

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-0067  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



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Governor's Office of Planning & Research

October 28, 2020

**Oct 29 2020**

La Cañada Unified School District  
Attn: Mark Evans  
Associate Superintendent, Business and Administrative Services  
4490 Cornish Avenue  
La Cañada, CA 91011

## STATE CLEARINGHOUSE

RE: New Outdoor Pool Facility and South  
Campus Improvement Project – Mitigated  
Negative Declaration (MND)  
SCH# 2020109010  
GTS# 07-LA-2020-03393  
Vic. LA-210 PM R21.571

Dear Mark Evans,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would demolish the existing basketball courts to construct a 40-meter pool facility, equipment area, outdoor storage area, girls restroom, boys restroom, two locker rooms, an indoor concrete storage area, office, and 19 outdoor showers. The existing on-campus baseball field would be shifted west to add 45 motor vehicle parking spaces to the student parking lot, and the existing 25-meter pool and pool equipment building would be replaced with new basketball courts with associated steps/seating that would provide extended emergency vehicle access to this area of campus. In addition, a drywell infiltration system would be constructed at the southern portion of the south parking lot to allow water to infiltrate the soil.

The nearest State facility to the proposed project is Interstate 210. After reviewing the MND, Caltrans has the following comments:

The Traffic Impact Analysis provided in Appendix G does not include a Vehicle Miles Travelled (VMT) analysis as required by Senate Bill 743 (SB 743). The explanation given in section 1.2 of Appendix G states that the City of La Cañada Flintridge has not yet adopted VMT thresholds, so a more "conservative" analysis using level of service (LOS) was being submitted to meet the CEQA transportation impact requirements. A different reason for not conducting the appropriate VMT analysis was given in section 2.17 (b) on page 112 of the full Initial Study/Mitigated Negative Declaration (IS/MND), stating that the reason the project was screened out was due to it being 0.5 miles from four different transit stops.

Caltrans finds the provided explanations inadequate in justifying the lack of a proper VMT screening/analysis for the following reasons:

- The City of La Cañada Flintridge has adopted VMT thresholds as of July 2020. In addition, the San Gabriel Valley Council of Governments (SGVCOG) provided a Regional Vehicle Miles Travelled Analysis Tool (<https://www.sgvco.org/vmt-analysis-tool>) to assist member agencies and developers in determining if a proposed project would require a full VMT analysis based on a given city's adopted thresholds. The full IS/MND is dated October 15, 2020, which allowed a reasonable amount of time to conduct a proper VMT screening to determine if a full VMT analysis would be required.
- Level of Service, or vehicle delay, is not considered to be a more conservative analysis of transportation impacts under CEQA. VMT is a more comprehensive measurement that accounts for regional trips and more appropriately captures all transportation modes.
- The four transit stops referenced in the IS/MND as meeting the screening criteria for a VMT analysis do not meet the definition of a "high-quality transit corridor" due to service intervals that exceed 15 minutes during peak commute hours.
  - Glendale Beeline, routes 3/31/32/33/34: No individual line maintains a service interval of 15 minutes or less throughout peak commute hours and line 34 only services the La Cañada High School bus stop in the afternoon with only 3 buses over the course of two hours.
  - Pasadena Transit, route 51: Headways of one hour at all times.
  - Metro, Line 268: Headways of 45+ minutes at all times.

The proposed project may be eligible to be screened out from a full VMT analysis, but an appropriate screening was not provided in the current project documents. The only element of concern for Caltrans is the addition of 45 surface parking spots. Research on parking suggests that abundant car parking encourages driving above other modes and that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. If the parking must be built, then the addition of infrastructure that allows people to walk, bike, or take transit to the campus should be added to offset the induced demand for motor vehicles. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

Mark Evans  
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If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS# 07-LA-2020-03393.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse