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Making Conservation

Governor's Office of Planning & Research

DEC 10 2019

STATE CLEARINGHOUSE

December 10, 2019

11-IMP-86 PM 12.2 Morningstar Subdivision Zone Change (R-1 to R-A) & (R-1 to C-2) ND/SCH#2019119027 & SCH#2019119029

Ms. Lisa Tylenda Planner City of Imperial 400 S. Imperial Avenue City, CA 92251

Dear Ms. Tylenda:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Negative Declaration (ND) for the Zone Change for Morningstar Subdivision from (R-1 to R-A) and (R-1 to C-2) Projects located near State Route 86 (SR- 86). 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 Engineering Analysis

- New proposed driveway access on SR-86 will not be allowed since there are reasonable alternatives access through La Brucherie Road, Neckel Road, and Larsen Road. Caltrans recommend a traffic study be done to evaluate any impacts to the intersections of SR-86/Larsen Road and SR-86/Neckel Road for the full Morningstar development.
 - a. Ralph Road currently does not continue to the west, it is a farming dirt road.
 - b. Creating a new driveway access creates addition conflict points for motorists on SR-86 that do not currently exist.
 - c. Remove SR-86 access driveways from all documents and all exhibits (See attached marked-up exhibit).

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- Please include intersections at SR-86/Ralph Road & SR-86/Neckel Road. The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.
- In addition, the TIS could also consider implementing vehicles miles traveled (VMT) analysis into their modeling projections.
- Any increase in goods movement operations and its impacts to State highway facilities should be addressed in the TIS.
- The data used in the TIS should not be more than 2 years old.
- Please provide Synchro Version 10 files.
- Early coordination with Caltrans is recommended.

Hydrology and Drainage Studies

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.
- Provide a pre and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details. Include detention basin details of inlets/outlet.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' Right of Way (R/W).
- Early coordination with Caltrans is recommended.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Imperial or other lead agency, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant

to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Caltrans recommends consideration of "fair share" funds towards future improvements associated with SR-86 corridor. Since the Zone Change application Project's cumulative impact is considered significant, feasible mitigation measures to State facilities should be identified in the TIS. Impacts that are significant and unmitigated/unavoidable need to have an alternative mitigation identified in the DEIR TIS. Recommended feasible mitigation measures include "fair share" contribution towards highway improvements. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (http://www.dot.ca.gov/trafficops/ice.html).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Right-of-Way

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. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality

Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

If you have any questions, please contact Mark McCumsey, of the Caltrans Development Review Branch, at (619) 688-6802 or by e-mail sent to <u>mark.mccumsey@dot.ca.gov</u>.

Sincerely,

MAURICE EATON Branch Chief Local Development and Intergovernmental Review

Enclosure



