

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

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a California Way of Life*

September 4, 2024

Gina Casillas, Planner  
Department of Development Services, Planning Bureau  
City of Long Beach  
411 W. Ocean Boulevard, 3<sup>rd</sup> Floor  
Long Beach, CA 90802

RE: Park Tower Student Housing Project  
SCH # 2024080441  
Vic. PM LA-1/2.74  
GTS # LA-2024-04601-NOP

Dear Gina Casillas:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The project would adaptively reuse the existing office building into private housing for students enrolled in California State University, Long Beach with 149 student residential suites (593 beds), totaling approximately 73,486 sf of residential area. The project would also construct a new 728 sf pavilion building that is designed to activate the street front along Clark Avenue. The project would incorporate approximately 22,523 sf of new accessible at-grade open space as well as indoor and outdoor common and private open space for project residents and guests. The project would utilize the three levels of existing subterranean vehicular parking and would include a total of 364 parking stalls (218 standard spaces, 19 accessible spaces, 127 tandem spaces). The project would also include 150 bicycle parking spaces on the first level of subterranean parking. The majority of construction would involve tenant improvements to the interior of the building. The project would largely maintain the exterior of the existing building.

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 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-a11y.pdf>

On page 57 of the Initial Study prepared in August 2024, "Project construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. During Project operation, the proposed Project may generate increased vehicle, bicycle, pedestrian, and transit trips, resulting in an increase in the use of the Project area's transportation facilities." Please provide a construction/operation trips analysis/discussion on the potential impact on E Pacific Coast Highway (SR-1).

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-2024-04601-NOP.

Sincerely,



ANTHONY HIGGINS  
Acting LDR/CEQA Branch Chief

email: State Clearinghouse