

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

Governor's Office of Planning & Research

DEC 06 2019

STATE CLEARINGHOUSE

December 6, 2019

Ms. Elisa Ventura, PE
City of Pasadena
150 S. Los Robles Avenue, Suite 200
Pasadena, CA 91101

RE: Arroyo Seco Canyon Project Area 2 and 3 –
Notice of Preparation (NOP)
SCH # 2014101022
GTS # 07-LA-2019-02909
Vic. LA-210/PM: R21.325

Dear Ms. Elisa Ventura:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project involves water infrastructure improvements in the Arroyo Seco Canyon to allow for the diversion and spreading of up to 25 cubic feet per second (cfs) of surface water. Improvements in Area 2 involve the demolition and replacement of an existing diversion facility and intake structure in the same general location. Improvements in Area 3 involve the reconfiguration and expansion of existing spreading basins. The project objective is to increase the beneficial use of the City's surface water rights and to improve biological functions within the Arroyo Seco. The City of Pasadena is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The proposed project is located approximately 1.25 miles away from Interstate 210 (I-210) and 3.5 miles away from State Route 134 (SR-134).

After reviewing the NOP, Caltrans agrees that project-related construction truck activities, in combination with the ongoing sediment removal activities associated with the Devil's Gate Reservoir project, have the potential to result in cumulative short-term impacts and that this topic should be further evaluated in the forthcoming Draft Environmental Impact Report (DEIR). The transportation impact analysis that will be part of the upcoming DEIR may need to include the following locations, due to their proximity to the project site and the size of the project. Also, some of the below locations were identified in the NOP as facilities that construction trucks will use for this project:

- SR-134 & Figueroa Street/School Canyon Road off-ramp and on-ramp
- I-210 & Windsor Avenue off-ramp and on-ramp
- I-210 & Foothill Boulevard off-ramp and on-ramp
- I-210 & Berkshire Place off-ramp and on-ramp

Also, queueing analyses should be provided for the above off-ramps, since excessive queueing at off-ramps increases the potential for traffic conflicts.

Since the City of Pasadena adopted a Vehicles Miles Traveled (VMT) metric for transportation analysis in 2014, Caltrans looks forward to reviewing the potential VMT analyses for the above locations, and to provide further comments, if warranted.

If it is found that any of the above locations will be significantly impacted by the project, Caltrans looks forward to reviewing the proposed mitigation measures for those locations.

The following information is included for your consideration.

Caltrans applauds the City of Pasadena for its early adoption of the VMT metric, which assists the State in meeting greenhouse gas emissions reductions targets and reducing VMT. Please continue to make every attempt to reduce VMT, and in particular the potential VMT generated from construction trips for this project. For TDM options that can reduce VMT, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>

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. Since construction traffic is expected to cause delays on State facilities such as I-210, please submit a construction traffic management plan detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2019-02909.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse