

California Department of Transportation

DISTRICT 7
100 SOUTH MAIN STREET, SUITE 100 | LOS ANGELES, CA 90012
PHONE (213) 897-0362 | FAX (213) 897-0360 TTY 711
www.dot.ca.gov



June 24, 2026

Krystin Hence, Assistant Director, Capital Development
County of Los Angeles
Department of Economic Opportunity
510 S. Vermont Avenue, 11th Floor
Los Angeles, CA 90020

RE: LA County General Hospital Campus
Community Plan - Subsequent EIR
SCH # 2014051061
Vic. LA-5/PM 18.78, LA-10/PM 19.07
GTS # LA-2025-05076-Subsequent EIR

Dear Krystin Hence:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Proposed Project involves implementation of the proposed Master Plan, which would guide the long-term redevelopment of approximately 30.8 acres of the Project Site, including adaptive reuse of the 1.2-million-square-foot General Hospital Building. The Proposed Project seeks to maintain flexibility for the County to redevelop other parts of the Project Site (the approximately 51.1 acres outside of the Master Plan area) with potential County-initiated projects in the future. The Proposed Project includes the demolition of existing buildings, structures, storage containers, modular buildings, pavement, utilities, and landscaping to allow for the development of 8,060,978 square feet of new uses including 3,200 housing units, 450 hospital beds, 200 patient and caregiving lodging rooms, and more than 3 million square feet of parking (8,588 parking spaces).

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 documents should include Vehicle Miles Traveled. You may reference the Governor's Office of Land Use and Climate Innovation webpage for more information:

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

SDEIR Project Description

When the Notice of Preparation (NOP) for the Subsequent Environmental Impact Report (SDEIR) was released on September 26, 2025, it did not specify the sizes or types of land uses proposed for the Los Angeles County General Hospital Campus Community Plan. Caltrans initially believed the project description aligned with the previously certified project, which encompassed approximately 1.7 million square feet. Detailed information regarding the sizes and types of land uses became available only with the publication of the SDEIR.

Although Caltrans was invited for early consultation after NOP was released, Caltrans later learned that the project had grown to more than four times the size originally analyzed, see Caltrans letter dated October 20, 2014 (**Attachment #1**), expanding the development footprint to over 8 million square feet. Such a substantial increase can significantly affect traffic density and transit patterns throughout the region.

Trip Generation

Caltrans acknowledges receipt and review of the Detailed Project Trip Generation (Supplement to Exhibit A of the Draft CEQA Chapter Excerpt), referenced as **Attachment #2**. To ensure transparency and consistency with CEQA requirements, Caltrans recommends that all trip generation credits or reductions be validated through a traffic survey based on actual land use trips under the current Master Plan. Consultant-assumed percentages, such as Internal Capture, Walk/Bike/Transit Credit, or Pass-By reductions, may not adequately reflect real-world conditions when current land uses can provide those credit trips. All trip generation analysis, including methodology and supporting data, must be included in public circulation materials to allow for meaningful public review and comment.

Trip Distribution

Caltrans acknowledges receipt and review of the Project Trip Distribution (see **Attachment #3**). To ensure accuracy and reliability, Caltrans recommends that trip distribution be validated through an actual trip survey conducted in accordance with the current Master Plan. Alternate trip distribution scenarios should be based on empirical data from this survey, rather than assumptions, to provide a defensible and transparent analysis consistent with CEQA requirements.

Parking Spaces

The proposal to construct **8,588 parking spaces** conflicts with the project's stated goal of promoting transit-friendly development. Providing such a large parking footprint is likely to encourage more driving, resulting in an estimated **63,927 daily trips** and potentially causing significant freeway congestion. It is inconsistent to claim reliance on public transit while simultaneously accommodating thousands of automobiles.

To effectively reduce traffic impacts and support transit-oriented objectives, the County should reconsider prioritizing automobile infrastructure. Caltrans recommends strategies include reducing the overall number of parking spaces to discourage driving, charging separately for parking so residents and workers understand the true cost, offering free transit passes to make public transportation more attractive, and repurposing parking stalls as hubs for bike, scooter, and carpool sharing. These measures can help shift travel behavior toward sustainable modes and align the project more closely with its transit-friendly vision.

Transportation Appendix

Caltrans acknowledges that the transportation analysis was integrated directly into the SEIR Transportation Chapter, rather than provided as a standalone traffic study appendix. The Transportation Chapter, along with the CEQA transportation excerpt dated March 20, 2026, which was previously shared with the Caltrans team by the consultant, incorporates the off-ramp queuing analysis, turning movement counts, Synchro calculation sheets, and signal timing information. Caltrans recommends that these materials be included as an appendix to ensure full transparency and facilitate meaningful public review and comment. We understand that following our consultation, portions of the analysis have been updated in the final Transportation Chapter.

VMT

While the project is described as a "transit-friendly" development, Caltrans notes that the proposed 8,588-space parking footprint raises concerns about alignment with transit-oriented goals. According to the Draft SEIR (page 3.15-23 and Table 3.15-3), the parking infrastructure is expected to generate 63,927 daily trips, comparable to the traffic of a small city, and the reported residential VMT of 7.6 per capita and work VMT of 10.6 per employee are not supported by substantial evidence. These metrics were calculated using travel data from a low-density, single-family neighborhood in Lincoln Heights rather than a high-density urban campus, and the population denominator was inflated to 9,634 residents instead of the actual cap of 8,000. This methodology may underestimate the true vehicle miles traveled and overstate the project's compatibility with transit.

Caltrans recommends that the County revisit the travel demand modeling, specifically analyzing how the extensive parking facility encourages additional car use, and consider reducing the proposed parking supply to ensure impacts are properly disclosed and mitigated. This master plan will serve as the basis for establishing the local VMT for that area, and as such, it is essential that the analysis accurately reflects the project's influence on travel patterns and complies with CEQA disclosure requirements.

Queuing Analysis

To ensure transparency and compliance with CEQA, the queue analysis must clearly compare "Existing" and "Existing plus Project" conditions. This side-by-side assessment is critical for disclosing incremental impacts, allowing stakeholders to evaluate project effects on off-ramp operations and supporting the identification of effective mitigation measures.

Impact TRA-3: Caltrans concurs with the identification of four freeway off-ramp locations where operation of the Proposed Project is anticipated to result in significant traffic impacts and geometric hazards due to queuing. These locations include the I-5 southbound off-ramp to Mission Road, I-5 northbound off-ramp to Cesar Chavez Avenue, I-10 westbound off-ramp to State Street, and I-10 westbound off-ramp to Soto Street. Caltrans acknowledges that queuing at these sites may cause operational and safety concerns consistent with CEQA analysis.

Proposed Mitigation Measures

- **TRA-3a:** Re-stripe the I-5 southbound off-ramp to Mission Road from a left turn lane, shared through-left lane, and right lane to two left turn lanes and one shared through-right lane. Optimize signal timing along Mission Road, including cycle length, offset, and phase splits. Apply Caltrans' Intersection Safety Operational Assessment Process (ISOAP) methodology as appropriate for intersection improvements.
- **TRA-3b:** Re-stripe the I-10 westbound off-ramp to State Street from a left turn lane and right turn lane to a shared left-right turn lane and a right turn lane. Optimize signal timing and apply ISOAP methodology as needed.
- **TRA-3c:** Re-stripe the I-10 westbound off-ramp to Soto Street from a left turn lane, shared through-left lane, and two right turn lanes to two left turn lanes, one through lane, and one right turn lane. Optimize signal timing and apply ISOAP methodology for intersection improvements.
- **TRA-3d:** Optimize signal timing at the I-5 northbound off-ramp to Cesar Chavez Avenue. Apply ISOAP methodology as appropriate for intersection improvements.
- **TRA-3e:** Implement a comprehensive Transportation Demand Management (TDM) program to reduce vehicle trips to the Project Site, which may help mitigate freeway off-ramp queuing hazards. TDM strategies include commute trip reduction programs, ridesharing, subsidized transit, bicycle facilities, employer-sponsored vanpools, parking management, school bus programs, and promoting active transportation for youth.

Caltrans acknowledges the proposed mitigation measures TRA-3a through TRA-3e. All proposed mitigation measures must be field verified to ensure technical and physical feasibility within the State Right-of-Way. However, these measures will not reduce

Impact TRA-3 to a less-than-significant level. While the measures would help decrease geometric hazards caused by freeway off-ramp queuing, analysis shows that queues will still exceed available storage during at least one peak hour at each location. This means the impact remains significant and unavoidable.

TRA-3b recommends restriping the westbound I-10 off-ramp to State Avenue from separate left and right turn lanes to a shared left/right turn lane and a right turn only lane. Caltrans requests confirmation that this configuration is feasible, given space constraints for dual right turn lanes. The turning radius for right turns should be evaluated to ensure safe and efficient operations. Caltrans further recommends assessing alternative designs, including intersection widening, to accommodate required turning movements.

While mitigation measures TRA-3a through TRA-3d aim to optimize intersection operations, significant traffic impacts remain due to excessive queue lengths and limited storage at freeway off-ramps. Caltrans recommends the County evaluate increasing storage length, as **Aerial Photo #1 to #4** indicate sufficient right-of-way may exist. A collaborative review with Caltrans is advised to confirm feasibility. Consistent with CEQA Guidelines §§ 15091 and 15126.4, Public Resources Code § 21002, and § 15092(b)(2), a project cannot be approved if feasible mitigation measures are available that would substantially reduce or avoid significant impacts.

Additional TDM

For **TRA-3e**, we recommend the County to enhance its efforts by adopting additional TDM strategies from Caltrans' Local Development Review Transportation Demand Management Toolbox. These measures include dynamic congestion pricing, advanced traffic signal systems, and promoting telecommuting and flexible work hours. Implementing these strategies will further reduce Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions, contributing to a healthier, more resilient community.

<https://dot.ca.gov/-/media/dot-media/district-4/documents/d4-transportation-planning-local-assistance/ldr/final-draft-2023-ldr-tdm-toolbox-071923-a11y.pdf>

The following remarks were presented to County staff and consultants during a virtual meeting held on June 6, 2026:

1. On Page 3.15-27, under the Queuing Analysis Methodology section, it is indicated that the HCM 7th Edition was utilized to determine queue lengths. However, some Synchro worksheets previously shared with Caltrans referenced HCM 2000 as the basis for calculations in the Draft CEQA Chapter Excerpt dated March 20, 2026. Please ensure that all analyses are conducted using the HCM 7th Edition and submit updated Synchro worksheets to Caltrans for review and record. Additionally, SimTraffic should be

employed to evaluate closely spaced and congested intersections for safety reasons, specifically at the I-10 ramps and Marengo Street intersections with Soto Street.

2. On Page 3.15-28, under Operational Improvements section, it stated that more extensive measures, such as added lanes or turn pockets, were assumed infeasibility due to right-of-way constraints and the potential negative effect on multimodal experience. Caltrans does not concur. Due to the significance of added queue to the freeway mainline that may result in safety issues, all mitigation measures should be explored and evaluated. Caltrans does not anticipate improvement on freeway mainline or ramp termini to result in negative impacts on multimodal travels.

3. The storage lengths presented in the tables under Section 3.15 are calculated as the sum of all lane-feet from the terminal intersection stop bar to the gore point. Caltrans does not concur with this methodology. Available storage length should be measured solely for the critical turning movement that has the potential to generate extensive queues onto the freeway mainline. Adopting this approach may identify additional ramps with potential safety concerns.

4. Given the substantial queue lengths and associated safety concerns, it is essential to evaluate mitigation measures beyond signal timing optimization, lane reassignments, and Transportation Demand Management (TDM) strategies. Comprehensive intersection improvement analyses should be thoroughly explored and documented within ISOAP, ensuring all feasible options are considered in accordance with CEQA requirements.

Other Comments

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 should 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. A truck and construction traffic management plan may be required for projects near I-5/I-10 on/off-ramps, and any lane closures/detours impacting freeway access must coordinate with Caltrans.

Given the scale of this project and its considerable impact on State facilities, Caltrans kindly requests that the Lead Agency and traffic consultants engage in ongoing discussions regarding direct traffic impacts and potential mitigation strategies. In follow-up to Caltrans' comment letters dated October 20, 2014 and November 19, 2014 (**Attachment #4**), we look forward to working collaboratively to identify effective solutions that address these concerns.

While Caltrans did not have early input on this project, we are committed to working with the County to ensure transparent disclosure and effective mitigation of traffic impacts in line with CEQA requirements. We welcome continued collaboration to address traffic concerns and support the public interest. If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, on (213) 269-1124 and refer to GTS # LA-2025-05076-Subsequent EIR.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Higgins".

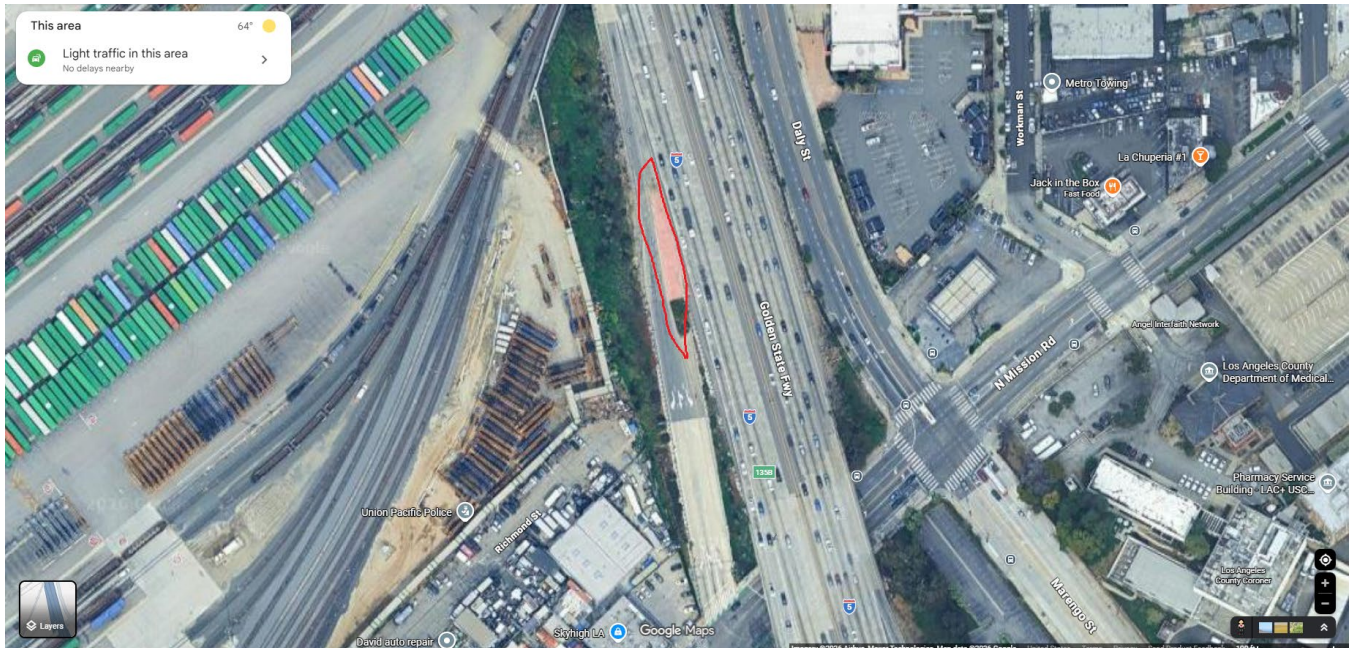
Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse

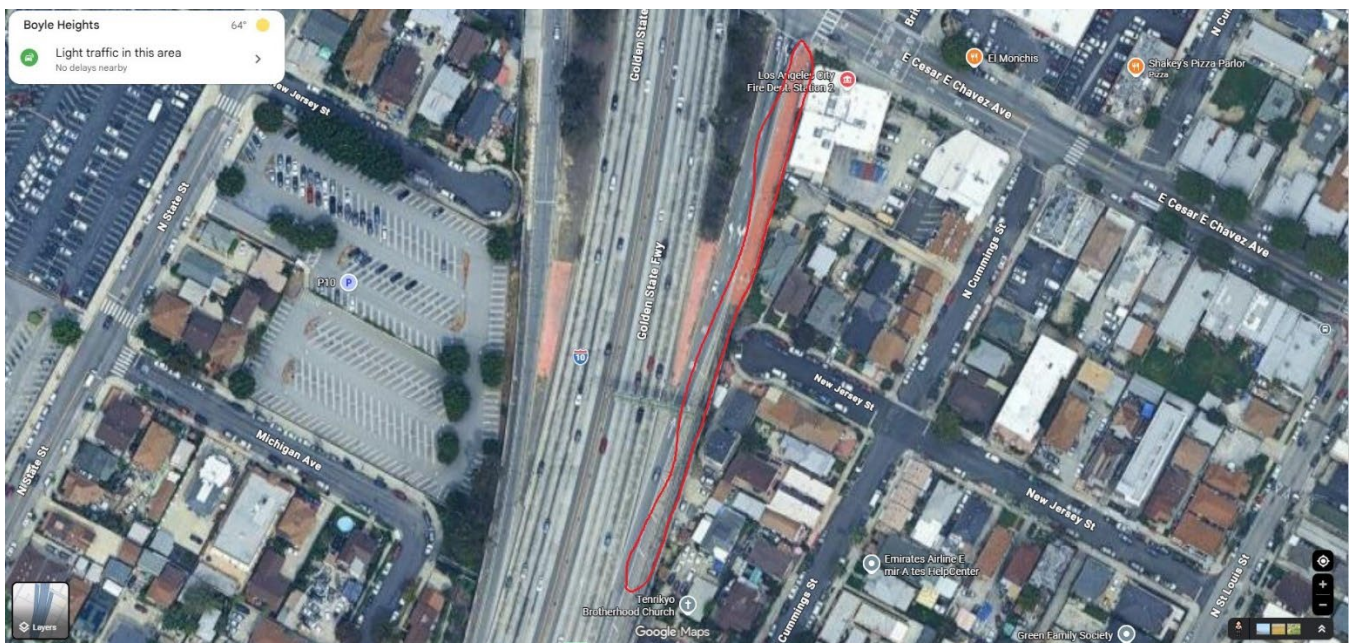
Attachments

- 1) D141020 CT Letter
- 2) Trip Generation
- 3) Trip Distribution
- 4) D141119 CT Letter
- 5) Aerial Photos 1, 2, 3, and 4

Aerial Photo #1, I-5 SB to Mission Rd.



Aerial Photo #2, I-5 NB to Cesar Chavez Ave.



Aerial Photo #3, I-10 WB to State St.



Aerial Photo #4, I-10 WB to Soto St.

