

California Department of Transportation

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May 15, 2023

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East Valley Specific Plan Project
DEIR/SCH# 2021020263

Mr. Adam Finestone
City of Escondido, Planning Division
201 North Broadway
Escondido, CA 92025

Governor's Office of Planning & Research

May 15 2023

STATE CLEARINGHOUSE

Dear Mr. Finestone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the East Valley Specific Plan Project (previously The Housing and Community Investment Study) located near Interstate 15 (I-15) and State Route 78 (SR-78). 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.

Caltrans has the following comments:

Vehicle Miles Traveled (VMT) and Greenhouse Gas Reductions

After further review of the *December 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA*, Caltrans found a key point that conflicts with what the *Appendix G Transportation Analysis* states on page 41:

"However, since the Project plans to maintain its purpose of providing local serving retail with less than 50,000 square feet, the retail portion may also be presumed to have a less than

significant impact as local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel."

As stated on page ES-5 of the project DEIR within the Development Potential section, the project is proposing a total of 1,025,801 square feet. This is an increase of 401,300 square feet of retail space by 2035 buildout. Please clarify and/or analyze the potential impacts of the larger square footage.

The increase in square footage of retail space conflicts with the threshold that distinguishes a local serving retail from regional serving retail development and according to the language below from page 17 of the *December 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA* the Project is actually regional serving:

"Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT."

Caltrans encourages the City of Escondido (City) to work towards meeting State goals of Greenhouse Gas Emissions (GHG) and VMT reductions through Transportation Demand Management (TDM) strategies to reach 15% below the regional average VMT/Per Capita, VMT/Employee and decrease total VMT.

On page 40 in the *Appendix G Transportation Analysis*, section 5.2 Location Near Transit Opportunities, it notes that there are no high-quality transit corridors and/or major transit stops within 1/2 miles of the project area. It is recommended that high-quality transit corridors and/or major transit stops be established to meet VMT thresholds. Coordination with North County Transit District (NCTD) is recommended to increase bus headways to less than 15 minutes each to become a high-quality transit corridor.

We encourage the City to utilize strategies that will help the City achieve conformance with State GHG emission and VMT reduction goals. Potential measures to reduce VMT include, but are not limited to:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle, and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming measures and strategies.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options.

- Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

Traffic Engineering and Analysis

Currently, intersections and streets within Caltrans' Right-of-Way (R/W) are built to the ultimate classification, Caltrans, however, accepts R/W dedication for any possible roadway improvements to the state route R/W near the project area.

Any proposed changes to the signal phasing at intersections that include Caltrans signals should be reviewed and concurred by Caltrans Signal Operations.

Caltrans request the following information to be submitted for review when available:

- a. At the time of development, each individual development shall submit a VMT analysis and Local Mobility Analysis (LMA) including Multi-Modal and Safety Analysis.
- b. Proper mitigation measures for each development shall be determined in the VMT/LMA for Multi-Modal and Safety Analysis.

Hydraulics

The proposed developments included in the project may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to Caltrans' facilities. Caltrans requests that the City include Caltrans in reviews of all submittals to the City regarding floodplain administration. Please allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from any proposed developments in this project.

Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to Caltrans when the City approves the permit to alter the floodplain and/or when the applicant applies for the CLOMR and Letter of Map Revision (LOMR).

Please include, in the preliminary environmental studies, a map depicting the FEMA-defined flood plain limits within the project sphere of influence.

Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities (i.e., Hydrological and water quality impacts to the highways, bridge, culverts, and drains) will not be allowed.

System Planning

SR-78 transitions from a freeway facility to a conventional highway within the City of Escondido. There is an opportunity to consider relinquishing this part of SR-78, to the City of

Escondido, via the state relinquishment process. This segment would include North Broadway, East Washington Avenue, North Ash Street, and San Pasqual Valley Road to the Bear Valley Parkway intersection which are near the project area. This would allow the local agency to be more responsive to community interest in the planning and operation of the facility.

The North County Comprehensive Multimodal Corridor Plan (CMCP) is in progress, with the final document scheduled for release in spring 2023. Though the CMCP study area includes the City of Escondido, the CMCP does not include the portion of SR-78 within the project area. The draft CMCP proposes a mobility hub within the City of Escondido, additional Bus Rapid Transit routes serving the City, and the double tracking of the SPRINTER. Caltrans has no planned major improvements in the project area.

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.

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 projects to meet multi-modal mobility needs.

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.

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. We would appreciate meeting with you to discuss the elements of the EIR that Caltrans will use for our subsequent environmental compliance. 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 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. As part of the encroachment permit process, the applicant must provide an approved final environmental document including CEQA determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

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 Charlie Lecourtois, LDR Coordinator, at (619) 985-4766 or by e-mail sent to Charlie.Lecourtois@dot.ca.gov.

Sincerely,

Rogelio Sanchez for

MAURICE A. EATON
Branch Chief
Local Development Review