

DEPARTMENT OF TRANSPORTATION

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a California Way of Life.*

February 5, 2021

11-SD-15
PM 20.99

The Trails at Carmel Mountain Ranch
DEIR/SCH# 2020039006

Ms. Elizabeth Shearer Nguyen
Environmental Planner
City of San Diego
Department Services
1222 First Avenue, MS-501
San Diego, CA 92101

Governor's Office of Planning & Research

Feb 05 2021

STATE CLEARINGHOUSE

Dear Ms. Shearer-Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Draft Environmental Impact Report (DEIR) State Clearinghouse (SCH) #2020039006 for The Trails at Carmel Mountain Ranch project located near Interstate 15 (I-15) and Carmel Mountain Road in the city of San Diego. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' Right-of-Way (R/W) through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the DEIR that Caltrans will use for our subsequent environmental compliance.

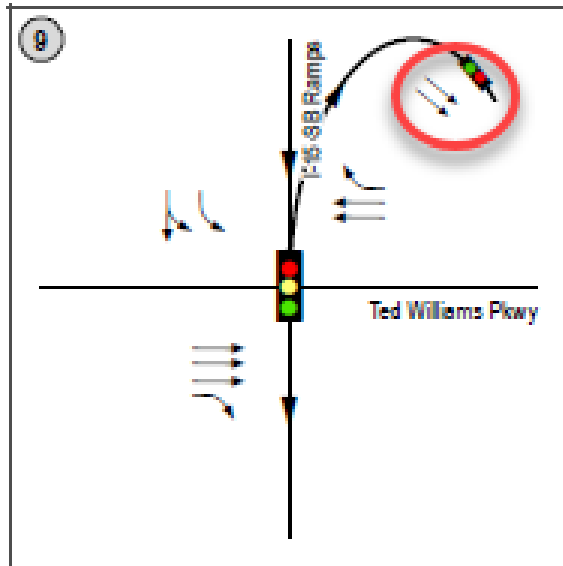
An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DEIR.

Traffic Impact Study

Traffic Engineering and Analysis Branch has received the DEIR and Local Mobility Analysis (LMA) for review and found the following comments.

1. No comments on the LMA proposed intersection improvements identified since they are outside of Caltrans R/W.
2. Page 15, Study Scenarios section should include Existing + Project scenario so direct impacts can be shown.
3. Figure 4; Existing Lane Configuration comments:
Intersection 9 needs to be corrected since it is showing a two-lane loop ramp, when it is a single lane on-ramp. Update Synchro to reflect this movement as it may impact traffic modeling.



4. This developments' vehicle miles traveled (VMT) analysis shows the proposed development VMT/Capita is 21.7, 21.4, and 23.2. "The expected Project VMT/Capita is 32-43% above the VMT significance threshold of 16.2."
 - a. This should not be "significant and unavoidable" since the development can be reduced to meet the VMT thresholds.
 - b. We recommend this development be revised to reduce the number of VMT to conform with the Governor's Office of Planning and Research guidance regarding VMT. Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based **Technical Advisory on Evaluating Transportation Impacts in CEQA** (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.

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Hydrology

- Provide the Drainage Study referred to at Page 96 of Appendix S - Storm Quality Management Plan Part 2.
- Provide drainage maps showing pre and post development Q, drainage configuration and runoff direction.

Right-of-Way

Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch