

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research



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**Mar 18 2021****STATE CLEARINGHOUSE**

March 18, 2021

Christopher Lopez  
City of Los Angeles  
Department of Water and Power  
Environmental Planning and Assessment  
111 North Hope Street  
Los Angeles, CA 90012

RE: Operation NEXT Water Supply Program and  
Hyperion 2035 Program – Notice of  
Preparation of an Environmental Impact  
Report (NOP)  
SCH # 2021030340  
GTS # 07-LA-2021-03521

Dear Christopher Lopez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The City is proposing to implement a new advanced treated recycled water (ATRW) infrastructure system that would maximize recycled water production at the Hyperion Water Reclamation Plant (HWRP). The project would construct new treatment, conveyance, storage, and distribution infrastructure to augment local water supplies by up to approximately 217 million gallons per day, equivalent to a third of the city's water supply. The proposed program would also establish an integrated water resource strategy that would provide a new local water supply source to sustain the long-term reliability and utility of local groundwater basins, as well as decrease the Los Angeles region's dependence on imported water supplies. To do this, the Los Angeles Department of Water and Power (LADWP) would increase recycled water treatment facilities, water conveyance pipelines, and groundwater recharge as well as extraction capacities within the Central, West Coast, and San Fernando Groundwater Basins. Meanwhile, Los Angeles Sanitation and Environment (LASAN) would install advanced treatment processes for the production of recycled water at HWRP. The Program would also enable future opportunities for direct potable reuse with ATRW supplies produced at the HWRP. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The program would require installation of infrastructure throughout the LADWP service area in areas overlying the Central, West Coast, and San Fernando Groundwater Basins. Caltrans understands that the program is in the conceptual design stage and that the location of program components within the project areas may change during future design phases. However, the project areas include State Highway System facilities, thus, Caltrans has reviewed the NOP and has the following comments:

- The NOP states that the forthcoming Draft Environmental Impact Report (DEIR) will include a discussion on the application of Vehicle Miles Traveled (VMT) thresholds. Caltrans recommends using the same VMT thresholds described in 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).

- These thresholds are also in 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>.
- 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 City'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>.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For TDM options that the City of Los Angeles may want to consider integrating into this project to further reduce VMT, 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 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.

Finally, when identifying specific locations for project components, please note that any work completed on or near Caltrans' right of way might require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. For more information on encroachment permits, see: <https://dot.ca.gov/programs/traffic-operations/ep>.

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-2021-03521.

Sincerely,



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