

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

MAY 15 2019

STATE CLEARINGHOUSE

May 15, 2019

Ms. Marilyn Simpson, AICP
Community Development Manager
City of Irwindale, Planning Division
5050 Irwindale Avenue
Irwindale, CA 91706

RE: The Park @ Live Oak Specific Plan
Vic. LA-605/PM 23.91
SCH # 2018041001
Ref. GTS # LA-2018-01402AL-NOP
GTS # LA-2018-02373-DEIR

Dear Ms. Simpson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would redevelop a 78.3-acre property that is presently occupied by an inert debris engineered fill operation in accordance with the land uses proposed in The Park @ Live Oak Specific Plan. The Park at Live Oak Specific Plan proposes to develop the property with an industrial park/logistics/commercial retail center containing several buildings that would collectively provide a maximum of 1,550,000 square feet of building space, including up to 1,451,400 square feet of industrial/business park uses and up to 98,600 square feet of commercial uses.

After reviewing the DEIR, Specific Plan, and Traffic Impact Analysis (TIA) prepared on December 12, 2018 by Urban Crossroad, Caltrans has the following comments:

1. On page 39 of TIA, "For the purpose of this analysis, an impact is considered significant if the Project causes the level of service of a facility to go from acceptable to unacceptable or adds 50 or more peak hour trips to a facility already operating at unacceptable level of service." Based on previous phone consultations and the meeting on April 23, 2019 with the City staff, it is confirmed that the City and Caltrans was not aware of this threshold on the State facilities for this project. As a reminder, Caltrans consultation is required when the City plans to set a significant project direct/cumulative traffic impact threshold on the State facilities.
2. On page 67 of the TIA, Table 3-4 Basic Freeway Segment Analysis for Existing (2017) Conditions did not provide any traffic volume reference, as a result we are not able to verify the existing LOS conditions. In addition, the current I-605 is

operating at or near capacity during the peak hours. For all future projects, please work with Caltrans to validate all existing LOS for the State facilities when preparing the traffic impact analysis.

3. On page 77 of the TIA, Table 4-2 Project Trip Generation Summary (PCE) stated that the project would generate 15,867 daily trips and 1,280/1,644 AM/PM peak hour trips. Table 4-3 Project Trip Generation Summary (Actual) stated that the project would generate 14,607 daily trips and 1,198/1,562 AM/PM peak hour trips. On page 88 of the TIA, there will be as high as 289 AM peak hour project trips traveling on the off-ramp.
4. There are 82 related projects in the project vicinity. It would be beneficial if the TIA discloses the total daily trips and AM/PM peak hour trips. On page 94 of the TIA, there are as high as 258 cumulative project peak hour trips traveling on the State facilities. Caltrans anticipates potential significant cumulative traffic impacts on the State facilities when the current freeway condition is at or near capacity during the peak hours. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate potential significant cumulative traffic impacts.
5. As a reminder, Caltrans is concerned that additional traffic exiting the freeway may potentially back into the mainline through lanes if the queue exceeds the storage capacity on the off ramps. A queuing analysis should be performed using HCM methodology. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor. The existing queue length should be calculated from the traffic counts, actual signal timing and the actual percent of truck assignments with an adequate passenger car equivalent factor. Signal optimization should be considered as a mitigation measure.
6. Caltrans' concern in terms of traffic is that the potential traffic conflict (rear-end accident) may occur at off-ramps when a speed differential is occurred. This may lead to potential cumulative significant traffic impact on the State facilities. From our meeting with you on April 23, 2019 and the letter prepared on May 2, 2019, we learned that the Project entitlements include a Development Agreement (DA), a Tentative Parcel Map, General Plan Amendment, and Zone Change. We concur the following proposal from the City:

From the Specific Plan:

- A pro rata fair share payment of \$703,655.81 shall be made to the City, prior to the issuance of the first building permit, towards the preparation of a study of potential improvements to the I-605 corridor

that may be initiated by Caltrans and/or City of Irwindale in the future. If a fair share calculation has been determined for improvements to the I-605 on/off ramp at Live Oak Avenue and/or the I-605 on/off ramp at Arrow Highway, then, the project applicant shall provide the City of Irwindale with a payment of \$1,600,000 to be applied toward the cost of Caltrans improvements as specified in The Park @ Live Oak Development Agreement.

From the Development Agreement:

- *Caltrans Studies.* Additionally, Developer shall be responsible for paying its pro rata fair share cost to Caltrans to fund the preparation of a study of potential improvements to the I-605 Corridor that may be initiated by Caltrans and/or City in the future Prior to issuance of the first building permit, Developer shall pay \$703,665.81 to City toward this study. If a fair share calculation has been determined for improvements to I-605 on/off ramp at Live Oak Avenue and I-605 on/off ramp at Arrow Highway, then upon receipt of the completed Caltrans feasibility study for the improvements to the affected on/off ramps, Developer shall provide the City with a cash deposit in the amount of \$1,600,000.00 to be applied to the cost of the Caltrans improvements. City shall commit to requiring all future developments, which City reasonably determines will impact such Caltrans improvements, to contribute a fair share amount toward this study so that each developer is not contributing more than its fair share and the costs of this study are borne equally.
7. 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.
 8. 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 off-peak commute periods.

As a reminder, 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,

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you may reference to The Governor's Office of Planning and Research (OPR) for more information.

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

As mentioned in Caltrans NOP letter, 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 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.

Also, 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.

Again, 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.

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). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts is needed. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access.

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When those fair share contributions are made, Caltrans traffic concerns are addressed. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2018-02373AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Attachment

Attachment



May 2, 2019

Miya Edmonson, IGR/CEQA Branch Chief
California Department of Transportation
District 7 – Office of Regional Planning
100 Main Street, MS #16
Los Angeles, CA 90012

Dear Ms. Edmonson:

RE: IRWINDALE DEVELOPMENT PROJECT AFFECTING CALTRANS FACILITIES ON I-605
(The Park @ Live Oak Specific Plan Project – 1200, 1220, 1270 Live Oak Avenue, Irwindale CA) DEIR SCH # 2018041001

Irwindale City staff met with Caltrans staff, coordinated by Alan Lin, on April 23, 2019 to consult on the above listed project. Caltrans is concerned with how the Park @ Live Oak Specific Plan (Project) will impact existing State facilities on I-605.

The Project provides for the development of a 1,550,000 square foot industrial & commercial business park on ±78.3 acres. The site is located southwest of the Santa Fe Dam Recreation Area and immediately west of I-605. The I-605 freeway forms the eastern boundary of the Project area with the I-605/Live Oak Avenue interchange located immediately southeast of the property and the I-605/Arrow Highway interchange located to the northeast. Project entitlements include a Development Agreement (DA), a Tentative Parcel Map, General Plan Amendment, and Zone Change.

The City understands Caltrans' concern that the Project will contribute to cumulative significant impact on state facilities. In order to address these concerns, the Specific Plan and DA outline the obligation of the developer regarding improvements to Caltrans facilities, as shown below. At this time, both the Specific Plan and DA are in draft form.

From the Specific Plan:

- A pro rata fair share payment of \$703,655.81 shall be made to the City, prior to the issuance of the first building permit, towards the preparation of a study of potential improvements to the I-605 corridor that may be initiated by Caltrans and/or City of Irwindale in the future. If a fair share calculation has been determined for improvements to the I-605 on/off ramp at Live Oak Avenue and/or the I-605 on/off ramp at Arrow Highway, then, the project applicant shall provide the City of Irwindale with a payment of \$1,600,000 to be applied toward the cost



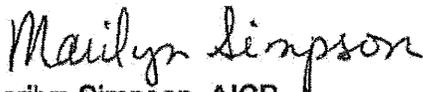
of Caltrans improvements as specified in The Park @ Live Oak Development Agreement.

From the DA:

- *Caltrans Studies.* Additionally, Developer shall be responsible for paying its pro rata fair share cost to Caltrans to fund the preparation of a study of potential improvements to the I-605 Corridor that may be initiated by Caltrans and/or City in the future Prior to issuance of the first building permit, Developer shall pay \$703,665.81 to City toward this study. If a fair share calculation has been determined for improvements to I-605 on/off ramp at Live Oak Avenue and I-605 on/off ramp at Arrow Highway, then upon receipt of the completed Caltrans feasibility study for the improvements to the affected on/off ramps, Developer shall provide the City with a cash deposit in the amount of \$1,600,000.00 to be applied to the cost of the Caltrans improvements. City shall commit to requiring all future developments, which City reasonably determines will impact such Caltrans improvements, to contribute a fair share amount toward this study so that each developer is not contributing more than its fair share and the costs of this study are borne equally.

The City wants to express our sincere appreciation for the department's guidance and support of our development projects and aspires to continue with this positive collaborative relationship. If you have any additional questions, please contact me at (626) 430-2209.

Best Regards,



Marilyn Simpson, AICP
Community Development Manager/City Planner

cc: William Tam, City Manager
Arsanious Hanna, City Engineer/Building Official
Daniel Co, Assistant Engineer
Adrian Guerra, Assistant City Attorney

