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*Making Conservation a California Way of Life*

September 23, 2024

Candice Bowcock, Principal Planner
Community Development Department
City of La Verne
3660 "D" Street
La Verne, CA 91750

RE: City of La Verne General Plan and Zoning Ordinance Update
SCH # 2023040002
Vic. LA-210. Citywide
GTS # LA-2023-04598-DEIR

Dear Candice Bowcock:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The updated La Verne General Plan is expected to be adopted in 2024 and will guide the City's development and conservation through land use objectives and policy guidance. The General Plan is intended to be an expression of the community's vision for the City and Planning Area and constitutes the policy and regulatory framework by which future development projects will be reviewed and public improvements will be implemented. The La Verne General Plan includes a comprehensive set of goals, policies, and actions (implementation measures), as well as a revised Land Use Map. A new Very High Density Residential land use category allowing for up to 32 dwelling units per acre is also provided for potential future development. The City will implement the General Plan by requiring development, infrastructure improvements, and other projects to be consistent with its policies and by implementing the actions included in the General Plan.

**VMT**

According to OPR's Technical Advisory (December 2018), " OPR recommends that a per capita or per employee VMT that is fifteen percent below that of existing development may be a reasonable threshold". A significant project VMT impact would occur if the citywide and sphere of influence VMT per service population exceeds the SGVCOG Northeast Subarea baseline. Table 14 VMT Comparison shows that the citywide rate (27.47) is lower than the baseline (28.46), indicating less-than-significant VMT impacts.

Please explain the rationale for using a reduction rate of 4.37% instead of OPR's recommended 15%.

**Roadways**

The Mobility Element developed as part of the General Plan update contains policies in support of roadway operations and traffic flow. These policies include:

- **M-1.1 Vehicle Level of Service (LOS).** Strive to maintain acceptable vehicular level of service along City facilities using methodologies consistent with the City's Transportation Study Guidelines.
    - Given the unique residential context around Old Town La Verne, and to maintain the area's character, lower levels of service may be deemed acceptable along portions of Bonita Avenue and White Avenue adjacent to Old Town La Verne.
- **M-1.2 Traffic System Management.** Continue to invest in Traffic System Management (TSM), signal maintenance and coordination to facilitate the efficient movement of vehicles and minimize delay through the City utilizing existing roadway facilities.
- **M-1.4 Development-Related Traffic Impacts.** Ensure that new development in the City does not adversely affect adjacent traffic flow and operations.
- **M-1.6 Arterial Roadway Network.** In order to accommodate existing and future needs due to land use growth and shifts in travel patterns, strive to implement the buildout roadway network based on the classifications mapped in Figure X. Roadway classifications are defined by the number of vehicular lanes provided, and can include other features such as landscaped medians, center turn lanes, on-street parking, and bike lanes.
    - Major Arterials consist of six travel lanes (three in each direction) and a landscaped median.
    - Secondary Arterials consist of four travel lanes (two in each direction) and are either divided (with a median or enter turn lane) or undivided (with centerline striping). Collectors consist of two travel lanes (one and each direction) and are either divided (with a center turn lane) or undivided (with or without centerline striping).
- **M-2.5 Eliminate Gaps.** Continue to identify and eliminate gaps in networks serving automobiles, bicyclists, pedestrians, transit users, equestrians, and other users. Remove natural and man-made barriers to accessibility and connectivity.
- **M-7.3 Roadway Design.** Maintain roadway design standards to facilitate access to light industrial and manufacturing areas along designated truck routes.
- **M-10.1 Caltrans Coordination.** Continue to coordinate with Caltrans to reduce the effects of I-210 ramp traffic on City roads.

