

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

September 28, 2022

John Mayer, Senior Planner
Community Development Department
City of Monrovia
415 South Ivy Avenue
Monrovia, CA 91016

RE: Monrovia 22021-2029 Housing Element
Update, Safety Element Update & New
Environmental Justice Element
SCH # 2022080729
Vic. LA-210 Citywide
GTS # LA-2022-04045-MND

Dear John Mayer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The project includes an update to the City's existing Housing and Safety Elements and a new Environmental Justice Element. The project represents a policy document and does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. The Housing Element updates sets forth the City's plan to accommodate its Regional Housing Needs Assessment (RHNA) allocation of 1,670 new housing units. The project also includes an update to the General Plan's Safety Element to align it with recently enacted State Laws and adopt new climate adaptation and wildfire strategies. Lastly, as part of the project, the City developed a new Environmental Justice Element for the General Plan to comply with Senate Bill (SB 1000) and Senate Bill (SB 244).

The City of Monrovia's RHNA is 1,670 units, broken down by income category as follows:

- Very Low Income (<50% of AMI): 519 units
- Low Income (50 to 80 percent of AMI): 262 units
- Moderate Income (80 to 120 percent of AMI): 254 units
- Above Moderate Income (>120% of AMI): 635 units

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 this project or for any future project. 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-tisg-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.

“Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric. The General Plan EIR identified roadway and freeway segment LOS impacts and Mitigation Measure TRANS-1 was identified to reduce this impact, but not to less than significant; this impact was considered significant and unavoidable, and the City adopted a Statement of Overriding Consideration. The proposed Project is consistent with the analysis in the General Plan EIR because land use and zoning designations are unchanged, and VMT under the General Plan EIR and the proposed Project would be similar.” This “similar Project VMT and VMT threshold should be disclosed to the public in order to determine the significant traffic impact.

In addition to Mitigation Measure TRANS-1 and to reduce any future traffic safety impact on the State facilities, Caltrans recommends the City implement a fee program on the State facilities. We would like to have the opportunity to assist the City to identify any potential safety improvement locations.

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-2022-04045-MND.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse