

DEPARTMENT OF TRANSPORTATION

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September 26, 2024

Scott Kinsey
Planning Bureau
Department of Community Development
411 West Ocean Boulevard, 3rd Floor
Long Beach, CA 90802

RE: Intex Corporate Office and Fullfillment
Center
SCH # 2023040345
Vic. LA-710/PM 9.77, LA-405/PM 8.09
GTS # LA-2023-04593-DEIR

Dear Scott Kinsey:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The proposed project includes the construction of a new 60-foot-tall, 517,437 square foot combination warehouse and distribution center with accessory offices. Goods would be imported via the nearby Port of Los Angeles and Port of Long Beach, sorted, and stored on-site, and then distributed nationally from the project site. The project site would be developed with 570 parking stalls and 174 loading/trailer parking spaces, all in an open surface parking field.

Access to the project site would be via five driveways on Carson Street and West Via Plata Street. The proposed project would include vacation of Via Alcalde Avenue on the eastern boundary of the project site. This right-of-way, once vacated, would become part of the site to be used for vehicle and truck parking and for on-site truck turning and maneuvering. All solid waste would be stored in trash enclosures with recycle bins that would be locked when not in use. The proposed project would include signage posted around the project site to indicate entrances and activity nodes, prohibit loitering and trespassing, and warn of surveillance on the site. The proposed project would also include security cameras dispersed throughout the project site. The proposed project would connect to existing electrical lines operated by Southern California Edison. The proposed project would not utilize natural gas service. Water and sewer services would be provided by the Long Beach Utilities Department.

On page 4.11-12 of the DEIR, Table 4.11-1 presents the City of Long Beach's VMT Thresholds of Significance, which set the threshold for Office and Industrial uses at 17.2. While the proposed project aligns with the General Plan and shows no net increase in VMT, this approach lacks sufficient evidence to meet state VMT reduction goals. Please clarify the rationale for using the "no net increase" method, as it leads to minimal VMT reduction. The 2027 Plus Project scenario indicates a home-based work VMT per employee of 18.8, with only a 4.78% reduction from the No Project scenario (19.8) and a 6.89% reduction from the County baseline (20.2). We recommend that the City adopt Transportation Demand Management (TDM) strategies to achieve OPR's recommended 15% or higher VMT reduction to align with state climate goals. Reductions below 15% may need further justification to ensure the project meets broader environmental and sustainability objectives.

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 should be prepared to validate Project VMT and future adjustments to VMT thresholds. Additional mitigation measures should be implemented if the post-development VMT analysis discloses any significant VMT impacts. This analysis, which may include interviews and surveys by project occupants, will provide new transportation data to help validate the City's VMT 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 thresholds, 2) to assist in setting future VMT thresholds, 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 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.

4. 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.
5. As a reminder, any transportation of heavy construction equipment and/or materials which require use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend large-size truck trips be limited to off-peak commute periods. Truck drivers should cover construction trucks with tarpaulin to avoid debris spillage onto the State Highway.

Please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2023-04593-DEIR.

Sincerely,



ANTHONY HIGGINS
Acting LDR/CEQA Branch Chief

email: State Clearinghouse