

**EXHIBIT NO. 11**

**LATE COMMENT RESPONSE TO THE DRAFT SEIR  
(CALTRANS)**

**STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION**  
(Email of 2/20/18)

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**From:** Lin, Alan S@DOT [alan.lin@dot.ca.gov]  
**Sent:** Tuesday, February 20, 2018 9:30 AM  
**To:** Richard Garland; Ethan Edwards  
**Cc:** Ghausi, Yunus M@DOT; Lee, Frances M@DOT  
**Subject:** FW: District at South Bay

Hi Ethan and Richard,

Since I did not receive a phone call from the City engineer, here are Caltrans concerns.

Attached please see the Existing Condition and Existing Plus Project peak hour traffic volumes. Location #2, Figueroa St./I-405 NB off-ramp shows 292(131) volume for right turn and 197(77) volume for left turn for both conditions. Please clarify!

However, on Table 6 (attached), the Existing and Existing +Project shows delay with significant traffic impact.

	Existing	Existing + Project
AM	143.3	165.4
PM	84.6	98.3

In the worst case scenario from the analysis, this project would have significant traffic impact at location #2 and should be liable to improve the existing plus project condition. Therefore, we recommend the City to consider to condition the developer to install signal at this location or propose other mitigation at this location.

Please let me know if you have any question.

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1. Figueroa St/405 SB On Ramp	2. Figueroa St/405 NB Off Ramp	3. S Main St/405 SB On Ramp	4. S Main St/405 NB Off Ramp	5. S Vermont Ave/Del Amo Blvd	6. Hamilton Ave/Del Amo Blvd	7. Figueroa St/Del Amo Blvd	8. S Main St/E Del Amo Blvd
603 (739) 603 (115) 603 (1175)	800 (747) 202 (131) 107 (77)	648 (508) 648 (130) 648 (130)	648 (508) 648 (130) 648 (130)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)
603 (739) 603 (115) 603 (1175)	800 (747) 202 (131) 107 (77)	648 (508) 648 (130) 648 (130)	648 (508) 648 (130) 648 (130)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)	308 (187) 308 (170) 308 (170)





ID	N/S Street Name	E/W Street Name	Intersection Control	Jurisdiction [1-3]	Analysis Period	Existing	Existing - Project	Project Increase	Significant Impact?	Existing + Project + Mitigations	Project Increase	Significant Impact?
						V/C or Delay [5]	V/C or Delay [6]	In V/C or Delay [5]		V/C or Delay [5]	In V/C or Delay [5]	
1	Figueras St	I-405 SB On Ramp	Unsignalized	City of Carson/Caltrans	AM	0.9	0.9	0.0	NO			
2	Figueras St	I-405 NB Off Ramp	TWSC	City of Carson/Caltrans	PM	7.9	143.3	22.1	NO			
					PM	84.6	98.3	13.7	NO			
3	S Main St	I-405 SB On Ramp	Signalized	City of Carson/Caltrans	AM	0.07	0.718	0.071	NO			
4	S Main St	I-405 NB Off Ramp	Signalized	City of Carson/Caltrans	PM	0.443	0.923	0.076	NO			
5	S Vermont Ave	Del Amo Blvd	Signalized	City of Carson/Caltrans	AM	0.891	0.929	0.038	YES	0.447	0.004	NO
					PM	0.847	0.701	0.031	NO	0.721	-0.170	NO
6	Hamilton Ave	Del Amo Blvd	Signalized	City of Los Angeles	AM	0.683	0.768	0.085	YES	0.654	-0.029	NO
7	Figueras St	Del Amo Blvd	Signalized	City of Los Angeles	PM	0.412	0.886	0.144	YES	0.731	-0.011	NO
8	S Main St	E Del Amo Blvd	Signalized	Los Angeles County	AM	0.440	0.815	0.079	YES	0.582	-0.058	NO
9	Stamps Dr	Del Amo Blvd	Project Intersection	City of Carson	PM	0.918	0.930	0.134	YES	0.763	-0.028	NO
10	S Avalon Blvd	E Del Amo Blvd	Signalized	City of Carson	AM	0.643	0.826	0.083	YES	0.816	-0.027	NO
11	Hamilton Ave	I-10 SB Ramps	ATVSC	Los Angeles County/Caltrans	PM	0.892	0.993	0.101	YES	0.901	0.009	NO
12	Figueras St	I-110 NB Ramps	Signalized	Los Angeles County/Caltrans	AM	0.648	1.009	0.182	YES	0.741	-0.105	NO
13	Main St	Leonardo Dr	Project Intersection	City of Carson	PM	0.711	0.482	0.307	YES	0.716	0.025	NO
14	Hamilton Ave	W Torrance Blvd	Signalized	Los Angeles County	AM	0.733	0.581	0.013	NO			
15	Figueras St	W Torrance Blvd	Signalized	City of Carson	PM	0.624	0.655	0.031	NO			
16	S Main St	W Torrance Blvd	Signalized	City of Carson	PM	0.795	0.852	0.057	NO			
17	Leonardo Dr	I-405 SB Ramps	Project Intersection	City of Carson	PM	0.782	0.874	0.092	NO			
18	S Avalon Blvd	I-405 SB Ramps	Signalized	City of Carson	AM	0.631	0.710	0.079	NO			
19	S Avalon Blvd	I-405 NB Ramps	Signalized	City of Carson	PM	0.753	0.827	0.074	NO			
20	S Main St	E 213th St	Signalized	City of Carson	AM	0.640	0.905	0.065	YES	0.678	-0.129	NO
21	S Avalon Blvd	E 213th St	Signalized	City of Carson	PM	0.745	0.861	0.096	YES	0.803	-0.007	NO
22	S Vermont Ave	W Carson St	Signalized	Los Angeles County	AM	0.808	0.901	0.085	YES	0.863	-0.073	NO
23	Figueras St	W Carson St	Signalized	City of Carson	PM	0.747	0.794	0.047	YES	0.732	-0.015	NO
24	S Main St	W Carson St	Signalized	City of Carson	PM	1.063	1.172	0.109	YES	0.696	-0.367	NO
25	S Avalon Blvd	E Carson St	Signalized	City of Carson	AM	0.535	0.679	0.089	NO			
26	I-405 SB Ramps	E Carson St	Signalized	City of Carson/Caltrans	PM	0.896	0.996	0.100	YES	0.785	-0.026	NO
27	I-405 NB Ramps	E Carson St	Signalized	City of Carson/Caltrans	PM	0.667	0.667	0.000	NO	0.904	0.008	NO
					PM	0.417	0.441	0.024	NO			
					PM	0.479	0.564	0.025	NO			

Note: Two-Way Stop Controlled

ATVSC: All Way Stop Controlled

[1] Methodology varies by Jurisdiction. If an intersection is located along a City border, both methodologies are applied.

Signalized intersections within the City of Carson and Los Angeles County are analyzed with ICU methodology but have different impact thresholds based on jurisdiction.

Un-signalized intersections within the City of Carson are analyzed with CMA methodology.

Un-signalized intersections within the City of Carson are analyzed with HCM 2010. If the worst approach LOS is E or F, then impacts are determined based on ICU V/C.

[2] Existing analysis evaluates LOS under construction lane configurations. Future analysis assumes post-construction lane configurations.

[3] Not all mitigations modeled are feasible. Mitigations at intersections under the jurisdiction of the City of Los Angeles, Los Angeles County, or Caltrans will require further coordination and detailed design review with the relevant jurisdiction to determine the feasibility of the mitigation. Any mitigation that is determined to be infeasible would be determined to be significant and unavoidable.

**CITY RESPONSE TO STATE OF CALIFORNIA, DEPARTMENT OF  
TRANSPORTATION (EMAIL OF 2/20/18)**

The commenter states in the “worst case scenario” from the traffic analysis of Caltrans facilities, the proposed modified Project would have significant traffic impact at Location No. 22, Figueroa St./I-405 NB off-ramp, in the Existing Plus Project condition and that the City should consider mitigation to address the significant impact. The commenter provides no data or significant criteria to support the commenter’s conclusion that there will be a significant impact. The commenter recommends the City consider conditioning the developer to install a traffic signal at this location or propose other mitigation at this location.

As a preliminary matter, this is not a “new” project. Instead, the SEIR provides additional evaluation of the impacts of the proposed modified Project and compares those results to the impacts of the approved Project. The purpose of the subsequent analysis in the SEIR is to determine if the proposed modified Project involves any new significant impacts that were not previously evaluated in the FEIR.

The commenter is incorrect that there would be a significant impact at Location No. 2. At Location No. 2, Figueroa St./I-405 NB off-ramp, the HCM LOS for the proposed modified Project indicated an LOS of F, but the proposed modified Project-related increase in V/C was only 0.011 in the AM and 0.016 in the PM. Additionally, the incremental project related increase in V/C at this location for the original, approved Project as analyzed under 2017 conditions was 0.001 lower during the AM peak period and 0.003 higher during the PM peak period.

The traffic study for the proposed modified Project also includes an off-ramp queuing analysis at Location No. 2 (Table 11 of the Traffic Study, Appendix D to the Final SEIR) using Highway Capacity Manual (HCM) 2010 methodology as requested by Caltrans. The analysis indicated that at 95th percentile queue, Location No. 2, Figueroa St./I-405 NB off-ramp, would not exceed existing storage length capacity under any of the scenarios analyzed for the proposed modified Project. The available storage capacity is 640 feet and under the Future plus Project scenario (the most intensive traffic scenario in terms of total trips) the 95th percentile queue was estimated at 428 feet.

As a result, an impact was not identified at this location for the proposed modified Project per City of Carson LOS methodology and no project related adverse effect was identified as part of the off-ramp queuing analysis for the I-405 NB off-ramp at Figueroa Street. Since Caltrans does not have specific intersection traffic impact criteria, it is not clear what is meant by the location “shows delay with significant traffic impact” under these circumstances. Since the application of the City of Carson significance thresholds does not show a significant impact, no mitigation is necessary or required.

Under these circumstances there is no significant traffic impact for the proposed modified Project at Location No. 2.