

APPENDIX A

Notice of Preparation and Comment Letters

NOTICE OF PREPARATION

DATE: February 17, 2015

TO: State Clearinghouse and Responsible and Trustee Agencies

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

PROJECT TITLE: **Downtown Hawthorne Specific Plan**

The City of Hawthorne (the "City") will be the Lead Agency and will prepare a Environmental Impact Report (EIR) for the adoption of the proposed Downtown Hawthorne Specific Plan (the "Specific Plan"). The Specific Plan area totals approximately 794 acres and is generally located along the Hawthorne Boulevard corridor that runs north-south through the downtown area of the City. The Specific Plan designates five land use areas (Residential, Hotel Hub, Commercial, Mixed-Use and Public/Quasi Public) and five opportunity sites known as Transformative Projects. The environmental analysis will examine the potential impacts of the total Specific Plan area in 2035 as a program EIR and the five Transformative Project sites in 2020 as a project EIR. In addition, the City of Hawthorne General Plan, including the General Plan Land Use Map, will be amended concurrent with the adoption of the Specific Plan to include the proposed land use designations, and goals and policies of the proposed Specific Plan.

The Specific Plan's Vision Elements, Land Use Diagram map and a description of the Transformative Projects are attached. The Specific Plan and other related documents are available for review at the Hawthorne Planning Department located at City Hall, 4455 West 126th Street, Hawthorne. The EIR will assess each of the environmental topics in an Initial Study, and therefore, an Initial Study was not prepared.

Please provide the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by the City of Hawthorne when considering your permit or other approval for the project.

The City is also conducting an environmental scoping meeting on the Specific Plan. The scoping meeting is scheduled for March 4, 2015 at the Hawthorne City Hall Council Chambers located at 4455 West 126th Street, Hawthorne from 10:30 am. to 12:00 pm.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but **not later than 30 days** from receipt of this notice. Please include the name, mailing address and phone number of a contact person in your agency.

Please send your response to: City of Hawthorne
4455 West 126th Street
Hawthorne, California 90250

Attn: Gregg McClain
Director of Planning

ORIGINAL FILED

FEB 20 2015

LOS ANGELES, COUNTY CLERK

Sincerely,



Gregg McClain
Director of Planning
(310) 349-2975

Feb. 17, 2015
Date



**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

February 26, 2015

Gregg McClain, Director of Planning
City of Hawthorne
4455 West 126th Street
Hawthorne, CA 90250

**Notice of Preparation of a CEQA Document for the
Downtown Hawthorne Specific Plan**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is

recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at Jwong1@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

LAC150220-02

Control Number



CITY OF INGLEWOOD

Planning and Building Department

Inglewood



March 4, 2015

Mr. Gregg McClain
Director of Planning
City of Hawthorne Planning Department
4455 W 126th St
Hawthorne, CA 90250

RE: Comments on Notice of Preparation of a Draft Environmental Impact Report for the Downtown Hawthorne Specific Plan

Dear Mr. McClain,

Thank you for the opportunity to provide comments on the Notice of Preparation of a Draft Environmental Impact Report for the Downtown Hawthorne Specific Plan. We have no comments at this time regarding the Draft EIR or the City's Downtown Hawthorne Specific Plan. However, we request that you continue to apprise us of developments in the CEQA process for this project.

Should you have any questions please contact me at (310) 412-5230. We look forward to receiving updates on the status of this project and we appreciate the opportunity to provide input.

Sincerely,

A handwritten signature in blue ink that reads "Mindy Wilcox".

Mindy Wilcox, AICP
Senior Planner



March 16, 2015

Mr. Gregg McClain, Director of Planning
City of Hawthorne
4455 West 126th Street
Hawthorne, California 90250
Phone: (310) 349-2975
E-mail: gmclain@cityofhawthorne.org

RE: SCAG Comment on the Notice of Preparation of a Draft Environmental Impact Report for the Downtown Hawthorne Specific Plan [SCAG NO. IGR8376]

Dear Mr. McClain,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Del Sur Solar Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Downtown Hawthorne Specific Plan. The proposed project is a specific plan for approximately 794 acres in the downtown area of the City of Hawthorne. The Specific Plan dedicates five land use areas (Residential, Hotel Hub, Commercial, Mixed-Use, and Public/Quasi Public) and five opportunity sites known as Transformative Projects.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

A handwritten signature in blue ink that reads 'Ping Chang'.

Ping Chang,
Program Manager II, Land Use and Environmental Planning

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

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Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
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Associated Governments

**COMMENTS ON THE NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE DOWNTOWN HAWTHORNE SPECIFIC PLAN [SCAG NO. IGR8376]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

Regional Growth Forecasts

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted City of Hawthorne Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	89,600	96,300
Households	6,458,000	7,325,000	29,500	30,600
Employment	8,414,000	9,441,000	21,100	21,800

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

March 20, 2015

Ref File No.: 3242787

Mr. Gregg McClain
Director of Planning
City of Hawthorne
4455 West 126th Street
Hawthorne, CA 90250

Dear Mr. McClain:

Downtown Hawthorne Specific Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on February 20, 2015. The Specific Plan area is located within the jurisdictional boundaries of District No. 5. We offer the following comments:

1. The Districts own, operate, and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City of Hawthorne (City) except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.
2. The Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
3. The wastewater generated by the City is treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 million gallons per day (mgd) and currently processes an average flow of 263.4 mgd.
4. In order to estimate the volume of wastewater a project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate proposed projects.

Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
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PHONE (213) 897-9140
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*Serious drought.
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March 19, 2015

Mr. Gregg McClain
City of Hawthorne
Planning Department
4455 West 126th Street
Hawthorne, CA 90250

Re: Downtown Hawthorne Specific Plan
Notice of Preparation of Draft EIR
IGR No: 150251/EA, SCH#2015021074
Vic: LA / 105 / PM 3.559

Dear Mr. McClain

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above mentioned project. The Downtown Hawthorne Specific Plan designates five land use areas: Residential, Hotel Hub, Commercial, Mixed-Use, and Public/Quasi Public. The Specific Plan also designates five opportunity sites known as Transformative Project sites: Hawthorne Mall, Civic Center, RFK Hospital, South Bay Ford and St. Joseph's Plaza. The Specific Plan area is the vicinity of Hawthorne Boulevard, which is part of State highway system as State Route 107.

As the State agency with jurisdiction over State highway transportation facilities, Caltrans is concerned with potential increase in traffic volumes directed to them as it might exacerbate existing congestion.

Please require that the project conduct a Traffic Impact Analysis (TIA) to evaluate potential transportation impacts to State Route 107, I-105 and I-405 freeways. Please refer traffic engineers to follow the Caltrans Guide for the Preparation of Traffic Impacts Studies, it is accessible online at: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

The TIA should include evaluation of potential traffic impacts to the regional transportation system including I-105 mainline before and after Hawthorne Boulevard, and Prairie Avenue on-and-off ramps. Please consult with Caltrans to obtain concurrence as to the limits of the study area. Please include mitigation improvements if the off-ramp storage capacity is projected to be exceeded.

Hawthorne Boulevard through the Cities of Hawthorne and Lawndale is no longer considered State Route 107; therefore any planned improvements within in that area will not need approval from Caltrans.

Listed below are elements of what Caltrans generally expects in a traffic impact study:

- Presentations of assumptions and methods used to develop trip generation, trip distribution, trip assignments, and choice of travel mode. Travel modeling should be consistent with other regional

Mr. Gregg McClain

March 19, 2015

Page 2

and local modeling forecasts and with travel data.

- Inclusion of all appropriate traffic volumes. Analysis should include a) traffic from the project(s) under consideration, b) cumulative traffic from all approved developments in the area, c) cumulative traffic from likely not-yet-approved developments in the area, and d) traffic growth other than from the project and developments. Any assumptions of vehicle trip reductions due to existing uses, internal captured trips, pass-by trips, or transit usage needs to be justified.
- Analysis of AM, and PM peak-hour volumes for both existing and future conditions in the affected area. Future conditions should extend to the horizon year build-out year of the Specific Plan.
- Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including a description of transportation infrastructure improvements, financial costs, funding sources and financing, sequence and scheduling considerations, implementation responsibilities, controls and monitoring.
- A plan of realistic mitigation measures under the control of the lead agency or project sponsors or specification percent shares of the costs for various mitigation actions undertaken by other agencies. Any traffic mitigation fees may be assessed proportionally with the additional traffic generated by the project. (See Caltrans' Traffic Impact Study Guide for a suggested formula).

Caltrans recommends that the City establish a Transportation fund or a funding plan to implement improvements that may be too costly for one specific development. Specific projects can contribute to the funding of improvements to State highways and City streets.

We encourage the City consider vehicle demand-reducing strategies. These may include incentives for commuters to use transit, park-and-ride lots, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc. To the extent that more of the population shifts to transit for some of their inter-regional trips, future cumulative traffic impacts to freeways may be satisfactorily mitigated.

Please be aware that although the lead agency is required to comply with Los Angeles County Congestion Management Program (CMP) standards and thresholds of significance, Caltrans does not consider the Los Angeles County's CMP criteria alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. The CMP does not adequately address cumulative transportation impacts and does not analyze for safety, weaving problems, or delay. The 2010 CMP Guidelines, Appendix D, states that Caltrans should be consulted for the analysis of State highway facilities. Caltrans' Guide directs preparers of traffic impact analysis to consult with the local District as early as possible to determine the appropriate requirements of the traffic impact analysis.

In the spirit of mutual cooperation, Caltrans staff is available to work with the project's traffic engineers to identify the parameters of traffic impact analysis such as study area, vehicle trip reduction factors, method of analysis, significant criteria, and possible mitigation measures if any are necessary.

Mr. Gregg McClain
March 19, 2015
Page 3

If you have any questions regarding these comments, please feel free to contact Elmer Alvarez, Project Coordinator at (213) 897-6696 or electronically at elmer.alvarez@dot.ca.gov.

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans District 7

cc: Scott Morgan, State Clearinghouse