

## California Department of Transportation

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Governor's Office of Planning & Research

**April 26, 2021**

April 22, 2021

### STATE CLEARINGHOUSE

11-IMP-8  
PM 6.3 to 7.1  
11-IMP-86

2040 City of El Centro General Plan  
Update PEIR/SCH #2020070349

Mr. Angel Hernandez  
Associate Planner  
City of El Centro  
1275 W. Main Street  
El Centro, CA 92243

Dear Mr. Hernandez:

Thank you for including the California Department of Transportation (Caltrans) in the review of the 2040 City of El Centro General Plan Update Draft Program Environmental Impact Report (PEIR), State Clearinghouse (SCH) #2020070349 for the City of El Centro. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. 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 appreciates opportunity to review this Program Environmental Impact Report (PEIR). Should elements of the project and/or mitigation measures change to effect Caltrans Right-of-Way (R/W), we would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Caltrans asks that the City initiate contact with us to discuss the elements of the General Plan Update that impact Caltrans R/W.

Through the Responsible Agency coordination, Caltrans will engage with your efforts to ensure that the supporting documents address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

In the event an encroachment permit is required, as part of the encroachment permit process the applicant must provide approved final environmental documents and corresponding technical studies, and any necessary regulatory and resource agency permits.

Caltrans has the following comments:

**Traffic Engineering and Analysis**

- Please see attached marked up “Appendix H1. Transportation Impact Study” attachment for additional comments.
- New developments resulting from the City’s General Plan update should provide a Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS). Please use the Governor’s Office of Planning and Research Guidance to identify VMT related impacts.<sup>1</sup>
- The El Centro General Plan Update Transportation Impact Study shows significant [VMT] impacts from the proposed retail and commercial land uses. This information is noted in section “Retail Land Uses Impact?” on pages 11-12 and section “Retail Land Uses” on pages 12-13. How will this information be included in the tables regarding VMT impacts, and also in places in the General Plan Update document where “No Impacts” is stated in the text?
- Caltrans agrees with the following statement from page 17: “To reduce retail VMT impacts, future developments under this proposed Land Use Environmental Update (LEU) would need to be mitigated on a project-by project basis. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT, to the extent feasible by providing on-site VMT reducing infrastructure, such as those found in California Air Pollution Control Officers Association (CAPCOA) or other sources that have been vetted through peer-review research; or pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT.”
- Provide a table showing all VMT impacts from Residential, Employment, and Retail land use to better view impacts by proposed Alternatives 1 and 2, and no project condition. This would make it easier to see which Alternative has the highest VMT based impact.

	Imperial County Region - Base Year	15% below Regional Average Threshold (<85%)	El Centro - Base Year	Alternative 1	Alternative 2	No Project Alternative (Adopted GP)	Significant Impact	Impact By % or Net Increase
Residential VMT/Capita	13.76	11.70	9.62	7.93	8.14	8.73	NO Alternative	all Below 85%
Employee VMT/Employee	18.59	15.80	11.35	8.00	8.10	8.74	NO Alternative	all Below 85%
Retail Land Use VMT (miles)	5,507,484			7,467,309	7,301,875	7,295,827	YES, All Alternative	Net increase
Retail (Home based shopping) (miles)	331,912			494,465	484,272	473,170	YES, All Alternative	Net Increase

- Caltrans notes that all Alternatives have a VMT for Residential & Employment under the 85% threshold. We also note that all Alternatives have “Retail Land Use”

<sup>1</sup> California Governor’s Office of Planning and Research (OPR) 2018. “Technical Advisory on Evaluating Transportation Impacts in CEQA.” [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

significant impacts. "Alternative 1" has the highest "Retail Land Use" VMT based impact, "Alternative 2" has the second highest "Retail Land Use" VMT based impact, and "No Project Alternative" has the third highest "Retail Land Use" VMT based impact.

- Caltrans recommends the "No Project Alternative" or "Alternative 2" scenarios since they have the lowest VMT impact, and these two VMT results are very close to each other.
- With SCAG's recently adopted Regional Transportation Plan/Sustainable Communities Strategy in September 2020 (Connect SoCal), and the [SCAG Transportation Demand Management Strategic Plan and Final Report \(August 23, 2019\)](#) efforts, Caltrans encourages the City of El Centro to coordinate with SCAG to address regional strategies to reduce greenhouse gases, and VMT as part of the City's 2040 El Centro General Plan Update.

## Design

- This comment is based on "4.0 El\_Centro\_Mobility\_Element\_2021\_03\_02.pdf Class I Bike Path". Due to the vulnerability of disabled pedestrians, please consider providing separate pathways for bicyclists and pedestrians.
- All improvements within Caltrans R/W will be required to comply with Caltrans Highway Design Manual (HDM) guidelines and standards.
- Any roadwork, bicycle and pedestrian improvements, striping, and traffic controls encroaching in Caltrans R/W will require an approved Caltrans Encroachment Permit.

## Environmental

Caltrans appreciates the opportunity to comment on this Draft Program Environmental Impact Report for the General Plan. The analysis presented may impact on Caltrans R/W in the future.

Should future projects based upon the changes enacted from the PEIR have elements and/or mitigation measures change to effect Caltrans R/W, Caltrans would welcome the opportunity to be a Responsible Agency under the CEQA and to the continued coordination of our efforts.

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 including but not limited to highways, roadways, structures, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, guardrail, drainage, slopes and landscapes. Caltrans is interested in any additional mitigation measures identified for the PEIR.

### **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of El Centro is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

*Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and new vehicle miles traveled associated with development and recommends appropriate measures to avoid, minimize, or mitigate transportation impacts through smart mobility community design and innovative multimodal demand reduction strategies.*

### **Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in

supporting travel demand management and reaching the state's transportation and climate action goals.

### **Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- 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 <https://dot.ca.gov/programs/traffic-operations/ep>. 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](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development and Intergovernmental Review

Attachment