

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
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7/17/2020

Governor's Office of Planning & Research

**Jul 17 2020**

**STATE CLEARINGHOUSE**

July 17, 2020

Max Castillo  
City of Carson  
Planning Division  
701 East Carson Street  
Carson, CA 90745

RE: Panattoni Project – Mitigated Negative  
Declaration (MND)  
SCH # 2020060370  
GTS # 07-LA-2020-03298  
Vic. LA-405/PM: 9.23

Dear Max Castillo:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project proposes the construction of three concrete tilt-up light industrial buildings totaling 292,400 square feet. The three buildings would include offices to support warehousing and/or manufacturing uses, with associated surface parking, landscaping, and truck loading docks for loading/unloading equipment and supplies. The project includes two development options, one with warehouse and manufacturing uses and one with warehouse uses only. The proposed structure siting and footprint would remain the same under both development options. In addition, a total of 387 parking spaces would be provided for employees and visitors, and a total of 54 spaces would be provided for truck loading docks. The City of Carson is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 3,000 feet away from the Interstate 405 (I-405) and Alameda Street on and off ramps. From reviewing the MND, Caltrans has the following comments:

- Please provide Caltrans with the detailed queueing analysis worksheets for the below off-ramps:
  - Wilmington Ave at I-405 NB Ramps
  - Wilmington Ave at I-405 SB Ramps
  - Alameda St at I-405 NB Ramps
  - 223rd St at I-405 SB Ramps
- The MND states “Should the City of Carson adopt a VMT threshold, the project Applicant or future Property Owner has the option to submit an updated VMT analysis to the City Engineer for review and approval.” If an updated VMT analysis is submitted, please send this to Caltrans for its review.

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. Thus, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions.

As discussed in the MND, if it is determined that after the implementation of Mitigation Measure TRA-1 the project would still exceed the City's threshold of 16.7 VMT per Employee, the project applicant shall be responsible for identifying and implementing travel demand measures to demonstrate the project's VMT per employee are reduced to less than significant levels. Below are some potential TDM measures the project applicant may want to consider implementing, regardless of whether Mitigation Measure TRA-1 is effective in decreasing VMT per Employee to less than significant levels:

- Ensure that no more parking than required by the City of Carson parking code is provided.
- Provide an adequate number of short-term and long-term bicycle parking spaces, and consider including spaces for cargo delivery bikes.
- Verify that the proposed driveways on 223rd Street will not have obstructions that could limit the ability of drivers to see approaching pedestrians and bicyclists, and vice-versa.
- Create a sidewalk along the unnamed street directly west of the development.
- Upgrade crosswalks to continental crosswalks at the below locations and ensure curb ramps are ADA compliant:
  - E 223rd Street & Wilmington Avenue
  - E 223rd Street & Tesoro Campus Drive
- Consider strategies to accommodate electric trucks per recommendations from the California Air Resources Board:  
<https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet>

For additional TDM options, please refer to:

- The *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research, dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf), or
- 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

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. Caltrans supports Mitigation Measure TRA-2, which is the preparation of a Traffic Management Plan (TMP). If construction traffic is expected to cause delays on any State facilities, please submit the TMP 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](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2020-03298.

Sincerely,



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