

DEPARTMENT OF TRANSPORTATION

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September 13, 2023

Governor's Office of Planning & Research

Sep 13 2023

STATE CLEARINGHOUSE

Lisa Flores
City of Arcadia
P.O. Box 60021
Arcadia, CA 91066

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

Dear Lisa Flores:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project is to demolish the existing Derby restaurant ("The Derby") and the vacant, former Souplantation restaurant and construct a six-story, mixed-use development over the approximately 2.23 acre site. To accommodate the new building, the two existing lots will be merged as one legal lot. The Derby will be reconstructed as a larger, two-story restaurant of approximately 12,850 square feet. In addition, two new commercial spaces will be included on the ground floor adjacent and to the east of the new driveway entrance: a 1,400 square foot café and a 3,300 square foot restaurant. The new mixed-use development will consist of 205 market rate units and 9 affordable units, totaling 214 rental units on levels two through six.

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 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.

For this project, we encourage the Lead Agency to evaluate and implement the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications for this development in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

On page 4.13-11 of the DEIR, "In conclusion, while the residential component of the Project would not be screened out from VMT analysis using the Project Type Screening, based on SB 743 and the revised CEQA Guidelines, the City's Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment, and the San Gabriel Valley Council of Governments (SGVCOG) VMT Assessment tool, the entire Project would be screened from a project-level VMT analysis because the Project is in a Low VMT generating area and within a TPA. Therefore, a VMT analysis is not required and impacts to VMT would be less than significant."

To protect the public's best interest, we only concur the residential component of the Project would not be screened out from VMT analysis using the Project Type Screening. Otherwise, almost all development within the City would be screened out from this approach because the City's average VMT is already 15.53 which is larger than Project TAZ of 11.1, from the San Gabriel Valley Council of Governments (SGVCG) screening tool. Only disclosing the Project VMT would then compare with the City's VMT threshold of 13.2 to determine if the project would cause any significant traffic impact. We highly recommend the City prepare the necessary VMT for this development for Caltrans' review.

The project site is located within a low VMT area as cited in the DEIR as VMT analysis is screened out. As such, a VMT analysis is not required and impacts to VMT would be less than significant. To validate this statement and for the City's consideration, we highly recommend the City prepare a post-development VMT analysis with all necessary mitigation measures. Mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact.

In Caltrans' NOP letter dated November 9, 2022, "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." On Figure 5 of the Transportation Impact Study, Proposed Project Trip Distribution, there are 20% and 5% residential and restaurant trips going on EB/WB of I-210. No queuing analysis was prepared, we are most interested in the westbound off-ramps on I-210 to Huntington Dr.

As a reminder, any transportation of heavy construction equipment and/or materials which require use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend large-size truck trips be limited to off-peak commute periods.

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-2022-04286-DEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse