

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning & Research

**June 10 2021**

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**STATE CLEARINGHOUSE**

Claude McFerguson  
Department of Transportation  
City of Commerce  
5555 Jillson Street  
Commerce, CA 90040

RE: City of Commerce Municipal Bus Lines  
Transit Maintenance Facility Project  
Mitigated Negative Declaration (MND)  
Vic. LA-5/PM 11.661  
SCH #2021050235  
GTS #07-LA-2021-03586

Dear Claude McFerguson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project (Project). The City of Commerce (lead agency) is processing a request to implement a series of discretionary actions that would ultimately allow for the development of a three-part project that would provide maintenance for the City's fleet including, but not limited to existing passenger vehicles, light trucks, trailers, lawnmowers and transit buses and vans.

The first part would be to develop a temporary transit maintenance facility (TMF) site at 5733 Shelia Street, while the permanent TMF site would be constructed. The second part is moving equipment and aboveground storage tanks from the existing TMF at 5555 Jillson Street to the temporary TMF site. The third part would be to develop a permanent TMF at 5926 Sheila Street, which would involve demolition of the existing Commerce Refuse to Energy Facility (CREF) and to construct a maintenance building approximately 16,500 square feet and an office and warehouse building approximately 20,000 sf. The compressed natural gas/liquefied natural gas (CNG/LNG) station on the east part of the project site would remain. CNG-fueled buses would refuel at the CNG/LNG station.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has been codified into California Environmental Quality Act (CEQA) law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects starting July 1, 2020.

From reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. However, the following information is included for your consideration.

### **Roadway System**

The nearest State facility to the Project is I-5 and I-710. In Project's Initial Study (IS) dated May 2021, page 2-1, states that "... regional access to the sites is from the Interstate 5 (I-5) Freeway via Eastern Avenue or Washington Boulevard." And, specifically, " The temporary TMF site is... approximately 0.3 mile southwest of the I-5 Freeway and 0.2 mile east of Eastern Avenue; The permanent TMF site is...approximately 0.25 mile southwest of the I-5 Freeway and 0.3 mile east of Eastern Avenue."

To increase traffic flow efficiency and improve traffic safety, Caltrans recommends that the lead agency consider implementing Transportation Demand Management (TDM) and Intelligent Transportation System (ITS) strategies on local streets near the Project. Potential areas for improvement includes I-5/Eastern, I-5/Washington Blvd., I-710/Washington Blvd. and I-710/Bandini Blvd. Examples of TDM and ITS strategies includes but not limit to traffic signal improvements like signal synchronization, CCTV camera installation and management, etc

### **VMT Analysis**

According to Project's IS, Section 4.17 – Transportation and Traffic, page 4.17-3, "Total [Project VMT] would increase by 558.4 from existing (2016) to future (2040) conditions, consisting of 534.8 net new VMT plus 23.6 shifted VMT... VMT per employee would increase slightly from 33.1 in 2016 to 34.0 in 2040.... The threshold of significance for VMT impacts for employment sites is 15.3 VMT per employee. Project-generated VMT per employee would exceed the threshold and thus would be a significant impact before implementation of mitigation measures TRANS-1 through TRANS-4."

The above-mentioned Mitigation Measures are mainly the following (Traffic Assessment, April 2021, page 42-43):

- Implement commute trip reduction program – a reduction up to 19%
- Ride-sharing program – a reduction up to 15%
- Transit subsidy – a reduction up to 20%
- Transit access and network improvements – a reduction up to 8%

Post-mitigation total Project VMT per employee would be reduced by an estimated amount of up to 62 percent, exceeding the VMT reduction goal of 55 percent (required to mitigate the identified significant Project VMT impact).

Caltrans concurs that with implementation of TDM Program set forth in MM TRANS-1 through TRANS-7, IS, page 4.17-6 &-7, such that the Project VMT impacts would be less than significant.

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In addition, any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

If you have any questions, please feel free to contact Frances Duong, the project coordinator, at (213) 266-3561 and refer to GTS #07-LA-2021-03586.

Sincerely,

*Frances Duong*

FRANCES DUONG  
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse