

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

Governor's Office of Planning & Research

Mar 24 2022

Dear Mr. Pedersen:

STATE CLEARINGHOUSE

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.

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3-1

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.

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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.

3-3

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.

3-4

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.

3-5

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

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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.

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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.

3-7

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.

3-8

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.

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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.

3-9

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.

3-10

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

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Cont.

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Letter 3
California Department of Transportation (Caltrans)

- 3-1 This comment provides opening remarks and does not raise any specific environmental topics.
- 3-2 This comment indicates that the project must mitigate its VMT impacts to below a level of significance. As discussed in the Draft EIR (page 3.15-10) the results of the project VMT comparison indicate that the project would exceed the significance threshold by 21.66%.

The City coordinated with the project applicant to review the feasibility of mitigation options that are identified in the *City's Traffic Impact Assessment Guidelines* (TIA Guidelines) specifically the Applicable VMT Reduction Strategies detailed Table 1 of Attachment C (VMT Mitigation). The following VMT reduction strategies were determined to be fully or partially applicable to the project: 1) Increase Site Density, 2) Major Transit Accessibility, 3) Voluntary Employer Commute Program, 4) School Pool Program, 5) Pedestrian and Bicycle Facility and Network Improvements, and 6) Community-Based Travel Planning.

The project applicant is also incorporating project features and design measures that can reduce VMT. These features and measures work towards enhancing and encouraging non-vehicular modes of transportation and reducing single-occupant trips. These include:

- **Bicycle Network Improvements** - The project applicant will provide bicycle network improvements in the project vicinity. These improvements are presented in figures at the end of the responses to the Caltrans letter. These include:
 - Painting solid green bicycle lane improvements on Barham Drive at the intersection approach of Woodland Parkway
 - Painting a dashed green bike lane on eastbound Barham Drive on the approach to La Moree Road.
- **Provision of Bicycle Racks and Storage** - The project design incorporates bicycle racks. Each residential unit includes a two car garage which can accommodate storage of bicycles.
- **Dedicated Parking for Carpool/Vanpools** - The project design includes a designated parking space for carpool, school carpool, vanpool, EV and/or park-and-ride spaces on site.
- **Information Sharing from Homeowner's Association (HOA)** - The project is conditioned so that the HOA Manager will provide transit information to project residents and inform community members of public transit options and carpool options (including school carpool). The HOA will also make a good faith effort in offering transit fare subsidies.
- **Workspace for Telecommuting** - The community building has been designed to include a workspaces for telecommuting. Each home is also equipped with areas suitable for telecommuting.

The project site is also located near transit options, which can reduce vehicular trips. The project site is within one mile of the Cal State San Marcos SPRINTER light rail station and within 0.9 mile of the Nordahl Road SPRINTER light rail station. Bus stops serving the North County Transit District (NCTD) Routes 305 and Route 347 are located approximately 0.4 and 0.7 mile from the project site. There is a pedestrian pathway from the project site to these SPRINTER stations and bus stops. Additionally, there is a bike lane on Barham Drive between the project site and nearby transit stations. Additionally, with the goal of reducing overall GHG emissions, the project will be required to comply with the City's Climate Action Plan which includes GHG reduction measures. These measures include:

- Providing EV charging stations
- Using electric tank hot water heaters instead of natural gas
- Complying with the City's Water Efficient Landscape Ordinance
- Planting 243 trees

It is important to note that the project reduces the overall amount of trip generation compared to what could be generated under the current General Plan designation. Under the current MU-3 (Mixed Use 3) designation, a mix of office and retail uses could be developed and generated up to 5,410 ADT, The project will generate 1,208 ADT, which is a 77% reduction. This reduction in ADT results in a corresponding reduction in air and greenhouse gas emissions which provides an overall benefit toward reducing VMT and GHG emissions on a region-wide basis.

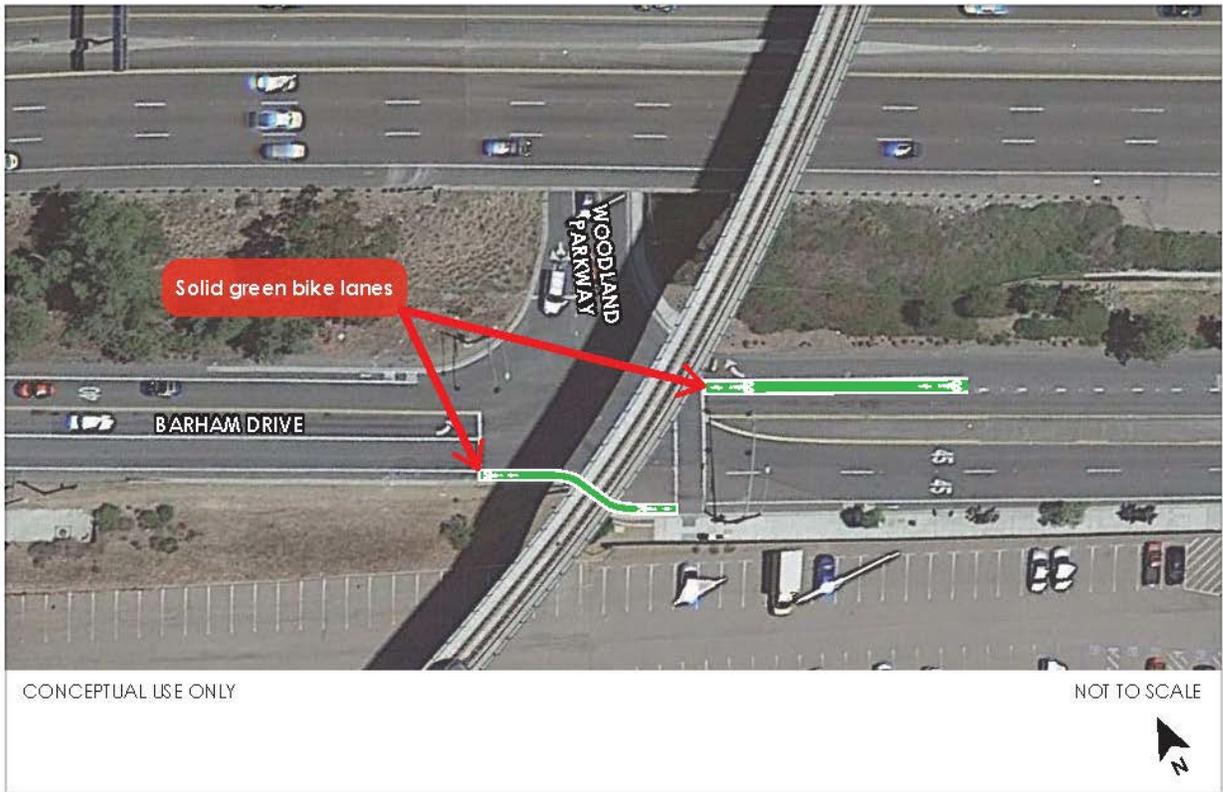
Finally, from an historical perspective, the owner of the project site contributed to roadway infrastructure improvements through the dedication of right-of-way when the City widened E. Barham Drive. These public road and utility easements (for public purposes) were signed over to the City in 2006 and 2008 and were recorded in 2012. East Barham Drive in front of the project site has been improved to its ultimate plan including tree wells, a bike lane and a 10-foot sidewalk. The bike lane and sidewalk along the project frontage provide for non-vehicular mobility options. In conclusion, the proposed project, while not able to mitigate the VMT impact to below a level of significance, incorporates several VMT and GHG emission reducing features and measures. The project also reduced potential ADT by 77% compared to what the ADT would be under buildout under the current General Plan designation of MU-3.

3-3 This comment requests that the City condition the project to provide a fair share contribution to Caltrans SR-78 Woodland/Barham project as partial mitigation for the project's VMT impacts. The only established fee program that the City has is the Public Facility Fees (PFF) development fees, a portion of which address the impact to the City of San Marcos' SR-78 interchanges. Per mitigation measures MM-LU-1, prior to the issuance of the first building permit, the Project Developer shall pay the local and regional Public Facility Fees (PFF) development fees assessed to address the impact to the City of San Marcos' SR-78 Interchanges. There are no other fee programs (i.e., in lieu VMT fee payment) that are available in the City.

3-4 This comment addresses drainage and runoff on Caltrans facilities. The project will not impact any Caltrans drainage facilities nor will it increase any runoff to Caltrans facilities. As

detailed in Section 3.9 (Hydrology/Water Quality) of the Draft EIR, the project site would be hydrologically engineered such that post-development runoff would be equal to the pre-development condition. Therefore, hydrologic impacts resulting from the proposed project would be less than significant.

- 3-5 This comment addresses Caltrans Complete Streets and Climate Change policies in State Highway Operations and Protection Program project. This requirement is not applicable to the proposed project.
- 3-6 This comment addresses land use planning and “smart growth” and coordination with the City. Comment noted however, this comment does not raise an environmental issue specific to the project.
- 3-7 This comment addresses noise from SR78 and potential impacts on the project. The noise analysis, which was summarized in Section 3.11 (Noise) of the Draft EIR considered the existing noise from SR-78 in the analysis. Mitigation measures (MM-N-3, MM-N-4 and MM-5) will be implemented by the project to reduce potential noise impacts to below a level of significance.
- 3-8 This comment addresses Caltrans responsibility as it relates to environmental review for encroachments into the Caltrans right-of-way. The project does not propose any improvements in the Caltrans right-of-way.
- 3-9 This comment addresses the availability of high speed broadband. High speed broadband is available in the project vicinity should future residents desire this service. Additionally, the common area building will include a space for telework.
- 3-10 This comment recommends consideration of “fair share” funds toward future improvements associated with the SR-78 corridor. As detailed in response 3-3, above, per mitigation measures MM-LU-1, prior to the issuance of the first building permit, the Project Developer shall pay the local and regional Public Facility Fees (PFF) development fees assessed to address the impact to the City of San Marcos’ SR-78 Interchanges.
- 3-11 This comment addresses survey monuments. The project will not impact any survey monuments. Nor will the project require any work within the Caltrans right-of-way.



New Green Bike Lane Improvements at Barham Drive and Woodland Parkway



Bicycle Improvements at Barham Drive and La Moree Road