

DEPARTMENT OF TRANSPORTATION

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a California Way of Life*

January 23, 2024

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



RE: Site Plan Review 23-012
SCH # 2023120722
Vic. LA-14, PM R71
GTS # LA-2024-04416-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 involves the construction and operation of a 1,227,596-square-foot industrial/cold storage warehouse with 40,000 square feet of the building to be utilized for offices. The proposed building would be tilt-up concrete construction with elements of insulated metal panels and would be approximately 50 feet in height. The facility is anticipated to operate 24 hours per day. The project would include a total of 415 trailer parking spaces and 564 passenger vehicle parking spaces. Of the 564 passenger vehicle spaces, 169 spaces would be electric vehicle (EV) parking spaces with 56 electrical charging stations installed and 113 spaces would be made EV charging capable. The project would also include 28 bicycle parking spaces.

On page 60 of the Initial Study, "the project site is located at the northeast corner of two major roadways, Avenue G and 45th Street West, and in close proximity to the Antelope Valley Freeway (2.5 miles west)." This is an incorrect statement as the project is located northeast corner of Avenue and 30th Street West, which is about half a mile away from SR-14 State facilities.

The VMT analysis reveals that the proposed project must decrease its VMT by 3,588 to achieve a 15% reduction below the City of Lancaster's established thresholds. Specifically, the Project's VMT/Employee is 15.3 compared to the threshold of 7.6, with Project VMT at 7,130 exceeding the threshold of 3,542. The necessary VMT reduction

is 7.7 VMT/Employee and 3,588 Project VMT. Per the City of Lancaster's Vehicle Miles Traveled Impact Fee Mitigation Program, the applicant shall pay \$538,200 to reduce VMT impacts before the issuance of construction-related permits.

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.

On page 69 of the Initial Study, there are 8 related projects in the project vicinity. Potentially, there will be many vehicle trips and truck trips utilizing the State facilities. There is no traffic study showing any safety traffic analysis on the freeway off-ramps at SR-14 and Avenue G. If the City is growing and allowing future development in the area, then a safety traffic analysis should be prepared. These 8 projects are within 1 mile from this Proposed Project site. Five of these projects have been approved and three projects are under review. If this proposed Project will be in construction at the same time as any of these projects in the area, a traffic handling/detour study needs to be prepared to mitigate the traffic impact in the surrounding community

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.

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-2024-04416-MND.

Sincerely,

Frances Duong

FRANCES DUONG
Acting LDR/CEQA Branch Chief

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email: State Clearinghouse