

California Department of Transportation

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December 23, 2024

Ms. Joanne Hwang
City Planner
City of Brea
1 Civic Center Circle.
3rd Floor
Brea, CA. 92805

File: LDR/CEQA
SCH: 2023070241
12-ORA-2023-02678
SR 142 PM: R1.169
SR 90 PM: R0.762

Dear Ms. Hwang,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the DJT4 Parcel Delivery Facility Project. The Project would demolish the existing 637,503-square-foot office building and surface parking lot to construct a 181,500-square-foot parcel delivery facility, consisting of 163,350 square feet of warehouse space and 18,150 square feet of ancillary office space, on a 31.52-acre site. The proposed facility would be a single-story building with a maximum height of 44 feet and FAR of 0.14. The Project would provide 1,064 vehicle parking spaces (consisting of 305 automobile spaces, 755 delivery van spaces, and four trailer truck spaces), 180 van loading spaces (90 loading spaces and 90 staging spaces), and 14 Utility Tractor Rig loading spaces to serve facility operations. The proposed facility would be generally located in the center of the Project Site and flanked by loading areas and surrounded by vehicle parking. The Project building would be located entirely within the M-1 zone, and surface parking and drive aisles would be located within the M-1 and MU-II zoned portion of the Project Site. The Project would operate 24 hours per day, 7 days per week to support delivery of packages to customer locations. The Applicant anticipates approximately 25 line haul trucks delivering packages to the Project Site each day, primarily between the hours of 10:00 p.m. to 8:00 a.m. The packages are removed from the line haul trucks, sorted by delivery routes, placed onto movable racks, and staged for dispatch. Delivery service Partner (DSP) and Amazon Flex drivers would work shifts between the hours of 9:20 a.m. and 9:10 p.m. to deliver customer packages. Amazon associates and managers would be assigned shifts to support and supervise delivery operations. Employee shifts and departure windows for delivery drivers are designed to alleviate impacts during rush hour periods. The Applicant anticipates that on a daily basis, there would be a total of 224 associates, managers, and dispatchers who work within the proposed facility; 312 van drivers; and 80 Flex drivers.¹ In order to fulfill the operational need, the Applicant anticipates that a maximum of 800 workers would be hired at the proposed facility.

The Project is located at 275 Valencia Avenue on Assessor Parcel Numbers 320-233-17, 320301-11, and 320-301-12 (Project Site) in the City of Brea. Primary regional access to the Project Site is provided via Imperial Highway/State Route (SR) 90 approximately 0.2 miles to the south of the Project Site and Carbon Canyon Road/SR 142 approximately 0.4 miles to the north of the Project Site. Local access to the Project Site is provided via Valencia Avenue, Surveyor Avenue, E. Birch Street, and Enterprise Street.

State Routes 90 and 142 are both owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

1. Consider providing discussion of existing transit route services for all such as local, intracounty, and/or interregional bus services within the nearby proposed project location including the regional connectivity into the rail services provided by Metrolink and Amtrak Pacific Surfliner.
2. Encourage the use of transit among future visitors, and workers of the development. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.
3. Provide adequate wayfinding signage and related amenities for transit stops where needed within the project vicinity.
4. The proposed project is located near local and regional bikeways. With these features in mind, consider providing secure bicycle parking facilities. For bicycle parking best practices, refer to APBP's Essentials of Bike Parking guide. (https://www.apbp.org/assets/docs/EssentialsofBikeParking_FINA.pdf)
5. Caltrans supports the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, wayfinding signage, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. Continue to incorporate Complete Streets in project development.
6. Consider incorporating electric charging infrastructure that provides trucks or transport refrigeration units access to power without running their engines, thus reducing GHG and heat emissions.
7. Operations involving truck staging will need adequate truck parking onsite for pick-ups/drop offs. Internal site circulation may impact adjacent road operations.


8. Please provide well-lit loading docks and parking spots to improve safety.
9. Delivery areas need to be clearly marked so delivery drivers are easily seen by either on-street traffic or delivery yard employees, other truck drivers, or warehouse operations (such as forklifts).
10. Existing weight restrictions on the State Highway System (SHS) off or on ramps of freight routes can impact truck routing efficiency. Identification of alternate routes to and from the facility or site may be needed.
11. Identify any potential pedestrian or bicycling conflict points to, from, or within the project site.
12. Site entrance and exit points must accommodate the design vehicle movements.
13. The project site should provide enough truck height clearances for trucks to maneuver without any issues while loading and unloading cargo.
14. Consider including zero or near zero emissions infrastructure or electric shore power infrastructure for truck drivers and cargo handling equipment can reduce GHG and heat emissions.
15. Please coordinate with the local/regional Travel Demand Manager to ensure workers can travel to warehouse/distribution center without needing personal vehicles can reduce air pollution and roadway congestion.
16. Consider installing bicycle parking for workers to encourage active transportation, especially in areas supported by transit.
17. Please provide electric charging stations for personal vehicle use to encourage adoption of electric or hybrid vehicles.
18. Consider installing on-site, overnight parking for truckers with safe, well-lit lots so truckers can rest. Also consider including restrooms, lighting, trash facilities, drinking water, showers, and food or vending machines.
19. Please provide Incident Response Plans showing critical entrances available for emergency personnel. Plans should also include alternative local roads and highways, so roadways do not become congested during an emergency.
20. Please consider leveraging strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.

21. Please conduct a new traffic study based on the existing traffic volume data from 2024/2025 and use the proposed trip generation numbers. Traffic patterns are different now than when the Bank of America building was occupied before 2020.
22. Traffic analysis does not include the requested LOS and queueing analysis based on the comments from the submitted LDR GTS #12-ORA-2023-02330. See below for the comments:
 - a. Based on routine surveillance, EB Route 90 to NB142, the left turn pocket has been known to reach its capacity. With the increase in vehicular traffic from the proposed project, there is a concern that vehicular queues will extend past the existing storage left turn capacity and block the through-lane on Route 90. Therefore, an operational and safety analysis for the subject intersection is requested.
 - b. The Traffic Impact Study (TIS) should identify the proposed project's near-term and long-term potential safety and operational impacts on or adjacent to any existing or proposed state facilities, for example:
 - Route 142 and Birch St / N Rose Dr.
 - Route 142 and Lambert Rd
 - Route 142 and Nasa St/La Floresta Dr., and
 - Route 142 and La Entrada Dr.
23. Please complete a LOS and queuing analysis per the City of Brea General plan, at the following intersections. Check the storage length of all turn pockets and ensure adequacy:
 - a. SR-90 and SR-142
 - b. SR-142 and Birch St / N Rose Dr.
 - c. SR-142 and Lambert Rd
 - d. SR-142 and Nasa St/La Floresta Dr., and
 - e. SR-142 and La Entrada Dr.
 - i. Verify which of these locations need lane reassignment, updated traffic signal timing/phasing, or turn lane extensions
 - ii. Look into active transportation & transit circuitry at these locations and in between the intersections for any mitigation factors
21. Please use OC CMP report as well as local agency guidance to help with the analysis of these intersections, and OCTAM projected volumes.
22. Appendix F-VMT, Attachment A-Tenant Specific Trip Schedule; the addition of trucks at the noted time in the table could impact storage length with existing truck movements. Please study existing truck patterns and determine if these new line trucks will impact the storage length for the LT lane.

23. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. Applicant must submit a signed Standard Encroachment Permit application form TR-0100 along with a deposit payable to Caltrans. Deposit amount will be dependent on when the application is submitted. Public corporations are legally exempt from encroachment permit fees. However, contractors working for public corporations are not exempt from fees. Please note that all utility work should be disclosed prior to permit submittal, and utility companies are to apply for separate permits for their corresponding work.

Caltrans' mission is to provide a safe and reliable transportation network that serves all people and respects the environment. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at Julie.lugaro@dot.ca.gov.

Sincerely,


Julie Lugaro (Dec 23, 2024 16:13 PST)

for
Scott Shelley
Branch Chief,
Local Development Review/Climate Change/Transit Grants
Caltrans, District 12