

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation
a California Way of Life

Governor's Office of Planning & Research

August 10, 2021

August 11 2021

STATE CLEARINGHOUSE

Ms. Jo-Anne Burns
City of West Covina
1444 West Garvey Avenue South
West Covina, CA 91790

RE: Amazon Delivery Station DAX9 Project
SCH # 2021070230
Vic. LA-10/PM 36.49
GTS # LA-2021-03655-MND

Dear Ms. Burns:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. Amazon Inc. is seeking to locate in the City of West Covina in Los Angeles County and repurpose the proposed Project site for a last mile delivery station. The proposed Project involves the repurposing of a former 177,440 square foot industrial building on a 21.22-acre site, that has recently been utilized by Faith Church. The Amazon Delivery Station would operate as a light warehousing and distribution operation with approximately 250 employees.

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 codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

For future reference, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for future development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The proposed Project generates the most trips outside the typical peak hour commute periods. The 10 AM to 11:00 AM and 8 PM to 9 PM are the peak hours of the generator. Therefore, the project would not contribute a traffic safety impact to the State facilities.

SGVCOG VMT Evaluation

The City of West Covina has adopted a 15 percent below baseline VMT per Service Population for all land uses. That baseline is 35.02 and the threshold is 29.77. The evaluation tool indicates the site would have a VMT/Service Population of 31.82 without the Project.

The proposed tenant offers all employees the option of setting aside up to \$270/month of their before tax pay to be used to subsidize alternative transportation expenses. The tenant also offers preferential parking for car/vanpools close to the building entrance with the number of available spaces varying by demand. In addition, as normal practice the tenant provides kiosks/bulletin boards where transit and ridesharing options are posted, provides a ride-matching platform such as Waze, and assigns an employee transportation coordinator to encourage the use of alternative transportation options. Application of these measures qualify as TP11 Alternative Transportation Benefits and are expected to reduce the VMT per service population to 29.72, below the significance threshold.

Pre-tax benefits are offered through Edened Commuter Benefits Solutions. Information about these benefits is provided to new employees during their orientation and is documented in the employee handbook. These benefits are applicable to:

- Transit expenses
- Parking expenses for Park & Ride lots/transit stations
- Vanpool and qualified ridesharing (such as Uber pool & Lyft Shared) expenses

With at least 15 percent of the tenant's employees being eligible for Alternative Transportation Benefits, the proposed Project would have a less than significant VMT impact.

ACTIVE TRANSPORTATION AND PUBLIC TRANSIT ANALYSIS

The proposed Project is consistent with adopted policies, plans, and programs to provide infrastructure for active transportation and public transit facilities. It would not conflict with existing or proposed facilities supporting these travel modes. Specifically, the West Covina Active Transportation Plan proposes the addition of bike lanes along Badillo Street. Conversion of the site to the proposed delivery station does not require any changes to Badillo Street that would prevent the installation of these bike lanes. The delivery station does not require any on-street parking along its frontage, freeing up pavement adjacent to the north curb for striping as a bike lane. In addition, while the Plan does not call for any pedestrian improvements along either Badillo Street or San Bernardino Road, the sidewalk along the site's frontage on San Bernardino Road would be replaced as part of the site's conversion to a delivery station. The Project would also provide signalized crosswalks across San Bernardino Road reducing the spacing of such crossing from a half to a quarter mile. Foothills Transit Route 190 provides fixed-route bus service with stops on San Bernardino Road at Vincent Avenue and Lark Ellen Avenue.

As a reminder, 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. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03655AL-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse