

A-2 California Department of Transportation

Comment Letter A-2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

August 10, 2017

11-SD-15
PM 36.64
Newland Sierra Project
DEIR SCH#2015021036

Mr. Nick Ortiz
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Ortiz:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the Draft Environmental Impact Report (DEIR) for the Newland Sierra project (SCH#2015021036), which will be located in the northwesterly quadrant of Interstate 15 (I-15) and Deer Springs Road interchange. Caltrans would like to make the following comments:

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Caltrans does not have a project at I-15 and Deer Springs Road as identified in the DEIR. Therefore any reference to such project bearing responsibility for future impacts is incorrect. As a result, the traffic analysis and mitigation is insufficient and misleading. Direct impacts from this Project are the responsibility of the County and the Developer to fully and adequately mitigate. Any work done in State Right of Way (ROW) will require Caltrans oversight and encroachment permits, including all required studies to be funded by the County or Developer. Any traffic mitigation within the State's ROW needs to include feasible alternatives that adhere to Caltrans the Highway Design Manual Standards without design exceptions.

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Traffic Engineering and Analysis (TEA) branch comments:

- Although I-15 NB/SB Ramps at Deer Springs Road were identified in the Traffic Impact Analysis (TIA) as direct impacts, an Intersection Control Evaluation (ICE) is required, and needs to be completed, finalized, and concurred by Caltrans TEA Branch in order to ensure that all proven and emerging solution concepts are considered to mitigate for the traffic impacts generated by the development.
Page 2.13-5 Newland Sierra Draft Environmental Impact Report states that, "Caltrans has not completed this phase nor initiated the Project Approval & Environmental Documentation (PA&ED) phase. To date, the Project Study Report-Project Development Support (PSR-PDS) document includes preliminary interchange alternatives consisting of an expanded diamond interchange, a diverging diamond interchange, and a roundabout interchange". This statement is misleading, Caltrans does not have a project to improve this interchange. It would be the Newland Sierra and its designee's responsibility to initiate an interchange improvement project per the ICE analysis at this location to mitigate traffic impacts generated by their proposed development. It is also the responsibility of the developer to pay for

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all construction improvements to mitigate all traffic impacts generated by the development within the States ROW which in this case is I-15.

- Draft EIR, Section 2.13.1.3 Significant Direct Impacts to Freeway Segments shown below, however, because it was identified as a direct impact, traffic mitigation is required for this segment of the freeway on I-15. Mitigation measures need to be developed and analyzed. The statement that "there is no feasible mitigation that would reduce the identified impact to less than significant", is not acceptable. Direct impacts are not mitigated through "fair share."

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Transportation and Traffic

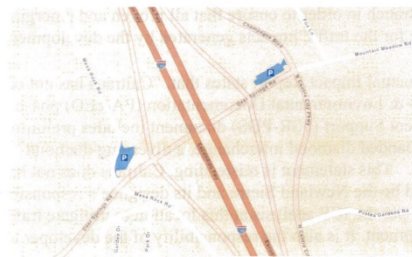
2.13.1.3 Significant Direct Impacts to Freeway Segments

The project would have a significant direct impact to the freeway segment listed below.

- **I-15 Mainline from Deer Springs Road to Pomerado Road (Caltrans):** These impacts would be mitigated by providing additional mainline capacity along this stretch of I-15. However, there is no Caltrans program in place to implement the necessary improvements into which the project could contribute a fair share and, thus, **there is no feasible mitigation that would reduce the identified impact to less than significant.** Therefore, these impacts are considered **significant and unavoidable.**

Park and Ride Coordinator comments: The Newland Sierra DEIR does not address impacts to the existing Park and Ride facilities and existing Transportation Demand Management efforts.

1. Caltrans has a lease with the County of San Diego for three park and ride facilities either next to or in close proximity to the Newland Sierra Project located off of Mesa Rock Road and Interstate 15 (I-15). Caltrans is tasked with oversight and maintenance of park and ride lots #33-Deer Springs Road, #34-Mountain Meadows Road, and #35-Gopher Canyon Road.



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#33-Deer Springs Road and #34-Mountain Meadows Park and Ride Lots

#33-Deer Springs Road park and ride lot is located on the west side of I-15 in the northeast corner of the intersection of Mesa Rock Road and Deer Springs Road. It has 29 parking spaces. The location is at the beginning of the proposed Newland Sierra Project.

#34-Mountain Meadows Road park and ride lot is located on the east side of I-15 in the northwest corner of the intersection of Mountain Meadows Road/Deer Springs Road and Old Highway 395/Champagne Boulevard. It has 41 parking spaces.

#35-Gopher Canyon Road park and ride lot is located a short distance north of #33 and #34 on the east side of I-15 in the southwest corner of the intersection of Gopher Canyon Road and Old Highway 395/Champagne Boulevard. It has 11 parking spaces.

Comment:

- All three of the Park and Ride lots:
 - ...are at 100% plus capacity. The need for additional parking spaces is eminent. Expansion of all or any of the three lots would be optimal for assisting in the reduction of the carbon imprint this project will provide and will assist San Diego County in decreased Green House Gas emissions.
 - ...are in need of asphalt, restriping, lighting, and security upgrades. The Deer Springs Road lot is at the entrance to the Newland Sierra project thus, the lot would provide a better presentation if it was upgraded.
- 2. The Town Center neighborhood has a park being established directly across the street (Mesa Rock Road) from #33-Deer Springs Road Park and Ride facility.
 - a. The Park and Ride lot is already at capacity. There is not any additional parking on the plans near the park. Is this project going to expand the park and ride lot to accommodate the Town Center park usage?
- 3. Throughout this report many of the referenced "PDF-" numbers mention park and ride or carpooling. Caltrans Park and Ride Coordinator should be part of the discussion regarding any coordinated communication or promotion at a park and ride facility.
- 4. Page 1-9, Section 1.2.1.6 Mobility and Utilities:
 - a. *Access Points and Internal Circulation:* Mesa Rock Road will be expanded to a six-lane entry with a median. #33-Deer Springs Road Park and Ride is right at the beginning of the intersection of Mesa Rock Road and Deer Springs Road. What is being proposed to accommodate ingress and egress at the Deer Springs Road Park and Ride lot?
 - b. *Mesa Rock Road:* The report states there will be no parking along Mesa Rock Road. Currently, Mesa Rock Road handles the overflow parking from the park and ride lot. What plans are in place to accommodate the overflow parking?
- 5. Page-2.1-1, Section Analysis of I-15 Interchange Improvements (Mitigation Measure M-TR-1):
 - a. The report states "Caltrans is the lead agency for the I-15 interchange improvement project." And continues to state that "Caltrans will analyze the I-15 interchange improvements, and whether the

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- existing park-and-ride lots should be expanded, reconfigured, and /or enhanced to support transportation alternatives (e.g., ride-share, care-share, and transit).” The Park and Ride at Deer Springs is owned by the County of San Diego and leased by Caltrans therefore, it is up to the County of San Diego to decide what they are going to do with their land but the Caltrans Park and Ride program would prefer to continue with a park and ride lot on this piece of land.
- b. With Caltrans should be involved in the mitigation process about the established park and ride since it is right next door to the development. The State directives and policies are to maximize mobility benefits of all facilities and transportation modes including park and ride lots. Enlarging or upgrading #33-Deer Springs Road park and ride lot to meet the needs of the traveling public would be the best decision. Including #34-Mountain Meadows Park and Ride in this process would be even better since it is on the east side of the freeway overpass.
 - c. Page 2.1-2: The report states that Caltrans is responsible for all interchange improvements but does not address what land will be used to widen Mesa Rock Road. Please explain.
6. Page 2.7-39:
- a. This section of the report has a discussion about the EV charging stations. There are currently 29 parking spaces at #33-Deer Springs Park and Ride. In the report it states the project will encourage 3% of the parking spaces total to be EV charging stations. For clarification, that would be $29 \times 3\% = 1$ EV charging station. This same paragraph states, “Should installation of EV charging stations at the park-and-ride facilities be deemed acceptable by Caltrans (the owner of the existing park-and-ride facility), the applicant would fully fund these improvements.” Caltrans is not the owner of #33-Deer Springs Park and Ride. County of San Diego is the owner, Caltrans is the lease holder and overseer at this location. These type of improvements would have to be discussed by Caltrans and the County of San Diego.
7. Page 2.7-58:
- a. Many sections in this report comment on the park and ride program or transit center usage. In Table 2.7-7 it is specifically spelled out that this project is only interested in “*coordinating*” or “*promoting*” use of the park and ride facilities. This is a very large project which will generate many vehicles, why is there no financial contribution or design plan to increase the existing park and ride facilities other than encouraging the addition of one electric vehicle space and priority parking for low and zero-emission vehicles to an already impacted park and ride lot? The Newland Sierra project should be contributing to improvements to the local Park and Ride lots.
8. Page 2.13-31, *County of San Diego General Plan Mobility Element*:
- a. Goal M-8 Transit System, Policy M-8.6: According to the plan in the Newland Sierra project, there will be no parking on Mesa Rock Road. This means the buses that go to the gaming facilities may be picking up patrons at the park and ride lots and will be pulling into the park and ride lots for loading. If the park and ride lots are to possibly be used for transit service to gaming facilities, the structure of the asphalt needs to be evaluated for durability for bus usage. The lots are structured to handle mainly cars not heavier buses.
9. Page 2.13-32, Section 2.13.3.1, *County of San Diego General Plan Mobility Element*:

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- a. Goal M-9, Policy M-9.4 Park and Ride Facilities: This section "Requires developers of large projects to provide or contribute to, park-and-ride facilities near freeway interchanges...". What contribution is being provide?
 - b. Goal M-10, Policy M-10.1: Where are the staging areas in this project for regional and community trails?
10. Page 2.13-56, Section 2.13.8, *Consistency with Applicable Plans, Policies, and Ordinances:*
- a. A park and ride lot is referred to in paragraph 3. Is this referring to the existing #33-Deer Springs Park and Ride or an additional lot in the project plans?
 - b. How is the applicant "actively working" with Caltrans to expand the existing park-and-ride facility?
 - c. In order to include bicycle lockers at a Caltrans park and ride, coordination will need to include SANDAG (iCommute), Caltrans Bike Coordinator (Seth Cutter), and the Park and Ride Coordinator (Carlena Darrieulat).
11. Page 2.13-84, Section 2.13.9.7, *Alternative Transportation Policies of the County's General Plan:*
- a. Goal M-8 Public Transit System: With the Project's location so close to the #33-Deer Springs Road and #34-Mountain Meadows Road Park and Ride lots, expansion of the lots would encourage increased park and ride lot usage since the Newland Sierra community with its seven communities is willing to support and encourage the usage of the lots. How and where are the existing park and ride lots being incorporated into the Town Center design for expansion? This report specifically mentions #33-Deer Springs Road park and ride facility but not in terms of its design and expansion that is being done through this development. Please be specific in the explanation.
12. Page 3.1-3, Chapter 3, *EFFECTS NOT FOUND TO BE SIGNIFICANT*
- a. It has been mentioned many times in this report that the two park and ride lots at the interchange of I-15 and Deer Springs Road/Mountain Meadows Road would be reviewed for improvements/expansion through a referenced interchange improvement project that Caltrans is supposed to have the lead. Both park and ride facilities, #33-Deer Springs Road on the west side of I-15 and #34-Mountain Meadows Road on the east side of I-15, are already at maximum usage capacity. Any additional usage overflow, such as this Newland Sierra project, has potential to over task the operations of both of these park and ride lots. Why is #33-Deer Springs Park and Ride facility not being included in the Newland Sierra project for mitigation improvements when the park and ride is right adjacent to this project and it has been mentioned for usage by the patrons of this large development?

Environmental Division comments:

All environmental analysis and mitigation measures recommended for the Interstate 15/Deer Springs Road Interchange Improvements Project (I-15/Deer Springs) should not be directed towards Caltrans. The interchange improvements are a direct result of anticipated traffic congestion and cumulative impacts from the Newland Sierra development. The future I-15/Deer Springs project is proposed and funded by the County of San Diego and private development with Caltrans providing oversight as the CEQA/NEPA lead agency. Thus, responsibility for environmental analysis, technical studies, and mitigation relating to the potential impacts to the I-15/Deer Springs project should not be prematurely assigned to Caltrans but rather addressed as part of the Newland Sierra Project in the DEIR.

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Additional environmental analysis and technical studies will be required for work within Caltrans ROW. A Preliminary Environmental Analysis Report (PEAR) will be prepared for the I-15/Deer Springs project and should state the required technical studies along with potential impacts and avoidance, minimization, and mitigation measures.

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If the I-15/Deer Springs project will modify access to the Interstate 15 ramps, then compliance with the National Environmental Policy Act (NEPA) and other federal regulations will also be required.

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The following is a list of potential resources within Caltrans right-of-way that may be directly or indirectly impacted by the Newland Sierra Development. We recommend that impacts to these resources as well as the avoidance, minimization, and/or mitigation measures be included in the DEIR:

- Community Character and Cohesion
- Cultural Resources
- Water Quality
- Paleontological Resources
- Hazardous Waste/Materials
- Air Quality
- Noise
- Biological Resources including Wetlands
- Traffic
- Cumulative Impacts

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Any work performed within Caltrans ROW will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans ROW prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans' ROW, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

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Improvement plans for construction within State Highway ROW must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. Caltrans Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements. Any modifications to access and ROW of Interstate facilities will require approval Federal Highway Administration (FHWA).

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Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

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Caltrans appreciates the opportunity to review and comment on your project. If you have any questions, please contact Trent Clark of the Caltrans Development Review Branch at (619) 688-3140 or by e-mail at trent.clark@dot.ca.gov.

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Sincerely,



ROY ABBOUD, Acting Branch Chief
Local Development and Intergovernmental Review Branch

c: Ashley Smith (County of San Diego)
Mark Slovick (County of San Diego)

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