

**DEPARTMENT OF TRANSPORTATION**

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May 26, 2022

John Potts  
Executive Officer Real Estate  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 22-9  
Los Angeles, CA 90012

RE: Transportation Communication Network  
(TCN)  
SCH # 2022040363  
Vic. LA-Los Angeles Citywide  
GTS # LA-2022-03921-NOP

Dear John Potts:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. Metro proposes to implement the TCN Program, which would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan. The TCN Program also includes the removal of existing static signage throughout the City. Implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures, all on Metro-owned property.

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.

In the Initial Study, Caltrans acknowledges that “the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. Furthermore, the Project would entail the adoption of a Zoning Ordinance permitting the review and approval of the Site Locations for TCN Structures as well as regulating its operations. The TCN Structures involve the usage of digital displays and would allow for the off-premise advertising. The Project could conflict with an applicable plan, ordinance or policy addressing the circulation system with regard to signage adjacent to major roadways and freeways. Therefore, further evaluation of this issue will be provided in the EIR.” We are looking forward to review this issue in the EIR.

In accordance with SB 743 and updates to the CEQA Guidelines, the focus of transportation analysis has shifted from driver delay to vehicle miles traveled (VMT). Operation of the Project would not result in new uses that would generate vehicle miles traveled on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent.

If any temporary lane closures on the State facility are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Caltrans would need to review and approve the construction management plans prior to the start of the construction for the project locations that involved with the State facilities.

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-2022-03921AL-NOP.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse