

**DEPARTMENT OF TRANSPORTATION**

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**Governor's Office of Planning & Research**

April 4, 2022

**Apr 04 2022**

Lauren Marsiglia  
City of Culver City Advance Planning Division  
9770 Culver Boulevard  
Culver City, CA 90232

**STATE CLEARINGHOUSE**

RE: Picture Culver City: General Plan  
2045– Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2022030144  
GTS # 07-LA-2022-03876

Dear Lauren Marsiglia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project, Picture Culver City: General Plan 2045 (GPU), is a comprehensive update to the City's General Plan. The City must update its General Plan periodically to respond to the changing needs and conditions of the city and region and to reflect new state laws. The General Plan 2045 will consist of 14 Elements. The following list of Elements are required by the State: Land Use and Community Design; Mobility; Housing; Noise; Conservation and Open Space; Safety; and Equity, Community Health, and Environmental Justice. In addition to the required Elements, the GPU will also include the following Elements: Governance and Leadership; Arts and Culture; Reimagining Public Safety; Economic Development; Parks, Recreation, and Public Facilities; Climate Change and Sustainability; and Infrastructure. The City of Culver City is the Lead Agency under the California Environmental Quality Act (CEQA).

The City of Culver City is in the southern part of Los Angeles County. The City comprises about 5 square miles and is bounded by the City of Los Angeles to the north, west, and south and by unincorporated areas of Los Angeles County along its eastern boundary. The Planning Area for the GPU covers about 3,910 acres, of which about 3,280 acres (84 percent) is within the City limits and about 630 acres (16 percent) is in unincorporated Los Angeles County. The Planning Area includes land within the City's jurisdictional boundaries and its Sphere of Influence (SOI). The SOI includes land within unincorporated portions of Los Angeles County located adjacent to the city. Since the project covers the entire City, it is located near Interstates 10 (I-10) and 405 (I-405) as well as State Routes 1 (SR-1), 90 (SR-90), and 187 (SR-187). After reviewing the NOP, Caltrans looks forward to reviewing this project's forthcoming Vehicle Miles Traveled (VMT) analysis. As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future 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.

Note that 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-interimldigr-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.

Caltrans also encourages lead agencies to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For additional strategies to integrate into the General Plan Update that will promote equity and environmental preservation, 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>
- 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>

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at [Ronnie.Escobar@dot.ca.gov](mailto:Ronnie.Escobar@dot.ca.gov), and refer to GTS # 07-LA-2022-03876.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse