DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

February 05 2024

STATE CLEARINGHOUSE

RE: 727 S. Grand Project SCH # 2023120557 Vic. LA-110/ PM 22.46

GTS # LA-2023-04408-NOP

February 5, 2024

James Harris
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Room 1350
Los Angeles, CA 90012

Dear James Harris:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. Project consists of the proposed construction and operation of a data center that is comprised of a 13-story building with one subterranean level totaling 229,756 square feet of floor area. The Project includes space for data processing equipment, offices, lobby, storage, as well as generators and electrical equipment.

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.

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

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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 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-a11v.pdf

Nevertheless, the Project is forecast to generate a net increase of 215 daily vehicle trips. Therefore, the Project does not exceed the screening criteria. Accordingly, a "less than significant" impact determination can be made as it relates to VMT. No mitigation is required or recommended as it relates to VMT.

The Project is expected to generate 38 vehicle trips (26 inbound trips and 12 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project is expected to generate 33 vehicle trips (8 inbound trips and 25 outbound trips). Given

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that the Project would not generate 250 or more net new daily vehicle trips and would not add 25 or more net new vehicle trips to any nearby freeway off-ramp during either the AM or PM peak hours, the Project would not result in a significant freeway safety impact.

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. Trucks hauling materials should have a tarp covering to avoid debris falling on to the freeways.

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-2023-04408-NOP.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse