

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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Nicholas Hamilton, Senior Planner
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: 2101 Sneath Lane Residential Project + Notice of Preparation (NOP) of an Environmental Impact Report

Dear Nicholas Hamilton:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 2101 Sneath Lane Residential Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the August 2022 NOP.

Project Understanding

The project proposes to demolish the existing San Bruno Golf Center and San Bruno Park School District maintenance building, and construct 118 single family residential homes at 2101 Sneath Lane in the City of San Bruno. Project is located adjacent to I-280.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the

exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance ([link](#)).
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Mitigation Strategies

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' Smart Mobility Framework Guide 2020 ([link](#)), the proposed project site is identified as a suburban community where community design is moderate to weak and regional accessibility is varied.

Given the place, type and size of the project, the DEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT Project design to encourage mode shift like walking, bicycling and transit access;

- Orientation of project towards non-auto corridor;
- Location of project near bicycle network;
- Incorporation of bicycle lanes in street design;
- Pedestrian network improvements;
- Traffic calming measures;
- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;

- Limiting parking supply;
- Unbundled parking from property costs;
- Implementation of Urban Non-Motorized Zone
- Ridesharing programs, Commute Trip Reduction programs, bike sharing programs;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit access supporting infrastructure (including bus shelter improvements and sidewalk/ crosswalk safety facilities);
- Bike parking near transit facilities.

Please consider the addition/ Increase in number of affordable housing units in project. To address the regional housing crisis and reduce displacement pressures based on housing prices, Caltrans strongly supports maximizing the number of BMR units. Caltrans notes that other recently proposed residential projects in San Mateo County have planned for more than the required 15% minimum threshold of BMR units, and strongly encourages the same within this project.

The Caltrans District 4 Bike Plan (2018) and Caltrans District 4 Pedestrian Plan (2021) evaluated bicycling and pedestrian needs along and across the STN in the nine-county Bay Area. These efforts culminated in a list of prioritized improvements to address bicycling and pedestrian needs, taking into account safety, equity, existing and future bicycle demand. Near the proposed project location, the plans identify the need for Class IV/Class II bike facilities along SR-35 from West San Bruno Avenue to Berkshire Drive (continuing north as Class II), intersection improvements at SR-35 and West San Bruno Avenue, intersection improvements at SR 35 and Sharp Park Road, interchange improvements at I-280 and Sneath Lane including Class II bike lanes, interchange improvements at I-280 and West San Bruno Avenue including buffered Class II bike lanes, a Class I shared-use facility linking I-280 and SR-82 and parallel to I-380 Right-of-Way (ROW), crossing improvements at I-380 and Cherry Avenue, intersection improvements at SR-82 and Sneath Lane, intersection improvements at SR-82 and West San Bruno Ave, and even more needs in the wider surrounding geography. Many of these needs are identified by the plans as top tier priorities. The project should anticipate and account for these stated needs and the larger regional objective of a connected active transportation and transit network in the project vicinity. The project could do so by substantively improving the existing nearby bike and pedestrian infrastructure, including any of the needs mentioned above, and through coordination with the City, SamTrans, Caltrans, and the relevant county authorities. Any such efforts would be considered partial implementations of the District 4 Bike or Pedestrian Plans.

As mentioned in the NOP, this site abuts Crestmoor Canyon. Caltrans strongly supports the project's proposal to improve the trailhead and dedicate land to the City for

public and maintenance access. Please consider creating new tie-ins to the Canyon, nearby signage and wayfinding, crossing improvements at nearby intersections, bike lanes along adjoining streets, and/or other improvements in coordination with the City.

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, refer to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity ([link](#)).

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Lead Agency

As the Lead Agency, the City of San Bruno is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office

of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2022. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse