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**VIA U.S. MAIL & E-MAIL**

February 8, 2020

Matt Chang, Senior Planner  
City of San Gabriel Planning Division  
425 South Mission Drive  
San Gabriel, CA 91776  
Em: [mchang@sgch.org](mailto:mchang@sgch.org)

Re: Pacific Square San Gabriel Mixed-Use Project Draft Environmental Impact Report (SCH No. 2018081085)

Dear Mr. Chang,

On behalf of the **Southwest Regional Council of Carpenters** (“**Commenter**” or “**Carpenters**”), my Office is submitting these supplemental comments on the City of San Gabriel’s (“**City**” or “**Lead Agency**”) Draft Environmental Impact Report (“**DEIR**”) (SCH No. 2018081085) for the Pacific Square San Gabriel Mixed-Use Project (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects. Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

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Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

6-2

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.<sup>1</sup>

The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project’s environmental impacts and to advance progress towards the State of California’s environmental goals.

## **I. EXPERTS**

Norman Marshall, President of Smart Mobility, Inc., is a transportation planning and modeling expert who specializes in analyzing the relationships between the built environment and travel behavior, and doing planning that coordinates multi-modal transportation with land use and community needs.

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Mr. Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel

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<sup>1</sup> California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

behavior, and doing planning that coordinates multi-modal transportation with land use and community needs.

Mr. Marshall's company, Smart Mobility, has completed transportation projects in over 30 states for a wide range of clients including state Departments of Transportation, Metropolitan Planning Organizations, Cities, transit agencies, and public interest groups.

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Mr. Marshall graduated from Worcester Polytechnic Institute in 1977 with a B.S. in Mathematics and from Dartmouth College in 1982 with a M.S. in Engineering Sciences. He has many peer-reviewed publications and presentations. Mr. Marshall is co-leader of the Congress for the New Urbanism project for Transportation Modeling Reform. Mr. Marshall's curriculum vitae is provided along with his comment letter regarding the Project's transportation impacts, attached hereto as Exhibit A.

## II. **THE DEIR'S TRANSPORTATION ANALYSIS IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE**

Mr. Marshall made the following findings in his review of the DEIR's transportation analysis<sup>2</sup>, indicating that it has failed to support its conclusion of a less than significant impact relating to transportation (vehicle miles traveled) under CEQA Guidelines sec. 15064.3:

- The total VMT per service area metric used to exempt the project from VMT analysis is invalid;
- The project Transportation Analysis Zone (TAZ) fails to satisfy the non-residential VMT screening test;
- The project is not located in a low residential VMT area;
- The project is not located in an area well served by transit; and
- The DEIR should have done a valid VMT estimate and mitigated significant impacts as necessary.

6-4

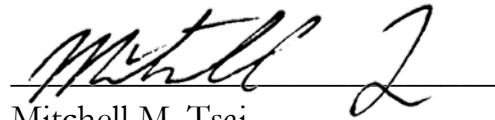
Commenters refer the City to Mr. Marshall's full analysis attached to this letter as Exhibit A. For all of the reasons described in Mr. Marshall's comments, the DEIR's transportation analysis is not supported by substantial evidence.

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<sup>2</sup> Smart Mobility, Comments on the Pacific Square San Gabriel Mixed-Use Project (Feb. 2, 2021). Attached as Exhibit A.

Please contact my Office if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitchell M. Tsai", is written over a horizontal line.

Mitchell M. Tsai

Attorneys for Southwest Regional  
Council of Carpenters

Attached:

Smart Mobility February 2, 2021 Letter to Mitchell M. Tsai, Comments on the Pacific Square San Gabriel Mixed-Use Project (Feb. 2, 2021) (Exhibit A); and  
Norm Marshall CV (Exhibit B).