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September 29 2023

September 29, 2023

STATE CLEARINGHOUSE

Jared Chavez
Community Development Manager
City of Lawndale
14717 Burin Avenue
Lawndale, CA 90260

RE: City of Lawndale General Plan Update
SCH # 2022120088
Vic. LA-405, LA-107. Citywide
GTS # LA-2022-04292-DEIR

Dear Jared Chavez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The City of Lawndale is preparing a comprehensive update to its existing General Plan. The General Plan Update is intended to be an expression of the community's vision for the City and Planning Area and constitutes the policy and regulatory framework by which future development projects will be reviewed and public improvements will be implemented. The Lawndale General Plan Update includes a comprehensive set of goals, policies, and actions (implementation measures), organized into Elements, as well as a revised Land Use Map. The Lawndale General Plan will include all of the State-mandated elements, and will address two optional topics: Economic Development and Community Facilities.

On page 29 of Appendix F Transportation Impact Analysis, it indicates the following:

The OPR recommended thresholds for residential and office land uses as follows:

- Residential: A project exceeding a level of 15% below existing VMT per capita for the city or region may indicate a significant transportation impact.
- Office: A project exceeding a level of 15% below existing regional VMT per employee may indicate a significant transportation impact.

On page 35 of Appendix F Transportation Impact Analysis, it indicates the following:

Project Threshold: a significant impact would occur if the project's 2045 VMT per capita or VMT per employee exceeds 15 percent below the existing Los Angeles countywide average VM per capita, or VMT per employee, respectively.

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.**” A conservative approach to preparing a transportation analysis would result in providing substantial evidence to comply with CEQA. Therefore we recommend the City use lower VMT data, Lawndale 2023 Existing Conditions as a base instead of Los Angeles County 2023 Existing Conditions.

The transportation analysis should use the Lawndale 2023 Existing Conditions VMT Per Capita/VMT Per Employee as a base threshold while the City data is available. Therefore with 15% reduction, the reduced threshold should be 8.39 (9.87X85%) for VMT Per Capita and 13.82 (16.26X85%) for VMT Per Employee.

Based revised threshold, the Lawndale 2045 Project condition 9.19 VMT Per Capita and 14.78 VMT Per Employee exceeds the revised threshold above. Therefore, the transportation impact would be significant and mitigation would be required.

At this time, the project's impacts related to VMT would be significant and unavoidable because no mitigation is proposed. We would recommend the City to consider the following measures for this General Plan and for all future projects:

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 new development, 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 traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City'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. Caltrans promotes Smart Growth and recommends the City to balance housing and office developments within the City boundaries. This would be the ultimate approach to reduce VMT.
4. VMT Fee Program for all development within the City boundary in which the program has the potential to address transportation funding challenges, promote sustainability, and offer more flexible and equitable approaches to financing and managing transportation systems. Alternatively, the City may consider a new concept of VMT mitigation banks and exchanges. You may learn this new concept from the following link.

<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/research-notes/task3886-rns-5-21-a11y.pdf#:~:text=A%20well%20developed%2C%20carefully%20structured%20VMT%20mitigation%20bank,pay%20for%20VMT%20reductions%20elsewhere%20in%20the%20region.>

5. As a reminder for each new development 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>

6. For future projects 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.

Jared Chavez
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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-2022-04292-DEIR.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse