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August 5, 2024

Megan Taggart
Deputy Director of Economic and Community Development
City of Palmdale Planning Division
38250 Sierra Highway
Palmdale, CA 93550

RE: Antelope Valley Commerce Center
Project – Draft Environmental Impact
Report (DEIR)
SCH# 2022090009
GTS #07-LA-2022-04562
Vic. LA 14 PM R64.664

Dear Megan,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The Project Applicant, AVCC Master, LLC proposes to entitle and develop the Antelope Valley Commerce Center Specific Plan Project (herein, "Project") on a 432.9 gross-acre undeveloped site located in the City of Palmdale, Los Angeles County, California. The Project would allow for the phased development of a master-planned commerce center containing industrial, commercial, and open space land uses, as well as roadways. The four phases of development would allow for a maximum of 8,302,536 square feet (s.f.) of building footprint, to be comprised of approximately 8,241,552 s.f. of industrial and 60,984 s.f. of commercial uses. Associated improvements to the Project site would include, but are not limited to, paved roads, paved parking areas, drive aisles, truck courts, utility infrastructure, landscaping, water quality basins, signage, lighting, property walls, gates, and fencing, including perimeter fencing. Six (6) buildings are proposed in the first phase and their development details are described herein. Site-specific detail for subsequent phases of development would be determined in the future, but reasonable assumptions are made herein about the future phases of development to enable a complete and comprehensive analysis of the whole of the Project.

This EIR analyzes the physical environmental effects associated with all components and all phases of the Project, including planning, grading, construction, and on-going operation. All development on the Project site would be required to substantially conform to the proposed Specific Plan.

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Development of the Antelope Valley Commerce Center is expected to occur in four (4) phases in response to market demands and according to a logical and orderly extension of roadways, public utilities, and infrastructure.

- Phase I includes the northern portion of the central Industrial lot, the northern portion of the western Industrial lot, and the Open Space lot in the northwest portion of the site;
- Phase II includes the southern portion of the central Industrial lot, and the southern portion of the western Industrial lot;
- Phase III includes the Commercial lot and the Industrial lot west of Public Street A; and,
- Phase IV includes the Industrial lot south of Public Street B.

Access to the Project site would be from existing north-south oriented Columbia Way / East Avenue M with support from the following internal streets that would provide access to the buildings:

- Public Street A. North-south oriented Public Street A located in the western portion of the Project site;
- Public Street B. North-south oriented Public Street B located in the eastern portion of the Project site;
- Public Street C. East-west oriented Public Street C located in the southern portion of the Project site;
- Public Street D. North-south oriented Public Street D located in the southwestern portion of the Project site;
- Private Drive D. East-west oriented Private Drive D located in the northern portion of the Project site; and,
- Private Drive E. A north-south oriented Private Drive E located in the central portion of the Project site.

This EIR includes an analysis of the overall Project as well as a detailed analysis of the proposed development in Phase I, which is proposed to include the construction and operation of six (6) industrial warehouse buildings, a drainage basin positioned in the northeastern portion of the Project site and supporting roadways and utility infrastructure.

After reviewing the DEIR, Caltrans has the following comments:

As stated in the DEIR, the Project will result in a significant impact to Air Quality, Greenhouse Gas Emissions, and Vehicle Miles Traveled.

All significant Project impacts are directly related to vehicular use and activity. With 8,302,536 square feet of new industrial use, 1,624 car parking spaces, 715 trailer parking stalls, and 394 truck-high dock doors, the Antelope Valley Commerce Center Project will induce demand for a consequential number of additional vehicle trips and vehicle miles traveled (VMT). While the Project will certainly result in significant Air Quality, GhG Emission, and VMT impacts, Caltrans does not concur that these impacts are unavoidable. The currently proposed mitigation measures are inadequate to offset the impacts of the project, as it is designed in the same status quo model of development that has proven to be unsustainable long-term.

Caltrans recommends the following:

- Reducing the amount of parking whenever possible. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation.
- Invest in and prepare the project's design for alternative modes of freight movement, such as rail, which is not only more efficient but also more easily converted to carbon neutral energy sources in the future.
- Due to the increased volume of truck trips, a substantial contribution should be made to a city fund that will build safer infrastructure for people walking, riding bikes, and taking transit throughout the city. The most effective methods to reduce pedestrian and bicyclist exposure to cars and trucks is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.
- Additional studies should be conducted to develop additional mitigation measures that include robust walking, biking, and transit infrastructure to further reduce the Project's VMT impact below the threshold of significance.

Following construction, a study should be conducted to confirm that the proposed mitigation measures are sufficiently offsetting the Project generated VMT. If not, new and/or additional mitigation measures need to be implemented.

Under Table 5-4, footnote #3 states that, *"Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the SR-14 Freeway mainline."* A speed differential between adjacent lanes, as well as sudden lane changes, can lead to significant safety issues. The intention of the adjacent through

lane is to accommodate through traffic, not to accommodate "spillover." The Office of Traffic Safety would like to see clarification of this statement as it does not appear to adequately mitigate this issue. Caltrans requests confirmation that this safety issue will not occur at the following locations:

- State Route 14 at E Ave N.
- State Route 14 at E Ave M.
- State Route 14 at E Ave L.
- State Route 14 at E Ave K.

Additionally, an encroachment permit will be required for any project work proposed near Caltrans Right of Way and all environmental concerns must be adequately addressed. Please note that any modifications to the State facilities will be subject to additional review by the Office of Permits prior to issuance of the permit.

Finally, construction of the proposed project would involve deliveries of materials, components, and supplies to the various sites, and will involve oversized trucks. As a result, prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Traffic Management Plan (CTMP) for review and approval by City staff to reduce any impacts to less than significant levels. The CTMP needs to specify the duration of construction period and provide construction analysis on significant impacts due to increase in construction truck traffic on highways not designated as truck routes. It should also specify any work that would affect the freeways and its facilities, and that Caltrans has the jurisdiction for review and approval. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-LA-2022-04562.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse