

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

November 9, 2020

Governor's Office of Planning & Research

**Nov 10 2020**

**STATE CLEARINGHOUSE**

Lisa Levy Buch  
Chief Communication Officer  
Metro Gold Line Foothill Extension Construction Authority  
406. E. Huntington Drive, Suite 202  
Monrovia, CA 91016-3633

RE: Metro Gold Line Foothill Extension  
Phase 2B – Draft Supplemental  
Environmental Impact Report  
(Draft SEIR)  
SCH # 2010121069  
GTS # 07-LA-2018-03377  
Vic. LA-210/PM: R 38.982 to SBD-  
10/PM: R1.115

Dear Lisa Levy Buch:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Draft Supplemental Environmental Impact Report (Draft SEIR). This Draft SEIR evaluates the environmental effects of the potential modifications to the Project approved by the Construction Authority and described in the 2013 FEIR and subsequent environmental actions (but not including the TPSS/LADWP refinement described in Addendum No. 3 and Modifications No. 6 and No. 7 described in Addendum No. 4),. Like the 2013 FEIR and subsequent environmental actions, this Draft SEIR is intended to provide information to the public, the Authority Board, and responsible and trustee agencies regarding the potential significant environmental impacts of the Project Modifications and to identify measures to reduce or eliminate any significant impacts.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT). Effective July 1<sup>st</sup>, 2020, Caltrans replaced LOS with VMT when evaluating traffic impacts.

After reviewing the project's Draft SEIR Caltrans has the following comments:

- Caltrans supports projects like the Metro Gold Line Extension that provide safe, reliable and equitable transportation in a manner that reduces VMT. Based on the Governor's Office of Planning and Research Technical Advisory, dated December 2018, transit and active transportation projects generally reduce VMT, therefore this project is presumed to cause a less-than-significant impact to the State transportation system.

- The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Therefore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to meet these goals. For examples of TDM options, 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>.
- Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.

Further information included for your consideration:

Please consider integrating transportation and land use in a way that reduces 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.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Also, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

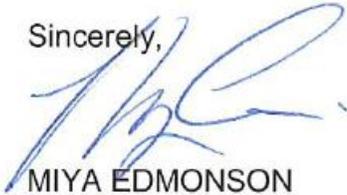
As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods

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Finally, The Draft SEIR indicates that significant earth moving activities may take place during construction. Please consider covering all vehicles hauling dirt and sediment as unplanned spills can potentially adversely impact the performance of the state highway system.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-LA-2018-03377

Sincerely,

A handwritten signature in blue ink, appearing to read 'Miya Edmonson', is written over the word 'Sincerely,'.

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