

DEPARTMENT OF TRANSPORTATION

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October 13, 2020

Jocelyn Swain
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: Tentative Tract Map No. 61921 – Mitigated
Negative Declaration (MND)
SCH # 2020090306
GTS # 07-LA-2020-03370
Vic. LA-14/PM: R68.108

Dear Jocelyn Swain:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project consists of a 70-lot residential subdivision in the R-7,000 zone (single family residential, minimum lot size 7,000 square feet). The project is located on approximately 20 acres at the northeast corner of 40th Street West and Avenue J in Lancaster. The City of Lancaster is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1.75 miles away from State Route 14. From reviewing the MND, Caltrans has the following comments:

- The MND states "In July 2020 the City of Lancaster adopted standards and thresholds for analyzing projects with respect to vehicle miles traveled (VMT)." and that one of these thresholds is "project located in a low VMT area - 15% below baseline."
- The MND also states that "The project site is located within a low VMT area; specifically, this area has a VMT which is at least 15% below the Antelope Valley Planning Area (AVPA) threshold. As such, a VMT analysis is not required and no impacts would occur."
- Similar to the City of Lancaster, in July 2020 Caltrans also adopted VMT as the primary metric for determining transportation impacts of projects, and released a new *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), found here: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.
- The new TISG states that Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018 and found here: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The OPR Technical Advisory states that residential projects that locate in areas with low VMT and incorporate low VMT features, such as density, mix of uses, and transit accessibility, will tend to exhibit similarly low VMT. It also states that "Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are currently below threshold VMT...." and that "...such maps can be used to screen out residential and office projects from

needing to prepare a detailed VMT analysis.”

- Therefore, Caltrans requests that the City revise its VMT threshold of “project located in a low VMT area - 15% below baseline.” to “project located in a low VMT area - 15% below baseline - **and project incorporates low VMT features.**” so that the threshold better aligns with those recommended in OPR’s Technical Advisory.
- Caltrans also requests that the City provide evidence that the project is located in an area that has a VMT of 15% below the AVPA’s VMT per capita and includes low VMT features, besides the proposed meandering sidewalk. To show that the project is in a low VMT area, the City can provide a map, per OPR’s Technical Advisory. If the City does not have such a map, other substantial evidence showing that the project is in a low VMT area would also be acceptable.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as the sidewalk along Avenue J and 40th Street West. Additional TDM strategies that the City of Lancaster may want to consider integrating into this project in order to further reduce VMT include:

- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Verify that no more vehicle parking than required by the local permitting agency is provided.
- Provide safe and secure bicycle parking.

Also, 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 recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans’ review.

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-2020-03370.

Sincerely,



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