

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

MAY 04 2020

May 4, 2020

STATE CLEARINGHOUSE

11-SD-78
PM 18.56
Palomar Heights
DEIR/SCH #2019059013

Mr. Adam Finestone
Project Manager
City of Escondido Community Development Department
201 North Broadway
Escondido, CA 92025

Dear Mr. Finestone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) (SCH # 2019059013) on the Palomar Heights multi land use development near State Route 78 (SR-78) at Valley Blvd. in the city of Escondido. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Analysis

The location of the development is not near a major transit corridor nor a high-quality transit corridor. Based on the anticipated trip generation of greater than 2,400 ADT and the project's inconsistency with the General Plan, a Project Specific SANDAG model run is required. The following are Caltrans comments on the Vehicle Miles Traveled (VMT) analysis:

- Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's

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significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.

- The Traffic Impact Analysis (TIA) shows 46% of project trips traveling towards Interstate 15 (I-15) yet no analysis was done at the I-15 interchange with Valley Parkway.
- Section 5 – VMT analysis of Appendix J TIA, did not provide the Project opening (2022) VMT comparison between the baseline regionwide VMT per capita nor the City of Escondido VMT per capita. The report is only comparing the 2025 VMT per capita.
- Appendix H is missing from the report. Section 5 states that the Baseline and Future VMT reports are included in Appendix H.

Environmental

Caltrans recommends that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans Right-of-Way (R/W) that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the Final EIR. Specifically, Caltrans would like to know the information for the resources listed in the Notice of Preparation (NOP).

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

Electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch