## DEPARTMENT OF TRANSPORTATION

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## Jul 08 2020

## **STATE CLEARINGHOUSE**

RE: Seven Patios Mixed Use Residential/Commercial Retail Project – Mitigated Negative Declaration (MND) SCH # 2020069046 GTS # 07-LA-2020-03303 Vic. LA-110/PM:30.712

Dear Kanika Kith:

July 8, 2020

Kanika Kith

City of South Pasadena 1414 Mission Street

South Pasadena, CA 91030

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project would involve the demolition of an existing office building and parking lot, and the construction of a new mixed-use project consisting of residential, retail, and restaurant uses on a 1.61-acre site. Specifically, the project would consist of 57 residential units, approximately 6,100 square feet of commercial retail space for restaurant (3,050 square feet) and retail uses (3,050 square feet), and two levels of underground parking. The project site is located at 845 El Centro Street/832 Orange Grove Place, which is approximately 700 feet away from the Metro Gold Line South Pasadena Station. The City of South Pasadena is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest state facility to the project is State Route 110 (SR-110), which has on and off ramps at Orange Grove Avenue located approximately 2,000 feet away from the project.

From reviewing the MND, Caltrans has the following comments:

- The transportation impacts of this project were analyzed in terms of both Level of Service (LOS) and Vehicle Miles Traveled (VMT), with the primary focus on LOS impacts. As discussed in the MND, 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. This MND was released for public review before July 1<sup>st</sup>, therefore, the City of South Pasadena was not required to primarily focus on VMT in the MND or adopt VMT analysis guidelines at the time of this MND's release. However, going forward, Caltrans encourages the City of South Pasadena to establish VMT analysis guidelines and use VMT as the primary metric in determining transportation impacts for its future development projects.
- Since the City analyzed transportation impacts in terms of both LOS and VMT, and the July 1, 2020 deadline has passed, Caltrans has reviewed this MND from a VMT perspective. We agree with the determination that this project can be presumed to have a less than significant impact, per the Technical Advisory on Evaluating Transportation Impacts in CEQA, written by the California Governor's Office of Planning and Research (OPR) and dated December 2018.
- As discussed in the MND, a presumption of less than significant impacts can be made because



the project is located within a Transit Priority Area and meets the following criteria:

- Has a floor area ratio of more than 0.75.
- Does not include more parking than required by the local permitting agency.
- Is consistent with the region's Sustainable Communities Strategy.
- Does not replace affordable residential units with a smaller number of moderate- or highincome residential units.

Therefore, the following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as being located within a Transit Priority Area and providing six bicycle parking spaces. Additional TDM strategies that the City of South Pasadena may want to consider integrating into this project in order to further reduce VMT include:

- Provide additional bicycle parking and ensure that the parking provided is secure and accessible.
- Confirm that project site driveways are designed to allow vehicle drivers to clearly see any approaching pedestrians or bicyclists at a safe sight-distance.
- Provide transit incentives and discounts to residents of the site, to facilitate increased use of nearby transit services, including the Metro Gold Line.

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. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control 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-2020-03303.

Sincerely,

Miya Edmonson

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