

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 266-3562

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

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Governor's Office of Planning & Research

August 30 2021**STATE CLEARINGHOUSE**

August 30, 2021

Jason Van Patten
City of Pasadena
175 N. Garfield Avenue
Pasadena, CA 91101RE: Planned Development #39 (Affinity Project)
– Notice of Preparation of an Environmental
Impact Report (NOP)
SCH # 2021080103
GTS # 07-LA-2021-03677
Vic. LA-710/PM: T31.757

Dear Jason Van Patten:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The Project involves demolishing six buildings totaling 45,912 square feet (sf) and constructing two new buildings. Building A would be a 154,000 sf, 7-story medical office building with ground-floor commercial uses. Building B would be a 184,376 sf, 7-story building with 85,800 sf of assisted living uses and 98,576 sf of independent living uses, including up to 95 senior housing units. There would also be five subterranean levels providing up to 850 parking spaces. In addition, the project would enable the flexibility to alter the uses in Building A to provide different amounts of commercial, residential, and parking uses. Although the project does not expect to alter the uses in Building A, this flexibility will allow the project to respond to the economic needs and demands of the City at the time of project implementation. The City of Pasadena is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately .6 miles away from State Route 110 (SR-110), and approximately 5,200 feet away from where the Interstate 210 (I-210), State Route 134 (SR-134), and Interstate 710 (I-710) meet. From reviewing the NOP, Caltrans has the following comments.

Caltrans looks forward to reviewing the Vehicle Miles Traveled (VMT) analysis for this project. 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.

Note that 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

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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>.

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. A TDM strategy that the City should consider for this project is keeping vehicle parking to a minimum, since research has shown that surplus parking can induce VMT.

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 issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans’ 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-2021-03677.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse