DEPARTMENT OF TRANSPORTATION

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October 14, 2019

Mr. Paul Lam City of Alhambra, Community Development Department 111 South First Street Alhambra, CA 91801

> RE: The Villages at the Alhambra – Draft Environmental Impact Report (DEIR) SCH # 2017101025 GTS # 07-LA-2017-02799 Vic. LA-710/PM: 27.475 LA-10/PM: 22.692

Dear Mr. Paul Lam:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project would construct 1,061 residential units, a 490 space parking structure, and associated open space, landscape, and vehicle/pedestrian circulation areas to accompany the existing 902,001 square feet of office space that would be retained. The City of Alhambra is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are Interstate 710 (I-710) and I-10. From reviewing the DEIR, Caltrans has the following comments:

- We concur that the W Valley Blvd & I-710 SB On-ramp intersection will be significantly impacted by the project. We also have transportation concerns about the W Valley Blvd & I-710 NB Off ramp intersection.
- All mitigation measures on state facilities need final approval from Caltrans. We invite the City of Alhambra to meet with us to discuss any potential mitigation measures. Please contact the project coordinator with potential dates and times for a meeting.
- We also concur that a signal is warranted at the W Hellman Ave & I-10 WB Ramps intersection. Various projects within the City of Alhambra have contributed to the existing conditions at this intersection, including the US Storage Centers project, which did not seek an encroachment permit from Caltrans prior to its completion. Since any project using the I-10 WB Ramps at this intersection will cause a significant cumulative impact this location, Caltrans invites the City of Alhambra to discuss the installation of a signal at this location during the previously mentioned meeting.
- Please keep Caltrans informed of future transportation infrastructure projects, as such as the I-10/Fremont Avenue On- and Off-Ramp Reconfiguration Project.

In addition, since construction traffic, such as haul trucks, could cause delays on any State facilities, such as the I-10 and I-710, please submit the Work Zone Traffic Control Plan detailing these delays for Caltrans' review. We support the measure discussed in the DEIR to schedule deliveries and material pick-ups during non-peak travel periods to the greatest extent possible. We also support the strategy to coordinate truck loading and offloading times to reduce truck idling time. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will

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need a Caltrans transportation permit.

In regards to the provision of 907 new vehicle parking spaces, Caltrans recommends that additional Transportation Demand Management measures be implemented to reduce the need to create additional parking. This is because, as stated in Caltrans' response dated November 13, 2017 to the Notice of Preparation for this project, research on parking suggests that abundant vehicle parking promotes driving, which in turn promotes increased Vehicle Miles Traveled (VMT) and greenhouse gas production. Efforts such as submitting parking variances to reduce parking requirements and providing bicycle storage are effective in reducing parking requirements. However, additional TDM strategies such as unbundling the price of parking and rental units, and offering transit passes to residents, should also be considered to further decrease the proposed parking supply.

As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743 Technical Advisory.pdf.

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-2017-02799.

MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse