DEPARTMENT OF TRANSPORTATION

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9/16/2020

September 14, 2020

Richard Claghorn County of Los Angeles Department of Regional Planning Zoning Permits North Section 320 West Temple Street, Room 1348 Los Angeles, CA 90012 Governor's Office of Planning & Research

Sep 14 2020

STATE CLEARING HOUSE

RE: Castaic Mountain View Apartments - Notice of Preparation of an Environmental Impact Report (NOP) SCH # 2020070041 GTS # 07-LA-2020-03305 Vic. LA-5/PM: R58.135

Dear Richard Claghorn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project would develop an approximately 106-acre project site with 648 apartment units and up to 344,995 square feet of light industrial or commercial space. The 648 apartment units would include 354 one-bedroom units, 234 two-bedroom units, and 60 three-bedroom units, all within 24 apartment buildings. The project also proposes grading of approximately 872,650 cubic yards of cut and 872,650 cubic yards of fill to be balanced on the site. The County of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4,000 feet from the Interstate 5 (I-5) ramps located at Parker Road in Castaic. From reviewing the NOP, Caltrans has the following comments:

- As a reminder, Senate Bill 743 (2013) mandates that 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 (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743 Technical Advisory.pdf.
- The County can also refer to Caltrans' updated VMT-focused Transportation Impact Study Guide (TISG), dated May 2020 and released on Caltrans' website in July 2020. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory:
 https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here, for the County's

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reference: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf.

Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis and significance determination in a manner consistent with OPR's Technical Advisory, as well as state GHG emissions and VMT reduction goals. These goals are articulated in OPR's Technical Advisory and in the California Air Resources Board's Scoping Plan.

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. Thus, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies for projects that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. For such TDM options, 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.

Also, 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 recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans' review.

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-2020-03305.

Sincerely,

MIYA EDMONSON IGR/CEQA Branch Chief

Miya Edmonson

cc: Scott Morgan, State Clearinghouse