

DEPARTMENT OF TRANSPORTATION

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a California Way of Life*

November 8, 2024

Brenda Magaña, Planning Manager
City of Palmdale Planning Division
38250 Sierra Highway
Palmdale, CA 93550

RE: Palmdale Logistics Center – Draft
Environmental Impact Report (DEIR)
SCH# 2023090551
GTS #07-LA-2023-04633
Vic. LA 14 PM R64.684

Dear Brenda Magaña,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The Project applicant proposes to subdivide the 150.63-acre Project site into three parcels. The Project would develop two warehouses (totaling 3,001,712 sf) on two of the parcels and a stormwater detention basin on the third parcel. In addition, approximately 17.65 acres of offsite improvements would be required for necessary roadway infrastructure to support the Project (including the addition of 35th Street East and Avenue L-8. Also, an additional 2.0 acres (or 17,400 linear feet) would be required for offsite utility improvements. The total area of disturbance for the Project would be 170.28 acres. Additional improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. The Project includes a Conditional Use Permit (CUP) required for additional building height and a Minor Site Plan review required for additional screening wall height. The Project also requires site annexation into the Los Angeles County Waterworks District No. 40 for water services and annexation into the Los Angeles County Sanitation District (LACSD) for wastewater services.

After reviewing the DEIR, Caltrans has the following comments:

As stated in the DEIR, the proposed project will result in a significant transportation impact due to exceeding Vehicle Miles Travelled (VMT) impact thresholds. With 3,001,712 square

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feet of new warehouse uses, 1,517 automobile parking spaces, 516 loading dock doors, and 990 trailer parking stalls, the Palmdale Logistics Center Project will induce demand for a consequential number of additional vehicle trips and vehicle miles traveled (VMT). This could also result in significant safety impacts on SR 14 at the Avenue M on/off-ramps. 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 encourages and incentivizes personal car ownership and driving above all other forms of transportation.
- Require contributions from projects that heavily rely on freight infrastructure to be invested in alternative modes of freight movement. These alternatives, such as rail, are 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 alternative mitigation measures should be considered and implemented to reduce the impact on VMT, as reducing the project's current impacts are critical to developing infrastructure that is both environmentally and economically sustainable. Following construction, a study needs to 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.

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

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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-2023-04633.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse