

California Department of Transportation

DISTRICT 12
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February 3, 2025

Mr. Nick Taylor
Principal Planner
City of Anaheim
200 South Anaheim Blvd.
1st Floor, Suite 162
Anaheim, CA. 92805

File: LDR/CEQA
SCH: 2022020363
12-ORA-2024-02710

Dear Mr. Taylor,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the City of Anaheim General Plan Focused Update Project. The proposed project is a focused update of the City of Anaheim's adopted General Plan that reflects zoning and land use updates resulting from the 2021-2029 Housing Element, which addresses the City's Regional Housing Needs Assessment (RHNA) growth allocation of 17,453 housing units. It will also complete the actions identified by the Center City Corridors Implementation Plan (C3 Plan). The proposed project updates residential and non-residential buildout to reflect growth projections anticipated through 2045.

The City of Anaheim encompasses over 34,000 acres with an additional 2,431 acres within its Sphere-of-Influence (SOI) (refer to Exhibit 1, Regional and Vicinity Map). The City is approximately 35 miles southeast of downtown Los Angeles and 7 miles north of the City of Santa Ana. The City is surrounded by the cities of Fullerton, Placentia, and Yorba Lina to the north; Riverside County to the east; the cities of Orange, Garden Grove, and Stanton and unincorporated Orange County to the south; and the cities of Cypress and Buena Park to the west. Regional access to and from the City is provided from State Route 91, Interstate 5, State Route 55, and State Route 241.

State Routes 91, 55, 241 and Interstate 5 are owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

1. Caltrans supports the inclusion of bicycle storage facilities pursuant to CALGreen code. Caltrans also recommends following bicycle parking best practices described in the "Essentials of Bike Parking" guide created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbbp.org/Publications>). Bike parking should be installed a minimum of

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24" away from walls and other objects (e.g., trash cans, plants, etc.). With the growing popularity of electric bikes and cargo/utility bikes (which tend to be bigger and heavier), Caltrans also recommends that bicycle storage facilities be designed to accommodate a range of bicycle styles, sizes, and weights.

2. Please encourage the use of transit among future residents, visitors, and workers of any developments. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.
3. Provide adequate wayfinding signage and related amenities for transit stops within proposed developments.
4. During any construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users.
5. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.
 - a. Potential Complete Streets improvements that would improve public safety include, but are not limited to, pedestrian-oriented LED lighting, high visibility crosswalks, curb extensions and bulb outs, and other improvements.
6. Consider accounting for off-street truck parking to help free up on-street space for other modes, such as city traffic, walking, and bicycling. Similarly, utilize alley space or similar areas, if available, to reduce the need for on-street parking which may conflict with highway/street flows.
7. Please consider designated on-street freight-only parking and delivery time windows to reduce the need for double parking. This strategy also helps prevent street traffic congestion.
8. Please consider leveraging strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.
9. Creation of emergency plans, that include emergency routes and paths, can alleviate congestion in the event of an emergency and allow EMS to easily access the site.

10. Encourage commercial and high-density residential developments to offer pick-up point services or automated parcel systems (e.g. Amazon Lockers) so that deliveries can be made with one truck stop instead of multiple stops to individual residences.
11. Providing electric charging for vehicle use encourages adoption of electric or hybrid vehicles. Install or implement air pollution reductions strategies.
12. Please note that future projects should not present adverse impacts to the overall transportation system including traffic circulation and the local State Highway Systems (SHS). If future developments disrupt or impede traffic circulation or the local State Highway System, Caltrans will request a Traffic Impact Analysis (TIA) of these assets. The TIA will also need to include existing and future average daily traffic volumes, traffic generation including peak hour, traffic distribution, Highway Capacity Manual (HCM) intersection analysis along with current and projected capacities of local street, and state highways or freeways including ramps that might be impacted.
13. When analyzing future proposed projects, please note potential short- and long-term traffic impacts with respect to regional vehicle miles traveled (VMT's), please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.
14. Any work performed within Caltrans right-of-way (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. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. Applicant must submit a signed Standard Encroachment Permit application form TR-0100 along with a deposit payable to Caltrans. Deposit amount will be dependent on when the application is submitted. Public corporations are legally exempt from encroachment permit fees. However, contractors working for public corporations are not exempt from fees. Please note that all utility work should be disclosed prior to permit submittal, and utility companies are to apply for separate permits for their corresponding work.
15. Project plans and traffic control plans must be stamped and signed by a licensed engineer. For all plans, including traffic control plans, Caltrans R/W lines should be clearly labeled, which includes existing and proposed (if there are any changes to Caltrans R/W), the north arrow, the edge of pavement, and edge of the sidewalk, if applicable. When submitting the application, please include final Environmental Clearance Documentation, relevant design details including design exception approvals and construction and drainage plans, traffic control plans, traffic management plan and traffic impact study if proposed traffic delay of 30 minutes

above normal recurring traffic delay is anticipated, any Caltrans R/W certifications if needed, maintenance agreement as needed, shoring plans for any excavation 5-foot or more, ADA certification, and any letter of authorizations.

16. Please submit all applications and associated documents/plans via email to D12.Permits@dot.ca.gov until further notice. Caltrans Encroachment Permits will be transitioning to an online web portal base for all applications in Fall 2023. Further details to be announced on the Caltrans Encroachment Permits homepage. Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (657) 328-6246. For specific details on Caltrans Encroachment Permits procedure and any future updates regarding the application process and permit rates, please visit the Caltrans Encroachment Permits homepage at <https://dot.ca.gov/programs/traffic-operations/ep>.
17. Page 24 (of PDF – same for all reference to page numbers in this document): Spell out 'C3' Abbreviation in “C3 Plan”. Has not been identified in this document anywhere before this.
18. Page 26 - Spell out Abbreviations (C3SP, C3IP on page 27, etc.). Has not been identified in this document anywhere before this. C3IP provides 19,473 housing units? That is the only missing component from the Housing element. Please clarify what is eliminated from the housing element.
19. Page 74 - Why were these 3 project planning areas selected to showcase and not all eleven mentioned? Expand.
20. Page 80, 2nd paragraph – “(C3SP)” has been abbreviated multiple times before this page. Same with other abbreviations throughout the document. There is a reference to 'C3IP' previous pages. Is it the same as 'C3 Plans'? Please verify and make it consistent in the document.
21. Figure 3-4, Page 85 - identifying C3 Plan location on this figure would be helpful to the reader since it's mentioned in the same section.
22. Page 91, 2nd paragraph - What is the basis of selection of these 3 proposed projects? How is it comparable to the other projects?
23. Page 577, Policy 1.1-1 – Shouldn't it refer to VMT now and not Level of Service?
24. Page 578, Goal 2.1 – Shouldn't it refer to VMT now and not Level of Service?
25. Page 586, Freeways and Highways section - Missing Highway: SR-39 Beach Blvd.

26. Page 598, 1st paragraph, "However, those thresholds were not intended to specifically address the appropriate methodology and metric for a general plan." - How is it not appropriate? Expand.
27. Page 601, Roadways section - Missing Highway SR-39 Beach Blvd.

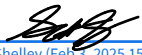
Comments on VMT Memorandum

28. Page 2., VMT Impact Criteria, "This transportation impact assessment compares VMT generated by buildout of the General Plan Focused Update (2045) to VMT generated by the "Existing Base Year (2021)" and to VMT generated by buildout of the 2004 General Plan (2045) at a total and per capita level to provide a comprehensive assessment."
Comment: Were adjustments made to data due to the pandemic? Please justify.
29. Page 5., VMT Impact Assessment, Second Paragraph; "Higher densities naturally shorten trip lengths by bringing residential, commercial, and employment activities into closer proximity."
Comment: Higher densities will inevitably pose risks to pedestrians and cyclists, especially if adequate infrastructure (such as sidewalks, crosswalks, and bike lanes) are not in place. If adjacent sidewalks or bike lanes need to be closed during construction, please ensure that closures and detours are clearly signed. This in turn could lead to strain on existing ramp intersections and freeways. Despite the project's assertion that there are no thresholds of significance, it is crucial to establish a comprehensive list of mitigation measures or a detailed plan to address these shortcomings.
30. Page 5., VMT Impact Assessment, Fourth Paragraph: "In addition, the City anticipates continued support of the following programs and efforts.
Micro Transit Planning Efforts
Mobility Hub Planning Efforts
First-Last Mile Planning Efforts
Transit Master Plan Planning Efforts
East-West Connection (included in LRTP)"
Comment: Provide brief descriptions/examples of each.
31. Page 7, Goal 2: Support bicycling, walking, and other active transportation modes, bullet #3; "Coordinate with adjacent jurisdictions and regional agencies to encourage the development of a connected bikeway network across jurisdictional boundaries."
Comment: Coordination should not only be with surrounding jurisdictions, but the City should also engage with existing residents to understand their concerns and incorporate their input into planning and development processes.

32. Page 9, "Goal 4: Facilitate safe goods movement throughout and within the city";
Comment: Ensure that truck parking, ingress, egress, and staging areas do not interfere with vehicle parking, pedestrian paths, or bicycle lanes/parking. Collaborate with community representatives to mitigate truck traffic routing onto residential streets to prevent conflicts with other road users. Limit the creation of new, unnecessary access points and driveways along State Highways. Additionally, provide comprehensive wayfinding to aid navigation for all users.

Caltrans' mission is to provide a safe and reliable transportation network that serves all people and respects the environment. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at Julie.lugaro@dot.ca.gov.

Sincerely,



[Scott Shelley \(Feb 3, 2025 15:51 PST\)](#)

Scott Shelley
Branch Chief,
Local Development Review-Climate Change-Transit Grants
Caltrans, District 12






City of Anaheim - General Plan Focused Update Project - 12-ORA-2024-02710

Final Audit Report

2025-02-03

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