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Letter A5

August 28, 2023

11-SD-5, 78

PM VAR

Housing and Safety Element

DEIR/SCH# 2022090339

Mr. Scott Donnell
Senior Planner
City of Carlsbad
1635 Faraday Ave.
Carlsbad, CA 92008

Dear Mr. Donnell:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Housing and Safety Elements located near Interstate 5 (I-5) and State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Carlsbad in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Caltrans Maintenance and Operations Station

The Housing Element proposes 182 housing units on the existing, actively used Caltrans' Carlsbad Maintenance Station near I-5/Palomar Airport Road, Carlsbad. The Caltrans Maintenance Station is the only one in North San Diego County and services areas from Del Mar to the San Diego County border at Orange County as well as freeways from I-5, SR-76 and SR-78. The land is not in Caltrans excess land, and is expected to be used for Caltrans Maintenance Operations for the long-term future.

If at some point in the future the City of Carlsbad would like to explore conversion of the Caltrans Maintenance Station for purposes of affordable housing, a number of things would need to happen, including but not limited to:

1

- A formal agreement would be needed between Caltrans and the City, detailing what would need to be done to transfer the parcel. The agreement would need to include cost considerations, to be borne by the City. The valuation of the current site would need to be "fair market value" at the time of sale or transfer.
- A suitable replacement site would need to be provided, and Caltrans Maintenance and Operations facilities built on the new site to accommodate work needs for Caltrans Maintenance activities that are done on the current site. Site acquisition costs, development costs, and building construction costs would be borne by the City.
- Since the existing Caltrans Maintenance yard site provides maintenance services to such a large geographic area, some additional land (ie. a larger parcel) may be needed to accommodate future CT Maintenance activities & needs.
- Several processes (internal to Caltrans) such as declaring the current site to be an excess parcel would need to be completed.

2

Traffic Impact Studies and VMT

- New developments resulting from the City of Carlsbad Housing Element should provide a Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) and local mobility analysis should be provided for future projects. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.¹
- The TIS may also need to identify a proposed development project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

Planning

As part of the City's 2023 Housing Element update, Caltrans requests that the City include discussions and mapping/graphics that describe the City's existing and future housing inventory per the City's Regional Housing Needs Assessment (RHNA).

3

Housing-element law requires a quantification of each jurisdiction's share of the regional housing need as established in the RHNA Plan prepared by the jurisdiction's metropolitan planning organization (MPO) or council of governments.

In accordance with California Government Code Sections 65583 and 65584, housing elements shall contain an analysis of population and employment trends and documentation of projections and quantification of the locality's existing and projected housing needs for all income levels. These projected needs shall include the locality's share of the regional housing needs (ie. RHNA) per Government Code Section 65584.

4

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 network. 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 network. Early coordination

¹ California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

4, cont | with Caltrans, in locations that may affect both Caltrans and the City of Carlsbad is encouraged.

5 | **Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

6 | **Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' 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.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

Maurice Eaton
Office Chief (Acting) | Office of Housing and Transportation
Division of Transportation Planning
California Department of Transportation

Letter A5

COMMENTER: Maurice Eaton, Office Chief Division of Transportation Planning, California Department of Transportation

DATE: August 28, 2023

Response A5-1

The commenter states that the Housing Element proposes 182 units on the existing, actively used Caltrans' Carlsbad Maintenance Station, which is expected to be used for Caltrans Maintenance Operations for the long-term future. The commenter expresses that if the city wishes to use the Carlsbad Maintenance Station for purposes of affordable housing, a formal agreement would be needed; a suitable replacement site would need to be provided; additional land may be required to accommodate future Caltrans Maintenance activities; and several internal Caltrans processes would be required to be completed.

Approval of the proposed project would not approve any physical development (e.g., construction of housing or infrastructure). However, the Draft SEIR assumes that such actions are reasonably foreseeable future outcomes of the proposed project because the proposed project involves rezoning 18 sites to implement the Housing Element and facilitate future housing development. Table 2-4 in Section 2, *Project Description*, of the Draft SEIR states that Site 16 currently includes the Caltrans Maintenance Station. Section 3, *Environmental Setting*, explains that the northern parcel of Site 16 is developed with a Caltrans maintenance station and the southern, privately-owned parcel is occupied by commercial uses. It is acknowledged that should future development occur on the northern parcel of the site, an agreement would be needed prior to any approval of a project between Caltrans and the project proponent. Because Caltrans owns the northern parcel of the site, development could not occur without property owner agreement.

Response A5-2

The commenter states that future development facilitated by the project should provide a VMT based Traffic Impact Study (TIS) and local mobility analysis. The commenter expresses that the TIS may also need to identify a proposed development project's near term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

As discussed under Mitigation Measure T-1 in Section 4.13, *Transportation*, of the Draft SEIR, future development at the 18 rezone sites would undergo review by the city and each project would be compared to the City of Carlsbad VMT Analysis Guidelines screening criteria to determine if the submitted project is eligible to be screened out of conducting project-level VMT analysis. If a project meets one or more of the screening criteria, the project would be determined to have a less than significant impact to VMT in accordance with the city's VMT Analysis Guidelines. A project that has not been excluded from the VMT analysis screening process outlined above must undergo a quantitative VMT analysis to determine whether it will have a significant impact on VMT. If it is determined that the project would have a significant impact on VMT (i.e., it does not result in at least a 15 percent reduction in VMT compared to existing conditions), the project would be required to implement project-level VMT reduction measures to mitigate project VMT impact to the extent feasible.

Further, while not required for CEQA, a TIS (or Traffic Impact Analysis Report) was prepared for the project and is available online at the City's website here:

Response A5-3

The commenter expresses the opinion that the city should include discussions and mapping/graphics that describe the city's existing and future housing inventory per the city's RHNA.

The city's existing and future housing inventory is discussed in the 2021-2029 Housing Element Update. The comment does not pertain to the adequacy of the Draft SEIR and no revisions to the Draft SEIR are required.

Response A5-4

The commenter recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation network. The commenter encourages early coordination with Caltrans.

The comment is noted and will be provided to city decision-makers for consideration. The comment does not pertain to the adequacy of the Draft SEIR and no revisions to the Draft SEIR are required.

Response A5-5

The commenter opines that the availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the State's transportation and climate action goals.

The comment is noted and will be provided to city decision-makers for consideration. The comment does not pertain to the adequacy of the Draft SEIR and no revisions to the Draft SEIR are required.

Response A5-6

The commenter states that any work performed within a Caltrans right-of-way will require discretionary review, an encroachment permit, and approval by Caltrans.

Future development with work performed within a Caltrans right-of-way would obtain an encroachment permit from Caltrans prior to start of work.