

DEPARTMENT OF TRANSPORTATION

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November 16, 2023

Governor's Office of Planning & Research

Ms. Brenda Magana, Planning Manager
Department of Economic and Community Development
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

Nov 16 2023

STATE CLEARINGHOUSE

RE: Site Plan Review 22-013, Tentative Parcel
Map 83915/ Palmdale Logistics Park
SCH # 2022080668
Vic. LA-14, PM R64.68
GTS # LA-2022-04335-DEIR

Dear Brenda Magana:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project Applicant proposes to develop the approximately 78-acre property with two industrial buildings together totaling approximately 1,429,700 square feet. Building 1 is proposed to contain approximately 711,930 square feet of warehouse area and 5,000 square feet of office area for a total of 716,930 square feet of total building area. Building 1 would include a total of 112 loading dock doors facing north and south. Building 2 is proposed to contain approximately 707,770 square feet of warehouse area and 5,000 square feet of office area for a total building area of 712,770 square feet. Building 2 would include 98 loading dock doors also facing north and south.

The Project was evaluated against screening criteria as outlined in the County Guidelines. The Project was not found to meet any available screening criteria, and a VMT analysis was performed. The Project's VMT analysis found the Project to exceed the County's VMT per employee threshold by 0.75% using the currently adopted thresholds. The Project's HBW VMT per employee was also evaluated against the County's anticipated updated thresholds and that found the Project to be below the threshold by 2.21%.

Potential commute trip reduction strategies have been considered for the purposes of reducing Project-related VMT impacts (i.e., commute trips) determined to be potentially significant. As the future building tenants are not known for the Project, the effectiveness of each commute trip reduction measure may be limited. The Project can however

consider the following measures that have the potential to reduce work/commute VMT, although no quantified benefit can be taken at this time. Potential VMT reduction measures that could be implemented are as follows:

- The Project may implement a Voluntary Commute Trip Reduction (CTR) measure. The purpose of the CTR would be to encourage alternative modes of transportation such as carpooling, which would reduce VMT. A proposed CTR program for this project could include providing on-site and/or online commute information services including information on available transit and ride coordination for employees.
- Provide designated carpool/vanpool parking in desirable locations on-site could be provided, which could encourage employees to carpool/vanpool to work and reduce VMT.
- The Project could install end-of-trip facilities such as bicycle parking and lockers which could encourage employees to use alternative modes of transportation and thus reduce VMT.
- The Project could install on-site electric vehicle charging stations beyond what is required by the 2019 California Green Building Code Standards (CALGreen) at designated parking areas. Although this measure would not directly reduce VMT, it would reduce greenhouse gas (GHG) emissions.
- The Project could increase sidewalks along the Project frontage and provide connections to existing trails (if applicable) in order to improve pedestrian access. This measure could encourage employees to walk to nearby destinations and thus reduce VMT.

Implementation of feasible VMT reduction measures would not definitively reduce Project VMT or Project VMT impacts. Therefore, even with the implementation of these measures, the Project VMT impact is assumed to exceed the County VMT threshold. The Project VMT impact is therefore considered significant and unavoidable.

We would recommend the City to consider the following measures for this project:

1. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, 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://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

2. For each new development, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared.

Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City's VMT traffic model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

3. Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase.

We noticed that on Avenue M near SR-14, there are two other proposed new warehouse projects.

1. SCH # 2022010581, APNS: 3128-015-900 and -902 (1,050,000 square feet industrial building)
 - a. Condition of Approval: The applicant shall design and construct traffic signals for Columbia Way (Avenue M) at State Route 14 northbound and southbound access ramps. Plans shall be subject to the approval of the State of California Department of Transportation and the City Engineer.
2. SCH # 2023090551, APN 3170-018-081, Palmdale Logistics Center Project (3 million square feet industrial buildings)
 - a. Notice of Preparation: Caltrans has sent a letter dated October 20, 2023.

As a reminder, 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 in On December 18, 2020. You can review those documents at the following link:

<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>

Ms. Brenda Magana, Planning Manager

November 16, 2023

Page 4 of 4

A traffic study for SCH # 2023090551 should reference to the above guidelines.

In addition, there are three Caltrans improvement projects near the Project location.

1. Project EA 30580 Hybrid Roundabout Project at Route 14 and Avenue M overcrossing between 10th Street and 15th Street West.
2. Project EA 31020 Hybrid Roundabout Project at Route 14 and Avenue N also locally funded by LACMTA.
3. Project EA 32890 on/off-ramp improvements at Route 14 and Avenue L.

Our recommendation is for the City to incorporate all three warehouse projects and the aforementioned Caltrans improvements into the environmental disclosure process to address any potential traffic impacts effectively.

During the phone call held on November 8, 2023, with City staff, an agreement was reached between Caltrans and the City to engage in future discussions regarding the potential significant traffic impact and mitigation strategies on State facilities for all three industrial projects.

Please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04335-DEIR for our next meeting appointment.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

email: State Clearinghouse