

California Department of Transportation

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January 29, 2026

Brenda Magaña, Planning Manager
Department of Economic and
Community Development Planning Division
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

RE: Pacific Palmdale
SCH # 2025020362
Vic. LA-14/PM R61.4
GTS # LA-2025-04980-DEIR

Dear Brenda Magaña:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project would allow for a maximum of 1,000,000 square feet (s.f.) of building space to be comprised of a cross-dock industrial warehouse building. The building would have a total of 148 dock doors for trucks, including 74 dock-high doors and 2 grade-level doors at both the northern and the southern façades of the building. One detention basin would be provided near the southeastern corner of the site. A second smaller detention basin would be provided near the northeastern corner of the site. Other associated improvements to the Project site would include, but are not limited to frontage road improvements, drive aisles, passenger vehicle parking areas, truck and trailer parking areas, loading dock truck courts, utility infrastructure, landscaping, signage, lighting, screen walls, security gates, and fencing, including perimeter fencing.

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>

Pedestrian

The project location is near a residential community. The DEIR notes "limited pedestrian facilities" and states that sidewalks are missing on the northbound side of West Rancho

Vista Boulevard/East Avenue P adjacent to the Project's south boundary and concludes the Project "would not conflict" with pedestrian policies and that "no mitigation is required." This finding is not supported because the DEIR does not identify the specific pedestrian improvements to be delivered, how they will connect to the surrounding network, or whether they will provide continuous, ADA-compliant first/last-mile access to transit stops and planned bicycle facilities.

We recommend the City incorporate enforceable Project Design Features requiring: (1) construction of continuous, ADA-compliant sidewalks along the Project frontage on W. Rancho Vista Blvd/E. Ave P where gaps exist; (2) installation of ADA curb ramps, accessible crossings, and pedestrian-scale lighting at access points and along frontage routes; and (3) establishment of direct, safe walking connections from bus stops to primary entrances, including wayfinding signage.

Bicycle

The General Plan identifies a proposed bikeway along the Project frontage on W. Rancho Vista Blvd/E. Ave P. While the DEIR states the Project "would not impact the City's ability to build out" planned bicycle facilities, it does not include frontage design commitments such as ROW dedication, setbacks, driveway design, or measures to maintain bikeway continuity. Without these commitments, the record does not demonstrate that the planned bikeway will be preserved/implemented or that driveway conflicts will be minimized.

We recommend the City add a binding commitment that the Project frontage design, including driveway spacing and geometry, frontage improvements within the public ROW, and any required dedication, will implement or preserve the planned bikeway, maintain continuity through driveway areas, and incorporate measures that reduce driveway-related conflicts.

Transit/TDM

The DEIR identifies AVTA service in the Project vicinity, including Route 3 with approximately a 30-minute headway along the frontage and Route 8 with approximately a 90-minute headway and no stop in the immediate vicinity. The DEIR also cites PMC Chapter 17.101 (Transportation Demand Management), which requires trip reduction measures prior to approval. However, the DEIR does not commit to a TDM program or specify transit-supportive features that would make transit a practical option for employees and visitors.

We recommend the City incorporate a Transportation Demand Management (TDM) program as an enforceable project feature, with specific elements such as transit subsidies, carpool/vanpool incentives, preferential parking, and shift-based trip reduction strategies suitable for warehouse operations.

The City should consider the additional TDM strategies consistent with Caltrans' Transportation Demand Management Toolbox:

<https://dot.ca.gov/-/media/dot-media/district-4/documents/d4-transportation-planning-local-assistance/ldr/final-draft-2023-ldr-tdm-toolbox-071923-a11y.pdf>

VMT

Table 4.13-3 lists a threshold of "15.81/18.21" and notes that TREDLite displays 15.81, differing from the 18.2 threshold referenced in the City Guidelines. The DEIR should clearly identify the controlling CEQA significance threshold, cite the adopted City source, and explain the basis for the TREDLite value.

The DEIR also states Work VMT per Employee applies to commute trips, while the Project includes substantial truck activity (Table 4.13-1, including truck-to-PCE conversions). For a high-cube warehouse/logistics project, the DEIR should plainly disclose whether truck (goods movement) VMT is included or excluded under the City's SB 743 method, the rationale for that approach, and whether any supplemental informational analysis was completed.

We recommend the City revise Section 4.13 to: (1) confirm one governing VMT threshold and explain the TREDLite discrepancy; and (2) clearly state the treatment of truck/goods-movement VMT under the adopted methodology and the supporting rationale.

Safety / Off-Ramp Queuing and Spillback

The DEIR describes the STR-019 Grade Separation Project adding a ramp from westbound Rancho Vista Boulevard to northbound Sierra Highway and two connecting ramps ("loop roads") with signalized intersections, and DEIR Figure 4.13-1 identifies Future Ramp Connectors. At ramp terminals tied to congested signals, queue spillback can extend to connector approaches and ramps, creating stopped conditions and elevating rear-end collision risk. The DEIR does not disclose whether any queue/storage (spillback) analysis was performed for the ramp connectors and off-ramps, and therefore does not provide sufficient technical support for the safety conclusions.

We recommend the City include an off-ramp/ramp-terminal connector queuing and storage analysis (or clearly explain why it was not performed and provide substantial evidence supporting the safety conclusion). The analysis should evaluate whether project traffic contributes to spillback to ramps and the potential for rear-end conflicts, and identify operational or geometric measures needed to avoid or reduce these hazards.

SR-14/Rancho Vista Blvd. Interchange and SR-14/10th St. W. Interchange

DEIR Table 4.13-1 indicates the Project would generate approximately 122 AM peak-hour PCE trips, 131 PM peak-hour PCE trips, and 2,093 daily PCE trips, with a portion expected to use nearby SR-14 ramp facilities (approximately 3,500 feet from the Project). Without disclosure of ramp/connector operations and queue effects, Caltrans cannot determine whether the Project could contribute to ramp-terminal spillback or associated safety hazards.

Given the Project's scale and its potential to increase turning movements accessing the State Highway System, Caltrans recommends a focused safety evaluation such as queuing analysis using existing signal timing and ramp storage lengths at the SR-14/Rancho Vista Blvd and SR-14/10th St. W interchanges. These locations may experience increased demand under buildout conditions, which can raise the potential for spillback onto freeway off-ramps. When impacts are identified, the analysis should inform feasible measures such as signal timing adjustments, intersection geometric modifications, Transportation System Management (TSM).

Others

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.

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-2025-04980-DEIR.

Sincerely,



Anthony Higgins
Acting LDR Branch Chief

email: State Clearinghouse