

# California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
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[www.dot.ca.gov](http://www.dot.ca.gov)



## Governor's Office of Planning & Research

May 25, 2023

**May 25 2023**

## STATE CLEARING HOUSE

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John Swiecki, Community Development Director  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005

### **Re: Brisbane Baylands Specific Plan – Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)**

Dear John Swiecki:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Proposed Brisbane Baylands Specific Plan. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the April 2023 NOP.

#### **Project Understanding**

The proposed plan encompasses 641.8 acres adjacent to US-101 that borders the proposed project site to the east. The proposed project includes 2,200 residential units, 7 million square feet of office/commercial space, and 30% of the total area will be active and restorative open space. Associated improvements include grading, roadways, renewable energy generation, water recycling facility, utilities, and infrastructure. Additional improvements in the revised NOP include a 250 mega-watt battery storage facility, relocating a fire station, adding a new fire station, and a new water acquisition deal with the Contra Costa Water District.

#### **Transportation Impact Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance (*link*).
- The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Please clarify how bicyclists and pedestrians will be able to access the site and transit facilities.

Please clarify how this project site will connect active transportation facilities to nearby activity centers and existing or future trail and or transit facilities. These smart growth approaches shall be consistent with Metropolitan Transportation Commission (MTC)'s Regional Transportation Plan/Sustainable Communities Strategies and would help meet Caltrans Strategic Management Plan targets.

In addition, this project proposes a new bridge crossing resulting in the extension of Geneva Avenue from Bayshore Boulevard to US-101 to accommodate automobiles, pedestrians, bicyclists, and a bus rapid transit service. Caltrans supports this proposed improvement because it supports the goals of the US-101 Comprehensive Corridor Plan (CCP) that was completed by Caltrans D4 in February 2018. Goal 4 of the CCP supports an accessible and inter-connected multimodal transportation system within the corridor. Goal 5 of the CCP supports the reduction of pollutants and greenhouse gas emissions (GHG). The proposed bridge will potentially make this corridor more accessible for different and active transportation modes, which supports the reduction of GHG emission by encouraging public transit and active transportation modes.

## **Hydrology**

According to Section 4.12 Hydrology and Water Quality, it is anticipated that there will be a significant increase in the amount of impervious surface resulting in increased runoff that could overwhelm the existing drainage systems and exacerbate flood conditions at the site and surrounding areas. As such, a hydrology and hydraulics report should be prepared for the pre- and post-development. The report should include all assumptions for the selection of hydrological and hydraulic factors, calculations and modeling of proposed drainage systems, retention/detention basins, representation of potential flooding with elevations of post-development conditions and demonstrate how post-development flows will match pre-development flows. The analysis will need to demonstrate how post-development flows to Visitacion Creek, Brisbane Lagoon or other drainage facility will be intercepted and conveyed across US-101 to San Francisco Bay.

## **Sea Level Rise**

The DEIR should include a discussion of how sea level rise (SLR) will be addressed. The project site location is near San Francisco Bay and the potential impacts of SLR could be significant. The proposed project should incorporate measures to increase flood resiliency and protect against the potential effects of projected SLR.

In the 2020 Caltrans District 4 Adaptation Priorities Report, US-101 adjacent to the project location is identified as a high-priority Caltrans asset vulnerable to sea level rise, storm surge, and climate change impacts, including increased precipitation. Caltrans would like to be included in discussions, to stay informed as Caltrans is interested in engaging in multi-agency collaboration early and often, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. Please contact Vishal Ream-Rao, Caltrans Bay Area Climate Change Planning Coordinator, with any questions: [vishal.ream-rao@dot.ca.gov](mailto:vishal.ream-rao@dot.ca.gov).

## **Construction-Related Impacts**

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

### **Lead Agency**

As the Lead Agency, the City of Brisbane is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

### **Equitable Access**

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

### **Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

To obtain information about the most current encroachment permit process and to download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

John Swiecki, Community Development Director  
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" being more prominent and the last name "Yunsheng" following in a similar style.

YUNSHENG LUO  
Acting District Branch Chief  
Local Development Review

c: State Clearinghouse