

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

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*Making Conservation  
a California Way of Life*

January 7, 2022

Eduardo Schonborn, AICP  
City of El Segundo  
350 Main Street  
El Segundo, CA 90245

RE: Smoky Hollow Specific Plan Amendment &  
Community Benefit Plans for Standard  
Works Project  
SCH # 2021120297  
Vic. LA-01/PM 24.916  
GTS # LA-2021-03792-MND

Dear Eduardo Schonborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The proposed Specific Plan Amendment (SPA) would modify the Height Development Standards for Community Benefit Plan (CBP) Tier II applicable projects in a designated 30-acre subarea of the Smoky Hollow Specific Plan (SHSP) with a maximum building height deviation up to 60 feet. The proposed Development Project involves the redevelopment of two buildings on two adjacent sites within the SHSP with a total building area of 65,061 square feet (FAR = 0.95) and new building heights of 59' 6". This Project will also include construction of a new 766-square foot coffee pavilion and a new 5,000-square foot public outdoor park with seating, picnic tables, shade trees and landscaping.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

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

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments 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. Overall, the environmental report should ensure all modes are served well 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.

For this project, 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>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links and

include those resources in the Bell Gardens General Plan Circulation and Transportation Element Update:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisq-a11y.pdf>

<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 prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The City has determined that an office project would have a significant impact if the project work VMT per employee is greater than 17.0 VMT/Employee. Project VMT Impacts, demonstrates that the Project VMT/employee is 19.3 miles, which is greater than the threshold of 17.0 miles. Therefore, the Project is required to reduce its VMT/employee to 17.0 (i.e., by 11.7%) to have a less than significant impact.

Mitigation Measures MM VMT-1 through VMT-6 outlined below are recommended for the proposed Project with implementation to be documented prior to receiving a certificate of occupancy:

**MM VMT-1 Unbundle Parking Cost.** This measure implements workplace parking pricing and unbundles the cost of parking from the lease. The Project shall include parking in the access-controlled parking structure. The property owner shall include language in the lease agreement which provides reduced lease rates if parking is not required by the tenant. The developer shall implement a monthly cost for parking spaces by charging a parking fee per access card. The range of VMT reduction from this measure is between 2.6% and 13%. **Based on the calculations, a \$50 per month/employee parking cost will result in a VMT reduction of 5.1%.**

**MM VMT-2 Parking Management Strategies.** Strategies to encourage efficiency in parking facilities and improve the quality of service to parking users results in reduction of VMT. This includes signage and directions, providing preferential carpool/vanpool parking spaces closer to the building entrance to and from the destination, etc. This encourages carpooling/vanpooling and also reduces the amount of time patrons drive around to find the best parking area to minimize walking. **The maximum reduction from this measure is 3%.**

**MM VMT-3 Mandatory Travel Behavior Change Program, Promotions & Marketing.**

This involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The project shall provide a web site that allows employees to research other modes of transportation for commuting. If a website is planned for the development, links to Google Transit, and/or local bus operators should be provided on the website. If a website is not planned, QR Codes could be provided in the parking structure and the building lobbies to enable users an easy way to access information about transit routes. **The maximum reduction due to this measure is 1%.**

**MM VMT-4 Implement Commute Trip Reduction Marketing.** This involves the use of marketing and promotional tools to educate and inform travelers about site specific transportation options and the effects of their travel choices with passive educational and promotional materials. The project shall implement marketing strategies to reduce commute trips. The project will implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include new employee orientation of trip reduction and alternative mode options, event promotions, and printed material. CAPCOA states that the range of reduction is between 0.8% to 4%, but states that in some literature, the VMT reduction has been as much as 15%, especially for urban areas. **For this project, a conservative reduction of 3% has been assumed.**

**MM VMT-5 Include Bike Parking in Excess of City Code.** This implements short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations. Based on discussion with the applicant, bike parking in excess of City code shall be provided. The City's code requires a minimum of 4 spaces for non-residential buildings up to 15,000 square feet, plus a minimum of 5 percent of the required vehicle spaces for the portion above 15,000 square feet. The maximum number of bicycle parking required under City code is 25 spaces. For the project, the number of bicycle parking spaces required under code is 17 spaces, and therefore, it is recommended that the project provide at least 18 spaces. **This results in a VMT reduction of 0.625%.**

**MM VMT-6 Include Secure Bike Parking and Showers.** This implements additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel. Based on discussion with the applicant, each building shall include shower facilities and secure bike parking facilities shall be provided. **This results in a VMT reduction of 0.625%.**

The VMT Assessment determined that implementation of Mitigation Measures MM VMT-1 through MM VMT-6 will reduce Project VMT by 13.35% or to a total of 16.85 miles which is less than the City's threshold of 17.0 miles. Caltrans recommends that the 16.85 miles

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be justified, and this assessment be disclosed to the public for review. A post-development VMT analysis with all mitigation measures should be prepared. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods.

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-2021-03792-MND.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse