

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research

**Sep 01 2020**

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August 31, 2020

**STATE CLEARINGHOUSE**

Carlene Saxton  
City of Palmdale  
38250 Sierra Highway  
Palmdale, CA 93550

RE: Palmdale Transit Area Specific Plan –  
Negative Declaration (ND)  
SCH # 2020080470  
GTS # 07-LA-2020-03352  
Vic. LA-138/PM: 44.426

Dear Carlene Saxton:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced ND. The City of Palmdale has developed the Palmdale Transit Area Specific Plan (PTASP) that proposes a framework and development strategy for a pedestrian-oriented mixed-use district surrounding the City of Palmdale's Transportation Center (PTC) and the future high-speed rail (HSR) station. The PTASP planning area covers 746 acres and is generally bounded by Technology Drive, State Route 14 (SR-14), a row of parcels south of Palmdale Boulevard (State Route 138), and a row of parcels east of 10th Street East, within the City of Palmdale. The PTASP intends to coordinate land uses, development intensity, building scale, and aesthetic characteristics of future development to create a mixed-use neighborhood with amenities for existing and future residents, employees, and visitors. The purpose of the PTASP is to support and sustain existing and planned transit services in the planning area. Implementation of the specific plan is anticipated to lead to future development by 2035 of 1,229 new dwelling units and 4.92 million square feet of nonresidential uses. The City of Palmdale is the Lead Agency under the California Environmental Quality Act (CEQA).

Since the PTASP planning area is located near SR-14 and State Route 138 (SR-138), Caltrans has reviewed ND and has the following comments.

Caltrans supports plans such as the PTASP. These types of plans support the creation of jobs and housing near transit, which decreases Vehicle Miles Traveled (VMT). Furthermore, decreases in VMT also decreases greenhouse gas emissions and improves air quality. These are outcomes that several of Caltrans' sustainability policies, as well as Senate Bill (SB) 743 (2013), aim to achieve.

SB 743 mandates that VMT, as opposed to Level of Service (LOS), be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020.

Future development projects associated with the PTASP and located near State facilities should be analyzed in terms of VMT, as the SB 743 implementation deadline has passed and the policy is intended to be applied prospectively. 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](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf). Within this technical advisory, Caltrans recommends the City refer to the section "Presumption of Less Than Significant Impact Near Transit Stations". This section will be particularly relevant for future projects within the PTASP area.

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-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

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 City'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 analyses of future developments associated with the PTASP and located near State facilities, such as SR-138 and SR-14. If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2020-03352.

Sincerely,



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