

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning & Research

**SEP 19 2019**

**STATE CLEARINGHOUSE**

September 19, 2019

Mr. Ken Robertson  
City of Hermosa Beach  
1315 Valley Drive  
Hermosa Beach, CA 90254

RE: RTI Transpacific Fiber Optic Cables Project  
– Notice of Preparation (NOP)  
SCH # 2019080175  
GTS # 07-LA-2019-02763  
Vic. LA-1/PM: 21.46

Dear Mr. Ken Robertson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project entails installing and operating up to two submarine fiber-optic cable systems with landing sites in Hermosa Beach. Terrestrial facilities (i.e. landing pipes, manholes, ocean ground beds, terrestrial cables, conduits, and an existing power feed equipment [PFE] facility) and marine components (i.e. marine conduits, marine cables, and cable regenerators) would be installed. An onshore landing site would be installed at either 6th Street or 10th Street to connect marine cables to a terrestrial conduit system. The landing site would lead to an existing PFE facility. The City of Hermosa Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facility to the proposed project is State Route 1 (SR-1). In the transportation section of the proposed project's Initial Study checklist, it states that the project would have a potentially significant impact in terms of:

- a. Conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- b. Conflicting or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- c. Substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and
- d. Resulting in inadequate emergency access.

The initial study also states that these potential impacts will be further discussed in the upcoming Draft Environmental Impact Report (DEIR). Caltrans looks forward to receiving the DEIR for review and to provide further comments, if warranted.

The forthcoming transportation impact study (TIS), which will be included in the draft EIR, should discuss the performance analysis results of any intersection, freeway, and interchange/ramps that will be potentially significantly impacted by project construction and operation. Caltrans recommends that the Highway Capacity Manual (HCM) Sixth Edition method be used for conducting all operational and conflict analyses on State highway facilities. Specifically, queuing analyses based on the HCM queuing methodology are required for any Caltrans' off-ramps that would be potentially significantly impacted by

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the project. Also, when the State highway facility has saturated flows, it is encouraged that a micro-simulation model be used for the analyses.

The Tenth Edition of the Institute of Transportation Engineers' Trip Generation Manual should be used for determining trip generation forecasts and trip reductions (e.g. pass-by, diverted, and internal capture trips). Local trip generation rates are acceptable if appropriate validation is provided.

Also, if construction traffic is expected to cause delays on any State facilities, please submit a Construction Traffic Management Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review. 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 to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists.

The following information is included for your consideration.

As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

In addition, storm water run-off is a sensitive issue for Los Angeles county. Please be mindful that the project needs to be designed to discharge clean run-off water.

Finally, any project work on or near Caltrans' right of way, including SR-1, will be subject to additional review by the Office of Permits and may need an encroachment permit.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2019-02763.

Sincerely,



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