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Governor's Office of Planning & Research

*Making Conservation
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October 17, 2022

Alvie Betancourt, Planning Manager
City of Carson
Community Development Department
Planning Division
701 East Carson Street
Carson, CA 90745

RE: 2040 City of Carson General Plan Update
SCH # 2001091120
Vic. LA-405, LA-110, LA-91, LA-47
GTS # DEIR-2017-04051-DEIR

Dear Alvie Betancourt:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project includes a comprehensive update of all elements of the Carson General Plan, with the exception of the Housing Element, which was adopted previously in February 2022. The General Plan would guide future land use decisions in Carson, providing a long-term vision for the City and, through its policies and implementing actions, would indicate how that vision would be achieved. The General Plan would be the primary policy document guiding growth and development within the Planning Area through the planning horizon year of 2040. Together with the Zoning Ordinance and related sections of the Municipal Code, the General Plan would serve as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council.

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:

<http://opr.ca.gov/ceqa/updates/guidelines/>

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, all future developments 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://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

On page 3.15-22 of the Draft Environmental Impact Report of the 2040 Carson General Plan Update prepared September 2022, Table 3.15-6 (2040 Plus Project VMT Compared to 2040 No Project VMT) shows all three VMT metrics perform better than the City's Baseline (approximately 6 percent to 20 percent better). However, the state's guidance and the City's VMT significance thresholds require the VMT metrics to perform at least 15 percent better than the City's baseline average in order to result in a less than significant impact. As such, the following project features were evaluated to assess their potential benefits for reducing total VMT per service population:

1. Implementation of Bike Improvements
2. Bikeshare Program
3. Telecommuting Options

Based on the analysis, the City is estimated to mitigate its total VMT by 244,490, Home-Based VMT by 43,978, and home-based work VMT by 44,232 miles. This would result in 36.3 total VMT per service population, 12.1 Home-Based VMT per capita, and 15.6 Home Based work VMT per employee. With the implementation of the measures described above, the VMT impact associated with Home-Based VMT per capita can be mitigated as 12.1 is lower than the threshold value of 12.2 Home-Based VMT per capita. The impact associated with total VMT per service population will remain, thus resulting in a conflict with CEQA Guideline Section 15064.3, Subdivision (b). This impact would be significant.

The proposed General Plan update does not meet the total service area VMT reduction goal of 15 percent, as established in the Circulation Element. As no feasible mitigation measures are available to reduce total VMT per service population, this impact would be significant and unavoidable. Since the environmental document does not provide any traffic safety analysis on the State facilities, Caltrans has traffic safety concerns within the City limits when the traffic volume is increased in the future.

To reduce any future VMT and traffic safety impact within the City, Caltrans recommends the City to consider implementing a VMT/Safety fee program. We would like to have the opportunity to assist the City to identify additional TDM strategies and any potential safety improvement locations.

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. In addition, any work performed within the State Right-of-way from any development will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications.

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-2017-04051-DEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse