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Governor's Office of Planning & Research

October 13, 2023

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STATE CLEARINGHOUSE

Melissa Soto
California State University, Long Beach
Office of Design and Construction Services
1331 Palo Verde Avenue
Long Beach, CA 90815

RE: California State University Long Beach
Master Plan Update
SCH # 20228040460
Vic. LA-01, LA-22, LA-405
GTS # LA-2022-04304-DEIR

Dear Melissa Soto:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. CSULB is proposing a comprehensive update of the current campus Master Plan, last updated in 2008, to accommodate enrollment growth, a campus population, and physical development of the campus through the horizon year 2035 (Master Plan Update, proposed project, or project). The Master Plan Update focuses on optimizing the existing physical assets of the campus, enhancing the efficiency of facilities throughout the campus, and evolving the existing buildings and programs to accommodate future university needs. The "project" that is analyzed in the Draft EIR includes specific development projects identified in the Master Plan Update that are expected to be developed in the near-term (2-5 years), mid-term (6-10 years), and long term (11 years or more).

The underlying purpose of the Master Plan Update is to support and advance the CSULB mission, vision, and values by guiding the physical development of the campus and to accommodate changes in enrollment through the horizon year 2035. CSULB's projected enrollment at the horizon year 2035 is approximately 36,000 Full-Time-Equivalent Students (FTES), including approximately 33,000 FTES on campus and 3,000 FTES off-campus. The Master Plan Update is intended to accommodate this projected student enrollment and the corresponding campus population.

According to Table 3.11-6: Estimated Total Site-Generated Daily Vehicle Trips, the Master Plan would generate an additional 12,679 daily vehicle trips (44,113 with project - 31,434 without Project). Many of those trips will utilize the State facilities during the peak hours. In Caltrans' letter dated May 20, 2022, we recommended that the following on and off-ramps and intersections be included in the traffic analysis: Interstate 405 (I-405) Northbound (NB) and Southbound (SB) at Bellflower Boulevard, I-405 NB and SB at Palo Verde Avenue, I-405 NB and SB at Studebaker Road, and State Route 22 (SR-22) and West Campus Drive intersection to the SR-22 and E. Campus Drive/Margo Avenue intersection. The potential for conflict points is a Caltrans safety concern when additional project trips utilize the State facilities.

The Draft Environmental Impact Report on page iv lacks a Transportation section in the Appendix as Caltrans needs clarification on the technical VMT data from Table 3.11-4: Baseline (2019) Daily VMT Summary, Table 3.11-6: Estimated Total Site-Generated Daily Vehicle Trips (source: Fehr & Peers, 2023), and Table 3.11-7: Daily VMT Forecast Summary. A Traffic Impact Analysis should also be included in the appendix for the State facilities.

On page 3.11-26 of the Draft Environmental Impact Report, it indicates the following:

A significant VMT impact is determined according to the following thresholds, which are specified in the CSU TISM:

Program/Project Level Impacts

Mixed-Use: Total VMT/service population exceeds a level of 15 percent below baseline countywide average.

Please clarify the reason for the Lead Agency's determination of the "countywide" average for threshold calculations instead of utilizing the available CSULA VMT baseline data. The environmental report should present substantial evidence for determining the VMT threshold. Considering Caltrans is not involved with the CSU TISM, the justification from the Lead Agency becomes crucial in this matter for the environmental report.

As a reminder, OPR Technical Advisory states that "**OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold.**" Applying CSULA VMT baseline data as a threshold calculation in a conservative manner to develop a transportation VMT analysis would yield valid substantial and conservative evidence to meet CEQA compliance standards. Please let us know if an updated VMT analysis is available for Caltrans' review.

TDM measures would be implemented to reduce vehicle trips and prioritize pedestrian and bicycle movement, encourage greater use of transit, pedestrian, and bicycle travel, and reduce dependence on automobiles at the campus. While CSULB has implemented

several TDM strategies, additional TDM measures considered under the Master Plan Update could include, but not be limited to:

- Completing an updated TDM plan that comprehensively plans for the future with a focus on achieving CSULB's goals of reducing GHG emissions and reliance on vehicle mobility, and reducing the need for parking;
- Increasing on-campus housing opportunities;
- Incentivizing student residents to not have a car on campus;
- Distributing class and work schedules to spread the peak demand on campus;
- Providing additional on-campus amenities (e.g., childcare, post office, etc.); and
- Enhancing transit, shuttle, bicycle, and pedestrian amenities on the campus.

In addition, we would recommend the Lead Agency to consider the following measures for this Master Plan and for all future projects on campus:

1. 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://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

2. For each term of the Master Plan, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the Lead Agency's VMT traffic model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

3. As a reminder for each new subproject 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 those document at the following link:

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

4. For future subprojects, any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.
5. Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

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-2022-04304-DEIR.

Sincerely,

Anthony Higgins for

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse