

V2. CHAPTER 2

PRDEIR – Agency Responses

This chapter contains the comment letters received from public agencies on the proposed Coast Highway Corridor Study Project (project) Partially Recirculated Draft Environmental Impact Report (PRDEIR) and the City of Oceanside’s (City’s) responses to significant environmental points that were raised in those comments. Each letter, as well as each individual comment within the letter, has been given an assigned letter and number for cross-referencing. Responses are sequenced to reflect the order of comments within each letter. **Table V2.2-1** lists all public agencies who submitted comments on the PRDEIR during the public review period.

TABLE V2.2-1
LIST OF AGENCY COMMENTERS ON THE PRDEIR

Letter No.	Commenter	Date of Comment	Comment Page Number	Response Page Number
PRDEIR A1	San Diego Association of Governments (SANDAG) Seth Litchney, Senior Regional Planner	1/10/2019	V2.2-2	V2.2-5
PRDEIR A2	California Department of Transportation (Caltrans), Jacob Armstrong, Chief Development Review Branch	1/11/2019	V2.2-7	V2.2-19



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sandag.org

January 10, 2019

File Number 3300300

Mr. John Amberson
City of Oceanside
300 North Coast Highway
Oceanside, CA 92054

Dear Mr. Amberson:

Subject: Coast Highway Corridor Study Recirculated Draft Environmental Impact Report

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North County Transit District
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

Thank you for the opportunity to comment on the City of Oceanside's Coast Highway Corridor Study Recirculated Draft Environmental Impact Report (DEIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

PRDEIR A1-001

Smart Growth

SANDAG appreciates that the City of Oceanside has prioritized transit-oriented development and land use changes in the project area that support the goals of the Smart Growth Concept Map and the 2015 Regional Plan. The project site is located in two Smart Growth Opportunity Areas (SGOAs): an Existing/Planned Town Center (OC-1) and an Existing/Planned Mixed-Use Transit Corridor (OC-2). A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Furthermore, these areas can support increased transit use, walking, and biking. Please continue facilitating access to planned transit routes and services within the project area.

PRDEIR A1-002

Transportation Demand Management

SANDAG supports the parking and transportation demand management (TDM) strategies laid out in the City of Oceanside Coast Highway Vision Strategic Plan and suggests that they be reflected in the Coast Highway Corridor Study DEIR. The Oceanside Transit Center is an important intermodal hub for the region and was identified as a mobility hub prototype location in the SANDAG Regional Mobility Hub Implementation Strategy. The Coast Highway Corridor Study presents an opportunity to reduce drive-alone trips by promoting shared mobility services (e.g., bikeshare, on-demand rideshare, Neighborhood Electric Vehicles, scootershare, carshare) to connect to popular

PRDEIR A1-003

community destinations and the Oceanside Transit Center. To support shared mobility, the City of Oceanside could designate space within the public right-of-way to accommodate shared mobility vehicles and allocate curb space for safe and convenient rideshare passenger pick-up and drop-off.

PRDEIR A1-003

The incorporation of TDM strategies that support the mobility hub concept can help mitigate potential traffic impacts identified in the recirculated DEIR. Please continue partnering with iCommute to promote participation in regional TDM programs and services, including the Regional Vanpool Program, the Guaranteed Ride Home service, and transit, biking, and carpool incentive programs. More information on these programs can be found at iCommuteSD.com.

Active Transportation

PRDEIR A1-004

In order to create a facility that is safe and comfortable for all users, please consider constructing Class IV separated bikeways as opposed to Class II buffered bikeways. Parking may be used to create a barrier between the bikeway and the driving lanes. If creating Class IV bikeways is not possible, buffers should be included on both sides of the bikeway, not just the "door-zone" side. The proposed configuration may create a hazard for bicyclists, and the project should consider providing additional protection in the Class II buffered bikeways.

Other Considerations

SANDAG has a number of resources that can be used for additional information on or clarification of topics discussed in this letter. The following relevant resources can be found at sandag.org:

PRDEIR A1-005

- Designing for Smart Growth: Creating Great Places in the San Diego Region
- Parking Strategies for Smart Growth
- Trip Generation for Smart Growth
- Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region
- SANDAG Regional Mobility Hub Implementation Strategy
- SANDAG Regional Parking Management Toolbox
- Riding to 2050: The San Diego Regional Bike Plan

When available, please send any additional environmental documents related to this project to:

PRDEIR A1-006

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

SANDAG appreciates the opportunity to comment on the City of Oceanside's Coast Highway Corridor Study Recirculated DEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

PRDEIR A1-006

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/kwa

**Letter
PRDEIR A1
Response**

**San Diego Association of Governments (SANDAG)
Seth Litchney, Senior Regional Planner
January 10, 2019**

- PRDEIR A1-001 This introductory comment states that the comments included in the SANDAG letter are based on the goals and policies of SANDAG’s San Diego Forward: The Regional Plan (Regional Plan) and are submitted from a regional perspective emphasizing the need for better land use and transportation coordination. This comment does not raise any issue concerning the adequacy of the PRDEIR and no further response is required. This comment is included in this Final Environmental Impact Report (FEIR) for consideration by the City prior to making a final decision on the project.
- PRDEIR A1-002 This comment expresses that Smart Growth is a key goal of the Regional Plan, where the project supports this goal through proposed implementation of transit-oriented development and land use changes and the Complete Streets improvements. In addition, this comment points out that the project area is located in two Smart Growth Opportunity Areas established in the Regional Plan, where development should be focused. This comment does not raise any issue concerning the adequacy of the PRDEIR and no further response is required.
- PRDEIR A1-003 This comment suggests that the parking and transportation demand management (TDM) strategies laid out in the Coast Highway Vision Strategic Plan be incorporated into the PRDEIR. In addition, this comment summarizes the opportunities for shared mobility services between the project and the Oceanside Transit Center, which has been identified as a mobility hub prototype location as part of the SANDAG Regional Mobility Hub Implementation Strategy. While this comment does not raise any issue concerning the adequacy of the DEIR, the City supports the iCommute program and would continue to implement TDM programs, as appropriate, in accordance with City policies established in the Circulation Element of the General Plan and in the City’s draft Climate Action Plan (CAP). Specifically, the City has included Policies 4.1 through 4.10 in its Circulation Element that address the City’s efforts to promote the integration of TDM programs and the draft CAP calls for the development of a TDM Ordinance and Program. The City appreciates the commenter for participating in this process. This comment is included in this FEIR for consideration by the City prior to a final decision on the project.
- PRDEIR A1-004 This comment requests that the City consider constructing Class IV separated bikeways as opposed to Class II buffered bikeways and provide parking as a buffer between the bikeway and driving lanes as the proposed

configuration may create hazards for bicyclists. While this comment does not raise any issue concerning the adequacy of the PRDEIR, the City has previously considered constructing a Class IV bike lane along Coast Highway but determined it was infeasible due to the specific conditions of the area and limited available right-of-way. In addition, Class IV bike lanes along Coast Highway would reduce or restrict on-street parking and could potentially cause safety concerns at intersections related to conflicts between bicycles and vehicular traffic. For these reasons, the City has decided to not pursue Class IV bike lanes along Coast Highway. This comment is included in this FEIR for consideration by the City prior to making a final decision on the project.

PRDEIR A1-005 This comment lists additional SANDAG resources on smart growth and TDM and provides the web address to find these resources online. Because this comment does not raise any issue related to the environmental evaluation of the project, no response is provided.

PRDEIR A1-006 This comment is conclusory in nature and provides an address to send future environmental documents related to the project to. The City will continue to provide any future environmental documentation on this project to the commenter. The City appreciates SANDAG being a part of the environmental and project evaluation process.

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

January 11, 2019

11-SD-5, 76, 78
PM VAR
Coast Highway Corridor Study
SCH#2016051078

Mr. John Amberson
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92054

Dear Mr. Amberson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Recirculated Draft Environmental Impact Report DEIR for the Coast Highway Corridor Study located near Interstate 5 (I-5), State Route 76 (SR-76), and State Route 78 (SR-78). 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.

PRDEIR A2-001

Caltrans has the following comments:

Traffic Impact Study

- Comparing the existing volumes (Figure 4-1 a & d - Existing (No Project) Peak Hour Volumes) with any of the alternatives with project (Figures 4-3, 4-4- and 4-5 - Existing with Project Alternatives 1-3), volumes did not change for intersections #48 through #56. The study is assuming zero diversion of vehicles to any of the State's facilities with the Project proposal. It is impossible that zero vehicles got diverted to Interstate 5 (I-5). Please justify.
It is important to note that as of 2018, there is no funding for the improvements of the Vista Way/SR-78 & I-5 Interchange project. Caltrans will not use this scenario for the review.
Comparing Table 4-1 'Existing conditions without Project' with table 5-2 'Future conditions 2035 without Project (Existing SR-78)' for intersections #48 through #56, all future delays improved except the PM Peak Hour for intersection #48, the PM for intersection #50, and the AM/PM for intersection #53. Please justify the decrease. What improvements were done to reduce delays?

PRDEIR A2-002

PRDEIR A2-003

PRDEIR A2-004

Mr. John Amberson
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 Page 2

- Comparing Peak Hour Volumes [Figure 4-1d-Existing and Figure 5-2d-Future (Existing SR-78)], please explain how volumes decreased for most of intersections #48 through #56 in the future scenario versus the existing. PRDEIR A2-005
- Section 7.2.1 Project Scenario states that intersection #56 Vista Way /I-5 SB On/Off ramp is not mitigatable. Please document the constraints to validate this determination. PRDEIR A2-006
- Table 7-3 Mitigation Measures - Future with Project (Existing SR-78), states to include two left turn lanes and a shared thru-right lane with a storage length of a 100' for intersection #52 -Oceanside -I-5 SB On/Off Ramp. Please explain. Is this referring to the On/Off ramp section? PRDEIR A2-007
- The Synchro baseline file, Existing and Future scenario, does not work in Sim Traffic. PRDEIR A2-008
- The Synchro baseline file does not reflect the existing lane configuration on SR-76 & I-5 NB On & Off-ramp and SR-76 & I-5 SB On & Off-ramp. Existing condition has only two through lanes throughout this corridor. PRDEIR A2-009
- In the Synchro file for Built out with project scenario, AM & PM, traffic is stuck on SBR movement at intersection #4. PRDEIR A2-0010
- The Synchro file for Built out with project scenario, AM & PM, creates a backup on to the I-5 NB offramp at intersection #53. PRDEIR A2-0011
- The Synchro output files are showing three through lanes for the westbound direction on intersection #49 & #50. It is incorrect, only two lanes are through lanes. Please correct input files and re-analyze. PRDEIR A2-0012
- The Synchro output files are showing a dedicated right turn lane from the eastbound direction at intersection #53 when there isn't an exclusive right turn lane. Please correct input file and re-analyze. PRDEIR A2-0013
- The Synchro output files are showing multiple lanes from different directions at intersection #54 when there is only one lane at each direction for all movements. Please correct input file and re-analyze. PRDEIR A2-0014
- One of the original Caltrans' comments, No. 6 out of 7 on Page 2, dated August 24, 2017 (attached), indicated that Year 2040 or Year 2045, instead of Year 2035, would be more suitable for the future traffic analysis. According to the Caltrans Highway Design Manual (HDM), Chapter 100, Topic 103.2, Design Designation, Design Period, geometric design of new facilities and reconstruction projects should normally be based on estimated 20 years after completion of construction. One of the options could be that a brief comparison between the Year 2035 in the SANDAG Series 12 with the Year 2040 or 2045 in the SANDAG series 12 or even later series could indicate the current analysis is representative of what is expected to occur with the 2040 to 2045 timeframe. The similar comparisons were made, and the appropriate boilerplate languages were adopted in Final Environmental Impact PRDEIR A2-0015

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Report/Environmental Impact Statement and Section 4(f) Evaluation for
Interstate 5 North Coast Corridor Project.

PRDEIR A2-0015

Interstate 5

A proposed reduction from 4 lanes to 2 lanes along Coast Highway, as well as the introduction of 7-12 roundabouts, would cause changes in traffic patterns and could divert additional traffic towards the I-5 ramp intersections at these six locations.

PRDEIR A2-0016

State Route 76 and Coast Highway

Since the Caltrans Right-of-Way (R/W) extends into this intersection and the southbound ramps are located approximately 600 feet east of the intersection, an exhibit displaying the anticipated construction limits of the proposed roundabout would aid in further analysis. Caltrans and the City of Oceanside currently split ownership of the intersection of North Coast Highway and SR-76.

PRDEIR A2-0017

Relinquishment of the state's R/W here to the City of Oceanside will be needed to construct the roundabout. More detailed geometrics will need to be provided to evaluate full impacts to the state highway.

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>).

PRDEIR A2-0018

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 Oceanside, is encouraged.

PRDEIR A2-0019

Mr. John Amberson
January 11, 2019
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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.

PRDEIR A2-020

Right-of-Way

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. 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's R/W, and any corresponding technical studies.

PRDEIR A2-021

If you have any questions, please contact IGR Coordinator Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov

PRDEIR A2-022

Sincerely,



JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch

Enclosure

ATTACHMENT 1

DEPARTMENT OF TRANSPORTATION
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*Making Conservation
 a California Way of Life.*

August 24, 2017

11-SD-5, 76, 78
 PM VAR
 Coast Highway Corridor Study
 SCH# 2016051078

Mr. John Amberson
 City of Oceanside
 300 N. Coast Highway
 Oceanside, CA 92054

Dear Mr. Amberson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Coast Highway Corridor Study located near Interstate 5 (I-5), State Route 76 (SR-76), and State Route 78 (SR-78). 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 Impact Study

1. Comparing the existing condition with the existing plus project, there are two intersections that have been identified as being impacted with the project – Oceanside Boulevard/Coast Highway and Cassidy Street/Coast Highway. Comparing the future condition with the future condition plus project, there are ten intersections that have been identified as being impacted with the project – among them are Oceanside Boulevard/Coast Highway, Cassidy Street/Coast Highway, Vista Way/Coast Highway, Vista Way/Ditmar Street, and Vista Way/Stewart Street. Since the addition of the project may affect the traffic flow in both the existing and future conditions, the State requests to add the following intersections to your analysis in order to determine if these impacts will affect the State's facilities:
 - (1) I-5/Mission Ave Southbound (SB)& Northbound (NB) ramps
 - (2) I-5/Oceanside Boulevard SB & NB ramps
 - (3) I-5/California Street NB On-ramp
 - (4) I-5/Cassidy Street SB ramps
 - (5) I-5/Vista Way/SR-78 SB & NB ramps

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2. Synchro output sheets state that the 2000 Highway Capacity Manual (HCM) is being used instead of the 2010 HCM. The TIS report states that the 2010 HCM was used to do the analysis. Synchro output sheets should also be using the 2010 HCM.
3. The Synchro output sheets for the Existing plus Project AM Peak hour are labeled PM Peak hour. Some of the labels, for the Synchro data in the Traffic Study in Appendix F, at the bottom of the sheet are incorrect. Several sheets were mislabeled as "Existing Project-PM Peak Hour", but are in fact the AM peak hour and/or a different study scenario. These errors need to be corrected for review of this document.
4. The development levels for the Coast Highway Project Corridor are above those currently forecasted and approved in the Regional Transportation Plan (RTP). As stated in volume 3, Appendix F (for more details please refer to the contents on Page 85), the land use changes, which are foundations for modeling and forecasting of future traffic volumes, are admittedly more significant than what was been accepted and approved by the current RTP. The increased project growth is at least partly based on the land use scenario proposed in the Modified Coast Highway Vision and Strategic Plan (CHVSP), which has not yet been formally adopted by the City of Oceanside. The "higher-than-the-expected" land use changes could have negative impacts to traffic metrics, such as vehicle miles traveled (VMT). In turn, it would cause direct traffic impacts on the neighboring freeways, namely I-5, SR-76, and SR-78. Even though the welcoming complete street components are included, the increased traffic volumes have been demonstrated by the Draft Traffic Impact Study when the existing with and without project (2008), and the future with and without project (2035) are compared.
5. In the light of the previous comment, please provide more comprehensive traffic analysis based on the Alternative 1 and 2, and No Build for the following interchange/ intersection locations along I-5 freeway:
 1. SR-76
 2. Mission Avenue
 3. Oceanside Boulevard
 4. SR-78/Vista Way
6. Considering the 20-year design life, would 2040 be more suitable for the future traffic analysis? The latest SANDAG Regional Transportation Models contain Year 2012, 2014, 2016, 2020rc (Revenue Constrained), 2025rc, 2030rc, 2040rc, 2045rc, and 2050rc.
7. Please clarify which version of SANDAG Regional Transportation Models has been used for developing the future traffic data analysis. If the current Activity Based Model (ABM) models are being employed, describe what the Peak Hour Factors are for calculating the Peak Hour Volumes since ABM models in general don't provide such datasets.

ATTACHMENT 1

Mr. John Amberson
August 24, 2017
Page 3

Interstate 5

The potential impacts to Interstate 5 were not analyzed or discussed in this draft document. Several interchanges are located east of Coast Highway, including those at Harbor Drive, SR-76, Mission Avenue, Oceanside Boulevard, Cassidy Street and SR-78.

A proposed reduction from 4 lanes to 2 lanes along Coast Highway, as well as the introduction of 7-12 roundabouts, would cause changes in traffic patterns and could divert additional traffic towards the I-5 ramp intersections at these six locations.

State Route 76 and Coast Highway

The Traffic analysis included in the Draft EIR for the proposed roundabouts at the SR-76/Coast Highway intersection (600 feet away from the first proposed roundabout) did not include a study of the ramp intersections and/or roadway segments at the I-5/SR-76 interchange. A study is needed to determine the potential impacts to the I-5/SR-76 interchange and its associated ramps as well as the ramp signal's impacts to the roundabout.

Since the Caltrans R/W extends into this intersection and the southbound ramps are located approximately 600 feet east of the intersection, an exhibit displaying the anticipated construction limits of the proposed roundabout would aid in further analysis. Caltrans and the City of Oceanside currently split ownership of the intersection of North Coast Highway and SR-76. Relinquishment of the state's R/W here to the City of Oceanside will be needed to construct the roundabout. More detailed geometrics will need to be provided to evaluate full impacts to the state highway.

Vista Way and State Route 78

The SR-78/Vista Way signalized intersection has not been analyzed to identify the potential traffic impacts from this proposed project. A change in roadway configuration and traffic patterns along Coast Highway could increase traffic congestion along Vista Way, between Coast Highway and I-5.

Caltrans receives complaints from local residents on a regular basis concerning the traffic congestion on Vista Way between Coast Highway and the SR-78 interchange. A queuing analysis is needed to determine any increase to congestion along Vista Way during peak hour periods, as well as the effects of any proposed improvements at Ditmar and Vista Way.

ATTACHMENT 1

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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 Oceanside, 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 is currently in the planning stage for the I-5/ SR-78 interchange project, which would modify the interchange to improve traffic operations and provide better connectivity to the I-5 North Coast Corridor project that would widen Interstate 5 through the City of Oceanside's city limits. This proposed City project directly effects the I-5/SR-78 interchange project. Mitigation measures should be included in the City's DEIR for these impacts.

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.

ATTACHMENT 1

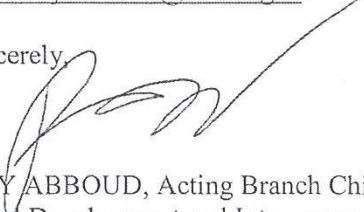
Mr. John Amberson
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Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered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

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. 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's R/W, and any corresponding technical studies.

If you have any questions, please contact IGR Coordinator Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,



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

ATTACHMENT 1

ATTACHMENT 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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*Serious drought.
 Help save water!*

July 6, 2016

11-SD-5 and 76
 PM VAR
 Coast Highway Corridor Study (GPA 16-00001)
 NOP/SCH#2016051078

Mr. John Amberson
 City of Oceanside
 300 North Coast Highway
 Oceanside, CA 92054

Dear Mr. Amberson:

The California Department of Transportation (Caltrans) received a copy of the Notice of Preparation for the proposed Coast Highway Corridor Study (GPA 16-00001) Project located near I-5 and SR-76. Caltrans has the following comments:

- 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 provide project distribution analysis of with and without project for I-5.
- It is recommended that Caltrans relinquish state R/W within the Coast Highway Corridor Projects proposed roundabout location at the SR-76 intersection. Caltrans R/W line should be reset to outside of the proposed roundabout so the City of Oceanside has complete control and can maintain the proposed roundabout. If the roundabout remains in Caltrans R/W and requires discretionary review and approval by Caltrans, further analysis will be required based on Caltrans Intersection Control Evaluation (ICE) policy: <http://www.dot.ca.gov/hq/traffops/liaisons/ice.html>.
- 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 with the Caltrans’ R/W, and any corresponding technical studies. Please see Section 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/manual/Chapter_6.pdf

ATTACHMENT 1

Mr. John Amberson
July 6, 2016
Page 2

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Armstrong', written over a light blue horizontal line.

JACOB ARMSTRONG, Chief
Development Review Branch

**Letter
PRDEIR A2
Response****California Department of Transportation (Caltrans)
Jacob Armstrong, Chief Development Review Branch
January 11, 2019**

-
- PRDEIR A2-001 This introductory comment describes the facilities in the project area which are under Caltrans jurisdiction and states that the Local Development-Intergovernmental Reviews Program reviews land use projects, which includes the project. This comment does not raise any issue concerning the environmental evaluation contained in the PRDEIR.
- PRDEIR A2-002 This comment states that traffic volumes for Intersections 48 through 56 do not change between the no project scenario and the project and alternatives for existing and future conditions. In addition, this comment also states that the Traffic Engineer incorrectly assumed a zero diversion of vehicles to State facilities with project implementation and requests justification for this assumption.
- As noted in the revised TIA (2018) prepared in support of PRDEIR, the proposed project involves the reconfiguration of Coast Highway into a complete street that accommodates all modes of travel. No new land use development is proposed as part of the project. The Incentive District proposed as part of the project is a tool proposed by the City to focus new development in the corridor in targeted locations, but the Incentive District does not change the General Plan land use designations or development capacity previously adopted by the City. Given this condition, the analysis of the Existing with Project traffic scenario assumes no increase in traffic volumes resulting from new land use development. Instead, the analysis assumes consistent existing traffic volumes to existing condition. Because traffic volumes along Coast Highway in the existing condition are below the capacity of a two-lane divided collector roadway, no diversion to the I-5 corridor is anticipated. No revisions to the PRDEIR are required in response to this comment.
- PRDEIR A2-003 This comment notes that as 2018 there is no funding for the improvements of the Vista Way/SR 78 & I-5 Interchange Project. The revised TIA (2018) prepared for the PRDEIR re-evaluated all traffic scenarios without implementation of the future improvements to the Vista Way/SR-78 & I-5 interchange and included the results of the new analysis in Section 3.14, *Transportation and Traffic*, and in the appendices of the PRDEIR. The City understands Caltrans’s comment and concurs that the evaluation should be based on the scenarios without implementation of the future improvements to the Vista Way/SR 78 and I-5 interchange, per the revisions to the traffic analysis found in the PRDEIR.

- PRDEIR A2-004 This comment states that when comparing the Existing Conditions without Project (shown in Table 4-1 of revised TIA (2018)) with the Future Conditions without Project (Existing SR 78) (shown in Table 5-2 of revised TIA (2018)) for intersections #48 through #56, all future delays improved except the PM Peak Hour for intersection #48, the PM for intersection #50, and the AM/PM for intersection #53 and requests clarification on what improvements are proposed to reduce delays. The improvement in LOS evident in the analysis is largely due to decreases in forecasted volumes at these intersections. The Future Year 2035 without Project forecast traffic volumes were obtained from the SANDAG Series 12 traffic model, which used the existing configuration of the Vista Way/SR-78 & I-5 interchange.
- PRDEIR A2-005 This comment requests clarification on how peak hour traffic volumes decreased for most of intersections #48 through #56 in the future scenario versus the existing when comparing Figures 4-1d and 5-2d of the revised TIA (2018). Please refer to response PRDEIR A2-004 for the response to this comment.
- PRDEIR A2-006 This comment states that Section 7.2.1, Project Scenario, of the revised TIA (2018) concluded that the intersection #56 Vista Way/I-5 SB On/Off Ramps is not mitigatable and requests the constraints that validate this determination. Intersection 56 is not mitigatable due to right-of-way (ROW) constraints. The northbound right turn (NBR) and westbound left turn (WBL) are critical turning movements and should be maintained. Westbound receiving lane is only one lane and does not have space to be widened. In addition, the NBR receiving lanes are on a bridge which is unfeasible to widen. For these reasons, the revised TIA (2018) concluded that impacts to Intersection 56 were not mitigatable.
- PRDEIR A2-007 This comment refers to Table 7-3, Mitigation Measures - Future with Project (Existing SR 78), in the revised TIA (2018) which states to include two left turn lanes and a shared thru-right lane with a storage length of a 100 feet for Intersection #52 (Oceanside -I-5 SB On/Off Ramp) and requests clarification on if the mitigation is referring to the On-/Off-Ramp section. The mitigation measures referenced in the comment refers to the southbound On-/Off-Ramps, where the 100-foot storage length is for the shared thru-right lane.
- PRDEIR A2-008 This comment states that the Synchro baseline file, Existing and Future scenario, does not work in Sim Traffic. In response to this comment, the file errors have been fixed so Sim Traffic now functions in all scenarios. The new worksheets have been included in the final revised TIA (2018) provided in this FEIR.
- PRDEIR A2-009 This comment states that the Synchro baseline file does not reflect the existing lane configuration on SR 76 & I-5 SB On-/Off-ramps (Intersection

49) and SR 76 & 1-5 NB On-/Off-ramps (Intersection 50) and that the existing condition has only two through lanes throughout this corridor. For the Synchro files for Intersection 49, the through lanes on SR 76 were reduced to two lanes in each direction due to slip ramps for all scenarios. For the Synchro files for Intersection 50, the through lanes on SR 76 have been reduced to two lanes in each direction for all traffic scenarios in the revised TIA (2018), except Alternative 3. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.

- PRDEIR A2-010 This comment states that the Synchro file for Built out with project scenario, AM and PM, traffic is stuck on southbound right (SBR) movement at Intersection #4. In response to this comment, the Synchro file have been revised with updated timings to allow SBR movements. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.
- PRDEIR A2-011 This comment states that the Synchro file for Built out with project scenario, AM and PM, creates a backup on to the 1-5 NB off-ramp at intersection #53. In response to this comment, the Synchro file have been revised to remove this back-up. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.
- PRDEIR A2-012 This comment states that the revised TIA (2018) includes incorrect Synchro output files that show three through lanes for the westbound direction on intersection 49 and 50 and requests that the input files are fixed and reanalyzed. For the Synchro files for Intersection 49, the through lanes on SR 76 were reduced to two lanes in each direction due to slip ramps for all scenarios. For the Synchro files for Intersection 50, the through lanes on SR 76 have been reduced to two lanes in each direction for all traffic scenarios in the revised TIA (2018), except Alternative 3. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.
- PRDEIR A2-013 This comment states that the Synchro output files incorrectly show a dedicated right turn lane from the eastbound direction at Intersection #53, where there isn't an exclusive right turn lane, and requests that the input files are fixed and reanalyzed. The Synchro files for Intersection 53 were updated to remove the eastbound dedicated right-turn lane, and change the eastbound configuration to be one left-turn lane, one through lane, and one through-right lane for all traffic scenarios. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.
- PRDEIR A2-014 This comment states that the Synchro output files incorrectly show multiple lanes from different directions at Intersection 54, where there is only one lane at each direction for all movements, and requests that the input files are fixed and reanalyzed. The Synchro files for Intersection 54 were updated to change

the approach lane configurations to a single shared left-/through-/right-lane for all directions in all traffic scenarios. The new Synchro files have been included in the final revised TIA (2018) provided in this FEIR.

- PRDEIR A2-015 This comment references one of the original Caltrans' comments on the DEIR (No. 6 out of 7 on Page 2, dated August 24, 2017) which indicated that Year 2040 or Year 2045, instead of Year 2035, would be more suitable for the future traffic analysis for the project. The comment provides an option to justify the use of Year 2035 is a brief comparison between the Year 2035 in the SANDAG Series 12 with the Year 2040 or 2045 in the SANDAG series 12 or even later series could indicate the current analysis is representative of what is expected to occur with the 2040 to 2045 timeframe, which the commenter states a similar analysis was provided in the I-5 North Coast EIR.

In response to this comment, a screenline analysis was conducted for the proposed project similar to the I-5 North Coast EIR. The screenline analysis was performed at 10 locations on major roadways and 5 locations on I-5 along the corridor. The analysis was performed using the Series 12 data provided by SANDAG online in the Transportation Forecast Information Center (TFIC) (tfic.sandag.org). When comparing the adjusted Series 12 volumes from 2035 to 2050, there is an average increase of 12 percent and 2 percent at freeway locations and key roadways, respectively. Using these values as a base for interpolation: the average increase from 2035 to 2040 is expected to be 4 percent and 0.67 percent for freeway locations and key roadways, respectively; the average increase from 2035 to 2045 is expected to be 8 percent and 1.33 percent for freeway locations and key roadways, respectively. Considering the small difference in 2035-2045 volumes forecast by the Series 12 model, it is believed that the 2035 volumes used in the traffic analysis are comparable to those which are expected for the years 2040 and 2045. Therefore, the use of year 2035 is justified as an appropriate planning horizon for the project. No revisions to the EIR are required in response to this comment.

- PRDEIR A2-016 This comment states the proposed reduction from four lanes to two lanes along Coast Highway, as well as the introduction of 7 to 12 roundabouts, would cause changes in traffic patterns and could divert additional traffic towards the I-5 ramp intersections at these six locations. Given the complexity of the model forecast for the Year 2035 used in the revised TIA (2018), which considers both potential diversion of traffic from Coast Highway to parallel routes such as I-5 and trips generated by anticipated development under the Incentive District, it is difficult to ascertain whether the increases in traffic volumes at the Caltrans ramps are caused more by diversion or more by the increased development/growth assumptions for the future traffic scenarios. However, through the use of the SANDAG Series 12 model, which incorporates these assumptions about traffic redistribution and

development growth, the proposed project and the alternatives analyzed are projected to result in changes to traffic volumes at all I-5 ramp intersections within the city of Oceanside. The revised TIA (2018) assessed these forecasted changes based on the SANDAG Series 12 model, which used the existing configuration of Vista Way/SR-78 & I-5 interchange, and presented the results of those modeled forecast conditions, which are also included in the analysis in Section 3.14, *Transportation and Traffic*, of the PRDEIR. As identified in the revised TIA (2018) and PRDEIR, significant traffic impacts are expected to occur at the following ramp intersections under each scenario:

Year 2035 With Project

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 1

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 2

- I-5 SB On-/Off-Ramps & Oceanside Boulevard
- I-5 SB On-/Off-Ramps & Vista Way

Year 2035 Alternative 3

- I-5 SB On-/Off-Ramps & Oceanside Boulevard

For these locations where significant impacts are forecasted to occur, mitigation measures have also been identified to reduce traffic impacts to the lowest extent feasible.

PRDEIR A2-017 This comment states that since the Caltrans ROW extends into the intersection of SR 76 and Coast Highway and the southbound ramps are located approximately 600 feet east of this intersection, an exhibit displaying the anticipated construction limits of the proposed roundabout would aid in further analysis. Furthermore, this comment states that both Caltrans and the City currently split ownership of the intersection of North Coast Highway and SR 76, where Caltrans would need more detailed geometrics to relinquish the State’s ROW at this intersection.

The City has prepared 30 percent preliminary engineering design plans as part of the Coast Highway Corridor Study, separate from the EIR. Design considerations for this location would be finalized as the design phase of the project progresses, where the City would continue to coordinate with

Caltrans. Once the engineering design phase has progressed further, the City would provide Caltrans more detailed geometrics and an exhibit showing the construction limits for this intersection to obtain Caltrans' approval of the relinquishment of the ROW to the City at this location.

- PRDEIR A2-018 This comment states that mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02), where alternative intersection design(s) will also need to be considered in accordance with the ICE policy. This comment also provides the website for the ICE policy and additional information. The City appreciates this additional information and will ensure consistency with ICE policy.
- PRDEIR A2-019 This comment expresses the commenter's view that transportation projects are an opportunity improve safety, access, and mobility for all travelers in California and recommends early coordination between Caltrans and the City to discuss any locations the project may affect that straddle both jurisdictions. The City acknowledges the commenter's recommendation and would continue to coordinate with Caltrans as the project progresses.
- PRDEIR A2-020 This comment states that direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA and the National Environmental Policy Act (NEPA). As documented in the PRDEIR, all impacts to the State Highway System associated with project implementation would be mitigated the fullest extent possible with adoption of the mitigation measures outlined in the EIR. Prior to approval of the project or any of the project alternatives the City would also need to demonstrate that the benefits of the project outweigh the environmental consequences of the project (through the Findings of Fact and Statement of Overriding Considerations). While the proposed project is required to undergo environmental review under CEQA due to its location within California, since the project does not include federal land, funds, approval, or permit, the project is not subject to environmental review under NEPA.
- PRDEIR A2-021 This comment states that any work within Caltrans ROW for the project would require discretionary review and approval by Caltrans and requires obtaining an encroachment permit prior to construction. Furthermore, this comment states that as part of the encroachment permit process, the City must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans's ROW, and any corresponding technical studies. This comment is not specifically on the PRDEIR. The City is required to certify the EIR prior to approval of the project. Only after this step occurs and the design of the project is complete would the City approach Caltrans for an encroachment permit or relinquishment of ROW.

PRDEIR A2-022 This comment is conclusory in nature and provides the commenter’s contact information. The City will continue to provide any future environmental documentation on this project to the commenter. The City appreciates Caltrans being a part of the Oceanside Coast Highway Corridor Study process.