

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

March 30, 2023

Mi Kim  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street, room 1354  
Los Angeles, CA 90012

RE: East San Gabriel Valley Area Plan  
SCH # 2022040512  
Vic. LA-210, LA-605, LA-10, LA-60, LA-57,  
LA-71 Countywide  
GTS # LA-2022-04175-DEIR

Dear Mi Kim:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The proposed East San Gabriel Valley Area Plan (ESGVAP or Project) is a community-based plan to enhance, guide, and support the long-term growth, development, and maintenance of 24 unincorporated communities in the East San Gabriel Valley (ESGV) planning area. The Project is an extension of the Los Angeles County General Plan that focuses on the unique characteristics and needs of local communities. The ESGVAP consists of 6 elements (Land Use Element, Economic Development Element, Community Character and Design Element, Natural Resources and Conservation Element, Mobility Element, Parks and Recreation Element) and 15 community-specific chapters. The ESGVAP has both area-wide goals, policies, and implementation actions and community-specific goals, policies, and implementation actions. The Project includes changes to land use and zoning designations to accommodate growth near major transit stops and corridors, implement the housing element, and bring zoning, land use policy, and existing use into consistency, which in turn requires changes to zoning and land use maps. The Project also includes an ordinance with new area-wide standards as well as update to existing standards.

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.

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>

As stated on page 4.15-3 of the Draft PEIR, we concur that "Caltrans coordinates and consults with local jurisdictions when proposed local land use planning and development may impact state highway facilities." 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 the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/sustainability/sb-743/sb743-resources>

Caltrans encourages the Lead Agency to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process using Caltrans guidelines above on the State facilities so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The total VMT per service population under the 2035 With Project scenario is estimated at 39.3. The significance threshold of 16.8 percent below the County baseline for 2022 is 25.5 total VMT per service population (16.8 percent below 30.7). Thus, with a 39.3 total VMT per service population, the proposed ESGVAP would result in a potentially significant VMT impact. Even with the proposed mitigation measures TR-4.15-1 (to

improve and/or expand transit service, bicycle and pedestrian facilities, and transportation projects, and VMT fees) and TR-4.15-2 (to implement TDM strategies where feasible and necessary based on project- and site-specific considerations), the impact related to VMT per service population will remain significant and unavoidable.

In order to reduce further VMT, we highly recommend the Lead Agency to balance future housing and employment locations in the 24 unincorporated communities in East San Gabriel Valley. This approach would reduce significant VMT and has an opportunity to meet the County VMT thresholds.

We recommend the City consider the following policies/comments for all future projects:

1. For any large project that may impact the State facilities, VMT and traffic safety consultation with Caltrans in advance should be considered by the Lead Agency.
2. For future projects, any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.
3. A post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact.

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-2022-04175-DEIR.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse