

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



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Governor's Office of Planning & Research

**Nov 05 2020**

November 4, 2020

**STATE CLEARINGHOUSE**

Julia Lee,  
Deputy Public Works Director  
City of South Pasadena  
1414 Mission Street  
South Pasadena, CA 91030

RE: City of South Pasadena 2020 Climate Action  
Plan – Draft Initial Study - Negative  
Declaration (DIS-ND)  
SCH # 2020100107  
GTS # 07-LA-2020-03390  
Vic. South Pasadena

Dear Julia Lee:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City is preparing the 2020 CAP to include measures addressing municipal and communitywide GHG emissions. Using the 2016 GHG emissions as a baseline, the City is committed to a GHG emissions reduction target of 40 percent below 2016 levels by 2030. This 2030 GHG emissions goal is selected to be consistent with Senate Bill 32 State emissions targets and CEQA Guidelines for a qualified GHG emissions reduction strategy, and to be achievable by City-supported measures identified in the 2020 CAP. To achieve the South Pasadena 2030 GHG emissions target, the City has developed 15 CAP Plays (measures) related to energy, transportation, water, waste, and carbon sequestration.

Based on the information received in the Draft Initial Study - Negative Declaration for the City of South Pasadena 2020 Climate Action Plan, Caltrans has the following comments:

Caltrans supports South Pasadena's plans to reduce GHG emissions and adapt to changing climate conditions. If applicable in the project area, please refer to Caltrans' Climate Change Vulnerability Assessments when completing the CAP and future CEQA documents. <https://dot.ca.gov/programs/transportation-planning/2019-climate-change-vulnerability-assessments>

Further information provided for your consideration:

Caltrans supports the implementation of complete streets and active transportation safety improvements, especially those represented in the Transportation section of the Draft IS-ND. Some of Caltrans' recommended improvements include, but are not limited to, measures such as road diets, bike lanes, and other traffic calming elements to promote sustainable transportation. The Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

When considering implementation of innovative bicycle infrastructure, the City may consult resources such as the National Association of Transportation Officials' (NACTO) Urban Bikeway Design Guide, or FHWA

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Separated Bike Lane Planning and Design Guide, to assist in the design process. Caltrans formally endorsed the NACTO Guide in 2014 and the FHWA released its guide in 2015. Also, the State's Highway Design Manual now contains provisions for protected bike lanes under "Design Information Bulletin Number 89: Class [V Bikeway Guidance (Separated Bikeways/ Cycle Tracks)."

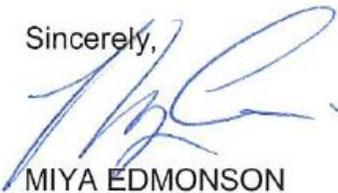
Effective July 2020, Caltrans replaced Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impact. Per SB 743 requirements, Caltrans supports the City's efforts towards developing these metrics and any development that may reduce VMT. As a reminder, Senate Bill 743 (2013) 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.

With regards to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any future project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building excessive parking.

Storm water run-off is a sensitive issue for Los Angeles county. For any future projects Caltrans supports designs that discharge clean run-off water and/or incorporate green design elements that can capture storm water. Incorporating measures such as, but not limited to, permeable pavement, landscaping, and trees reduce urban water run-off and encourage a healthy, sustainable environment.

If you have any questions or concerns regarding these comments, please contact project coordinator, Reece Allen at reece.allen@dot.ca.gov and refer to 07-LA-2020-03390.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse