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Governor's Office of Planning & Research

February 16, 2021

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Norman Mundy
City of Los Angeles
Department of Public Works, Bureau of Engineering
1149 South Broadway, Suite 600, Box 939
Los Angeles, CA 90015

STATE CLEARINGHOUSE

RE: Los Angeles Zoo and Botanical Gardens
Vision Plan Project – Draft Environmental
Impact Report (DEIR)
SCH # 2019011053
GTS # 07-LA-2019-03454
Vic. LA-5/PM: 26.565

Dear Norman Mundy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed Project would guide future development and modernization of the Zoo for the next 20 years. The Project would include the comprehensive redesign and redevelopment of the Zoo to replace outdated buildings and infrastructure, as well as upgrade animal care and guest amenities throughout the 133-acre Zoo. Improvements include new and revitalized immersive exhibit space and animal habitats, new visitor-serving buildings, upgraded administrative and services facilities, circulation improvements for access roads, pedestrian facilities, an enhanced entrance, and new parking facilities. The Project is projected to increase annual visitation by approximately 1.2 million visitors per year. This projected growth in visitation and expansion of facilities within the Zoo property would have commensurate increases in employment. The City of Los Angeles, Department of Public Works is the Lead Agency under the California Environmental Quality Act (CEQA).

According to the Notice of Availability, "Regional vehicular access to the Zoo is provided via I-5, located approximately 0.2 miles east of the Zoo entrance, as well as SR-134, which is located approximately 0.35 miles north of the northern boundary of the Zoo." Caltrans wrote a letter in response to the Notice of Preparation for this project in February 2019. Since then, the implementation deadline has passed for Senate Bill 743, which requires that Vehicle Miles Traveled (VMT) rather than Level of Service (LOS) be used as the primary metric to determine transportation impacts under CEQA. Thus, Caltrans has reviewed this DEIR from a VMT rather than a LOS perspective.

The DEIR states that the VMT impacts of this project will be significant and unavoidable, even after the implementation of a Transportation Demand Management Program (also referred to as Mitigation Measure T-2), that would require the Zoo to reduce employee VMT by 10 percent below existing conditions as well as reduce projected visitor VMT to the maximum extent feasible.

Caltrans recognizes the challenges in reducing employee and visitor VMT in an area that lacks transit and that a majority of visitors as well as employees currently travel to by Single Occupancy Vehicle. We also acknowledge the difficulty of reducing VMT while accommodating new employees and an increase of

approximately 1.2 million annual visitors. However, Caltrans recommends that the TDM program require that employee VMT be reduced to 15% below existing levels by 2040, rather than 10%, in order to better align the TDM program with the VMT thresholds recommended in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018. Similarly, rather than require the TDM program to reduce visitor VMT to the greatest extent possible by 2040, Caltrans recommends creating a more specific goal, such as requiring that visitor VMT not experience a net increase. This change would also better align the goals of the TDM program with OPR's thresholds.

The DEIR contains several measures that could be potentially included in the TDM program. Below are additional or more specific TDM measures for the City of Los Angeles to consider including in the TDM program, in order to further decrease this project's VMT impacts:

- Coordinate with Metro to increase bus service frequency to the Zoo by advocating for the implementation of Metro's proposed Line 501.
- Rather than construct the proposed parking structure to meet parking demand that would otherwise be exceeded on certain days in 2025, 2027, and 2030, increase the incentives to use alternative transportation modes on those days. This is based on the idea that surplus parking can lead to increased VMT, as mentioned in the DEIR. The TDM program already proposes implementing a Peak Period Parking Program and providing incentives for employees to use vanpool programs. Thus, on those days that visitor and employee attendance is expected to be highest, increase the charges and incentives associated with these programs, to further reduce parking demand.
- To incentivize employee participation in existing carpool and vanpool programs, subsidize participant fees, offer in-kind services such as oil change discounts, and provide preferential parking for program participants.
- To increase employee transit use, provide free or discounted transit passes.
- In addition to providing free or discounted equipment to employees who bike to work, also provide free or discounted equipment to employees who walk to work, such as discounts on walking shoes.
- To decrease visitor VMT, provide accessible and intuitive traveler information tools, such as signage and mobile applications with real-time transit information as well as bicycle and pedestrian wayfinding signage.

If the above TDM measures are not feasible, please refer to the below resources for alternative TDM options:

- The 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

In addition, the project involves various upgrades to the Zoo Drive & Western Heritage Way intersection, realignment of Western Heritage Way & Crystal Springs Drive, and a signal at the intersection of Riverside Drive & the 134 EB Off-Ramp. The DEIR states "All such roadway improvements and realignments would require cooperation with Griffith Park, the Autry Museum, Los Angeles Department of Transportation, Caltrans, and other interested agencies and stakeholders." Caltrans appreciates this

statement. Please send us the final designs for these roadway improvements, and any others that might impact Caltrans' Right of Way, once they are ready. As mentioned in the DEIR, encroachment permits are required for any project on or near Caltrans right-of-way. However, the final decision on whether this project will need encroachment permits will be determined by Caltrans' Office of Permits.

The following information is included for your consideration.

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. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. We support the implementation of Mitigation Measure T-1, "Construction Traffic & Access Management Plan". According to the DEIR, "Construction activities associated with development of the proposed Project would result in additional construction VMT in the Project vicinity and on the I-5 and SR-134 freeways." Please submit the Construction Traffic & Access Management Plan detailing any potential issues on state facilities for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2019-03454.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse