

DEPARTMENT OF TRANSPORTATION

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8/10/2020

Governor's Office of Planning & Research

Jul 27 2020**STATE CLEARINGHOUSE**

July 27, 2020

Sonya Lui
City of Whittier Community Development Department
13230 Penn Street
Whittier, CA 90602

RE: Whittier Library Renovation Project –
Mitigated Negative Declaration (MND)
SCH # 2020070216
GTS # 07-LA-2020-03312
Vic. LA-72/PM: 4.065

Dear Sonya Lui:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The Whittier Library Renovation Project will consist of demolition, remodeling, and 5,211 square feet of new construction at the existing library located at 7344 Washington Avenue in Whittier, CA. The City of Whittier is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 3,400 feet away from State Route 72 (SR-72) at Mar Vista Street. From reviewing the MND, Caltrans has the following comments:

- 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. 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. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-5-20-approved-vmt-focused-tisg-a11y.pdf>.
- The MND states that the City of Whittier is in the process of adopting criteria for the uniform evaluation of VMT impacts under CEQA. Caltrans encourages the City to finalize this adoption as soon as possible, as the statewide implementation date for Senate Bill 743 is July 1, 2020. As discussed in Caltrans' new TISG, Caltrans strongly recommends that the City's new VMT methodology is consistent with OPR's Technical Advisory.
- In the meantime, the City has conducted a qualitative analysis of this project's VMT impacts. Caltrans concurs that this project will have a less than significant transportation impact. This is because based on OPR's Technical Advisory, "In any area of the state, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that

generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.” This project meets these criteria.

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 Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as providing patrons and employees with information regarding the availability of transit options in the vicinity of the site. Additional TDM strategies that the City of Whittier may want to consider integrating into this project in order to further reduce VMT include:

- Verify that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Ensure that no more parking than required by the local permitting agency is provided.
- Consider reducing parking through providing bicycle or carpool spaces.
- Provide an adequate number of short-term and long-term bicycle parking spaces.
- Offer transit incentives and discounts to library patrons and employees, to facilitate increased use of nearby transit services.

For more 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>

Also, 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-2020-03312.

Sincerely,



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