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Governor's Office of Planning & Research

February 23, 2021

STATE CLEARINGHOUSE

February 23, 2021

Ms. Gena Guisar, Contract Planner
City of Carson, Planning Division
Community Development
Department 701 East Carson Street
Carson, CA 90745

RE: Imperial Avalon Mixed-Use Project
Vic. LA-405 PM 11.24, LA-110 PM 6.77
SCH # 2021010116
GTS # LA-2021-03470AL-NOP

Dear Ms. Guisar:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project would involve removal of the existing on-site uses and construction of two residential apartment buildings and two residential apartment mixed use buildings within the eastern half of the Project site, and 48 townhome buildings within the western half of the Project site. The Project would allow for the construction of 833 residential units within the four apartment buildings, 180 of which would be age-restricted for senior residents. The apartment buildings would contain a mix of studio, one-bedroom, and two-bedroom units. The Project would also include construction of 380 dwelling units within the townhome portion of the Project. The townhomes would consist of a mix of two- and three-bedroom units. A total of 1,213 residential dwelling units would be provided. The residential apartment mixed use buildings would contain one restaurant and one café respectively. The project is immediate adjacent to the I-405/Avalon Blvd. interchange.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects environment. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

This development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated, May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020.

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

Overall, the environmental report should include a Transportation Impact Study (TIS) to ensure all modes are well served by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

The proposed 1,213 residential dwelling units may have a traffic safety impact at the following locations:

1. I-405 NB off-ramp to Avalon Blvd and related intersection
2. I-405 NB on-ramp from NB Avalon Blvd and related intersection

These locations have been identified in Caltrans network screening process' as having existing traffic safety impacts and planned safety improvements. Additional analysis will be required when more detailed project trip data is provided to determine if additional safety countermeasures may be warranted for project identified safety impacts.

Freeway queuing analysis may be needed at the following ramp locations once more detailed project traffic data is available.

3. I-405 SB off-ramp to Avalon Blvd.
4. I-110 NB off-ramp to W 220th Street.

The project may conduct its own analysis to determine significant freeway queuing traffic safety impacts as outlined within the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance and provide that analysis as a submittal for review, or Caltrans will conduct such analysis once the required project trip data is provided.

5. Per a conversation between the City and Caltrans staffs on February 10, 2020, both agencies agree that a traffic safety analysis for the off-ramps and turn pockets should be conducted for the above study locations in addition to I-405 SB on-ramp from NB Avalon Blvd. (right-turn pocket).

If a potential safety impacts are identified, the following preferred traffic safety impact mitigation may be recommended as mitigation:

- Transportation demand management program(s) to reduce the traffic safety impacts, which may include increased transit access, commute trip reductions such as rideshare programs, shared mobility facilities (bicycle or vehicular), increased bicycle and pedestrian infrastructure;
- Investments to existing active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's traffic safety impacts; and/or
- Potential change(s) to the ramp terminal operations including, but not limited to lane reassignment, traffic signalization, signal phasing or timing modifications, turn lane extensions to mitigate safety impacts from project traffic.

Caltrans recommends that project traffic data be provided as soon as it is available to allow for adequate time to review and provide analysis.

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Any proposed changes to any infrastructure within Caltrans right of way will require an encroachment permit. This work will require additional review and may be subject to additional requirements to ensure current design standards and access management elements are being addressed.

Caltrans recommends early coordination on safety analysis and encroachment permit, if needed, so findings can be considered in the Draft Environmental Impact Report. If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03470AL-NOP.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief email:

State Clearinghouse