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*Making Conservation
a California Way of Life*

April 25, 2024

LASAN-Solid Resources Citywide Recycling Division
City of Los Angeles
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Los Angeles, CA 90015

Governor's Office of Planning & Research

Apr 26 2024

STATE CLEARINGHOUSE

RE: Comprehensive Plastics
Reduction Program
SCH # 2023050007
Vic. LA-Citywide
GTS # LA-2023-04478-DEIR

Dear 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 city-wide Comprehensive Plastics Reduction Program, which would involve measures to reduce or eliminate the production and use of single-use plastic products 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 ("upstream" measures). These upstream measures may include bans on specific single-use products; extended producer responsibility programs; policies to require and/or support manufacturing of durable, reusable, repairable, and recyclable products; and conducting additional studies. The Program also includes elements to increase the City's ability to collect, reuse, recycle, and compost alternative materials to single-use plastics and support reusable products ("downstream" measures). These downstream measures may include the construction or expansion of recycling and composting facilities; regional market development to expand the City's ability to recycle and reuse currently unmarketable single-use items; and infrastructure and facilities to support the collection and use of reusable items. The Proposed Program would also include public education, outreach, and engagement, as well as enforcement.

Caltrans agrees with the findings presented in Table 3.18-1, which indicate that downstream impacts would be significant and unavoidable. The project has proposed a mitigation measure in MM TR-1: Traffic Impact Report.

Construction

State CEQA Guidelines Section 15064.3(b) outlines criteria for analyzing transportation impacts based on project type and specifies criteria for conducting VMT analysis. A maximum of 152 additional daily vehicle trips is estimated during construction, staying below the LADOT threshold of 250 trips per day. However, considering all proposed facilities and estimated employees, the calculated VMT per employee per day could reach 37, exceeding LADOT thresholds of 7.6 to 15.0 VMTs per employee per day. This indicates potentially significant impacts, contrary to CEQA Guidelines. Mitigation measures, like adjusting truck schedules or promoting alternative transportation, will be evaluated, but they may not always bring impacts below acceptable levels, resulting in potentially unavoidable impacts as per CEQA Guidelines 15064.3(b).

Operation

The State CEQA Guidelines Section 15064.3(b) outlines criteria for assessing transportation impacts, depending on the project type. Impact Criterion (a) suggests that the operation of all downstream facilities would add around 1,772 daily vehicle trips. This exceeds the LADOT screening threshold of 250 trips per day and their VMT threshold of 15% below the existing baseline VMT per capita levels. Consequently, these new trips could lead to significant transportation impacts, not aligning with CEQA Guidelines. The introduction of MM TR-1 ensures that any increase in vehicle trips from a project undergoes thorough analysis to determine if mitigation measures can bring impacts to an acceptable level.

The locations for future facilities are yet to be determined. Priority will be given to integrating them into the community and neighborhood traffic considerations. The aim is to select sites and routes aligning with existing traffic patterns to minimize potential traffic burdens. Zoning restrictions will prevent placement in areas where hazards due to incompatible uses could arise. Additionally, adherence to the guidelines of MM TR-1 will ensure project designs avoid hazards like sharp curves or dangerous intersections. During construction, temporary increases in vehicle trips may occur, posing hazards or necessitating road improvements. These potential impacts will be addressed in a project-specific traffic impact report, identifying measures to mitigate them as much as possible. However, in some cases, mitigation measures may not fully alleviate the impacts, rendering them potentially significant and unavoidable.

Mitigation Measure

MM TR-1: Traffic Impact Report. Prior to the approval of any future facility, a project-level traffic impact report shall be prepared by a qualified traffic consultant. The report shall be prepared to the standard of the LADOT that would be providing approvals for the project. The report shall include existing traffic information, thresholds of significance, construction and operation-related trip generation and a project and cumulative-level analysis. The traffic report shall identify mitigation measures to reduce project and cumulative-level impacts to the maximum extent practicable. Such mitigation measures could include roadway and intersection improvements, payment of traffic impact fees,

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timing of collection truck schedules to avoid peak hours, encouraging carpool, vanpool, or alternative transportation for employees through the use of incentives.

For the new facility's TDM options to reduce VMT, 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>

For the new facilities next to the State facilities, 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 standards and specifications.

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 for the construction phase and operation phase.

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-2023-04478-DEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

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