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*Making Conservation
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January 17, 2024

Amanda Acuna
City of Gardena
1700 West 162nd Street
Gardena, CA 90247

Governor's Office of Planning & Research

Jan 17 2024

STATE CLEARINGHOUSE

RE: Normandie Crossing Specific Plan Project
SCH # 2023050241
Vic. LA-405/PM 13.86, LA-110/PM 9.84,
LA-91/PM 6.16
GTS # LA-2023-04396-DEIR

Dear Amanda Acuna:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project proposes to remove all existing onsite structures (approximately 115,424 square feet (SF) of industrial uses) and, in their place, construct up to 403 multi-family DU, including 328 apartment units in one building and 75 townhomes in nine buildings. The apartment building would provide approximately 39,098 SF of private/public open spaces, 399 vehicle parking spaces, and 173 bicycle parking spaces. The townhomes would provide approximately 11,395 SF of open space, and 160 vehicle parking spaces (150 resident spaces in two-car garages and 10 guest spaces). Additionally, the Project proposes two offsite improvements: 266 linear feet of sidewalk improvements along 169th Street and various railroad track and roadway improvements along South Normandie Avenue.

Transit

The project site is situated within a quarter-mile of multiple bus stops and is accessible through transit service provided by the City of Gardena's Transit Service, Route 1X and Route 4 (GTrans).

Pedestrian and Bicycle Facilities

Existing sidewalks along the project frontage form part of a continuous pedestrian network, with a brief gap on the south side of 169th Street. Sidewalks are absent on Brighton Way, a public alley. Marked crosswalks and pedestrian facilities are available at signalized intersections along Normandie Avenue.

Currently, there are no separated or protected bicycle facilities along Normandie Avenue at the project site. The South Bay Bicycle Master Plan designates Normandie Avenue as a bike route (Class III) from 182nd Street to 170th Street, with adjacent streets also designated. A future Bicycle Friendly Street segment on 170th Street is proposed in the plan.

VMT Screening

The City uses three screening criteria to determine if a VMT analysis would be required for this project. 1) The project's proposed 403 residential units are expected to generate approximately 1,715 average daily trips (ADT), which would be more than 110 ADT threshold. Also, the Project is not 100 percent affordable. The Project is not screened out from VMT analysis based on project type screening criterion. 2) The Project is in a TAZ estimated to generate 11.01 VMT per capita, which is 23.3 percent below the 2020 SCAG regional baseline VMT of 14.35. When compared to the 2040 SCAG regional baseline VMT of 12.97, the Project's VMT per capita is 15 percent below the 2040 SCAG regional baseline VMT. Therefore, the Project is in an area with low residential VMT, which means the Project can be presumed to have a less than significant VMT impact and can be screened out from further VMT analysis based on low VMT area screening. 3) The Project has more than 25 percent of its area farther from Gardena's High-Quality Transit Areas. Therefore, the Project is not screened out from VMT analysis under the Transit Proximity screening criterion.

Based on the City's transportation guidelines and impact thresholds, the Project can be screened out from a full VMT analysis and is presumed to result in a less than significant transportation impact concerning VMT under the low VMT screening criteria. However, the DEIR does not show why the other criteria are not considered. For this sizable development of 403 multi-family units, we recommend a conservative approach by including a Vehicle Miles Traveled (VMT) analysis. This will help preempt any potential environmental challenges from third parties, ensuring a thorough evaluation of transportation impacts.

TDM

Because of the size of the project, we encourage the City 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>

Post VMT Analysis

After this development is completed, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be considered and 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.

Traffic Safety Analysis

On Caltrans' June 7, 2023 letter (see attached), we asked for a safety analysis for Caltrans off-ramps. Traffic safety is a CEQA matter and should be considered by the City. We are not able to identify the safety analysis in Appendix 4.13-1: CEQA Transportation Study nor Appendix 4.13-2: Local Transportation Assessment.

Others

As a reminder to address Caltrans concerns in preparing VMT and safety analysis, 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 on December 18, 2020. You can review those documents 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>

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.

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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-2023-04396-DEIR.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse