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

Apr 21 2021

STATE CLEARING HOUSE

April 21, 2021

Clare Lin City of Sierra Madre 232 West Sierra Madre Boulevard Sierra Madre, CA 91024

> RE: Sierra Madre General Plan Housing, Land Use, Safety, and Circulation Element Update – Notice of Preparation of an Environmental Impact Report (NOP) SCH # 2021040369 GTS # 07-LA-2021-03556

Dear Clare Lin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project consists of a comprehensive update to the Housing Element as well as related updates to the Land Use Element and Land Use Map of the City of Sierra Madre General Plan. The project also includes updates to the City's Zoning Code, Zoning Map, Safety Element, and Circulation Element. The City of Sierra Madre is the Lead Agency under the California Environmental Quality Act (CEQA).

The citywide project is located near the Interstate 210. From reviewing the NOP, Caltrans has the following comments:

- We support replacing references to level of service (LOS) thresholds in the Circulation Element with vehicle miles traveled (VMT) thresholds, because 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 (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The City can also refer to Caltrans' updated Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), dated May 2020 and released on Caltrans' website in July 2020: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City's reference: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf.

Clare Lin April 21, 2021 Page 2 of 2

> Caltrans looks forward to reviewing the forthcoming DEIR for this project and providing comments, if warranted.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For more TDM options to include in this project's updated elements and codes, 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.

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-2021-03556.

Sincerely,

MIYA EDMONSON

IGR/CEQA Branch Chief

Miya Edmonson

cc: Scott Morgan, State Clearinghouse