California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
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Caltrans*



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Lisa Costa Sanders, Principal Planner City of San Carlos 600 Elm Street San Carlos, CA 94070

Re: 501 Industrial Road Hotel EIR Project Notice of Preparation (NOP)

Dear Lisa Costa Sanders:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 501 Industrial Road Hotel EIR Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2022 NOP.

Project Understanding

The proposed project would involve the demolishing of the existing commercial buildings and redeveloping the site with a new six-story hotel with up to 188 rooms, meeting spaces, landscaping, and a courtyard. The proposed project would include 152 ground level parking spaces, in addition to 20 short-term bicycle parking spaces and 10 long-term bicycle parking spaces. The project is located along Industrial Road, abutting the United States Route (US)-101/Holly Street interchange in San Carlos.

Hydraulics

- 1. Section 3.2.3.2 Vegetation and Land Cover, Page 3-5:
 - According to the NOP, the hotel site drains to a 24-inch drainage system running north-south beneath Industrial Road and is likely maintained by the City of San Carlos. Since the work as proposed does not appear to alter flow patterns toward State drainage facilities (US-101) and State Right-of-Way (ROW), Caltrans currently does not have specific drainage-related requirements. However, please provide any proposed changes that would alter storm drainage patterns toward State ROW as the DEIR is prepared. At this time, it appears the proposed

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changes, including installation of "Stormwater Treatment Planters with Rushes and Sedges" as shown on Figure 3-6, Landscape Plan, will likely only serve to improve the water quality and energy of flows to downstream drainage facilities.

- 2. Environmental Analysis, Hydrology and Water Quality, page 4-13:
 - All the points listed are of concern for projects of this type where significant impervious surface areas are proposed. Caltrans looks forward toward this analysis related to these points.
- 3. Discussion of Flood Control with Concurrence:
 - The project site is close to San Francisco Bay and in a low-lying area with shallow depths to groundwater. Please note that a discussion of flood control and concurrence by the City of San Carlos and the San Mateo Flood Control District are of particular importance.
- 4. C.3. Requirements of Municipal Regional Stormwater Permit (MRP):
 - Please include a detailed analysis of how the C.3. requirements of the MRP will be met for this proposed project. Information on the existing impervious surface and groundwater depths (already included) along with hydrology and flow data will need to be discussed further. Please include an explanation of how post-project surface flows will be reduced or match pre-project surface flows with data and demonstrate that the proposed project meets the C.3. MRP requirements.
- 5. Stormwater Drainage Plans and Details:
 - Please include plans and details showing how stormwater runoff from the
 proposed development will connect to the existing 24-inch drainage system
 running north-south beneath Industrial Road. We request the inclusion of flow
 quantities, downstream drainage system capacities, and graphic
 representations of hydraulic grade line elevations demonstrating adequate flow
 containment.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' <u>Transportation Impact Study</u> Guide.

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If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in align with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the Draft Environmental Impact Report (DEIR), which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Mitigation Strategies

Caltrans recognizes the preliminary Transportation Demand Management (TDM) measure recommendations and looks forward to updates/modifications to the TDM measures, if any, in the DEIR.

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Utilities

Any utilities that are proposed, moved or modified within Caltrans' ROW shall be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltransissued encroachment permit.

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Lead Agency

As the Lead Agency, the City of San Carlos is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the State ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating the State ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

To download the permit application and to obtain more information on all required documentation, visit https://dot.ca.gov/programs/traffic-operations/ep/applications.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email <u>LDR-D4@dot.ca.gov</u>.

Sincerely,
Mark Long

MARK LEONG

District Branch Chief

Local Development Review

c: State Clearinghouse