DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning 100 S. MAIN STREET, MS 16 LOS ANGELES, CA 90012 PHONE (213) 897-9140 FAX (213) 897-1337 TTY 711 www.dot.ca.gov



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JUL 1.2 2019 STATE CLEAKINGHOUSE

July 8, 2019

Mr. Eduardo Schonborn, AICP City of El Segundo Planning and Building Dept. 350 Main St. El Segundo, CA 90245

> RE: Continental Grand Campus Specific Plan – Recirculated Partial Draft Environmental Impact Report (Recirculated Partial DEIR) SCH# 2017011005 GTS # 07-LA-2017-02506 Vic. LA-1/PM: 25.169

Dear Mr. Eduardo Schonborn,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project's Recirculated Partial DEIR. The proposed project would allow for orderly expansion and ultimate build-out of the Mattel corporate headquarters. The project consists of constructing a new 14-story office building on the parcel located at 455 Continental Boulevard. Approximately 219,870 sf would be used for office space and approx. 73,290 sf would be used for design and development. An 8-level parking structure would be located on the parcel located at 455 Continental. Demolition of existing 57,082 sf building located at 1955 Grand Avenue and constructing a new 6-story office measuring up to 174,240 sf. Also a new surface parking lot would be located behind the structure.

Caltrans has reviewed the Recirculated Partial DEIR and has the following comments:

Because of this project's size, location, and potential impact to State facilities, Caltrans suggests the project's Traffic Impact Study (TIS) consider the following adjustments:

 The capacity of the off ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor (i.e. 85% of total queue length, etc.). The existing queue length should be calculated from traffic counts, actual signal timing and the actual percent of truck assignments with an adequate passenger car equivalent factor. The analyzed result may need to be calibrated with signal timing when necessary.

Impacts to off-ramps are considered significant if the traffic generated by the project causes queueing that: (a) exceeds 85% of the off-ramp's storage capacity; or (b) when an auxiliary lane is present, exceeds the lesser of one-half the length of auxiliary lane or 1,000 feet.

When analyzing intersections please consider utilizing Synchro 10. Also, for intersection analysis, instead of using signal timing optimization please use actual traffic signal timing.

- Considering the above, Caltrans suggests including additional queue analysis for Westbound (WB) State Route 105 (SR-105) off-ramp to Southbound (SB) Pacific Coast Highway utilizing synchro 10.

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- Additionally, please consider performing 85% queue analysis at EB 105 off-ramp to Imperial Highway utilizing Synchro 10.

- 2. Caltrans suggests including heavy vehicle volume/percentages in the analysis of the report.
- 3. On the HCM (Highway Capacity Manual) worksheet (page 3-1) "Existing PM Peak Hour" for Pacific Coast Highway at Imperial Highway, Eastbound (EB) of Imperial Highway, the queuing analyses were LOS F, D, E and showed only 5 cars per level of service respectively. Please elaborate on this conclusion.

Please consider the following comments on mitigation measures at Intersection No. 1, 5, 6, 18, and 20:

1. Considering MM TRAF-4 (Intersection No.1- PCH at Imperial Hwy), re-striping the northbound (NB) approach would create non-standard lane widths and require Caltrans' approval of design standard decision document (previously known as fact sheet).

- Please consider adding right-turn overlap phasing to the NB approach of the intersection and restrict U-turn movement of WB traffic.

 Considering MM TRAF-5 (Intersection No. 5- PCH at Grand Ave), Re-striping the WB approach would require nonstandard lane and/or shoulder widths and require Caltrans' approval of design standard decision document. In addition, this modification would require signal modification and result in conflicts with the NB pedestrian phasing.

- Please consider adding right-turn overlap phasing to the WB approach of the intersection and restrict U-Turn movement of SB traffic.

 Considering MM TRAF-6 (Intersection No. 6- PCH at El Segundo Blvd), Re-striping the WB approach would require nonstandard lane and/or shoulder widths and require Caltrans' approval of design standard decision document. In addition, this modification would require signal modification and result in conflict with the NB pedestrian phasing.

- Please consider adding right-turn overlap phasing to the WB approach of the intersection and restrict U-turn movement of SB traffic.

4. Considering MM TRAF-2 (Intersection No. 18- El Segundo Blvd at I-405 SB ramps),

- Caltrans concurs with the recommendation.

5. MM TRAF-3 (Intersection no. 20- El Segundo Blvd at I-405 NB ramps)

- Truck turning radius will need to be studied for addition of left turning movement, "cat-track" pavement markings may be needed as well.

6. The study stated that the above mitigation measures for intersections with significant impacts need to happen within Caltrans' right-of-way, therefore the impacts are unavoidable and will not be mitigated by the project. This response is incorrect and not permissible on the State Highway System. If there are potential mitigation measures that can be implemented, the impacts are not unavoidable. Through

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> the Caltrans' right-of-way encroachment permit process, it is still possible for the project to implement the above-mentioned mitigation measures on Caltrans right-of-way.

Further information included for your consideration:

Caltrans is moving towards replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impact. For any future project, like the proposed EIR, we encourage the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

Caltrans recommends the Lead Agency develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria as this is required by SB 743 in the near future.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Caltrans recommends the project to consider the use of methods such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping, be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2017-02506

Sincerely,

MIYA EDMONSON IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse