

California Department of Transportation

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11-SD-VAR
PM VAR

Climate Action Plan Update
DEIR/SCH#2020120204

Ms. Meghan Kelly
Project Manager
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Ms. Kelly:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report for the County of San Diego Climate Action Plan Update located near various Interstates and State Routes. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the County of San Diego in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and

connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Climate Action

Caltrans supports the County's efforts to reduce greenhouse gas (GHG) emissions as per AB1279, SB 32 and others, in a way that does not rely on purchase of carbon offsets to meet emissions targets. As an environmentally conscious agency, Caltrans strives to work with partner agencies like the County of San Diego in order to reduce GHG emissions and adapt to the impacts of climate change on the state highway system. Caltrans agrees that setting clear goals and metrics is an excellent step towards planning for, and meeting, emissions reductions targets that promote environmental justice and equity. Caltrans appreciates the large array of strategies and policies utilized to reduce GHG emissions, promote energy efficiency, and improve the overall quality of the San Diego County environment found in the Climate Action Plan Update (CAP). Additionally, due to the potential uncertainty of changing climate conditions, Caltrans recognizes and supports the application of adjustable adaptation strategies and plans that can be modified to fit future conditions. This updated CAP is an excellent step forward, and great example of the strategies and plans needed to improve air quality and curb GHG emissions across San Diego County. This draft CAP will be taken into consideration while Caltrans continues to expand the zero-emission vehicle (ZEV) charging grid, reduce Vehicle Miles of Travel (VMT), and promote the use of ZEV across California. Caltrans looks forward to working with the County of San Diego in order to implement recommendations outlined in this CAP update when possible.

For additional information regarding Caltrans' policies, plans, guidance, and strategies related to climate change impacts please refer to documents such as, but not limited to, Caltrans Climate Change Vulnerability Assessment, Caltrans Climate Change Adaptation Priorities Report, Caltrans Climate Change Adaptation Strategies Report, Caltrans Climate Change Communication Guide, and Caltrans GHG Emissions Mitigation Report. These documents and other resources can be found at: <https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/climate-change>.

Several other local agencies have also produced climate change adaptation guidance documents that may be helpful when finalizing the County's CAP. These documents include, but are not limited to, California's 4th Climate Change Assessment – San Diego Region Report, CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI) and various city's Climate Action Plans.

Sustainability

The County of San Diego CAP contains several actions and strategies that align with Caltrans' responsibilities and priorities. Caltrans recommends collaboration between our agency and the County of San Diego CAP on the proposed transportation related topics including adaptation strategies to help improve the County's resilience to potential climate change impacts and strategies to reduce VMT, and off-road and on-road GHG emissions.

Caltrans recognizes that transportation is a leading contributor to GHG emissions in the region and is dedicated to reducing and mitigating transportation related emissions. We recommend collaborating with Caltrans on the following measures brought up by this plan increasing the use of ZEV, installing electric vehicle (EV) charging stations, identifying Right-of-Way (R/W) areas to be used for carbon sequestration, and complete streets.

The existing climate hazards discussed in this document will have an impact of the transportation system. We recommend working with Caltrans on determining the preventative strategies the Caltrans can take to keep roadways operational and ensure their longevity against climate stressors such as increased temperatures, changes in precipitation patterns, wildfire, and flooding. Caltrans recognizes the central role that transportation planning plays in safety and ensuring that when these natural hazards do occur, citizens have a reliable evacuation route.

Electric Vehicles

On page 5-43 it states "Policy M-9.5 Electric Vehicle Recharging Infrastructure. Require new development to include electric vehicle recharging facilities to meet current and reasonably foreseeable increasing demand over time as the County's private vehicle fleet includes greater numbers of electric vehicles, consistent with State transportation and climate policies."

Please clarify if new electric vehicle recharging infrastructure for new development will be usable by the public or is it specifically for the County of San Diego's staff vehicle fleet. It is recommended that new development include the electric vehicle recharging facilities for public usage.

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 network. 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 network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.

To reduce GHG 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 County to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local VMT and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

System Planning

The final paragraph of the Chapter 1 Project Description introduction on page 1-2 indicates that the County is preparing a Transportation Program to address VMT mitigation measures for development within the unincorporated county. Please include Caltrans in the review process for the Transportation Program document. System Planning recommends discussing the CAP for Transportation Infrastructure (CAPTI) in Section 2.13.2.2 State (Regulatory Framework), including the CAPTI guiding principles and implementation strategies.

System Planning recommends including a high-level summary of the completed, in-progress, and upcoming Comprehensive Multimodal Corridor Plans (CMCPs) in Section

2.13.2.3 Local (Regulatory Framework). The CMCPs complement San Diego Forward: The 2021 Regional Plan (discussed in section 2.13.2.3) and highlight possible funding opportunities for the proposed transportation solution strategies.

Please ensure that the final paragraph on page 2.11-1 and the “Physically Divide an Established Community” issue topic in Table 2.11-1 are consistent. The last paragraph on page 2.11-1 indicates that the “implementation of the proposed project would not result in new or more significant impacts on land use and planning.” Table 2.11-1 states that the CAP Update would result in a new or more significant impact, before and after mitigation, in the “Physically Divide an Established Community” topic area.

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’ 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.

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 including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project’s draft Environmental Document.

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 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.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to CEQA and National Environmental Policy Act (NEPA) standards.

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 emailing D11.Permits@dot.ca.gov 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 or concerns, please contact Reece Allen, Climate Action Program Manager, at (858) 688-1576 or by e-mail sent to Reece.Allen@dot.ca.gov.

Sincerely,



REECE ALLEN, MSTM
Climate Action Program Manager