

DEPARTMENT OF TRANSPORTATION

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November 7, 2025

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

RE: Parkway Village Specific Plan
SCH # 2024020979
Vic. LA-14/PM R65.676 to R66.743
GTS # LA-2024-04910-DEIR

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 City of Lancaster is proposing the Parkway Village Specific Plan, a 20-year mixed-use development that would establish land use designations, development standards, and infrastructure strategies for approximately 43 planning areas. The project envisions a walkable community with a mix of residential, commercial, medical, recreational, and public uses, including 4,246 housing units, 130 hotel rooms, up to 750,000 square feet of commercial and office/medical space, a 200-bed hospital with related facilities, 27.8 acres of parks, an 8.7-acre school site, and a 10.2-acre aquatic center.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and 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. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

We understand that the Specific Plan may be processed under the City's adopted SB 743 VMT Policy and that transportation analysis may be limited or omitted if CEQA exemptions or screening criteria are applied. Given the scale and regional significance of the proposed development, we submit the following comments for your consideration and for inclusion in the administrative record.

1. Project Overview and Scale of Potential Impact

Based on the Specific Plan documentation, the project proposes:

- 4,246 residential units
- 130 hotel rooms
- 750,000 square feet of commercial/office space
- A 200-bed hospital and 500,000 square feet of medical-related uses
- 8.7 acres of schools and 27.8 acres of parks
- A potential transit hub serving the site and broader area

This development, by size and intensity, is anticipated to generate significant daily trips and Vehicle Miles Traveled (VMT) and may directly or indirectly impact the State Highway System, particularly via State Route 14 and nearby interchanges.

2. VMT Comments on the DEIR

State Route 14, located approximately one-half mile from the Specific Plan site, is a Class 2 (Other Freeway or Expressway) facility. Avenue L, which extends from the Specific Plan boundary to State Route 14, is a Class 3 facility (Other Principal Arterial). Any modifications or improvements to State Route 14 or to Avenue L in the vicinity of the interchange would require an evaluation of potential VMT-inducing impacts, according to the Caltrans guidance documents for evaluating transportation impacts of projects on the State Highway System.

These guidance documents include the Transportation Analysis Framework (TAF) and the Transportation Analysis Under CEQA (TAC). The 2nd edition TAF and TAC are available on the Caltrans SB 743 Implementation Resources page (<https://dot.ca.gov/programs/sustainability/sb-743/resources>).

The TAC notes that, during the screening review, practitioners should examine the specific project circumstances to ensure that there are no unusual circumstances that could otherwise lead to an increase in VMT. When concluding that a particular project may be screened out from further analysis, the practitioner should review and fully document the rationale supporting the conclusion that the particular project would not likely lead to a measurable and substantial increase in VMT.

3. Concerns with Application of CEQA Screening

While we recognize the City's efforts to align with SB 743 and streamline CEQA review, we caution against applying broad CEQA exemptions or VMT screening criteria that would bypass detailed transportation analysis for a development of this magnitude.

Key considerations include:

- The proposed land uses — including a hospital, regional commercial, and a transit hub — are likely to attract trips from a beyond-local service area, exceeding typical local-serving thresholds.
- Regional draw increases the potential for substantial VMT generation and cumulative transportation impacts.
- The City's VMT policy should not be applied in a way that precludes full disclosure of transportation impacts merely due to CEQA exemptions or TPA screening without project-specific justification.

Additional VMT Screening Recommendations:

We recommend that the project proponent submit a completed screening criteria checklist for Caltrans review. The screening criteria will help determine whether the project is likely to have a less-than-significant impact on regional VMT, potentially exempting it from a detailed VMT analysis.

Although the proposed project is located within an area that may be characterized as low VMT-generating, there could still be potential changes in travel patterns due to the scale and diversity of land uses proposed. Therefore, even if the project site is within a low VMT area, a project-specific VMT analysis may still be warranted to evaluate potential impacts.

We also recommend consulting with the local planning agency to understand specific thresholds. For reference, residential development that would generate vehicle travel that is 15 percent or more below the existing residential VMT per capita—measured against the region or city—may indicate a less-than-significant transportation impact. It is critical, however, that the agency maintain consistency in its VMT measurement approach throughout the analysis to ensure an “apples-to-apples” comparison. For example, if the agency uses home-based VMT for the threshold, it should also use home-based VMT for calculating project VMT and for evaluating the effectiveness of mitigation measures.

4. Impacts to the State Highway System (SHS)

The Parkway Village site is located within proximity to State Route 14, and access to/from the project may affect the following:

- On/off-ramps and interchanges serving regional trips
- Mainline congestion and queuing potential
- Emergency access routes, particularly to the proposed hospital
- Regional traffic circulation, especially during peak periods or special events

In Caltrans' comment letter dated March 26, 2024, "Caltrans recommends the Lead Agency include queuing analysis with actual signal timing for existing traffic conditions plus project trips at the impacted off-ramps such as at I-14 and Avenue K and I-14 and W Ave L". Due to the project's size and proximity to SR-14, there is potential for rear-end collision risk at the off-ramps during the peak conditions.

We request the City coordinate closely with Caltrans 07 to assess any encroachment, operational, or access-related issues, and to ensure that necessary mitigations or improvements are identified and addressed through the project review process.

5. Safety and Non-CEQA Mobility Considerations

Even where CEQA transportation impacts may not be significant or analyzed, the City retains local responsibility for ensuring that transportation infrastructure and planning address:

- Bicycle and pedestrian safety within and around the project site
- Site access and circulation, especially for schools, parks, and transit
- Queue spillback at off-ramps to mainline, intersections and driveways
- Emergency vehicle routing and access, particularly to the hospital

Cities such as San Diego have implemented Local Mobility Analyses (LMA) outside of CEQA to address these concerns. We encourage the City to consider a similar approach, especially for complex, multimodal projects like Parkway Village.

6. Complete Street and Non-Motorized Access

In addition to the comments above, Caltrans District 7's Planning Office has prepared detailed Complete Streets recommendations (see Attachment A) addressing pedestrian and bicycle connectivity between the Parkway Village site and State Route 14 interchanges, Avenue K-L corridors, and the Future Sierra Highway.

These recommendations identify specific locations where new crosswalks, ADA-compliant curb ramps, separate bikeways, and other safety enhancements are warranted to accommodate increased multimodal travel generated by the Specific Plan. We request the City incorporate these measures, or equivalent features meeting Caltrans standards, into the Final Specific Plan and its Mitigation Monitoring and Reporting Program (MMRP). Any work within or affecting the State right-of-way shall require Caltrans design review and approval through the Encroachment Permit process.

7. Adopt Robust Monitoring and An Enforceable VMT Compliance Mechanism

The Final EIR should require a monitoring program with thresholds and remedial measures regardless if a VMT analysis is required: e.g., within X years after occupancy of the first 1,000 units, the City or project owner must report observed travel behavior (counts, transit boardings, modal split, and VMT estimates). If VMT exceeds the projected level by a defined margin, the project must pay into the City VMT Mitigation Fund or implement specific on-site/off-site TDM or transit service improvements. This condition should be legally enforceable and tied to building permits/occupancy. (This is consistent with City practice and OPR guidance on defensible assumptions.)

8. Legal Defensibility and Enforcement

Due to the regional nature and long-term implications of this project, the City should be prepared to demonstrate that:

- Any CEQA exemptions or screening determinations are fully supported by substantial evidence,
- Any mitigation measures or conditions are enforceable and tied to measurable outcomes, and
- Monitoring provisions are established, particularly for VMT reduction strategies or transportation demand management (TDM) measures.
- Caltrans supports the inclusion of Transportation Demand Management (TDM) strategies to reduce project-generated VMT.

This will support the City in maintaining legal defensibility of its actions and ensuring long-term transportation system performance.

9. Other Comments

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

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. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

Storm water run-off is a sensitive issue for Los Angeles County. 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.

In addition, a truck/traffic construction management plan may be needed for this project when mitigation/improvement is proposed at SR-14 interchanges. Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

10. Request for Ongoing Coordination

We request the opportunity to:

- Discuss the substantial evidence for the VMT screening.
- Discuss Project features including TDM reducing project-generated VMT.
- Evaluate potential operational and safety impact to SR-14 Interchanges.
- Participate in interagency review of transportation-related materials,
- Review any future traffic operations studies or mitigation proposals, and
- Be informed of public hearings, CEQA findings, and final approvals.

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-2024-04910-DEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse