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Governor's Office of Planning & Research

**NOV 21 2019**

November 21, 2019

**STATE CLEARINGHOUSE**

Cliff Stokes  
County of Los Angeles Department of Public Works  
900 South Fremont Ave., 5<sup>th</sup> Floor  
Alhambra, CA 91803

RE: Rancho Los Amigos South Campus Project  
– Draft Environmental Impact Report (DEIR)  
SCH# 2017081017  
GTS# 07-LA-2017-02924  
Vic. LA-105 / PM R14.565

Dear Cliff Stokes:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The County proposes to develop three new County administrative buildings in the Development Area on the Project Site, including the Internal Services Department (ISD) Headquarters, Probation Department Headquarters, and a County Office Building. Staffing for each of these buildings would be filled by approximately 3,000 County-budgeted positions that are currently at other existing County facilities located within the region. The ISD and Probation Headquarters buildings, both of which would be up to six stories (90 feet) each, may be co-located in one building, which would also be up to six stories (90 feet). The County Office Building would be up to five stories (75 feet). The total square footage for the proposed Project would be up to approximately 650,000 square feet. The proposed Project would include development of two parking structures for employees and visitors. The ISD/Probation Parking Structure would provide 2,167 parking spaces, with a height of up to nine stories (90 feet). The County Office Parking Structure would provide 525 parking spaces, with a height of up to three stories (36 feet). The proposed Project would include all necessary utilities and points of connection, roadways, curbs and gutters, sidewalks, medians, site structures, hydrants, vaults, manholes, substations, street lights, street signage, landscaping, and irrigation for the proposed new development. Off-site-improvements, such as those required for utilities, would also be necessary. All staging during construction would occur on the Project Site.

The nearest State facility to the proposed project is Interstate 710 and Interstate 105. After reviewing the DEIR, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that ultimately help California to meet its climate, transportation, and livability goals. However, due to the amount of parking and lack of mixed land uses, the Rancho Los Amigos South Campus Project is designed in a way that potentially induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

- Reducing the amount of parking whenever possible, as research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building an excessive amount of parking. 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>

- If the parking structures must be built, they should be designed in a way that is conducive to adaptive reuse. Parking structures with flat floors and ramps on the exterior edge can be more easily converted to more beneficial uses in the future.
- This project is immediately adjacent to a planned light rail station along the West Santa Ana Branch Transit Corridor. This DEIR has done little to discuss the significantly different transportation context that will exist in the future. It should contain elements that improve walkability and encourage future light rail users.
- As stated in the DEIR, there will be improvements to nearly all interior roadways. This presents an opportunity to create a streetscape that is safe and comfortable for all users. Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

Caltrans concurs with Mitigation Measure TRA-1 regarding detours during construction, which states: "Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate." Additionally, Caltrans recommends that bicycle and pedestrian detours during construction meet or exceed standards required in the California Manual on Uniform Traffic Control Devices (MUTCD). Maintaining viable detour routes during construction, that include adequate barriers against motorized traffic, is critical to the safety and comfort of pedestrians and bicyclists.

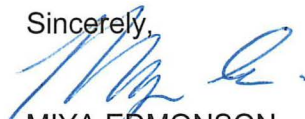
Regarding the Traffic Impact Study (TIS):

- Caltrans is responsible for obtaining measures that will off-set significant impacts to State facilities. Therefore, the Congestion Management Program (CMP) guidance of 150 or more vehicle trips added before freeway analysis is needed, does not apply. MTA's CMP, in acknowledging Caltrans' role, stipulates that Caltrans must be consulted to identify specific locations to be analyzed on the State Highway System.
- 95 additional trips (see Figure 7-3) generated by the project will be added to the WB Route 105 mainline, and no freeway segment analysis was conducted. It is recommended that the freeway analysis be conducted.
- No threshold of significance for determination of impact on Caltrans on- and off-ramp terminal intersections was provided. It is recommended that the threshold of significance be provided.
- The northbound (NB) and southbound (SB) on- and off-ramps to and from Imperial Highway were not included in the TIS. It is recommended that these locations be included.
- Intersection #11, Garfield/105 EB off-ramp, is currently operating at a cycle length of 70 seconds. HCM Data Sheets contained in Appendix F show a cycle length of 90 seconds. Consequently, the analysis result at this location was not calibrated with the actual signal timing plan. It is recommended that the intersection be re-evaluated with the correct cycle length.

Additionally, 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.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2017-02924.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse