

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

August 26 2021

STATE CLEARINGHOUSE

August 25, 2021

Ellen Fitzgerald
City of Whittier, Community Development Department
13230 Penn Street
Whittier, CA 90602

RE: Trinity Lutheran Church Campus
Modification and Brandywine Homes Project
– Mitigated Negative Declaration (MND)
SCH # 2021080155
GTS # 07-LA-2021-03681
Vic. LA-72/PM: 5.699

Dear Ellen Fitzgerald:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project proposes to subdivide the 3.59-acre area located at 11716 Floral Drive in the City of Whittier into two separate parcels. Parcel 1, consisting 2.56 acres, is reserved for a 25-unit detached single-family condominium project. Parcel 2, at 1.03 acres, is reserved for the existing Trinity Lutheran Church facility. Modifications are proposed for the church, including the demolition of a 14,545 square foot administration building and the addition of a 2,794 square foot parish hall, as well as new classrooms, offices, and a reception area. Other proposed modifications to the church are reconfiguring and restriping the parking lot to accommodate the new building design. The City of Whittier is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4,000 feet away from the Norwalk Boulevard and State Route 72 (SR-72, also known as Whittier Boulevard) intersection. It is also located approximately one mile from the SR-72 and Interstate 605 (I-605) interchange. From reviewing the MND, Caltrans has the following comments.

We concur that factors such as proximity to transit, access to multimodal transportation options, and diversification of land uses will limit the Vehicle Miles Traveled (VMT) impact of this project. However, these factors are not considered substantial evidence that this project will have a less than significant VMT impact, based on 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. Thus, please provide additional evidence that this project will have a less than significant VMT impact.

For instance, to prove that this project will have a less than significant VMT impact due to its proximity to transit, please also discuss how this project does not meet the following criteria, which according to OPR, may render a less than significant VMT impact determination inappropriate:

- Has a Floor Area Ratio (FAR) of less than 0.75.

- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization).
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Alternatively, if this project does not meet any of the screening thresholds for land use projects discussed in the OPR Technical Advisory, please provide a more detailed VMT analysis showing that this project will have a less than significant VMT impact.

For 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.

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. Thus, Caltrans supports the TDM strategies this project has incorporated, such as informing residents of transit options and discounted transit passes offered by the City. Additional TDM strategies that the City may want to consider integrating into this project in order to further reduce VMT include:

- Enhancing amenities at nearby transit stops, such as providing a shelter at the Route 7 bus stop at Beverly Boulevard and Floral Drive.
- Limit vehicle parking to no more than required by the local permitting agency.
- Provide safe and secure bicycle parking.

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-2021-03681.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse