

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Governor's Office of Planning & Research



Making Conservation
a California Way of Life.

SEP 13 2019**STATE CLEARINGHOUSE**

September 13, 2019

Mr. Jason McCrea
City of Los Angeles, Department of City Planning
221 Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Sepulveda Palms Project– Notice of
Preparation (NOP)
SCH # 2019080275
GTS # 07-LA-2019-02762
Vic. LA-405/PM: 28.523
LA-10/PM: 5.711
LA-187/PM: 5.946

Dear Mr. Jason McCrea:

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, at 3443 South Sepulveda Boulevard. The project would result in the demolition of an approximately 37,900 square-foot commercial building and associated surface parking lot, and the construction of a seven-story mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are SR-405, SR-10, and SR-187. 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 Initial Study, we agree with the following statements:

- "Operation of the Project would generate new residents in addition to on-site employees and patrons of the commercial spaces, which would result in increased vehicle trips on area roadways that could degrade existing performance levels of roadway facilities."
- "Traffic would be added to nearby roadways with the development of the Project, potentially including the I-405 freeway. Therefore, the impact of the Project's additional traffic on CMP intersections and freeway segments may be significant and will be evaluated in an EIR."

Based on these statements and other information provided in the Initial Study, the following intersections on the State highway may need to be included in the forthcoming transportation impact study (TIS), which will be included in the draft EIR:

- I-405 NB ramps and Sepulveda Blvd (South of Route 187)
- I-405 SB ramps and Sawtelle Blvd (South of Route 187)
- I-405 NB off ramp and National Blvd
- I-405 SB on ramp and National Blvd
- SR-187 (Venice Blvd) and S Sepulveda Blvd

- SR-187 (Venice Blvd) and Sawtelle Blvd
- I-10 and I-405 interchange

The locations to be studied should not be limited to those above. The above locations may need to be studied due to the project's size and location.

The TIS should discuss the results of intersection, freeway, and interchange/ramp performance analyses at the above locations. 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 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 the Work Area Traffic Control 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. Caltrans supports large size truck trips to be limited to off-peak commute periods to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists.

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. 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.

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. Therefore, 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. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to meet these goals. Potential strategies for this project include:

- Enhancing bike lanes on Sepulveda Boulevard, including designing Class III bike facilities near the Palms Boulevard intersection where bike lanes currently end
- Installing electric vehicle charging stations and solar panels
- Planting shade trees and bioswales, as well as using permeable pavement, to reduce storm-water runoff, which is a sensitive issue for Ventura county and needs to be considered during project design
- Implementing new bus shelters and other amenities to encourage transit use
- Providing high-visibility crosswalks with Continental or Ladder designs near the project site
- Constructing wide sidewalks with Americans with Disabilities Act (ADA) compliant ramps that are not obstructed by utility poles, perhaps through under-grounding utilities

Mr. Jason McCrea
September 13, 2019
Page 3 of 3

For additional TDM options, please refer to Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8) by the Federal Highway Administration (FHWA). The reference is available online at: <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

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-2019-02762.

Sincerely,



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