

**DEPARTMENT OF TRANSPORTATION**

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November 9, 2022

Ms. Fiona Graham, Planning Services Manager  
Planning Division  
City of Arcadia  
240 West Huntington Drive  
Arcadia, CA 91007

RE: The Derby Mixed-Use Project  
SCH # 2022100298  
Vic. LA-210/PM R32.9  
GTS # LA-2022-04093-NOP

Dear Ms. Graham:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The Project would construct a new space for The Derby restaurant as part of a new mixed-use residential and commercial development. The existing buildings and surface parking lots on the Project site would be demolished to accommodate the proposed Project and the Lot Line Adjustment would merge the two existing lots into one legal lot. The Project would include 205 market-rate units and 9 affordable units, totaling 214 for-rent dwelling units.

The ground level would include the new The Derby restaurant (including 12,850 sf for both levels), a 1,400 s.f. café space, a 3,300 s.f. complementary restaurant space, a residential leasing office, a residential lobby, and a residential bike storage area, as well as interior and exterior restaurant/café/valet parking areas. Level two would include a portion of The Derby's restaurant area, which would serve as The Derby's rooftop bar, as well as a residential co-working space, residential units, and an exterior residential courtyard and amenity space. Level three and level four would consist entirely of residential units, residential storage, and interior residential amenity spaces, including a yoga room. Level five would include residential units and additional residential amenity spaces, including the outdoor pool, roof deck, and interior amenity kitchen. Level six would include residential units, as well as a residential fitness center and exterior courtyard.

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:

<https://opr.ca.gov/ceqa/#guidelines-updates>

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 the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development 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 the SB 743 Implementation Resource at the following link:

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

Potential Environmental Effects of the Project should include the Transportation section with VMT analysis in the Draft Environmental Impact Report. Due to the project size and distance to the State facilities, Caltrans requests queuing analysis with actual signal timing at the eastbound/westbound off-ramps on I-210 to Huntington Dr.

Caltrans encourages lead agencies to prepare traffic safety impact analysis for this development 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.

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-2022-04093AL-NOP.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse