California Department of Transportation

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July 15, 2024

Mr. Chris Schaefer
Planning Manager
City of Fullerton
303 W. Commonwealth Ave.
Fullerton, CA. 92832

File: LDR/CEQA
SCH:2023090133
12-ORA-2023-02600
SR-91, SR 90
SR-57, I-5

Dear Mr. Schaefer,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the Fullerton Housing Incentive Overlay Zone (HIOZ) Program. The Program is designed to facilitate housing unit production by allowing housing development on properties with non-residential underlying zoning classifications in exchange for providing a specified percentage of affordable housing units. The Program would apply an overlay zone to 759 parcels across the City totaling 593 acres. Implementation of the Program could result in a buildout potential of 35,611 units. The Program would not directly result in the construction of the total buildout potential. Instead, the Program would facilitate the construction of housing units with the adoption of this zoning program.

The HIOZ Program is proposed within the City of Fullerton, located in north Orange County, California. State Routes 57, 90, and 91, as well as Interstate 5 reside within the project area and are owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

1. Please identify potential conflict areas with environmental justice communities.

2. There is a high concentration of rezoning along the north-south corridor of Euclid St., but no bike lanes. Please consider bike lanes along Euclid St and other streets to allow alternative modes of transportation for city residents.

3. The Housing Overlay is also located around schools such as Raymond Elementary School and Sunny Hills High School. Please consider street calming measures due to the potential increase in traffic in the school vicinity.

4. Ensure that truck parking, ingress and egress, and staging will not interfere with vehicle parking, pedestrian paths, or bicycle lanes/bicycle parking. Work with community representatives to mitigate any truck traffic routing onto residential streets or conflicting with other road users, including and especially bicyclists and pedestrians.

5. Consider encouraging or incentivizing the use of transit among both construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.

6. Please coordinate with local/regional Travel Demand Manager to ensure workers can travel to warehouse/distribution center without needing personal vehicles, this potentially can reduce air pollution and roadway congestion thru a reduction in VMT.

7. Please identify all the existing transit services for local and regional bus services including the connectivity to rail services from the nearest train stations provided by Metrolink and/or Amtrak Pacific Surfliner.

8. Please provide discussion of multimodal transportation mobility options of the current transit services and regional rail services and look for opportunities and connectivity to safe and convenient access.

9. Consider encouraging or incentivizing the use of transit among both construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.

10. Provide adequate wayfinding signage to transit stops within all the project vicinity and local roadways.

11. Consider how many individual packages will be delivered daily to individual residences within the areas identified for increased housing production. Shared drop-off locations can help reduce the amount of driving done by delivery trucks and can increase the efficiency of deliveries in densely developed areas. Similarly, high-density residential developments should consider automated parcel systems (i.e., Amazon Lockers) so that deliveries can be made with one truck stop instead of multiple stops to individual residences.

12. 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.

13. If truck parking (i.e., for home deliveries) is to be on-street, ensure the width of the parking lane is wide enough for freight trucks without encroaching on bicycle lanes or street lanes.

14. 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.

15. Please ensure that, throughout the identified areas for increased housing opportunities, the City provides posted speed signs for truckers to follow.

16. Consider having urban greening mitigations, such as green walls. Incident Response Plans can keep critical entrances open for emergency personnel. Plans should also include alternative local roads and highways, so roadways do not become congested during an emergency.

17. Please note that General Plans and Specific Development Plans should not present adverse impacts to the overall transportation system including: traffic circulation and the local State Highway Systems (SHS). Caltrans is requesting a Traffic Impact Analysis (TIA) that focuses on the impacts to Fullerton's local SHS; (State Route 91 (SR 91), State Route 57 (SR 57), State Route 90 (SR 90) and Interstate 5 (I-5)). Caltrans is also requesting that the TIA includes the impacts to the ingress and egress ramps for SR 91, SR 57, and I-5, as well as the City's proposed mitigation measures for these impacts.

18. A Vehicle Miles Traveled Analysis (VMT) vs. Level of Service Analysis (LOS) could lead to inconsistencies in identifying impacts and determining appropriate mitigations. How does the City plan to address impacts that are not significant under VMT but are significant under LOS?

19. Any project work proposed in the vicinity of the State Right-of-Way (ROW) would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for

any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at: http://www.dot.ca.gov/hq/traffops/developserv/permits/

20. Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (657) 328-6553 or D12.permits@doct.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment Permits. 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.

Caltrans' mission is to provide a safe, sustainable, equitable, integrated, and efficient transportation system to enhance California's economy and livability. 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
Branch Chief,
Local Development Review/Climate Change Planning
Caltrans, District 12