

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.

9/11/2020

Governor's Office of Planning & Research

Sep 10 2020**STATE CLEARINGHOUSE**

September 10, 2020

Matt Chang
City of San Gabriel
Community Development Department
Planning Division
425 South Mission Drive
San Gabriel, CA 91776

RE: 414 South San Gabriel Boulevard Project –
Mitigated Negative Declaration (MND)
SCH # 2020080157
GTS # 07-LA-2020-03337
Vic. LA-164/PM: 6.9

Dear Matt Chang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project proposes a 199,358-square foot building with approximately 190,232 square feet of self-storage and 9,126 square feet of executive artists space on a 1.75-gross acre site. The self-storage facility would include a 1,000-square foot ground floor rental office. The executive artist space would include a 1,000-square foot community arts space fronting South San Gabriel Boulevard. The proposed structure would be four stories with one level of subterranean self-storage space along South San Gabriel Boulevard, while a partial fifth story with one level of subterranean self-storage space would be provided along Commercial Avenue and Gladys Avenue. The City of San Gabriel is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4,500 feet away from the State Route 164 (SR-164) and Broadway intersection. It is also located approximately 2 miles away from the Interstate 10 (I-10) and San Gabriel Boulevard interchange. From reviewing the MND, Caltrans has the following comments:

- As stated in the MND, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020.
- In the MND, both a Level of Service (LOS) analysis and a VMT analysis were provided. Since the SB 743 deadline has passed, Caltrans has reviewed this project primarily from a VMT perspective.
- Caltrans concurs that the project's self-storage component can be considered local-serving retail and thus presumed to have a less than significant transportation impact, because it would generate substantially less trips than a typical 50,000 square foot retail establishment and would improve the proximity of self-storage facilities for residents in northern San Gabriel, San Marino, Temple City and Arcadia. These effects would reduce VMT.
- Also, while Caltrans commends the City for adopting VMT as a metric to evaluate transportation impacts, Caltrans also strongly recommends that the City to update its *Traffic*

Study Guidelines for Development Projects in the City of San Gabriel so that VMT is the primary basis for determining significant transportation impacts of future projects in the City.

- For more information on determining transportation impacts in terms of VMT on the State Highway System, the City can 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 Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, dated December 2018.
- 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 July 2020 and found here, for the County's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.

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 one long-term and two short-term bicycle spaces. Additional TDM strategies that the City of San Gabriel may want to consider integrating into this project in order to further reduce VMT include:

- Provide additional long-term and short-term bicycle spaces.
- Ensure that improvements to sidewalks, curbs, and gutters are ADA compliant.
- Verify that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.

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 the Traffic Management 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-2020-03337.

Sincerely,



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