

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

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May 29, 2025

Mr. Jodie Sackett, Subdivisions
Los Angeles County
Department of Regional Planning
320 W. Temple Street, FL. 13
Los Angeles, CA 90012

RE: Northlake Specific Plan Project-
Recirculated Partial DSEIR
SCH # 2015031080
Vic. LA-05/PM R59.0508 to R59.007
GTS # LA-2017-04795-DSEIR

Dear Mr. Jodie Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The previously approved Project (not certified) consists of development of Phase 1, Phase 2, and associated offsite map improvements for both Phase 1 and Phase 2. Phase 1, which includes the entitlements Vesting Tentative Tract Map ("VTTM") No. 073336, Vesting Tentative Parcel Map ("VTPM") No. 073335, and Conditional Use Permit ("CUP") No. RPPL2023004316, comprises development of a 720-acre portion of the Project Site with a total of 2,295 dwelling units, including 288 single family units on approximately 41 acres, 1,341 multi-family units on approximately 107 acres, 345 senior multifamily units on approximately 49 acres, and 315 affordable units and six market-rate live/work units (included within 20 acres of commercial use). Phase 1 also includes commercial uses (22 acres), open space and parks uses (412 acres), roadways (86 acres), a school pad (21 acres), water tank pad (5.1 acres), and a fire station pad (1.4 acres).

The remainder of the Project Site, referred to as the Phase 2 area, would be developed with 855 single family units; 386 acres of parks, trails, and open space; 23 acres of school uses; and 36 acres of associated roadway and infrastructure improvements. Phase 2 is not included in VTTM 073336 and will require a separate map number. VTPM 073335 requests 21 large lot parcels (40 acres or more) for future lease and finance purposes and covers both phases.

Associated off-site map improvements in both Phase 1 and Phase 2 total 65.13 acres, including remedial grading, drainage features, and road and utility alignments.

The Project improvements would consist of the construction of Ridge Route Road at the Project's main entrance to the south and a secondary access route to the northwest, construction of Northlake Parkway adjacent to and west of the Phase 2 portion of the Project Site, a 4.64 acre connection of Grasshopper Creek Park, a debris basin, 2.39 acres in trail connections, a 5.1-acre pad for a water tank, 29.79 acres of manufactured slopes, and 11.98 acres of natural open space. In addition, extensions of the existing electrical distribution circuitry would occur along the existing Ridge Route Road to reach the Project, and substation upgrades would occur on Southern California Edison property.

In addition to the above improvements, an existing crude oil pipeline easement containing two oil pipelines that traverse the entire north-south length of the Project Site and both Phases 1 and 2 would be relocated to an alignment along the eastern boundary of the proposed development area and within the identified grading footprint.

The SEIR concluded that impacts associated with the 2019 previously Approved Project (not certified) would result in significant and unavoidable environmental impacts related to Operational, Construction, and Cumulative Air Quality; Construction, Operational, and Cumulative Noise; and Project and Cumulative Traffic. The RPDSEIR evaluates the potential for environmental impacts based on the Court Order. The RPDSEIR provides supplemental analysis related to:

- 1) Revised biological impact analysis only as to the Western Spadefoot Toad, special-status plants, and crotches' Bumble Bee;
- 2) Updated Traffic Analysis as to Vehicle Miles Travelled pursuant to Senate Bill 743 and CEQA Guidelines Section 15064.3;
- 3) Updated Wildfire Analysis pursuant to Appendix G of the CEQA Guidelines; and
- 4) Revised alternatives analysis only as to the addition of a Creek Avoidance Alternative and a Partial Creek Avoidance Alternative.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental document should

include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

The Final SEIR appropriately acknowledges significant impacts to multiple State transportation facilities along the I-5 corridor. Specifically, the impacted locations include the I-5 northbound ramps at Lake Hughes Road, the I-5 southbound ramps at Parker Road, the I-5 northbound off-ramp at Ridge Route Road, and the I-5 southbound ramps at The Old Road. These locations are projected to experience operational deficiencies under cumulative conditions. While the County does not have direct jurisdiction over State facilities, we support the County's recognition of these impacts and the County's stated intent to coordinate with Caltrans District 7 to advance potential mitigation strategies. Improvements may include ramp widening, geometric enhancements at ramp terminals, new traffic signals, and intersection control modifications to address queuing, delay, and safety concerns. Ongoing collaboration with Caltrans will be essential to ensure that these improvements are fully evaluated and implemented through the appropriate project development and funding processes. Caltrans concurs that funding mechanisms such as the County's Castaic Bridge and Major Thoroughfare District, along with the payment of applicable district fees, are appropriate to satisfy the project's fair share obligations for improvements to State transportation facilities.

We noticed that the analysis uses 27.0 VMT per service population, based on the previously approved Northlake Specific Plan, as the threshold for determining transportation impacts. We respectfully ask the lead agency to clarify why a reduction-based threshold was not considered in this case. Given the statewide shift under SB 743, it's important to understand how this approach supports the intent of CEQA moving forward.

As a reminder, the Governor's Office of Planning and Research (OPR) recommends using a threshold that reflects a 15% reduction below the regional or jurisdictional average VMT. This benchmark is intended to help projects contribute meaningfully to reducing vehicle travel, emissions, and other transportation-related impacts. We encourage the County to revisit the VMT threshold applied in the analysis and share its reasoning for not incorporating a reduction target, especially in light of the broader goals set by SB 743 and OPR guidance.

To further support VMT reduction and for the County's consideration, we recommend that the project incorporate a Transportation Demand Management (TDM) program. TDM strategies such as enhanced transit connectivity, subsidized transit passes, carpool/vanpool programs, employer-based trip reduction incentives, bicycle and pedestrian infrastructure, and telecommuting support can materially reduce project-level VMT. These measures should be quantified, monitored, and integrated into project conditions or mitigation measures to ensure accountability and effectiveness.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

In addition, a truck/traffic construction management plan may be needed for this project because the project is near by Caltrans on/off-ramps. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2017-04795-DSEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse