

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

November 7, 2019

NOV 12 2019

STATE CLEARINGHOUSE

Mr. John Mayer
City of Monrovia
415 S. Ivy Avenue
Monrovia, CA 91016

RE: Alexan Foothills Specific Plan and
Development Project
Vic. LA-210/PM R33.921
SCH # 2018101058
Ref. GTS # LA-2018-02038-NOP
GTS # LA-2018-02847-DEIR

Dear Mr. Mayer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City of Monrovia is proposing amendments to the General Plan and Zoning Code to change the land use designation for 9.6 acres of land from "manufacturing" to "Planned Development". The proposed development would allow up to 436 dwelling units and 798-stall parking structure.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (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. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

After reviewing the Draft Environmental Impact Report for this project based on Level of Service (LOS), Caltrans has the following comments:

1. From the Traffic Impact Analysis (TIA) prepared in May 2018 by LSA, it was stated that the project would generate net 1,938 daily trips and 143/194 AM/PM peak hour trips per Table B Trip Generation Summary. There are 9 related projects in the project vicinity generating 8,689 average daily trips and 727/711 AM/PM peak hour trips. Many of the project and related trips would be traveling on the State facilities once the projects are built. Cumulative project trips assigning to the State facilities would contribute potential cumulative traffic impacts on the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate potential cumulative traffic impacts.
2. For Location #8 Myrtle Avenue/Central Avenue I-210 WB Ramps, existing LOS is C/D during AM/PM peak hours; cumulative plus project LOS is D/E during AM/PM peak hours. For Location #9 Myrtle Avenue/Evergreen Avenue I-210 EB Ramps, existing LOS is B/D for AM/PM peak hours; cumulative plus project LOS is C/E during AM/PM peak hours. Significant cumulative traffic impact should only be compared to the existing condition for the traffic that would affect on the State facilities. We concluded both Location #8 and #9 would contribute significant cumulative traffic impact. We recommend the City to propose mitigations on both locations.

3. On page 32 of the TIA, the report indicated that project will result in a significant impact to Location #8, however there is no mitigation proposed. Please clarify! Last sentence of this page, "If this program is adopted prior to the final entitlement of the proposed project, the project may be asked to participate in the program rather than implement the improvement at Myrtle Avenue/Central Avenue and the I-210 westbound ramps." Again, there is no mitigation proposed at this location.
4. For off-ramp analysis on page 31 of TIA, a factor of safety should be used for vehicle storage capacity. Otherwise, potential rear-end accident would occur before any improvement can be implemented. Caltrans typically recommends 15% factor of safety for the off-ramp analysis in which the vehicle storage capacity should not exceed $990 \times 85\% = 842$ feet for Myrtle Avenue/Central Avenue I-210 WB off-ramp and $1,630 \times 85\% = 1,386$ feet for Myrtle Avenue/Evergreen Avenue I-210 EB off-ramp. For these reasons, we concluded that both off-ramps would need to be improved.
5. We acknowledge that the City is in the process to study an area-wide Transportation Impact Fee that would allow new development to pay a trip fee to assist in project mitigation. We recommend the City to include improvements on the State facilities, and we would like to have the opportunity to assist the City in preparing such study.
6. If feasible mitigations are proposed, the City can collect the fee and implement the mitigation or mitigation agreement can be signed between Caltrans and the developer.
7. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.
8. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.
9. As a reminder, in the event that the project proponent finds a significant impact to an intersection including safety traffic issue, an Intersection Control Evaluation (ICE) should be prepared as an initial step of an intersection improvement project.

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If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2018-02847AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse