

**DEPARTMENT OF TRANSPORTATION**

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**MAR 02 2020**

March 2, 2020

**STATE CLEARINGHOUSE**

Ms. Jessica Magana  
City of Brea  
1 Civic Center Circle  
Brea, CA 92821

File: IGR/CEQA  
SCH#: 2019080299  
DOC:12-ORA-2019-01311

Dear Ms. Magana,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the proposed Brea Mall Mixed-Use Project. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The project will redevelop existing portions of Brea Mall which will result in a net increase of 149,625 sq. ft. of commercial space and 312 residential units. The project is located between Randolph Avenue, State College Boulevard, and Imperial Highway. Nearby State facilities include State Routes 57 (SR 57) and SR 90. Caltrans is a responsible agency and has the following comments:

**Traffic Operations:**

1. Based on the TRAF-1 Mitigation in the DEIR: "Prior to issuance of a building permit, the City and Caltrans shall jointly identify feasible operational and physical improvements and the associated fair-share funding contribution necessary to mitigate project-related direct and indirect impacts to state transportation facilities, including these intersections:
  - a. #16 Harbor Boulevard at Imperial Highway,
  - b. #18 Brea Boulevard at Imperial Highway,
  - c. #19 Randolph Avenue at Imperial Highway,
  - d. #20 State College Boulevard at Imperial Highway,
  - e. #22 SR-57 NB Ramps at Imperial Highway, and
  - f. #23 Associated Road at Imperial Highway"

Caltrans Traffic Operations have identified the following improvements as possible mitigation measures for project impacts:

**IMPERIAL HIGHWAY:**

- A. Consider adding a data collection station west of the Randolph/Imperial intersection. This station would collect VMT and improve the safety and operation of the intersection.
- B. The city's proposed mitigation measure No. 19 Randolph Avenue at Imperial Highway – Caltrans Traffic Operations would prefer to keep the dual left turn lanes. Storage on the southern portion of the intersection is severely limited and would benefit from dual left turn lanes.
- C. Ensure that Imperial Highway has 3 through lanes, and 2 signal timing heads, in both eastbound and westbound directions to maintain efficient throughput.
- D. Any signals operated by the City on Imperial Highway must be under a maintenance agreement.
- E. For improvements on Brea Boulevard and Imperial highway:
  - a. Northern leg must not have a right-turn on red. This will streamline and remove possible conflicts to westward travelers on Imperial Highway.
  - b. The right turn pocket on the western leg is too short, which may result in queueing on the thru lanes. Consider expanding the right turn pocket.
  - c. The lane drop on the southern leg of the intersection may not be sufficient for 3 thru lanes and a right turn. Consider keeping the SB lane consideration as is.

**SR 57:**

- F. For improvements on the NB 57 offramp:
  - a. Consider shifting the eastward stop bar further back to provide a safer left turn radius for all vehicles.
  - b. Consider expanding the NB offramp to 3 left turn lanes and 1 ½ right turn lane.
  - c. Consider extending the sidewalk on the left-side of the NB SR 57 onramp, in order to create a shorter pedestrian crossing with better visibility.
  - d. Consider installing additional lighting along each intersection.
- G. For improvements on the SB 57 offramp, considering expanding the intersection to include 2 left-turn lanes and 2 right-turn lanes.

Possible mitigation for the Project is not limited to the ones listed above. Caltrans is willing to work for the City to explore other avenues of mitigation and to implement the ones mentioned in the DEIR and above.

2. The project will generate significant impacts on the State Highway System and the local arterial system. Proposed mitigation includes changing the alignment and phasing of certain intersections on Imperial Highway. Caltrans Traffic Operations group will need to review the proposed changes to alignment and phasing for signal timing optimization, corridor synchronization, to ensure the safety for all users and improve efficiency of vehicle throughput.
3. Limit any construction to off-peak hours in order to minimize impacts on Caltrans facilities.

**Transportation Planning:**

4. The DEIR states: "However, these improvements are within Caltrans' right-of-way and are subject to Caltrans review and approval. In addition, Caltrans has no mechanism by which projects can contribute fair share fees to offset impacts. Therefore, the mitigation measure was considered but determined to be infeasible."

Caltrans will coordinate with the City to development funding and/or cooperative agreement options that would facilitate the development and implementation of suggested and agreed upon mitigation measures, to ensure they are feasible.

5. The DEIR states: "Since the proposed Project cannot guarantee that these improvements which are under the jurisdiction of Caltrans will be implemented, a statement of overriding considerations may be required for this location."

Please coordinate with Caltrans to adequately address the impacts associated with the proposed project, by completing the proposed mitigation improvements to comply with CEQA regulations.

6. The Brea Mall contains a transit hub. Consider providing improved notification to future residents and mall visitors of its location through appropriate signage and wayfinding. Additionally, providing easier bicycle and pedestrian access to the transit hub would promote transit usage, reducing vehicle miles traveled, and improve congestion.
7. Consider incorporating designated areas/parking for freight delivery and micro-transit pick up and drop off in the site plan design for this project.

8. Consider using fair-share funds for improvements in the Brea Park-and-Ride Lot. These could include the installation of electric vehicle charging station. Charging stations would promote the use of clean air vehicles, reducing GHG emissions and air quality impacts of the facility.
9. Explore the option of using underutilized parking spaces near the transit hub and during off peak hours as park and ride spaces. These would promote transit as a more accessible and feasible mobility option.

**Active Transportation:**

10. Consider adding conflict zone striping for Class II bicycle facilities in areas such as driveways and entrances/exits to parking lots and structures. This highlights the movements of bicyclists through these areas, increasing their safety by making them more visible to vehicles.
11. Consider adding green paint to the on-street bicycle facilities to highlight conflict points between bicycles and vehicles, thus improving bicyclists' safety.
12. According to the City of Brea's Active Transportation Plan (2019), there are proposed bicycle improvements along State College Boulevard. Consider adding safe and appropriate bicycle connections to State College Boulevard. Improvements may include wayfinding signage, continuation of bicycle facilities, and conflict zone striping. Improvements will also encourage residents to bicycle to destinations, thus reducing the amount of short-duration vehicle trips.
13. Craig Regional Park is located south of the project site and the Tracks at Brea Trail is location north of the project. Consider adding safe bicycle and pedestrian connections across nearby roadways and intersections. Active Transportation-oriented improvements will encourage residents to walk and bicycle to the park, thus promoting Active Transportation and public health, as well as reducing congestion and improving air quality.
14. Caltrans District 12 recently completed a project to improve sidewalks and curb ramps along SR 90. Due to the proposed project's proximity to SR 90, consider providing safe and appropriate pedestrian connections to SR 90. Improvements may include pedestrian-oriented lighting and wayfinding signage, and will encourage residents to walk to destinations, therefore reducing the amount of short-duration vehicle trips.

15. Caltrans supports the project's inclusion of secure and functional short- and long-term bike parking. Short-term bike parking at retail locations should be placed on the ground floor in visible areas that are close to main entrances and should be installed at least 24" away from walls and other objects (e.g. trash cans, plants, etc.). Both short- and long-term bike parking should be designed to accommodate different types of bikes (e.g. cargo bike, bike with trailer).
16. For additional guidance on providing functional bike parking, see the attached "Essentials of Bike Parking" guidance created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>).

**Hydraulics:**

17. Diversion flow is not allowed and discharging groundwater to storm drains is not allowed. Existing flow pattern shall be maintained.
18. Final construction plans and hydrology calculations (existing & proposed condition) need to be reviewed and approved by Hydraulics Branch during Encroachment Permitting Process to clarify that there will be no increase in water surface elevation in the existing systems

**NPDES/Stormwater:**

19. Prior to connecting to Caltrans drainage systems, the City must receive approval from the NPDES/Stormwater group during the Caltrans Permitting Process.

**Design:**

20. All pedestrian facilities within Caltrans ROW (if any) shall be ADA compliant. All roadways within Caltrans ROW shall comply to standards set forth in the Highway Design manual or receive an approved exception.

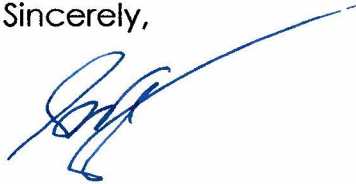
**Permits:**

21. 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/>

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Jude Miranda at (657) 328-6229 or [Jude.Miranda@dot.ca.gov](mailto:Jude.Miranda@dot.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Shelley', with a long, sweeping horizontal line extending to the right.

SCOTT SHELLEY  
Branch Chief, Regional-IGR-Transit Planning  
District 12