

California Department of Transportation

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January 20, 2022

11-SD-78

PM VAR

Hallmark-Barham Specific Plan
DEIR/SCH#2021040009

Mr. Norm Pedersen
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

Dear Mr. Pedersen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Hallmark-Barham Specific Plan located near 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.

We look forward to working with the City of San Marcos in areas where the City 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:

Transportation Analysis Study

Section 13 Page 45 of Appendix K Transportation Analysis states:

“Based on the VMT analysis presented above in *Section 6*, a significant transportation impact is calculated. The results of the Project VMT comparison indicate that the Project would exceed the significance threshold by 21.66%. This would require mitigation of 21.66% or more to reduce the VMT impact to less-than-significant. Since the maximum feasible total VMT reduction combining all measures is 15%, the Project's impact is considered significant and unmitigated.”

Even with a presumed reduction per CAPCOA (LUT-1) of 6.2%, the project would still exceed the VMT significance threshold by 15.46%. Although the Transportation Analysis states that this VMT impact is significant and unmitigated, the project still needs to mitigate for its VMT impacts. This VMT impact is not in alignment with State VMT and emissions reduction goals. The project's VMT impacts need to be mitigated down to a level considered less than significant. Caltrans expects conformance to state law (CEQA) with respect to mitigation of VMT impacts. Caltrans invites coordination with the City of San Marcos to determine appropriate mitigation measures including fair share contributions to Caltrans projects in the SR-78/Barham area within the City of San Marcos.

Contributing funds towards the Barham Drive active transportation path is one way this project can help mitigate its VMT impacts and align itself with the purposes of Senate Bill 743.

Per section 13.1 of the project's Transportation Analysis, the VMT impact is stated to remain significant and unmitigated. The project needs to investigate additional methods to address this VMT impact. Some potential solutions to analyze are:

- a. Reducing the project size.
- b. Implementing other transportation improvements that would be comparable to fully mitigating the VMT impact.
- c. Contribute funding equivalent to a calculated VMT reduction that the City of San Marcos will allow to the Caltrans SR-78 Woodland/Barham project that is in the area.

Design

Caltrans and the City of San Marcos have a planned project to construct managed lanes on SR-78 and improve the Woodland Parkway interchange. This project is also proposed to construct a Class 1 active transportation path along a realigned Barham Drive, connecting the Inland Rail Trail to the Cal State San Marcos SPRINTER Station. This Caltrans/City of San Marcos project's work limits will encompass the section of SR-78 that is adjacent to the proposed Specific Plan Area. After reviewing the documents, specifically Appendix K Transportation Analysis, we request that the City of San Marcos condition the project to provide fair share contribution to Caltrans SR-78 Woodland/Barham project as partial mitigation for the project's VMT impacts.

Hydrology and Drainage Studies

Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

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 City of San Marcos 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.

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 vehicle miles traveled 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 City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-78.

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 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 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.

Mitigation

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

Caltrans recommends consideration of "fair share" funds towards future improvements associated with SR-78 corridor. Recommended feasible mitigation measures include "fair share" contribution towards Caltrans SR-78 Woodland/Barham project. Mitigation identified in the transportation analysis, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify, and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements on or adjacent to state facilities should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (<http://www.dot.ca.gov/trafficops/ice.html>).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

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.

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- 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 Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review