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Making Conservation a California Way of Life.

June 9, 2021

Emily Stadnicki
City of La Cañada Flintridge
One Civic Center Drive
La Cañada Flintridge, CA 91011

RE: 600 Foothill Boulevard Mixed-Use Project –
Mitigated Negative Declaration (MND)
SCH # 2021050119
GTS # 07-LA-2021-03581
Vic. LA-210/PM: R20.501

Dear Emily Stadnicki:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project would demolish the existing structures, which are used for religious purposes, and replace them with a 77,310-square foot, three-story structure to be utilized for mixed-use purposes. The new structure will contain 47 senior housing units, 12 non-serviced hotel units, 7,600 sf of office, and one level of underground parking. The subterranean parking structure would provide 107 parking spaces. The City of La Canada Flintridge is the Lead Agency under the California Environmental Quality Act (CEQA).

The project site is located approximately 750 feet southwest from the Interstate 210 (I-210) ramps at Gould Avenue. Caltrans has reviewed this MND from a Vehicle Miles Traveled (VMT) perspective, because 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.

The Transportation Study of the MND, which is Attachment 9, states that the project is considered an infill development and that "the Project's net weekday VMT would be approximately 16% less than the VMT of a comparable project developed on a vacant site." The project's infill location, in combination with the facts that it is located within walking distance of bus stops and commercial destinations, and will implement a Transportation Demand Management (TDM) program, has the led the City to determine that the VMT impacts of this project will be less than significant.

Caltrans concurs that infill projects located in close proximity to transit and commercial destinations, and that also implement TDM programs, will have less VMT impacts than similar projects that do not have these characteristics. However, since this is a redevelopment project, please explain in the Final MND why the VMT of this project was not compared to the VMT of the existing uses it is replacing. If necessary, please also provide an analysis in which this project's VMT is compared to the existing VMT.

This recommendation is based on the section titled "Redevelopment Projects" in 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). This section states that "Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should

apply." These statements suggest that for a redevelopment project such as this one, project VMT should be compared to existing VMT, as opposed to the VMT of a comparable project on a vacant site.

For more information on determining transportation impacts in terms of VMT on the State Highway System, see 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. Note that Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

In addition, after reaching out to the City with the above VMT questions, the City sent Caltrans a memorandum prepared by Gibson Consultants, which is attached to the end of this letter. The memorandum states that the VMT analysis included in Attachment 9 is based on an older version of the project, that included 75 residential units rather than 59. The main point of the memorandum is that since the current project would generate fewer trips than the previous project analyzed in the Transportation Study, the analysis in the Transportation Study is conservative and its conclusion that the project would not result in significant VMT impacts remains valid. Within this memorandum, it shows that the multi-family housing trip generation rate (Land Use Code 220) was used to estimate trips generated from the 12 non-serviced hotel units. Please explain in the Final MND why this trip generation rate was used as opposed to a hotel trip generation rate.

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 TDM strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports this project's TDM plan. For more TDM options to integrate into this plan, 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. Since construction traffic might cause delays on the I-210, please submit the Construction Traffic Mitigation Plan to Caltrans for review.

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-2021-03581.

Sincerely,

Frances Duong

FRANCES DUONG
Acting IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

MEMORANDUM

TO: Alexandra Hack, Cedar Streets Partners LLC

FROM: Sarah M. Drobis, P.E., and Casey Le, P.E.

DATE: December 11, 2020
Revised April 15, 2021

RE: Trip Generation Analysis for the Refinements to the 600 Foothill Boulevard Project
La Cañada Flintridge, California **Ref:** J1813

Gibson Transportation Consulting, Inc. (GTC) was asked to conduct a review of recent refinements to the 600 Foothill Boulevard Project (Project) in the City of La Cañada Flintridge (City). This memorandum summarizes the findings of our review.

PROJECT BACKGROUND

GTC prepared *Transportation Study for the 600 Foothill Boulevard Project* (Revised April 2021) (Transportation Study) analyzing the Project's 75-unit age-restricted housing development with 6,218 square feet (sf) of office space. The Project would provide 140 parking spaces on-site within two subterranean levels with access via Woodleigh Lane.

Since the completion of the Transportation Study, the Project has been modified to provide a total of 59 residential units, a reduction of 16 units as compared to that proposed in the Transportation Study, and approximately 7,600 sf of office space (Refined Project). Of the 59 residential units, 47 units would be dedicated to age-restricted housing and 12 units would operate as hotel rooms and be utilized as short-term housing for visitors and guests to the area. The Refined Project would provide 107 parking spaces on-site within one subterranean level with access via Woodleigh Lane.

TRIP GENERATION

The trip generation of the Refined Project was estimated using the same methodology used in the Transportation Study. The trip generation rates from *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, 2017) for Land Use Code 221 (Mullti-Family Housing Mid-Rise) were used to develop the trip generation estimates for the hotel rooms/short-term housing units.

