

DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life.*

October 9, 2020

Dylan Lawrence
City of Los Angeles Planning Department
200 N. Spring Street
Los Angeles, CA 90012

RE: James Street Four (4) Single-Family
Residences – Mitigated Negative
Declaration (MND)
SCH # 2020100088
GTS # 07-LA-2020-03389
Vic. LA-110/PM: 26.291

Dear Dylan Lawrence:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The Project is the construction, use, and maintenance of four single-family dwellings, each with a total floor area of approximately 1,840 square-feet on four vacant lots with a total area of 15,142.6 square-feet. The Project proposes to cut 2,000 cubic yards across the four lots and use a haul route to export a total of 2,000 cubic yards of soil. No fill or import of soil is proposed. The City of Los Angeles Planning Department is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4,000 feet away from the Interstate 5 and State Route 110 interchange in Los Angeles. From reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. Therefore, the following information is included for your consideration.

As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT), rather than Level of Service, be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

The City can also refer to Caltrans' updated Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as

providing temporary pedestrian facilities during construction. For additional TDM options to further reduce this project's VMT impact, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit the proposed Construction Staging Plan detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03389.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse