

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

May 05 2021

STATE CLEARINGHOUSE

May 5, 2021

Alicen Bartle
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069

RE: City of West Hollywood Housing Element
Update – Notice of Preparation of an
Environmental Impact Report (NOP)
SCH # 2021040781
GTS # 07-LA-2021-03570
Vic. LA-2/PM: 10.621

Dear Alicen Bartle:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project involves updating West Hollywood's Housing Element, which was last updated in 2013. The current update will cover the 2021-2029 period. The Housing Element Update will provide a framework for introducing new housing units at all levels of affordability. Through its identification of future development sites and housing programs, the updated Housing Element will lay the foundation for achieving the City's fair share housing needs of 3,933 units. The proposed project may also involve updates to the Safety Element and the inclusion of environmental justice policies. The City of West Hollywood is the Lead Agency under the California Environmental Quality Act (CEQA).

The project, which is citywide, is located near State Route 2, which is also known as Santa Monica Boulevard. From reviewing the NOP, Caltrans has the following comments:

- 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 (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- 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: <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 and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For more TDM options to potentially integrate into this project, 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>.

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-2021-03570.

Sincerely,

Frances Duong for

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