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September 12, 2025

Kathleen King
City of Los Angeles, Department of City Planning
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Los Angeles, CA 90012

RE: Five Points Union Project – NOP
SCH# 2025080636
GTS# 07-LA-2025-04877
Vic. LA 10 PM: 2.58
LA 10 PM: 2.78
LA 10 PM: 3.27

Dear Kathleen King,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes the redevelopment of the 444-acre Project Site through the Five Points Union Specific Plan (Specific Plan), comprised of a commercial and recreational development (Town Center) on the northern portion of the site, and an industrial development (Industrial Center) on the southern portion of the site.

The Town Center would include 337,000 square feet of retail and food service uses (including sit down and drive-through restaurants, grocery store, and a major retailer), a 60,000 square foot indoor sports facility, and other community serving uses such as a 500 square foot police substation and a 5,000 square foot community meeting/work room, totaling 402,500 square feet of floor area, with building heights up to 65 feet. The Town Center would include surface parking and 27 acres of publicly accessible outdoor areas, including three acres of sports fields, two playgrounds, and more than 3.5 miles of walking paths. A new approximately one-mile-long sidewalk would also be installed along North Gaffey Street.

The Industrial Center has two development options, the Reduced Outdoor Storage Option and the Additional Outdoor Storage Option. Both Options have the same overall uses, massing, site access, and site layout, but vary in the allocation of indoor and outdoor industrial uses within the southern-most portion of the Industrial Center. Building heights would be permitted up to 115 feet.

Under the Reduced Outdoor Storage Option, the Project would include the development of up to 5,982,100 square feet of industrial uses; 184,000 square feet of ancillary office uses generally located within the ground floor and mezzanines of the industrial buildings; up to 402,500 square feet of commercial and recreational uses; and approximately 24 acres of outdoor storage uses such as trailer parking and container storage that would be integrated with, and support, the industrial uses, for a total floor area of 6,568,600 square feet. Under the Additional Outdoor Storage Option, Building 8, located on the southeastern portion of the Industrial Center, would be reduced by 664,000 square feet to provide for an increase in the outdoor storage areas from 24 acres to 52 acres. Under this Option, the total floor area would be 5,904,600 square feet.

The Project proposes vehicular and pedestrian access infrastructure, including a new truck tunnel, located near an existing truck tunnel beneath the I-110 Freeway connecting the southeast portion of the Project Site to John S. Gibson Boulevard. Surface parking for vehicles and truck trailers, and landscaped areas would be provided.

Approximately 199,700 square feet of existing floor area would be removed, along with the removal of existing large-scale bulk liquid storage tanks, refinery process units, other refinery-related equipment and structures, and equipment related to the storage of liquefied petroleum gas. Demolition and removal activities would be followed by remediation of the Project Site and then construction of new buildings and site improvements.

After reviewing the NOP, Caltrans has the following comments:

Caltrans looks forward to reviewing the project's transportation impact analysis covering the VMT impacts from the project, including induced freight trips from associated development. As required by SB 743, Caltrans recommends the Lead Agency develop a verifiable performance based VMT criteria. Significant transportation impacts warrant substantive mitigation measures, including transportation demand management and transportation system management. Projects anticipating a significant volume of induced freight trips may consider additional modes for goods movement, including enhancing connections to existing or proposed freight rail facilities.

<u>Transportation</u>

A robust Intersection and ramp analysis should be conducted to ensure that project induced trips do not create unsafe conditions at intersections or on the mainline. The study should include, but not be limit to, the following locations:

- SR-110 on/off ramps at Anaheim St, Figueroa St, Figueroa Pl, John Gibson Blvd, Harry Bridges Blvd, Gaffey St, and Channel St.

- A Multi-Modal Conflict Analysis should also be conducted across the project area and at the above locations, including the intersection of SR-213 (Western Ave) and Palos Verdes Dr.
- An accessibility analysis, including a review of potential pedestrian, bicycle, and transit trips. This should include the identification and proposal of complete streets features and related street improvements (ADA curb ramps, sidewalks, bicycle lanes, high-visibility crosswalks, etc.)

If any impacts are found to degrade conditions for any road users, they should be mitigated with project design changes and infrastructure investments that reduce trips made by car and induce demand for the safe use of alternative modes of travel. It is anticipated, that due to the amount of car parking provided and the auto-oriented design of the proposed site plan, the Five Points Union Project is currently designed in a way that potentially induces demand for unnecessary personal vehicle trips. For California to achieve its goals, this demand should be addressed with appropriate design and management principles. Caltrans recommends the following:

- Provide for a mixture of land use types within the Project's zoning area, including residential, to allow for adaptive reuse in the future. This can allow housing, goods, services, and jobs to be created near one another.

- Increase density, both vertically and horizontally. Land use developments, like the one proposed, should not sprawl across huge areas of land. By bringing the built environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.

- Reducing the amount of parking whenever possible, as research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. If surface parking must be built, it is recommended that it not face the street directly. By shifting the parking to the rear or interior of the project site, a more inviting streetscape can be created. A more active frontage, against the sidewalk, can encourage both recreational and transportation walking.

- Improve connections to existing active transportation and transit infrastructure. This can be done with robust signage, wayfinding, safety improvements, and human scale amenities.

- Create a streetscape that is safe and comfortable for all users. Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to

benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

- Implementation of Transportation Demand Management (TDM) strategies to reduce transportation impacts, which may include increased transit access, commute trip reductions such as rideshare programs, shared mobility facilities (bicycle or vehicular), increased bicycle and pedestrian infrastructure.

- Potential change(s) to ramp terminal operations including, but not limited to lane reassignment, traffic signalization, signal phasing or timing modifications.

Freight

The Project's significant industrial components and proximity to major ports necessitates careful consideration of freight impacts. Please consider the following while developing the DEIR:

1. Truck Trip Generation & Profiles
    - The project team will need to provide peak-hour and daily truck trips by class (Light/medium/heavy, tractor-trailer, yard tractors) and by daily operating hour (peak and off-peak hour, Weekday and Weekend) and e-commerce dispatch patterns, and seasonal surges at the project location.
    - The project team will need to distinguish drayage vs. regional line-haul vs. last-mile vans; include return-to-base deadhead for the accurate truck type demand analysis.

2. Network Assignment & Bottlenecks
    - This project will bring more truck trips to specific SHS facilities and ramps (I-110, I-710, SR-47, SR-103, SR-1, US-101 feeders) and that will require network truck volume analysis/forecast with turning-movement counts at key interchanges and terminal area ramps.
    - The project team will need to analyze queuing/spillback at ramp termini, terminal gates, and project driveways; for the purpose of demonstrating no queueing onto nearby SHS.

3. SB 743 related freight measurements
    - The project team will need to report truck VMT, vehicle-hours of delay (VHD), and travel time reliability on the adjacent SHSs. The analysis will need to include the with- and without-project impact analysis and mitigation approach analysis.

4. Truck/Pedestrian Safety Accessibility
    - The project team will need to evaluate conflict points with short weaving sections near ramps; assess sight distance, turning radius, and driveway spacing for multi-axles trucks.
    - The project team will need to address worker (pedestrian) access safety (walk/bike/transit) across high-injury corridors and adjacent streets of project location.

5. Pavement & Geometrics
    - The project team will need to consider the pavement impact assessment for nearby SHS and nearest city local streets that are designated as truck routes.

6. Environmental Impacts
    - The project team will need to quantify incremental emissions (NOx, PM2.5, DPM and others) from construction and operations; evaluate exposure for nearby communities (e.g., Wilmington, West Long Beach, San Pedro).
    - It would require addressing SCAQMD Rule 2305 (WAIRE) compliance strategy and report expected points and measures.

7. Zero-Emission (ZE) Truck Readiness
    - The project team will need to include a ZE truck/van adoption schedule aligned with CARB regulations regarding the on-site electric truck charging facility profiles, grid upgrades for the infrastructure, and yard infrastructure such as the MHD/DC fast charging, TRU electrification approaches.

8. Truck Parking & Staging
    - The project team will need to demonstrate adequate on-site truck/van parking, staging, and layover to prevent curbside or SHS queueing; include truck driver supporting facilities such as restrooms and also need to consider preparing the idling-free policies near the freeway on/off ramp and the connecting streets to mega warehouses and proper enforcement plans.

9. Construction Traffic Management Plan (TMP)

- The project team will need to submit a Construction Transportation Management Plan (TMP), haul routes, oversize/overweight permitting needs, night/weekend work windows, and protections for SHS operations during the construction period.

Regarding the new truck tunnel beneath the I-110 Freeway: Located at the southeast portion of the Project Site, this expanded connection to John S. Gibson Boulevard will require extensive collaboration and procedural approvals between the project developers and Caltrans. This process will include the establishment of a HIA (Highway Improvement Agreement) and the development of a PSR-PDS (Project Study Report-Project Development Support) as specified in Chapter 9 of the PDPM (Project Development Procedures Manual.) Working with the Caltrans Office of Project Studies on this process will provide a scope of approval for "projects-funded-by-others."
The PDPM can be found here: https://dot.ca.gov/programs/design/manual-project-development-procedures-manual-pdpm

In addition to the proposed tunnel, Caltrans has the jurisdiction for review and approval of any work that would affect the freeways and its facilities. Any proposed changes to any infrastructure within Caltrans right of way will require an encroachment permit and be subject to additional requirements to ensure current design standards and access management elements are being addressed.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2025-04877.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse