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 DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

MAY 08 2020

May 8, 2020

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STATE CLEARINGHOUSE

Ms. Manraj Bhatia Community Development Department City of Carson 701 East Carson Street Carson, CA 90745

RE: KL Fenix Project Vic. LA-10/PM 17.122 SCH # 2020040140 Ref. GTS # LA-2020-03162/03210 GTS # LA-2020-03235-MND

Dear Ms. Bhatia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the construction and operation of a cargo container parking facility on a 14.3 acre vacant and undeveloped land, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The project would include an approximately 53,550-square-foot warehouse and office building on the eastern part of the project site. In addition, the project would include approximately 115 parking spaces for passenger vehicles, 400 spaces for cargo containers, 75 spaces for truck parking, and 6 loading docks.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

http://opr.ca.gov/ceqa/updates/guidelines/

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage

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existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also 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.

After reviewing the Mitigated Negative Declaration (MND) for this project and pre-CEQA document submitted to Caltrans, we have the following comments:

- 1. For Vehicle Miles Traveled (VMT) analysis, since there is no truck traffic data collected for the City at current time, for this project we concur that "based on the project's proximity to I-110, which provides direct access to other regional significant freeway facilities; the project's potential to divert truck traffic from other truck facilities located further away from regional freeway facilities; and, the requirement to implement VMT-reducing Project Design Features, the proposed KL Fenix truck facility would have a less than significant impact to vehicle miles traveled." For future Vehicle Miles Traveled (VMT) analysis, we recommend the City to adopt a VMT threshold including warehouse/trucking land uses.
- 2. With pre-CEQA consultation with Caltrans, we concur with City's proposal with the existing Caltrans improvement project under EA 29370 at the intersection of Hamilton Avenue/I-110 SB ramps. The City also proposed to convert the southbound left-through lane to a dedicated left-turn lane and add appropriate signage and striping to prevent vehicle in the left-turn lane to continue southbound through the intersection. Caltrans would consider these improvements before mitigation agreement is signed. We concur the project applicant pay a fair share contribution to all improvements at this location per City's adopted Ordinance No.

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19-1931 on April 16, 2019, which implements the City's Interim Development Impact Fee (IDIF) Program. Mitigation agreement should be prepared and presented to Caltrans by developer.

- 3. Caltrans concurs Mitigation Measure MM-TRA-1. "Prior to the issuance of the first building permit, the project applicant shall coordinate with the California Department of Transportation (Caltrans) and the City on the redesign of the Figueroa Street/Interstate (I-) 110 northbound ramps intersection to ensure adequate and safe operation at the intersection and project access. The intersection modification shall involve the consolidation of the two project driveways currently proposed along Figueroa Street into a single driveway that is aligned with the present location of the I -110 on- and off ramps (i.e., creation of new east leg of the intersection) or other designs acceptable to Caltrans. The required improvement shall be installed and operational to the satisfaction of Caltrans and the City prior to issuance of the first Certificate of Occupancy."
- 4. For MM-TRA-1, Caltrans' Intersection Control Evaluation policy should be applied to determine what is the best traffic control at this subject intersection. As a reminder, if developer proposes traffic signal after ICE evaluation, then developer should provide new proposed signal timing, new proposed signal phasing, and queue analysis for the NB I-110 off-ramp and NB I-110 on-ramp to ensure the adequacy of this improvement during Caltrans permit encroachment process.
- 5. For MM-TRA-1, please be reminded that any work performed within the State Rightof-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.
- 6. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.
- 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. It is recommended that large size truck trips be limited to offpeak commute periods.

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If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03235-MND.

Sincerely,

Miya Amonson

MIYA EDMONSON IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse