

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

February 8, 2021

Susan Koldeda  
City of La Cañada Flintridge  
1 Civic Center Drive  
La Cañada Flintridge, CA 91011

RE: City of La Cañada Flintridge General Plan  
Housing Element and Safety Element  
Updates – Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2021020022  
GTS # 07-LA-2021-03488  
Vic. LA-2/PM: 24.491

Dear Susan Koldeda:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The City of La Cañada Flintridge is updating the Housing Element of its General Plan. As required by new State legislation, the updated Safety Element will be adopted concurrently with the Housing Element. The Housing Element identifies available land that is suitable for housing development, as well goals, policies, and programs to accommodate the City's housing need, provide opportunities for new housing, and preserve the existing housing stock. The City of La Cañada Flintridge is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located adjacent to sections of State Route 2 (SR-2) and Interstate 210 (I-210) in Los Angeles County.

From reviewing the NOP, Caltrans has the following comments:

- 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](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).
- The City can also refer to Caltrans' updated *VMT-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 OPR 2018 Technical Advisory.
- 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 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 December 2020 and found here, for the City’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

- Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

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. 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 Mayra Jimon, the project coordinator, at [Mayra.Jimon@dot.ca.gov](mailto:Mayra.Jimon@dot.ca.gov), and refer to GTS # 07-LA-2021-03488.

Sincerely,



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