As summarized in Table 1, the Transportation Study detailed that the Project is anticipated to generate 269 net new daily trips, including 22 net new morning peak hour trips and 19 net new afternoon peak hour trips during the weekday. The Project is

anticipated to generate 196 net new Saturday daily trips, including 25 net new midday peak hour trips, and a net reduction of 36 Sunday daily trips, including 12 net new midday peak hour trips. The Refined Project is anticipated to generate 243 net new daily trips, including 22 net new morning peak hour trips and 18 net new afternoon peak hour trips during the weekday. The Refined Project is anticipated to generate 168 net new Saturday daily trips, including 22 net new midday peak hour trips, and a net reduction of 74 Sunday daily trips, including eight net new midday peak hour trips.

The Refined Project is anticipated to generate fewer trips than the Project. Accordingly, the Refined Project's traffic effects on intersection operations and queuing would be less than those identified in the Transportation Study. Therefore, the analysis contained in the Transportation Study is conservative and the conclusions remain valid. The Refined Project would not result in significant transportation-related impacts.

SUMMARY

As detailed above, the Refined Project would generate fewer trips as the Project analyzed in the Transportation Study. Therefore, the analysis contained in the Transportation Study is conservative and the conclusions remain valid. The Refined Project would not result in significant transportation-related impacts.

TABLE 1
TRIP GENERATION COMPARISON

Land Use	ITE Land Use	Rate	Daily	Morning Peak Hour			Afternoon Peak Hour			Saturday Daily	Midday Peak Hour			Sunday Daily	Midday Peak Hour		
				In	Out	Total	In	Out	Total		In	Out	Total		In	Out	Total
TRIP GENERATION RATES [a]																	
Senior Adult Housing - Attached	252	per Dwelling Unit	3.70	35%	65%	0.20	55%	45%	0.26	3.23	62%	38%	0.33	3.14	64%	36%	0.36
Multi-Family Housing - Mid-Rise	221	per Dwelling Unit	5.44	26%	74%	0.36	61%	39%	0.44	4.91	49%	51%	0.44	4.09	62%	38%	0.39
Church [b]	560	per ksf	6.95	--	--	0.00	50%	50%	0.80	5.99	66%	34%	0.30	27.63	6%	94%	1.60
General Office Building	710	per ksf	9.74	86%	14%	1.16	16%	84%	1.15	2.21	54%	46%	0.53	0.70	58%	42%	0.21
TRIP GENERATION ESTIMATES																	
Refined Project [c]																	
Age Restricted Housing	252	47 du	174	3	6	9	7	5	12	152	10	6	16	148	11	6	17
Hotel/Short-Term Housing [d]	221	12 du	65	1	3	4	3	2	5	59	2	3	5	49	3	2	5
Office	710	7.600 ksf	74	8	1	9	1	8	9	17	2	2	4	5	1	1	2
TOTAL - REFINED PROJECT			**313**	**12**	**10**	**22**	**11**	**15**	**26**	**228**	**14**	**11**	**25**	**202**	**15**	**9**	**24**
Existing to be Removed																	
Church [b]	560	10 ksf	70	0	0	0	4	4	8	60	2	1	3	276	1	15	16
TOTAL - EXISTING TO BE REMOVED			***70***	***0***	***0***	***0***	***4***	***4***	***8***	***60***	***2***	***1***	***3***	***276***	***1***	***15***	***16***
TOTAL - NET NEW TRIPS (REFINED PROJECT)			**243**	**12**	**10**	**22**	**7**	**11**	**18**	**168**	**12**	**10**	**22**	**(74)**	**14**	**(6)**	**8**
TOTAL - NET NEW TRIPS (TRANSPORTATION STUDY PROJECT) [e]			**269**	**11**	**11**	**22**	**8**	**11**	**19**	**196**	**16**	**9**	**25**	**(36)**	**17**	**(5)**	**12**
TRIP DIFFERENCE			**(26)**	**1**	**(1)**	**0**	**(1)**	**0**	**(1)**	**(28)**	**(4)**	**1**	**(3)**	**(38)**	**(3)**	**(1)**	**(4)**

Notes:

ksf: 1,000 square feet

[a] Trip generation rates are from *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, 2017) and are based on developments located in "General Urban/Suburban" area.

[b] Existing trips based on driveway counts conducted during the peak periods on a Wednesday (November 4), Saturday (November 14), and Sunday (November 15) in 2015. Daily trips based on rates in *Trip Generation Manual, 10th Edition.*

[c] Project trip estimates are conservative as all trips are considered to be driving trips and no adjustments were made to account for transit usage or any walking trips made to nearby commercial uses. Additionally, no further trip reductions were considered to account for the proposed TDM strategies to be employed by the Project that would reduce vehicle trips to the site.

[d] The Project proposes units that would operate as hotel rooms and be utilized as short-term housing for visitors and guests to the area. Thus, multi-family housing (Land Use Code 220) trip generation rates were used.

[e] Total net new trip estimates based on Table 3 of the Transportation Study.