

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



June 30, 2023

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Rhiannon Bailard, Chief Operating Officer  
University of California College of the Law, San Francisco (UC Law SF)  
200 McAllister Street  
San Francisco, CA 94102

### **Re: UC Law SF Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project – Notice of Preparation (NOP) for Draft Environmental Impact Report (DEIR)**

Dear Rhiannon Bailard:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2023 NOP.

#### **Project Understanding**

The proposed project is an update to the UC Law SF Long Range Campus Plan (LRCP), which provides a high-level planning framework for the campus, and a proposed new mixed-use building at 201-247 Golden Gate Avenue, which would contribute to additional campus housing, academic space, and office space. The LRCP update articulates a vision for an academic village and a diversification of academic spaces on the college campus. The proposed new building will be either academic heavy or academic light and the DEIR will evaluate both variants.

#### **Multimodal Transportation Planning**

This proposed project is in the transit-rich area. The project developer should highlight all transit options available to the residents and promote active transportation modes feasible at this location.

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 (DP-37), which supersedes Deputy Directive 64-R1, and further builds upon its goals. More information on DP-37 can be viewed here ([link](#)).

### **Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to STN may be assessed by Caltrans via the Interim Safety Guidance ([link](#)).
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Lisel Ayon, Associate Transportation Planner, via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

For future early coordination opportunities or project referrals, please contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Luo Yunsheng". The signature is written in a cursive, flowing style.

YUNSHENG LUO  
Acting District Branch Chief  
Local Development Review Branch

c: State Clearinghouse