

California Department of Transportation

DISTRICT 12
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July 22, 2024

Samantha Beier
City of Tustin
300 Centennial Way
Tustin, CA 92780

File: LDR/CEQA
SCH#2024020969
LDR LOG #202402499
I-5

Dear Ms. Beier,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Notice of Preparation of a Draft Environmental Impact Report for the Market Place project. The city is proposing to designate an 18-acre portion of the overall 76.9-acre Project site exclusively for residential development. The 18-acre site consists of seven parcels (full or partial APNs 500-291-06, -07, -11, -12, and -25 and 500-312-03 and -10), which are primarily used as surface parking lots.) This new High Density Residential designation would allow for the future development of up to 900 dwelling units on the Project site, consistent with the certified 2021-2029 Housing Element Update. The Project site is generally bounded by Myford Road to the northwest, Bryan Avenue to the northeast, Jamboree Road to the southeast and I-5 (Santa Ana Freeway) to the southwest.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Caltrans is a responsible agency on this project and has the following comments:

EIR Appendix D - VMT Analysis Methodology Comments:

1. Page 5 of Appendix D – VMT Analysis, it is stated that total population and employed population of the project was calculated using current household average occupancy in adjacent Traffic Analysis Zone (TAZ). Please include in the report the adjacent TAZ used in the TAZ 1126 calculation.
2. Page 5 of Appendix D – VMT Analysis, Please include the employment growth value in the report .
3. Page 5 of Appendix D – VMT Analysis, The OCTAM model was run base year and future year with and without project conditions. Please discuss why this is not included in Table 2 and show the data for base year and future year, with and without project conditions.

4. Page 5 of Appendix D – VMT Analysis, the report states that it is infeasible to achieve a 15% VMT reduction below the citywide average for many areas in the city. The report states that by ensuring that land use development projects result in no net increase in VMT, a sustained reduction in city wide VMT and GHG emissions will occur, and the projects impact on VMT would be considered less than significant. Please explain what measures/strategies will be used to ensure there will be no net increase in VMT.

Traffic Impact Analysis Report Comments:

5. Page 6 – Please discuss why Walnut/Jamboree Intersection is not included in the analysis.
6. Page 15 and 16 – There are peak hour volumes where the approach volumes are 0 at an intersection, for Intersection. Please update the approach volumes and update the analysis to reflect on Table 3.2.
7. Page 17 – Discuss how traffic volumes were calculated and what growth factor was used to obtain 2030 volumes. Discuss why some volumes for 2030 were lower than existing volumes.
8. Page 18,26 - Intersection 6 has an unsatisfactory LOS and is in the proximity of Intersection 5 (SB I-5 on/off ramp). A discussion of potential mitigation measures is required for as the result of the proposed project,
9. Page 25 – Discuss how traffic volumes were calculated and what growth factor was used to obtain 2045 volumes. Discuss why some volumes for 2045 were lower than existing volumes.
10. The proposed project increases the capacity of allowable housing. With more residential units near commercial, there is opportunity to encourage multi-modal travel and reduce VMT. Short local car trips can potentially be replaced with walking and bicycling trips. Caltrans encourages the design of Complete Streets that include high-quality pedestrian and bicycle facilities that are safe and comfortable for users of all ages and abilities.
11. Consider complete street designs on streets surrounding the project area.
12. There are opportunities for connections to existing alternative modes of transportation near the project. These include the Tustin Metrolink Station, OCTA Bus Route 79, and Class II bike lanes on Bryan Avenue and Jamboree Road.

13. Currently, there are no north-south OCTA bus routes connecting the Market Place. Consider coordinating with OCTA to expand bus service and include connections to the Tustin Metrolink Station, which is about 1.5 miles south.
14. To encourage alternative modes of transportation and reducing VMT, consider closing the bike lane facility gap on El Camino Real and the southern segments of Myford Road and Jamboree Road to connect the commercial and residential development.

Please consider the following recommendations from Caltrans March 18, 2024, letter:

15. Ensure that truck parking, ingress and egress, and staging will not interfere with vehicle parking, pedestrian paths, or bicycle lanes/bicycle parking.
16. Establish freight pick up & drop off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion for freight. Consider designating on-street freight-only parking and delivery time windows so trucks will not resort to double parking, thus causing street traffic congestion.
17. For the multifamily residential units proposed, consider how many individual packages will be delivered daily to individual residences. Amazon lockers or an equivalent shared drop-off location can help reduce the amount of driving done by delivery trucks and can increase the efficiency of deliveries.
18. Work with local partners and community representatives to mitigate any truck traffic routing onto residential streets or conflicting with other road users, including and especially bicyclists and pedestrians.
19. In the event of any work performed within Caltrans right-of-way, an encroachment permit will be required prior to construction. Please submit all applications and associated documents/plans via online web portal base Caltrans Encroachment Permit System (CEPS) at <https://ceps.dot.ca.gov/>
20. 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

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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. 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.

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 Maryam Molavi, at Maryam.Molavi@dot.ca.gov.

Sincerely,



Scott Shelley

Branch Chief – Local Development Review/Climate Change/Transit

District 12