

**DEPARTMENT OF TRANSPORTATION**

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**Governor's Office of Planning & Research****February 18, 2021**

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**STATE CLEARINGHOUSE**

Lisa Edwards  
City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232

RE: 11469 Jefferson Boulevard Project –  
Mitigated Negative Declaration (MND)  
SCH # 2021010247  
GTS # 07-LA-2021-03483  
Vic. LA-90/PM: 2.748

Dear Lisa Edwards:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The Project would redevelop a 33,813 square foot (SF) property located in the northwest corner of the Jefferson Boulevard and Slauson Avenue intersection in Culver City. The existing single-story commercial building and parking lot would be removed as part of the Project. The Project includes the development of a new, five-story, 175-room boutique hotel building with food and beverage amenities and a two level, below-grade parking garage. Specifically, the 111,000 SF building would provide a total of approximately 67,030 SF in 175 hotel rooms, 8,536 SF of back of-house uses, 14,783 SF of hotel amenities, 630 SF of bicycle parking, 18,842 SF of circulation facilities, and 1,119 SF of loading area. In addition, 15,450 SF of open space area would be provided, as well as 56,300 SF of subterranean parking that would accommodate a minimum of 138 parking spaces. The City of Culver City is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1,000 feet away from the State Route 90 and Interstate 405 interchange. From reviewing the MND, Caltrans has the following comments. As mentioned in the document, 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. Since this implementation deadline has passed, Caltrans has reviewed this project from a VMT rather than a Level of Service (LOS) perspective.

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: <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.

Due to the release of these guides, Caltrans no longer refers to the following agreements mentioned in the MND: the October 2013 Agreement Between the City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures, and the December 2015 First Amendment to the Agreement

between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures.

Regarding VMT, the MND states “Given the Project’s proximity (approximately one block) to the Westfield-Culver City Transit Center, the City considers the Project site to be in a key TPA [Transit Priority Area]. Therefore, based on the key TPA screening threshold, the Project is presumed to have a less-than-significant VMT impact and no further VMT analysis is required.” The OPR Technical Advisory states that a presumption of less-than-significant VMT impact may not apply if the project includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction. Thus, in the final MND please confirm that the project will not include more parking than required. For example, please state the maximum rather than the minimum number of parking spaces that will be provided.

In addition, encroachment permits are required for any work performed on or near Caltrans’ right of way. Such permits might be needed for the installation of closed-circuit television cameras at the Jefferson Boulevard & 1-405 Northbound Ramps intersection. However, Caltrans’ Office of Permits will make the final determination on this. Also, the MND states that the project applicant will contribute a fixed-fee financial contribution toward funding these improvements. In the final MND, please clarify which entity will be asked to pay the balance of the needed funding.

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 this project implementing a TDM plan. For specific TDM options to include in this plan, 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 supports the following measure: “Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods.” If construction traffic is expected to cause delays on any State facilities, please submit the Construction Management 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-2021-03483.

Sincerely,



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