

DEPARTMENT OF TRANSPORTATION

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September 10, 2019

Governor's Office of Planning & Research

SEP 10 2019

STATE CLEARINGHOUSE

City of Los Angeles, Department of City Planning
ATTN: Marie Cobian, City Planner
Case No: ENV-2019-3379-EIR
200 North Spring Street, Room 667
Los Angeles, CA 90012

RE: Harbor LA Community Plans Update –
Notice of Preparation (NOP)
SCH # 2019080248
GTS # 07-LA-2019-02766
Vic. LA-110/PM: 3.661
LA-405/PM: 13.201
LA-1/PM: 10.787
LA-213/PM: 5.437

Dear Ms. Marie Cobian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project is located within the City of Los Angeles and is composed of the boundaries of the Harbor Gateway and Wilmington-Harbor City Community Plan Areas (CPAs). The proposed project is an update to the Harbor LA Community Plans, which include the Harbor Gateway Community Plan and the Wilmington-Harbor City Community Plan. The proposed project also includes the adoption of necessary updates to land use designations, zoning, plan text, and other ordinances to implement those updates. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The proposed project is near several State facilities, including I-110, I-405, SR-1 and SR-213. The City of Los Angeles has determined that an Environmental Impact Report (EIR) is required for the proposed project. Caltrans looks forward to receiving the draft EIR for review and to provide further comments, if warranted. From reviewing the NOP, the four previously mentioned state facilities may need to be included in the forthcoming transportation impact study (TIS), which will be included in the draft EIR. Also, queuing analysis may be needed for specific off-ramps on the I-405 and I-110. The facilities studied in the TIS should not be limited to the I-110, I-405, SR-1, and SR-213. These facilities may need to be included in the TIS due to the project's size and location.

If significant impacts are found at locations along the previously mentioned facilities, the TIS should discuss trip distribution, weaving analysis results, and the cumulative effects of other related projects. Also, 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.

Caltrans also 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 the project. When the State highway facility has saturated flows, it is encouraged

that a micro-simulation model be used for the analyses. For intersection analyses, the actual traffic signal timing of an intersection should be used, as opposed to the optimized signal timing of an intersection.

As the City of Los Angeles is aware, 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. Caltrans looks forward to reviewing this project's VMT analysis.

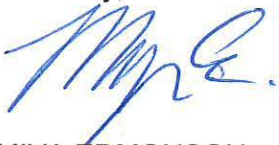
The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Therefore, Caltrans supports the project goals discussed in the NOP, such as directing growth within walking distance of transit centers and using pedestrian-oriented design standards. In addition to these objectives, the following are additional strategies to consider including in the plan updates:

- Promote Complete Streets principles by creating facilities, such as bike lanes and bicycle parking, that improve mobility for travelers of all ages and abilities
- Install electric vehicle charging stations where feasible
- Design additional green and open space areas, as well as plant shade trees and bioswales, which will increase livability and reduce stormwater runoff. The latter is a serious issue in Los Angeles County and needs to be considered during project design.

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-2019-02766.

Sincerely,



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