

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

September 21, 2021

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Brad Johnson
City of Claremont
207 Harvard Avenue
Claremont, CA 91711

STATE CLEARINGHOUSE

RE: City of Claremont Housing Element Update
– Notice of Preparation of an Environmental
Impact Report (NOP)
SCH # 2021090340
GTS # 07-LA-2021-03709
Vic. LA-10/PM: 47.903

Dear Brad Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project would amend the City of Claremont General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element. It would also update the Safety Element of the General Plan to reflect recent changes in State law. The City's General Plan was last updated in July 2012 and program Environmental Impact Report (EIR) for the General Plan was completed in October 2006. The Housing Element was last updated in July 2019. The new housing Element must discuss how the City will meet its Regional Housing Needs Allocation (RHNA), plus a 20 percent buffer, which for the 2021-2029 planning period would be 2,236 units. The City has also accounted for 559 residual units in the Housing Element update. The City of Claremont is the Lead Agency under the California Environmental Quality Act (CEQA).

The citywide project is located near the Interstate 210 and Interstate 10. From reviewing the Initial Study, 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 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>. Caltrans encourages lead agencies to complete traffic safety impact analysis 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 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. For TDM options to include in this project, 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>.

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-2021-03709.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse