

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

TTY 711

www.dot.ca.gov

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STATE CLEARINGHOUSE

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Ashley McBride, Associate Planner
City of Livermore, Planning Division
1052 South Livermore Avenue
Livermore, CA 94550

Project: Isabel Neighborhood Specific Plan (INSP) Update – Notice of Preparation (NOP)/Initial Study (IS)

Dear Ashley McBride:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the INSP Update. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the November 2019 NOP/IS.

Project Understanding

The City of Livermore (City) is now considering allowing the INSP to proceed with a Valley Link Station due to the Bay Area Rapid Transit (BART) Board of Directors' decision to not advance BART to Livermore. The Valley Link rail project is a fixed-rail service from the existing Dublin/Pleasanton BART Station to the approved Altamont Corridor Express (ACE) North Lathrop Station, with an ultimate Phase II extension to Stockton. Similar to the BART to Livermore Extension project, Valley Link proposes a rail station at Isabel Avenue. The City intends to retain the proposed base land use designations, allowable densities/intensities, and urban design and other features of the INSP. The only proposed amendments to the INSP are 1) the removal of a parking overlay designation in a small area north of the station, and 2) the incorporation of station design changes. The project is adjacent to both Interstate (I)-580 and State Route (SR)-84. According to Plan Bay Area 2040, the INSP is indicated as a potential Priority Development Area.

Travel Demand Analysis

Please submit an updated travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis resulting from the proposed project. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. Please ensure that the travel demand analysis includes a VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Draft Guidelines. Projects that result in automobile VMT per capita greater than 15% below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

With respect to the local and regional roadway system, provide project related trip generation, distribution, and assignment estimates. To ensure that queue formation does not create traffic conflicts, the project-generated trips should be added to the existing, future and cumulative scenario traffic volumes for the intersections and freeway ramps listed below. Potential queuing issues should be evaluated including on-ramp storage capacity and analysis of freeway segments near the project; turning movements should also be evaluated. In conducting these evaluations, it is necessary to use demand volumes rather than output volumes or constrained flow volume.

- Intersections and Ramps:
 - I-580 and Isabel Avenue on- and off-ramps

Valley Link Coordination

Please ensure that the appropriate coordination between this project and the Valley Link project takes place, especially given that the Valley Link project is currently going through its own separate environmental review process.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4: Suburban Communities** where location efficiency factors, such as community design, are often weak and regional accessibility varies. Given the place, type and size of the project, the INSP should, at minimum, retain its Transportation Demand Management (TDM)

measures as described in the 2018 Draft Environmental Impact Report (DEIR) to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would help meet Caltrans Strategic Management Plan sustainability goals.

Additionally, the project should ensure that Valley Link connects with frequent transit services such as Livermore Amador Valley Transit Authority's Route 30R.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Transportation Impact Fees

The Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the INSP; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. The City should also consider fair share fees for shuttles that use the public curb space.

The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is prepared along with the General Plan. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Construction-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the EIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Prior to construction, coordination is required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Utilities

Any utilities that are proposed, moved or modified within Caltrans' ROW shall be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltrans-issued encroachment permit.

Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires a Caltrans-issued encroachment permit. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Ashley McBride, Associate Planner
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-5433 or andrew.chan@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse