

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

NOV 18 2019

STATE CLEARINGHOUSE

November 18, 2019

Mr. Christopher Lopez
City of Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

RE: Van Norman Complex Routine Operation
and Maintenance Program – Mitigated
Negative Declaration (MND)
SCH # 2019119023
GTS # 07-LA-2019-02919
Vic. LA-5/PM: 42.625

Dear Mr. Christopher Lopez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project is the Van Norman Complex Routine Operation and Maintenance Program which generally entails ensuring the proper function of existing facilities throughout the Van Norman Complex (VNC). Specifically, the project involves routine vegetation management and maintenance activities at several existing facilities throughout the VNC. The activities can generally be characterized as removal of overgrown vegetation, mowing herbaceous vegetation, and removal of accumulated sediment and debris. In performing these proposed maintenance activities, staff would use equipment such as loaders and bobcat dozers. The City of Los Angeles Department of Water and Power is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are Interstate 5 (I-5), Interstate 210 (I-210), and Interstate 405 (I-405). Specifically the project is located adjacent to the I-5 & I-210 interchange, and .5 miles away from the I-5 & I-405 interchange.

From reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

The following information is included for your consideration.

The City of Los Angeles adopted a Vehicles Miles Traveled (VMT) metric for transportation analysis in 2019. Caltrans applauds the City for adopting the metric that assists the State in meeting its greenhouse gas emissions reductions targets as well as reducing VMT.

Please make every attempt to reduce the VMT associated with this project, and in particular the potential VMT generated from truck trips. For TDM options that can reduce VMT, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>

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As a reminder, any transportation of heavy maintenance or operational equipment and materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We support large size truck trips be limited to off-peak commute periods.

Also, 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, if any management and maintenance activities will involve encroaching on or near Caltrans' right of way, an encroachment permit may be required. However, this decision will be subject to additional review by Caltrans' Office of Permits.

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-2019-02919.

Sincerely,

A handwritten signature in blue ink that reads "Alan Lin". The signature is written in a cursive, flowing style.

ALAN LIN
ACTING IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse