

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research

**DEC 10 2020****STATE CLEARINGHOUSE**

Making Conservation  
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December 10, 2020

Steven Jones  
County of Los Angeles Department of Regional Planning  
320 W. Temple Street, 13th Floor  
Los Angeles, CA 90012

RE: Rorimer & La Seda Residential Project –  
Mitigated Negative Declaration (MND)  
SCH # 2020110238  
GTS # 07-LA-2020-03425  
Vic. LA-60/PM: 17.175

Dear Steven Jones:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project would develop a 2.18-acre lot with 56 attached residential condominium units in 11 detached buildings, at a density of 25.7 units per acre. Fourty four of the units would be two-bedroom and 12 would be three-bedroom. Four of the three-bedroom units would be restricted to households with incomes at or below 120% of the Los Angeles County median. The Project also includes the demolition of 17,420 square feet of church and ancillary buildings currently on site. The County of Los Angeles' Department of Regional Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1 mile away from the State Route 60 at Nogales Street interchange. From reviewing the MND, Caltrans has the following comments:

- As discussed in the traffic study, Senate Bill (SB) 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020.
- The traffic study also states, "The County of Los Angeles is still in the process of adopting criteria for the uniform evaluation of VMT impacts under CEQA, including the preferred analysis methodology, modeling requirements, and thresholds of significance." Since the implementation date for SB 743 has passed, Caltrans encourages the County to adopt VMT criteria as soon as possible.
- For information on determining transportation impacts in terms of VMT on the State Highway System, the County can 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 2018 Technical Advisory created by the California Governor's Office of Planning and Research (OPR).
- Based on the above guidelines, Caltrans concurs that the VMT impact of this project will be less than significant.
- For future reference, the updated TISG states "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a

simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.

The following information is included for your consideration.

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 all residents with information regarding the availability of transit options in the vicinity of the site. Additional TDM strategies that the County may want to consider integrating into this project in order to further reduce VMT include:

- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Verify that no more parking than required by the local permitting agency is provided.
- Restrict more of the units to households with incomes at or below 120% of the Los Angeles County median.

Also, 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 a construction traffic control 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](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2020-03425.

Sincerely,



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