

DEPARTMENT OF TRANSPORTATION

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January 23, 2024

Jocelyn Swain, Senior Planner
Community Development Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534



RE: Site Plan Review 22-14, Lot Line
Adjustment No. 23-004, L-4 Avenue
Warehouse Industrial Park
SCH # 2023120648
Vic. LA-14, PM R65.68
GTS # LA-2023-04412-MND

Dear Jocelyn Swain:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The proposed project consists of an application for a Site Plan Review (SPR No. 22-14), and a Lot Line Adjustment (LLA) No. 23-004 to merge the two lots. SPR 22-14 would allow for the construction and operation of one building proposed for light industrial and general warehousing uses with a total building area of 217,700 square feet, consisting of 215,200 square feet of warehouse space and 2,500 square feet of ground floor office space, with 28 dock doors, on an approximately 10.56-acre vacant property in the City of Lancaster, California.

Bicycle and Pedestrian Facilities

The existing Sierra Highway Bikeway, a Class I off-street bikeway near the Project, is complemented by a proposed Class I bike path along Avenue L east of Sierra Highway. Although pedestrian facilities are limited in the Project's vicinity, its development plans include accommodating them, especially along the north side of W. Avenue L-4. Field observations and 2023 traffic counts indicate light pedestrian and bicycle activity in the study area.

Transit

The City of Lancaster study area is presently served by the Antelope Valley Transit Agency (AVTA), covering various jurisdictions in the Antelope Valley region of Los Angeles County. AVTA Routes 4, 8, and 786, running along Sierra Highway adjacent to the Project site, could potentially serve the proposed Project. An existing stop on Sierra Highway, just north of W. Avenue L-8, adds accessibility. AVTA periodically reviews and updates transit services to address ridership, budget, and community needs. Changes in land use can impact these adjustments. Therefore, it is recommended that the applicant collaborates with AVTA to explore potential bus service options for the site, a recommendation that Caltrans concurs with.

VMT Analysis

Baseline conditions, established for the 2022 VMT analysis using the SCAG model, indicate an estimated Los Angeles County's Antelope Valley Planning Area (AVPA) Baseline Home-Based Work (HBW) VMT per employee of 9.1. The impact threshold, set at 15% below the Baseline AVPA VMT, is calculated to be 7.7 HBW VMT per employee. The Project exceeds the current threshold by 46.8%, indicating a potential VMT impact. To mitigate this impact, the HBW VMT per employee must decrease by 810 VMT. This reduction is calculated as $(11.3 \text{ VMT/Employee Project} \times 225 \text{ Employees}) - (7.7 \text{ VMT/SP Threshold} \times 225 \text{ Employees}) = 810 \text{ VMT}$.

Caltrans seeks clarity on Resolution No. 23-08, enacted on January 24, 2023, concerning VMT mitigation for new developments in the City of Lancaster. First, we request details on how the \$150 fee per mile traveled is calculated for new developments. Second, we ask for specifics, including project locations, regarding the Transportation Demand Management (TDM) strategies and VMT-reducing projects proposed by the City. Lastly, we would like to understand the justification process and VMT calculations for the post-mitigation, supporting the City's confidence in the effectiveness of these proposed measures.

Others

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 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 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, 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 traffic 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. Construction truck loads should be covered with a tarpaulin cover. Any large-size and semi-truck trips be limited to off-peak commute periods for the construction phase and operation phase.

There are three large new warehouse projects in the project vicinity in the City of Palmdale.

1. SCH # 2022010581, APNS: 3128-015-900 and -902 (1 million square feet industrial building)
2. SCH # 2023090551, APN 3170-018-081, Palmdale Logistics Center Project (3 million square feet industrial buildings)
3. SCH # 2022080668, Site Plan Review 22-013, Palmdale Logistics Park, DEIR (1.4 million square feet industrial buildings)

In addition, there are three Caltrans improvement projects near the Project location in which the City may be involved already.

1. Project EA 30580 Hybrid Roundabout Project at Route 14 and Avenue M overcrossing between 10th Street and 15th Street West.
2. Project EA 31020 Hybrid Roundabout Project at Route 14 and Avenue N also locally funded by LACMTA.
3. Project EA 32890 on/off-ramp improvements at Route 14 and Avenue L.

We would like to ensure that those State improvements can accommodate the additional traffic and reduce any future traffic safety concerns. We recommend that the City includes

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all three warehouse projects, along with the mentioned Caltrans improvements, in the environmental disclosure process to effectively address potential traffic impacts.

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-2023-04412-MND.

Sincerely,

Frances Duong

FRANCES DUONG

Acting LDR/CEQA Branch Chief

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email: State Clearinghouse