

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning & Research

**August 05 2021**

**STATE CLEARINGHOUSE**

August 5, 2021

Kaneca Pompey  
City of Carson  
701 East Carson Street  
Carson, CA 90745

RE: 1055 E. Sandhill Avenue Project – Mitigated  
Negative Declaration (MND)  
SCH # 2021070155  
GTS # 07-LA-2021-03637  
Vic. LA-91/PM: R8.077

Dear Kaneca Pompey:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The project is located on a 5.79-acre lot with existing industrial uses in the City of Carson at 1055 East Sandhill Avenue. As part of the project, 8 warehouses totaling 109,449 sf would be demolished, and a 126,013 sf warehouse would be developed on the site. This warehouse would include 119,501 sf of industrial space, 6,512 sf of office space, and a 3,256 sf mezzanine. The project also includes 20 truck loading docks and a surface parking lot with 130 vehicle parking spaces. The City of Carson is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 2,000 feet away from the State Route 91 (SR-91) and S Central Avenue ramps. It is also located approximately 1.75 miles away from the Interstate 110 (I-110) and SR-91 interchange. From reviewing the MND, Caltrans has the following comments.

The implementation deadline for Senate Bill 743 (2013), which mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA starting July 1, 2020, has passed. Thus, Caltrans urges the City of Carson to adopt VMT thresholds as soon as possible. For information on determining transportation impacts in terms of VMT on the State Highway System, see Caltrans' updated Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Note that Caltrans' new TISG is largely based on the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018, that was quoted in the MND.

OPR's Technical Advisory states that a project that generates a *total*, rather than a *net total*, of less than 110 trips per day may generally be assumed to cause a less-than-significant transportation impact. Lead Agencies can adopt their own VMT thresholds that differ from those recommended in OPR's Technical Advisory. However, substantial evidence should be provided as to why the City of Carson will be adopting this threshold that considers net total trips as opposed to total trips. Therefore, Caltrans recommends that the City provide substantial evidence for why it plans to adopt this threshold. Alternatively, the City can

adopt the same threshold recommended by OPR and provide a more detailed VMT analysis for this project, because it will generate a total of more than 110 trips per day.

In addition, Caltrans conducted a traffic safety review for several intersections along SR-91 in close proximity to the project. This safety review was based on Caltrans' interim safety analysis guidance, dated December 2020 and found here, for the City's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>. As a result of the safety review, the westbound SR-91 on-ramp from Central Avenue has been identified as a repeated Table C location with statistically significantly higher concentrations of crashes, and in particular, rear-end collisions. In general, as traffic volumes increase, the number of collisions is likely to increase according to the April 2019 Caltrans Traffic Safety Investigation Handbook. Therefore, if the proposed project is anticipated to add new trips to the westbound SR-91 on-ramp from Central Avenue, this ramp will be subject to another Caltrans safety review. To assist us in determining whether there are traffic safety impacts at this location, please provide the number of trips the project will generate that should be assigned to this location. Also, please provide us with the queuing analysis at this location during the peak hours under both existing and future conditions. When the requested traffic information becomes available, we will review this location further and make a traffic safety assessment.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans suggests that the City provide no more vehicle parking than required, which according to the MND, is 101 parking stalls. This is because offering additional vehicle parking can induce VMT.

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 issues on any State facilities, please submit a construction traffic control plan detailing these issues 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-2021-03637.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse