

DEPARTMENT OF TRANSPORTATION

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7/29/2020

Governor's Office of Planning & Research

Jul 28 2020

STATE CLEARINGHOUSE

July 28, 2020

Ms. Elisa Ventura, PE
City of Pasadena
150 S. Los Robles Avenue, Suite 200
Pasadena, CA 91101

RE: Arroyo Seco Canyon Project Area 2 and 3 –
Draft Environmental Impact Report (DEIR)
SCH # 2014101022
GTS # 07-LA-2019-03288
Vic. LA-210/PM: R21.325

Dear Ms. Elisa Ventura:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project involves water infrastructure improvements in the Arroyo Seco Canyon to allow for the diversion and spreading of up to 25 cubic feet per second (cfs) of surface water. Improvements in Area 2 involve the demolition and replacement of an existing diversion facility and intake structure in the same general location. Improvements in Area 3 involve the reconfiguration and expansion of existing spreading basins. The project objective is to increase the beneficial use of the City's surface water rights and to improve biological functions within the Arroyo Seco. The City of Pasadena is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The proposed project is located approximately 1.25 miles away from Interstate 210 (I-210) and 3.5 miles away from State Route 134 (SR-134).

Thank you for providing queueing analyses of Caltrans off-ramps near the project, as requested in our December 6, 2019 letter in response to this project's Notice of Preparation. After reviewing the queueing analyses and other contents in the DEIR, Caltrans has the following comments:

- We agree with the results of the queueing analyses and the proposed mitigation measures, including MM CUML-1, which states "The City and/or their Construction Contractor shall coordinate with the Los Angeles County Department of Public Works and/or their contractor for the sediment removal activities at Devil's Gate Reservoir regarding the schedule of trucks to and from landfills that would require the use of Interstate 210 eastbound ramps/Arroyo Boulevard intersection. If it is determined that activities would overlap and Project traffic and cumulative traffic including the Devil's Gate project traffic would have vehicle queues at Caltrans facilities that exceed available storage lengths, then the City and/or their contractor shall implement construction vehicle/hauling restrictions that disallow the proposed Project's truck traffic during the AM and PM peak hours of 7:30 AM to 8:30 AM and 4:30 PM h 5:30 PM."
- We agree that the City of Pasadena's VMT thresholds were not exceeded and thus no further analysis is needed.

The following information is included for your consideration.

Caltrans applauds the City of Pasadena for its early adoption of the VMT metric, which assists the State in meeting greenhouse gas emissions reductions targets and reducing VMT. Please continue to make every attempt to reduce VMT, and in particular the potential VMT generated from construction trips for this project. For TDM options that can reduce VMT, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports the implementation of MM-TRA-1 which states that “During the peak phase of construction activities (i.e. during the demolition phase requiring haul truck trips) in Area 3, all Construction Contractors shall schedule the arrival and departure of the sediment export haul trucks to be outside the AM peak hours of 7:30 AM to 8:30 AM and the PM peak hours of 4:30 PM to 5:30 PM.”

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2019-03288.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse