

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning & Research



*Making Conservation  
a California Way of Life*

**May 22 2023**

**STATE CLEARING HOUSE**

May 22, 2023

LASAN – Solid Resources Citywide Recycling Division  
Ms. Christine Batikian  
1149 S. Broadway  
5th Floor, Mail Stop 944  
Los Angeles, CA 90015

RE: Comprehensive Plastics Reduction Program  
SCH # 2023050007  
Vic. LA-Citywide  
GTS # LA-2023-04221-NOP

Dear Ms. Christine Batikian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The City seeks to implement a citywide Comprehensive Plastics Reduction Program, which would involve measures to reduce or eliminate the production and use of single-use plastic products (“upstream” measures) and encourage the reuse of other items to the extent feasible, thereby reducing or eliminating the input of single-use plastics into the City’s waste stream and the environment and reducing the aesthetic, environmental, and human health impacts of single-use plastics.

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:

<https://opr.ca.gov/ceqa/#guidelines-updates>

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.

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Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development 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.

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>

Also, 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 the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/sustainability/sb-743/sb743-resources>

All future development projects (construction or expansion of recycling and composting facilities) as a result of this plastic reduction program should prepare VMT analysis. However, if the Lead Agency can estimate future plastics reduction program trips as a result of this program implementation, then a VMT analysis should be prepared in the DEIR.

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Caltrans encourages lead agencies to prepare traffic safety impact analysis for this development in the California Environmental Quality Act (CEQA) review process using Caltrans guidelines above on the State facilities so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

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-2023-04221AL-NOP.

Sincerely,

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

MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse