

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

MAY 10 2019

STATE CLEARINGHOUSE

May 10, 2019

Ms. Rene Bobadilla
Public Work and Development Services
City of Commerce
2535 Commerce Way
Commerce, CA 90040

RE: Citadel Outlets Expansion & 10 Acre Project
Vic. LA-5/PM 12.66
SCH # 2016091024
Ref. GTS # LA-2016-00145ME-NOP
GTS # LA-2016-02387-DEIR

Dear Ms. Rene:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed new development within the three areas (Area 1, Area 2, and Area 3) will have a total floor area of 1,007,202 square feet. The new development will consist of approximately 237,662 square feet of retail uses; 358,000 square feet of hotel uses totaling 770 rooms; 270,000 square feet of theater, entertainment, and recreation uses; 16,540 square feet of food serving uses; 70,000 square feet of office uses; and 55,000 square feet of industrial uses.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) 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. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

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

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future 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

Ms. Rene Bobadilla
May 10, 2019
Page 2

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.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also 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). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts is needed. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

After reviewing the Draft Environmental Impact Report (DEIR) and Transportation Impact Study (TIS) for this project, Caltrans has the following comments:

1. From the Transportation Impact Study (TIS) prepared in January 2019 by Gibson Transportation Consulting, Inc., Table 7A (Project Trip Generation Estimates, the Citadel Site) stated that the project would generate net 12,070 daily trips and 342/1,294/1,932 AM/PM/Saturday midday peak hour trips. Table 7B (Project Trip Generation Estimates, 10-Acre Parcel) stated that the project would generate 3,226 daily trips and 284/270/329 AM/PM/Saturday midday peak hour trips. There are 18 related projects in the project vicinity generating 13,208 daily trips, 702/1,341/1,543 AM/PM/Saturday midday peak hour trips. Many of the project and related trips would be traveling on the State facilities once the projects are built. Caltrans anticipates potential significant cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate potential significant cumulative traffic impacts.

2. On page 117 and 118 of TIS, only Intersection 12 I-5 Northbound Ramps/Camfield Avenue & Telegraph Road and Intersection 17 I-5 Ramps/Commerce Casino & Telegraph Road have proposed mitigation measures. The final feasible mitigation approval would require Caltrans to perform field observation and physical measurement. Caltrans would work with the City to identify/finalize any feasible mitigation at these locations.
3. On page 121 of the TIS, mitigation cost sharing is proposed. Caltrans recommends Mitigation Agreement to be signed with the developer once traffic impact location and mitigation/improvements are finalized. Please clarify how \$5.25 million mitigation cost is calculated. The final cost should submit to Caltrans for approval when the Mitigation Agreement is signed.
4. Caltrans' concern in terms of traffic is that the potential traffic conflict (rear-end accident) may occur at off-ramps when a speed differential is occurred. From our review, research, and observation, we still have traffic concerns about the following State intersections:
 - a. Intersection No. 20, I-5 NB Ramps & Telegraph Rd.
During a weekday AM peak hours, occasionally the off-ramp may have queue developed. Additional traffic assigning to this off-ramp would contribute cumulative traffic impact. Caltrans would like to discuss this further with the City.
 - b. Intersection No. 22, Eastern Ave & I-5 Ramps/Stevens Pl.
During a weekday, when the freeway I-5 is operating near capacity during the PM peak hours, the off-ramp queue is starting to approach capacity as well. Additional traffic (159 project PM peak hour trips) assigning to this off-ramp would contribute cumulative traffic impact. Caltrans would like to discuss this further with the City.
 - c. Intersection No. 25, I-5 SB Ramps & Washington Blvd.
On Table 15, significant traffic impact is identified. Feasible traffic mitigation should be proposed at this location. Caltrans would like to discuss this further with the City.
 - d. Intersection No. 28, I-5 SB Ramps & Bandini Blvd.
On page 107 of the TIS, when the intersection is overflow (LOS F), any additional traffic assigning to this off-ramp would contribute significant traffic impact. The City should consider upgrading this location from a stop-

controlled to a signalized intersection or other feasible alternative. Caltrans would like to discuss this further with the City.

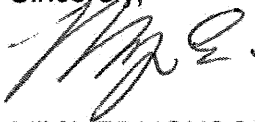
5. As a reminder, Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis (such as Table F-12 Freeway off-Ramp Queue Evaluation) should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor. The existing queue length should be calculated from the traffic counts, actual signal timing and the actual percent of truck assignments with an adequate passenger car equivalent factor. Signal optimization should be considered as a mitigation measure.
6. On page 159, Table 20 Existing with Project Condition (Year 2018) LOS needs to be verified again with Caltrans data. Currently, this segment of the freeway is operating at LOS F on SB I-5 during the PM Peak Hours.
7. From Table F-4 to Table F-7, there will be cumulative traffic impact on the mainline I-5 in which the project will assign 248 project trips to I-5 in the future when the freeway is near/at capacity. Proportion of Project-Related Traffic in percentage is calculated. Any future improvements on the State facilities could use this proportion percentage methodology to calculate fair share contribution. Caltrans would like to discuss this further with the City.
8. Caltrans concurs and would like to work and discuss with the City with the mitigation program for the Project includes the following major components:
 - a. Implementation of a Transportation Demand Management (TDM) program for the Project site to promote peak period trip reduction.
 - b. Transportation Systems Management (TSM) improvements, including signal system coordination, signal controller updates and installation of closed circuit television (CCTV) at key intersections within the study area.
 - c. Specific intersection improvements, including physical mitigations and signal phasing enhancements.
9. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

Ms. Rene Bobadilla
May 10, 2019
Page 5

10. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

We would like to invite the City and traffic consultant to discuss potential traffic impact and mitigation/improvement on the State facilities in the project vicinity. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2016-02387AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