**Transit, Bicycle, and Pedestrian**

The updated Mobility Element, part of the General Plan, integrates vehicular roadway classifications and the Active Transportation Plan (ATP) to enhance nonmotorized transportation throughout the city. With projected roadways operating at or below capacity, the plan aims to minimize traffic impacts on transit, walking, and bicycling conditions. The General Plan also emphasizes development in high-quality transit areas to encourage alternatives to driving, such as transit, bike-to-transit, and walk-to-transit

trips. Overall, the Mobility Element promotes accessible and efficient multi-modal transportation options. These policies include:

- **M-2.1 Complete Streets for Roadway Projects**. Apply Complete Streets principles to all new transportation improvements impacting the public right-of-way.
- **M-2.2 Local and Regional Collaboration**. Cooperate and collaborate with regional and local partners, stakeholders, and agencies to ensure the implementation of Complete Streets within and connecting to the City.
- **M-2.3 Best Practices and Design Guidance**. Monitor and strive to follow the best and latest design standards for implementing Complete Streets in the City.
- **M-2.4 Context Sensitivity**. Consider the land use and design context of the surrounding areas when designing Complete Streets.
- **M-2.5 Eliminate Gaps**. Continue to identify and eliminate gaps in networks serving automobiles, bicyclists, pedestrians, transit users, equestrians, and other users. Remove natural and man-made barriers to accessibility and connectivity.
- **M-2.6 Streetscape Improvements**. Create an attractive transportation network by providing streetscape improvements such as landscaping, benches, lighting, street furniture and public art in the Old Town area, University of La Verne area, Metro A Line Station Area, and other pedestrian oriented areas in the City.
- **M-2.7 ADA Accessibility**. Ensure the City's transportation network is safe, accessible, and consistent with the Americans with Disabilities Act (ADA), to allow mobility-impaired users, such as disabled persons and seniors, to safely travel within and beyond the City.
- **M-2.8 Safe Routes to School**. Work with the Bonita Unified School District and other schools in the City to establish a Safe Routes to School Program, allowing parents and children the opportunity to walk, bike, or roll to schools within the City.
- **M-2.9 Effects of New Technologies on Complete Streets**. Monitor the development of new technologies (e.g., scooter share and bikeshare) and the potential impacts on designing a transportation network that accommodates all modes and users.
- **M-4.1 Safe Rail Crossings**. Work with rail agencies and operators to ensure the rail crossings in the City are safe for vehicles, pedestrians, and bicyclists and explore opportunities to implement grade separation where desirable.
- **M-4.5 Bicyclist and Pedestrian Safety**. Develop safe and convenient bicycle and pedestrian facilities and crossings that reduce conflicts with other modes.
- **M-5.1 Transit Use**. Support programs encouraging public transit use by people living in, working in, or visiting La Verne.
- **M-5.2 Improve Local Public Transit Service**. Work with Foothill Transit and other local public transit providers to improve local transit service in the City.
- **M-5.3 Improve Bus Stops**. Work with Foothill Transit to improve bus stop amenities along roads in La Verne that have local transit service.
- **M-5.4 Paratransit Service**. Work with local transit and other providers to support paratransit service for seniors and persons with disabilities.

- **M-5.5 Metrolink Service**. Monitor and participate in any future regional discussions pertaining to changes in Metrolink service in the area and station facilities.
- **M-5.6 Metro A Line Service**. Work with LA Metro to ensure Metro A Line service (including headways and service hours) are sufficient to meet the needs of transit commuters to and from La Verne and do not overly impact vehicular crossings.
- **M-5.7 Metro A Line Station**. Work with LA Metro and the Foothill A Line Construction Authority to ensure the planned station in La Verne is consistent with the City's Complete Streets, active transportation, and parking policies.
- **M-5.8 Effects of New Technologies on Transit Use**. Monitor the development of new technologies (such as rideshare and microtransit) and the potential effects on transit demand and the way users access public transit.
- **M-5.9 Transit to and from University of La Verne**. Work collaboratively with the University of La Verne to determine the most effective ways to encourage transit use by students and staff, such as shuttles between campus and the planned Metro A Line station in La Verne.
- **M-6.1 Active Transportation Plan**. Maintain and implement the Active Transportation Plan (ATP) to provide active transportation facilities that can serve as an alternative to automobiles, including the ATP's walking and bicycling facility recommendations as shown in Figure X and Figure X.
- **M-6.2 Active Transportation Facilities on Foothill Boulevard**. Coordinate with Caltrans to explore the appropriate bicycle and pedestrian facility improvements on Foothill Boulevard through the City.
- **M-6.3 Connectivity to Metro A Line**. Coordinate with LA Metro and the Foothill A Line Construction Authority to ensure suitable first-last mile facilities are provided to facilitate non-vehicular access to the planned Metro A Line station.
- **M-6.4 Effects of New Technologies on Active Transportation**. Monitor the development of new technologies (such as bikeshare, scooter share, and electric bikes) and the potential effects on non-vehicular travel and mode choice in La Verne.
- **M-6.5 Marshall Canyon Trail**. Work with the County of Los Angeles to ensure the Marshall Canyon Trail is open and maintained and that access to and from the trail, including equestrian access, is facilitated within the City.
- **M-6.6 Sidewalk and Bikeway Gaps**. Identify and eliminate gaps in sidewalks and bikeways in the City in order to create a connected and complete active transportation network.
- **M-6.7 Coordination with Adjacent Cities**. Coordinate its bikeways system and pedestrian facilities (including trails and sidewalks) to be consistent with and connected to regional facilities and facilities in adjacent jurisdictions.
- **M-6.8 Bicycle/Pedestrian Facilities at New Developments**. Encourage new residential and nonresidential developments in the city to provide safe and attractive bicycle and pedestrian facilities, such as secure bicycle parking, pedestrian-scale lighting, street furniture, landscaping, and other improvements.

- **M-6.9 Effective Roadway Projects**. Consider the implementation of projects within the ATP when roadways are being rehabilitated or resurfaced.
- **M-6.10 Bicycling and Walking to University of La Verne**. Work collaboratively with the University of La Verne to ensure walking and bicycling options to different destinations in the City are facilitated for students and staff.
- **M-10.1 Neighboring Jurisdictions**. Coordinate the City's vehicular facilities, Complete Street treatments, active transportation facilities, and goods movement network to be consistent with those in neighboring jurisdictions.

**Geometric Design and Incompatible Use Hazards**

A significant project impact may occur if a development introduces hazardous design features or incompatible uses. However, the proposed uses within La Verne's General Plan Update are compatible with existing surroundings. The Mobility Element, designed to enhance safety and reduce hazards, includes policies such as:

- **M-2.1 Complete Streets for Roadway Projects**. Apply Complete Streets principles to all new transportation improvements impacting the public right-of-way.
- **M-2.4 Context Sensitivity**. Consider the land use and design context of the surrounding areas when designing Complete Streets.
- **M-2.5 Eliminate Gaps**. Continue to identify and eliminate gaps in networks serving automobiles, bicyclists, pedestrians, transit users, equestrians, and other users. Remove natural and man-made barriers to accessibility and connectivity.
- **M-2.7 ADA Accessibility**. Ensure the City's transportation network is safe, accessible, and consistent with the Americans with Disabilities Act (ADA), to allow mobility-impaired users, such as disabled persons and seniors, to safely travel within and beyond the City.
- **M-2.8 Safe Routes to School**. Work with the Bonita Unified School District and other schools in the City to establish a Safe Routes to School Program, allowing parents and children the opportunity to walk, bike, or roll to schools within the City.
- **M-4.1 Safe Rail Crossings**. Work with rail agencies and operators to ensure the rail crossings in the City are safe for vehicles, pedestrians, and bicyclists and explore opportunities to implement grade separation where desirable.
- **M-4.2 Traffic Calming**. Support traffic calming strategies in residential areas to slow traffic through residential neighborhoods and divert traffic to arterial roads.
- **M-4.3 New Project Access and Safety**. Ensure that new projects follow best design practices and guidelines to reduce conflicts between circulation system users.
- **M-4.4 I-210 Crossings**. Work with Caltrans to ensure safe conditions continue to be provided at the I-210 crossings and ramps in the City.
- **M-4.5 Bicyclist and Pedestrian Safety**. Develop safe and convenient bicycle and pedestrian facilities and crossings that reduce conflicts with other modes.
- **M-4.6 Safe Transportation to and from University of La Verne**. Work collaboratively with the University of La Verne to ensure that the transportation

needs of students and staff (such as rideshare hailing at City curbsides) are accommodated safely.

- **M-4.7 Public Education**. Work with the Police Department and other groups to implement safety related community classes and awareness campaigns.
- **M-7.1 Truck Traffic on Local Streets**. Continue to discourage truck traffic within residential neighborhoods.
- **M-7.2 Local Truck Routes**. Maintain a network of local truck routes to facilitate goods movement to regional roads and to discourage the use of residential roads.
- **M-7.3 Roadway Design**. Maintain roadway design standards to facilitate access to light industrial and manufacturing areas along designated truck routes.

The General Plan is a program-level document, meaning it provides broad guidelines for city planning. As individual sites are developed, the City will review and approve each site's plan. This process includes analyzing access, circulation, and design to ensure that neither the on-site layouts nor interactions with surrounding streets create hazardous conditions or geometric design flaws. The City can enforce adjustments to mitigate any potential design issues to ensure public safety.

The Mobility Element of the proposed project includes policies and implementation actions that specifically focus on VMT reduction programs:

- **Policy 6.1 Decrease vehicle trips**. Prioritize transportation and development investments and strategies that reduce single-occupancy vehicle trips.
- **Policy 6.2 Decrease vehicle miles traveled**. Prioritize pedestrian, bicycle and other micro-mobility transportation means, and transit enhancements. Encourage infill, mixed-use, and other land use development that locates resources and services near residents' homes.
- **Policy 6.3 Emissions reduction.** Support and encourage the adoption of low- and zero-emission vehicles, clean vehicle technologies, charging infrastructure and services to reduce GHG emissions from vehicles.
- **Policy 6.4 Transportation Demand Management (TDM).** Promote and incentivize the use of TDM strategies for employers and expand options for emission reductions from commuting through means such as vehicle sharing, alternative fuel vehicle support, and telecommuting.
- **Implementation Action M-A.7 VMT-based transportation analysis policy and VMT mitigations for environmental review.** Adopt and implement the City's Vehicles Miles Traveled (VMT) Analysis Guidelines, which defines VMT-based thresholds of significance for transportation impacts in environmental review and identifies TDM-based mitigations.

We would recommend the City to consider the following policy/measures for all future projects:

1. A post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures to further reduce VMT should be implemented if the post-development VMT analysis discloses any significant impacts. This analysis, which may include interviews with and surveys of project occupants, will provide new data to help validate the City's VMT model results.

   The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT thresholds, 2) to assist in setting future VMT thresholds, and 3) to identify suitable TDM to apply as minimization or mitigation measures in the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant VMT impacts.

2. VMT Fee Program for all developments within the City in which the program has the potential to address transportation funding challenges, promote sustainability, and offer more flexible and equitable approaches to financing and managing transportation systems. Alternatively, the City may consider a new concept of VMT mitigation banks and exchanges. You may learn about this new concept from the following link.

   https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/research-notes/task3886-rns-5-21-a11y.pdf#:~:text=A%20well%20developed%2C%20carefully%20structured%20VMT%20mitigation%20bank,pay%20for%20VMT%20reductions%20elsewhere%20in%20the%20region.

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-2023-04598-DEIR.

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR/CEQA Branch Chief

email: State Clearinghouse