DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

APR 13 2020

STATE CLEARINGHOUSE

April 13, 2020

Manraj Bhatia City of Carson – Planning Division 701 East Carson Street Carson, CA 90745

> RE: CT Warehouse Project – Mitigated Negative Declaration (MND) GTS # 07-LA-2020-03212 SCH # 2020030427 Vic. LA-110/PM: 10.554

Dear Manraj Bhatia:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced MND. The project would demolish a former salvage yard and two residential dwellings to construct a new 145,840-square foot warehouse facility with associated surface parking and landscaping. The facility would include distribution/warehousing/manufacturing uses with supporting office space. A total of 146 parking spaces would be provided for employees and visitors in surface parking lots located along building perimeters, exceeding the City's 120 spaces requirement for the proposed development. Twenty-five truck loading docks for loading/unloading equipment and supplies would be located along the eastern perimeter of the facility. The City of Carson is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 1,700 feet away from Interstate 110 (I-110) at W Gardena Boulevard, 4,000 feet away from the I-110 & State Route 91 (SR-91) interchange, and 2 miles away from the I-110 & Interstate 405 (I-405) interchange.

From reviewing the MND, Caltrans has the following comments:

- The City of Carson has chosen to analyze the transportation impacts of this project in terms of Level of Service (LOS). As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- We do not anticipate this project to have a direct adverse impact on any state facilities, however, the below issues in the transportation impact analysis (TIA) should not appear in future TIAs completed for other projects. Some of these issues only apply to those TIAs completed in terms of LOS before July 1, 2020.
 - o Caltrans recommends that the HCM 6th Edition rather than the 2010 Edition be used.
 - Due to the project's large truck volumes, Synchro analyses should be based on actual heavy vehicles percentages rather than the default of 2%.

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- It is unclear whether the Synchro analyses for the existing conditions scenarios are based on actual or optimized signal timings. Caltrans recommends that actual signal timings be used.
- Caltrans recommends that more relevant data than the City of Fontana Truck Trip Generation Study for Light Industrial Uses (August 2003) be used to estimate the heavy vehicle mix. Similarly, Caltrans recommends utilizing more relevant Passenger Car Equivalent (PCE) factors for conversion of trucks into passenger vehicles than San Bernardino County PCE conversion factors.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies that this project has incorporated, such as providing a bike rack near the western driveway and replacing the sidewalk, curb, and gutter along the project's frontage at West Gardena Boulevard. Additional TDM strategies that the City of Carson may want to consider integrating into this project include:

- Decrease the amount of vehicle parking provided to be no more than required, which would be 120 stalls for this project, according to the MND. This could be accomplished by offering additional bicycle parking at various safe and convenient locations near employee work stations.
- Confirm that bike parking is secure, convenient, and accessible.
- Ensure that the new pedestrian facilities along West Gardena Boulevard are ADA compliant.
- Provide convenient and accommodating access throughout the development.

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Management Plan detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03212.

Sincerely,

MIYA EDMONSON IGR/CEQA Branch Chief

Miya Edmonson

cc: Scott Morgan, State Clearinghouse