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*Making Conservation
a California Way of Life*

September 15, 2021

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City of Simi Valley
Department of Environmental Services
2929 Tapo Canyon Road
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Governor's Office of Planning & Research

September 16 2021

STATE CLEARINGHOUSE

RE: GPA-2021-0001: General Plan
Amendment to Update the Housing
Element for the 2021-2029 Planning
Period
SCH # 2021080508
Vic. VEN-118 Citywide
GTS # VEN-2021-00459-MND-AL

Dear Mr. Dionne:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The project consists of a comprehensive update to the 2013-2021 Housing Element, which comprises Chapter 4 of the Simi Valley 2030 General Plan (adopted in 2012), and maintain internal consistency of the General Plan Elements (inclusive of Community Development, Safety, and Environmental Justice), Land Use Map amendments and Zone changes. To comply with State law, the City's Housing Element must be updated every eight years to ensure the City's policies and programs can accommodate estimated housing growth allocation identified by the state-determined Regional Housing Needs Assessment. The project is located at selected sites citywide.

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 is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, 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 in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisq-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 for all developments 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.

Simi Valley Transit serves the city with fixed-route bus service that connects to the Los Angeles Metro in the San Fernando Valley and with Ventura County Transit Center in the Simi Valley Mall (City of Simi Valley 2021). Bicycle routes within the city consist of a network of facilities that connect trails and transit stations with roadways through various bicycle facilities (Class I through III), that vary in their degree of separation from the vehicular lanes (City of Simi Valley 2008).

Implementation of the 2021-2029 Housing Element would increase density on some sites throughout the city to meet the RHNA allocation. The Opportunity Areas identified in the 2021-2029 Housing Element would largely accommodate infill development that tends to reduce VMT because it places residential development close to commercial and office uses and produces opportunities to travel by foot or bicycle instead of automobile. As described under *Environmental Setting*, Simi Valley is served by public transit options and bicycle routes on city roadways. Future projects implemented under the 2021-2029 Housing Element are therefore likely to reduce VMT compared to regional averages, due to residential uses being developed close to commercial, office, and other uses.

We concur the City's 2030 General Plan policies that encourage reduced VMT

- Policy M-8.4 Accommodate Alternative Modes
- Policy M-11.1 & Policy M-11.5 Transportation Demand Management (TDM)
- Policy M-11.2 Alternative Transportation Modes
- Policy M-11.4 Demand Reduction Program
- Policy M-12.1 Bicycle Master Plan
- Policy M-12.2 Bicycle Usage
- Policy M-12.3 Bicycle Facilities

The 2021-2029 Housing Element does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Simi Valley. Because it is a policy document, the 2021-2029 Housing Element will not result in impacts

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to transportation or affect existing plans that address transportation and mobility. Furthermore, future development accommodated under the 2021-2029 Housing Element would be subject to development plan review to determine potential concerns related to transportation and VMT based on site-specific locations and development design. Development proposals for individual projects would be subject to adopted development guidelines, including standards that govern VMT, transportation, GHG, and associated issues. Any impacts identified for an individual project would be addressed through the project approval process, including design review specific to any potential impacts of that project. Therefore, the impacts would be less than significant.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # VEN-2021-00459-MND-AL.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse