

**DEPARTMENT OF TRANSPORTATION**

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Making Conservation  
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February 10, 2021

Governor's Office of Planning & Research

**Feb 10 2021**

Cally Hardy  
City of Los Angeles  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**STATE CLEARINGHOUSE**

RE: Los Angeles Citywide Housing Element  
2021-2029 Update and Safety Element  
Update – Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2021010130  
GTS # 07-LA-2021-03471

Dear Cally Hardy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project involves updates to the City of Los Angeles General Plan Housing Element and Safety Element, and a Rezoning Program for the creation of additional housing units. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels of the community; provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029; and identify a Rezoning Program to reach the required housing capacity. As of September 3, 2020, the City's Draft RHNA Allocation is 455,577 units. The City conservatively estimates that 419,261 to 429,261 units will be developed by 2029. Meanwhile, 36,316 units are considered already approved pipeline housing units. In addition, the Safety Element Update will formally integrate related long-range planning efforts to ensure compliance with State law. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project covers the City of Los Angeles, which includes several state facilities, such as the Interstate (I) 210, United States 101, State Route (SR) 134, SR-118, SR-170, I-405, I-10, I-110, I-105, I-5, and I-710. From reviewing the NOP, Caltrans has the following comments:

- Senate Bill 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. 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](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.

- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.
- 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 December 2020 and found here, for the County's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.
- Caltrans encourages lead agencies to complete traffic safety impact analysis in the CEQA review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

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. For TDM strategies that the City can integrate into this project in order to reduce VMT to the greatest extent possible, 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>.

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 housing unit construction be limited to traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues 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-2021-03471.

Sincerely,



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