

DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life*

May 14, 2024

Governor's Office of Planning & Research

May 15 2024

STATE CLEARINGHOUSE

Louis Morales, Interim Director
Economic Development and Planning
City of Commerce
2535 Commerce Way
Commerce, CA 90040

RE: Commerce Energy Storage 2023
SCH # 2022040355
Vic. LA-05/PM 10.72/LA-710/PM 19.72
GTS # LA-2022-04511-MND

Dear Louis Morales:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The project would add a battery energy storage facility at 6920 East Slauson Avenue, modify the previously approved battery energy storage facility at 6904 East Slauson Avenue, and make related modifications at the Southern California Edison substation located at 6319-6337 Garfield Avenue.

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:

<https://opr.ca.gov/ceqa/#guidelines-updates>

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.

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

At the 6920 Site, construction traffic won't significantly affect local roads like Garfield Avenue and Slauson Avenue, which already handle large truck traffic. Permits would be needed for oversized loads. During operation, with only six staff traveling to the site each shift, the increase in vehicle miles traveled (VMT) would be minimal. The project won't interfere with existing bus routes or the City's plans to improve the Slauson Corridor. The City plans to improve Slauson Avenue with bicycle lanes, but the project won't interfere with this. Work in public areas would follow safety guidelines and limit impacts on transportation, including ensuring safe pedestrian access at all times.

At the 6904 Site, the minor underground extension will result in a slight increase in the temporary use of Garfield Avenue during construction. However, Garfield Avenue will never be fully closed to traffic in either direction. Steel plates will be placed over any open sections of the trench each night to ensure safe traffic the following day. A Traffic Control Plan will be in place to maintain continuous and safe traffic operations on Garfield Avenue throughout construction, with occasional temporary lane closures. Bus stops on Garfield Avenue and Randolph Street will remain unaffected. Nighttime work on Major Arterials will comply with the City's requirements to avoid conflicts with public transit. Similarly, construction of the riser pole at the Laguna Bell Substation will have minimal impacts on Garfield Avenue, with traffic maintained in both directions under approved measures, including limited lane closures during specific hours. Taking these into account, the Project's impacts on VMT trips will be negligible, and it will not conflict with circulation system plans or policies.

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According to CEQA Guidelines Section 15064(b)(1), projects within half a mile of an existing major transit stop or along a high-quality transit corridor are generally presumed to have minor transportation impacts. Since the Project site is near bus routes with stops less than half a mile away, it aligns with these guidelines, indicating no significant transportation issues.

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 that large-size truck trips be limited to off-peak commute periods. Construction truck loads should be covered with a tarpaulin covering.

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-2022-04511-MND.

Sincerely,

Anthony Higgins for

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse