

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

April 26, 2022

Alfonso Hernandez  
City of Downey  
11111 Brookshire Avenue  
Downey, CA 90241

RE: Prologis Stewart and Gray Road  
Warehouse Project – Notice of  
Preparation of an Environmental Impact  
Report (NOP)  
SCH # 2022030738  
GTS # 07-LA-2022-03898

Dear Alfonso Hernandez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed Project would include the demolition of five existing buildings and the construction of an approximately 510,110 square foot (sf) industrial concrete tilt-up building for warehouse/logistics uses, and a 25,000-sf ancillary truck workshop facility. The Project would include 614 auto parking spaces, 215 trailer and/or container parking spaces and 109 dock loading doors. The warehouse building would have a 40-foot interior clear height and would reach a maximum height of 55 feet above grade. The City of Downey is the Lead Agency under the California Environmental Quality Act (CEQA).

The Project is located in the City of Downey at the northwest corner of the intersection of Stewart and Gray Road and Woodruff Avenue. The Project is in vicinity of Interstate 605 (I-605) and Interstate 105 (I-105). The NOP finds that Transportation impacts may be potentially significant, therefore a Traffic Impact Analysis will be prepared for the proposed Project to be further analyzed in the Environmental Impact Report (EIR). We look forward to reviewing the Project's Traffic Impact Analysis.

As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research (OPR), dated December 2018. Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020, and the Caltrans Interim Local Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory. You can review these resources online at:

- [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)
- <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>
- <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For TDM strategies, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Caltrans also encourages lead agencies to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For additional strategies that will promote equity and environmental preservation, please refer to the 2010 Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Finally, 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, including I-105 and I-605, please submit a construction traffic control plan detailing these issues for Caltrans' review.

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at [Ronnie.Escobar@dot.ca.gov](mailto:Ronnie.Escobar@dot.ca.gov), and refer to GTS # 07-LA-2022-03898.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse