

DEPARTMENT OF TRANSPORTATION

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June 20, 2024

Bandi Jones, Senior Planner
City of Irwindale
5050 Irwindale Avenue
Irwindale, CA 91706

RE: Irwindale Gateway Specific Plan
SCH # 2023020290
Vic. LA-605, PM 23.57 to PM 23.97
GTS # LA-2023-04536-DEIR

Dear Bandi Jones:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Irwindale Gateway Specific Plan proposes the development of an industrial logistics and distribution center and associated parking and loading docks. The proposed project would redevelop the project site with one of two options.

Option 1 proposes a 52.6-acre general light industrial, manufacturing, warehouse/distribution, e-commerce fulfillment center encompassing 954,796 square feet of warehouse space and 43,000 square feet of office space.

Option 2 proposes a 36.71-acre general light industrial/warehouse/distribution, e-commerce fulfillment center encompassing 668,070 square feet of warehouse space and 36,000 square feet office space, and 15.94 acres of battery energy storage system (BESS) (electric energy storage, transmission and AC/DC and voltage conversion). The preliminary design for the BESS has 353,000 square feet of battery arrays, within which battery enclosures, inverter enclosures, and medium voltage transformers would be arranged. The BESS would be served by an overhead electric tie-line consisting of three 220-kilovolt conductor cables below an optical ground wire that serves dual purposes of grounding and fiber optic communications.

Existing Multimodal Infrastructure and Service Conditions

The VMT (Vehicle Miles Traveled) assessment evaluates existing multimodal infrastructure and service conditions that support non-SOV (Single Occupancy Vehicle) trips, essential for reducing VMT in the project area. Projects exceeding the City's VMT

significance threshold can mitigate impacts by investing in non-SOV trip infrastructure and services.

Bicycle and Pedestrian Conditions

- **San Gabriel River Trail:** This trail runs north/south to the east of the project site between Live Oak Lane and Rivergrade Road, passing under Live Oak Avenue and crossing at an at-grade signalized intersection at Arrow Highway.
- **Sidewalks:** Sidewalks are discontinuous along Arrow Highway and Live Oak Avenue. On Arrow Highway, the sidewalk on the south side ends approximately 170 feet east of Live Oak Lane. On Live Oak Avenue, sidewalks are on the north side from the San Gabriel River Trail to Live Oak Lane and on the south side from the Trail to Graham Road. There is a crosswalk at the Live Oak Avenue/Graham Road intersection. Live Oak Lane lacks sidewalks.
- **Active Transportation Plan:** The City of Irwindale's plan designates Live Oak Avenue and Arrow Highway as Major Roads, recommending a Class IV Bikeway along Live Oak Avenue connecting to the San Gabriel River Trail. The plan also includes actions such as:
 - Encouraging secure bicycle parking at employment centers, commercial areas, recreational, and civic amenities.
 - Promoting pedestrian-oriented improvements in new developments.
 - Requiring new developments to provide sidewalks in Pedestrian Priority Areas.

Transit Conditions

- **Foothill Transit Line 492:** This line (Montclair – Arcadia – El Monte via Arrow Hwy) stops at Live Oak Avenue and Stewart Avenue and runs along the southern border of the project site with service every half hour from 5:30 AM to 11:00 PM.
- **Foothill Transit Line 272:** This line (Duarte – Baldwin Park – West Covina) stops at Live Oak Avenue/Stewart Avenue and Rivergrade Road/Arrow Highway, running along the northern border of the project site with hourly service from 5:30 AM to 9:00 PM.

Project-Level VMT Analysis

The SGVCOG web-based VMT Evaluation Tool was used for the project-level analysis under CEQA. The Baseline (Year 2023) plus Project assessment suggests that the project's VMT impact will be modest, comparable to cumulative VMT levels. The following VMT reduction elements were included in the Project-level analysis:

1. Constructing 750 feet of a five-foot-wide meandering public sidewalk and a 20-foot-wide landscaped parkway on the north side of Live Oak Avenue adjacent to the project site.
2. Dedicating 1,900 feet of Live Oak Lane (300 feet and 1,600 feet along the northern and southern portions, respectively) to meet the City's 60-foot street standard.
3. Constructing five-foot-wide sidewalks on both sides of Live Oak Lane and ten-foot-wide landscaped setbacks along the portion abutting the project site.

4. Installing a new traffic signal at the Live Oak Lane and Live Oak Avenue intersection.
5. Installing five new public streetlights along the north side and eight along the east side of Live Oak Lane abutting the project site.
6. Constructing a meandering sidewalk and parkway on the south side of Arrow Highway.
7. Providing carpool/vanpool infrastructure.
8. Providing 23 bicycle parking spaces.

Despite these improvements, the project alone would not reduce the VMT impact to less-than-significant levels, necessitating further mitigation measures:

- **New Bus Stop:** Installing a bus stop for Foothill Transit Line 492 on Live Oak Avenue at Live Oak Lane, reducing the distance from the nearest transit stop from 2,750 feet to 150 feet. This would require coordination with Foothill Transit and the City of Irwindale.
- **Class IV Trail:** Modifying the sidewalk and landscaping along Live Oak Avenue to include a Class IV trail, in line with the City of Irwindale's Active Transportation Plan, connecting to the San Gabriel River Trail.

VMT Conclusion

Without VMT reduction measures, the project would result in 20.8 daily VMT per employee, exceeding the City's threshold of 18.5. However, with the proposed multimodal improvements and mitigation measures, the daily VMT per employee would be reduced to 18.4, meeting the City's threshold and resulting in a less-than-significant impact on the transportation system.

Others

We noted that the truck VMT is 40 VMT/Emp with or without mitigation measures, as disclosed on page 7-14 of the DEIR. Please provide a discussion or clarification on whether the City intends to mitigate this impact, given that the City's threshold is 18.5 VMT/Emp.

We recommend the Lead Agency to consider the following measures for this project as an additional TDM:

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 this 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 for:

- a) validating existing VMT thresholds,
- b) assisting in setting future VMT thresholds, and
- c) identifying suitable TDM to apply as minimization or mitigation measures for the future projects. These measures could be implemented in the event the post-development VMT analysis discloses any significant transportation impacts.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

As a reminder, the transportation of heavy construction equipment and materials requiring oversized transport vehicles on State highways will necessitate a Caltrans transportation permit. We recommend scheduling large truck trips during off-peak commute periods and utilizing alternative routes when possible. Additionally, truck drivers should cover construction loads with tarpaulins to prevent debris spillage onto the State Highway. If construction trips are anticipated to impact traffic flow near State facilities, a construction management plan may be required.

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-2023-04536-DEIR.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

email: State Clearinghouse