

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



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Governor's Office of Planning & Research

Sep 16 2020**STATE CLEARINGHOUSE**

September 16, 2020

Carey Upton
Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, CA 90404

RE: Malibu Middle and High School Campus
Specific Plan and Local Coastal Plan
Amendment Project – Notice of Preparation
of Environmental Impact Report (NOP)
SCH # 2020080350
GTS # 07-LA-2020-03345
Vic. LA-1/PM: 55.772

Dear Carey Upton:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project would redevelop and modernize the existing Malibu Middle and High School (MMHS) campus and former Juan Cabrillo Elementary School (JCES) campus to create three distinct areas: Middle School Core, High School Core, and shared facilities. Implementation of the project would result in demolishing all 11 buildings on the former JCES campus and 7 buildings on the MMHS campus, for a total of 147,556 square feet of demolition. The project would result in 32 classrooms and 8 labs, for a total of 190,967 square feet of building space. After project completion, the MMHS campus will have a total of 47 classrooms and 12 labs, for a total of 240,650 square feet of building space. In addition, the project will provide 451 parking spaces. The Santa Monica-Malibu Unified School District is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 0.25 miles northeast of the Pacific Coast Highway (PCH). From reviewing the NOP, Caltrans has the following comments:

- As discussed in the Initial Study, 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. 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 school district 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 OPR's 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 July 2020 and found here, for the school district’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.

- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans’ new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR’s Technical Advisory.

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 VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as a pedestrian trail system. Additional TDM strategies that the school district may want to consider integrating into this project in order to further reduce VMT include:

- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Verify that no more parking than required by the local permitting agency is provided.
- Provide safe and secure bicycle parking for students and employees.

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-2020-03345.

Sincerely,



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