

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

Governor's Office of Planning & Research

**July 29 2021**

**STATE CLEARINGHOUSE**

July 28, 2021

Mr. Benjamin Fiss/Ms. Megan Taggart  
City of Palmdale  
Economic and Community Development Department  
38250 Sierra Highway  
Palmdale, CA 93550

RE: Site Plan Review 21-002 and Density  
Bonus Agreement 21-001  
SCH # 2021070099  
Vic. LA-138/PM 46.221  
GTS # LA-2021-03649-MND

Dear Mr. Fiss:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated MND. The project includes involves construction of a three-story, multi-family, residential development consisting of 149-units reserved for low-income residents and two market rate Manager's units.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources at the following links:

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<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<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 prepare traffic safety impact analysis at the State facilities for this development 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 City is using the County of Los Angeles Guidelines to determine the significant traffic impact of this project. Section 3.1.2.4 of the guidelines state that if 100% of the units, excluding manager's units, are set aside for lower income households, further VMT analysis is not required, and a less than significant determination can be made. The project consists of 100% affordable housing units. Therefore, the Proposed Project would have a less than significant impact on VMT and would not conflict with an applicable plan, ordinance, or policy.

Based on Caltrans' experience, the intersections of 20<sup>th</sup> Street east and 30<sup>th</sup> Street east have been noted for having traffic safety concerns with left turning traffic from the local streets onto State Route 138. Caltrans is planning to perform a study on the left turn into SR-138 from both 20<sup>th</sup> and 30<sup>th</sup> street in the future and see if improvements are warranted as a result of this development. We will share this study when it becomes available.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2021-03649AL-MND.

Sincerely,

*Emily Gibson*

EMILY GIBSON  
Acting IGR/CEQA Branch Chief

email: State Clearinghouse