

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

June 17, 2022

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

**Jun 17 2022**

Stefanie Edmondson, Senior Planner  
Community Development Department  
City of Carson  
701 East Carson street  
Carson, CA 90745

**STATE CLEARINGHOUSE**

RE: 21611 Perry Street Self-Storage Project  
SCH # 2022050571  
Vic. LA-405/PM 10.56  
GTS # LA-2021-03966-MND

Dear Stefanie Edmondson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The proposed project includes the development of a self-storage facility with three buildings totaling approximately 113,714 square feet. The self-storage facility would be comprised of a mix of one- and two-story buildings with a maximum height of 31 feet. The self-storage facility would include a 2,425 square foot lobby/self-storage office area, a 1,550 square foot retail use for a cafe, and a 700 square foot retail use (likely a mail service store such as a UPS or FedEx) comprising a total of 4,675 square feet for these uses. The proposed project would provide 41 parking spaces that would be accessed from one driveway providing ingress/egress off South Perry Street.

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.

The Technical Advisory on Evaluating Transportation Impacts in CEQA (Office of Planning and Research 2018) was used to conduct the VMT analysis pursuant to CEQA Guidelines Section 15064.3, Subdivision (b). Based on the proposed project characteristics, it can be classified as local-serving retail. As described in the Technical Advisory, local-serving retail can be screened from a quantitative VMT analysis for CEQA purposes:

*“By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT.”*

Based on the above, the proposed project would not conflict with CEQA Guidelines Section 15064.3, Subdivision (b), and the impact would be less than significant.

Given the above finding of less than significant Project VMT impact, Caltrans concurs the finding at this time. However, a post-development VMT analysis for this land use with additional mitigation measures is highly recommended for monitoring/validation purpose and for future project thresholds in the area. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

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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-2021-03966-MND.

Sincerely,

A handwritten signature in cursive script that reads "Miya Edmonson".

MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse