

**Comment Letter S3**

---

**From:** Dodson, Kimberly@DOT <kimberly.dodson@dot.ca.gov>  
**Sent:** Monday, March 19, 2018 11:59 AM  
**To:** Curtis, Cynthia  
**Cc:** State.Clearinghouse@opr.ca.gov; Davis, Damon@DOT  
**Subject:** I-5: McClellan-Palomar Airport Master Plan Update DEIR SCH#2016021105  
**Attachments:** SD\_5\_R47.03\_McClellan-Palomar Airport Master Plan Update DEIR.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Curtis:

Please see the attached comment letter regarding the McClellan-Palomar Airport Master Plan Update Draft Environmental Impact Report SCH#2016021105. The original letter will be mailed.

S3-1  
↓

Regards,

**KIMBERLY D. DODSON, GISP**  
Caltrans District 11 Planning | Associate Transportation Planner  
4050 Taylor St., MS-240 | San Diego, CA 92110 | 619-688-2810  
[kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov) | <http://www.dot.ca.gov/d11/index.html>

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
PHONE (619) 688-3193  
FAX (619) 688-4299  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

March 15, 2018

11-SD-5  
PM R47.03  
McClellan-Palomar Airport Master Plan Update DEIR  
SCH#2016021105

Ms. Cynthia Curtis  
County of San Diego, Department of Public works  
5510 Overland Avenue, Suite 410  
San Diego, CA 92123

Dear Ms. Cynthia Curtis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report for the McClellan-Palomar Airport Master Plan Update located near Interstate 5 (I-5). 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.

S3-1  
cont.

Caltrans has the following comments:

**Traffic Impact Study**

Traffic Engineering and Analysis has reviewed the Traffic Impact Analysis (TIA) dated December 7, 2017 for the above development and has the following comments:

1. The following existing volumes used for the analysis on I-5 intersections with Palomar Airport Road (PAR) are significantly lower than Caltrans' published volumes. The main difference is that the peak time frames are different (the TIA AM peak hour is 07-09 and PM peak hour is 16-18 hours). Caltrans' existing counts are taken for at least seven continuous days, 24 hours per day and Caltrans has found that the peak times vary depending on the intersection. Caltrans would like to review analysis on these intersections using actual peak time volumes not what it is standard for the City of Carlsbad.
  - SB I-5 on-ramp from WB PAR, AM peak hour count is 57% lower (peak time 11-12)
  - SB I-5 on-ramp from EB PAR, the AM peak hour count is 62% lower (peak time 11-12)

S3-2

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

Ms. Cynthia Curtis  
March 15, 2018  
Page 2

- NB I-5 on-ramp from PAR, AM peak hour count is 35% lower (peak time 11-12)
- NB I-5 off-ramp to PAR, PM peak hour count is 39% lower (peak time 13-14)

S3-2  
cont.

2. The Synchro intersection analysis output sheets of the Long Term and Long Term plus project (PAL2) show a level of service for the entire intersection and per leg of the intersection. Although the average level of service for the entire intersection may be an acceptable one (LOS D or better) Caltrans does not accept having a level of service lower than D per leg as this affects the queue length and delay for drivers. The following are movements per intersection that fall in this scenario:

S3-3

- Intersection #6 shows an increase of delay from 148.3 (Long Term only) to 163 (Long Term plus project) for the NB right movement (NB I-5 off-ramp) during the PM peak hour. Both are LOS F, an increase of 2 or more seconds triggers a significant impact.

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

S3-4

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,

DAMON DAVIS, Acting Branch Chief  
Local Development and Intergovernmental Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

**Response to Letter S3****State of California, California Department of Transportation (Caltrans)**

- S3-1** The comment provides introductory remarks about Caltrans' mission and to conduct land use project review to ensure consistency with their mission.
- S3-2** The comment states that traffic volumes under existing conditions published in the Draft PEIR are lower than Caltrans' published volumes. The comment also states there is a difference between peak hour times in the PEIR (which relied on data from the City of Carlsbad) compared to Caltrans' data. Caltrans requested to review the analysis based on their peak hour times.

Following submittal of Caltrans' comments to the Draft PEIR, County staff met with Caltrans to discuss this comment on April 16 and April 19, 2018, and both parties reached an agreement that the Draft PEIR analysis is appropriate. Specifically, selection of the peak hour in the analysis is consistent with City of Carlsbad & San Diego Traffic Engineers' Council (SANTEC) methodology, and with the "common rules" as set forth in Caltrans' December 2002 published guidance: Caltrans Guide for the Preparation of Traffic Impact Studies. The traffic study methodology follows the Caltrans guidelines. County staff confirmed that existing weekday AM and PM peak hour (7:00-9:00 AM and 4:00-6:00PM) traffic volumes should be used from the TMP, and are most relevant to the project impact area. Comparison of Caltrans peak hour to the project's peak hour analysis are not equivalent since each agency applied different peak hour timeframes based on the roadways within their jurisdiction. The City's peak hour analysis, particularly in the 5-6PM timeframe, is most relevant to this project, as it demonstrates the movement of traffic from all directions from the I-5 facility onto the City's roadways and towards the airport.

In addition, in consideration of Caltrans' comment regarding the Master Plan Update traffic volumes at these alternate peak hour timeframes, County staff agreed at the April 19 meeting to augment the CEQA analysis by also looking at the same traffic volumes in the 11AM-12PM and 1-2PM time frames. As such, the County studied the Caltrans ramp data and City of Carlsbad 24-hour data on Palomar Airport Road to calculate existing turn volumes for the 11AM-12PM and 1-2 PM time frames. These existing volumes were then extrapolated (using the same methodology as the Master Plan Update PEIR traffic study) to estimate long-term and project-related traffic volumes for these times frames. Analysis was performed for these scenarios to Caltrans satisfaction, and the levels of service would not cause a significant impact to traffic at the Caltrans facility.

On May 1, 2018, the County submitted a letter to Caltrans summarizing the above discussion and resolution. On May 16, 2018, Caltrans submitted a response letter to the County confirming their original March 15, 2018 comment letter on the Draft PEIR is no longer applicable, and Caltrans concurs with the PEIR traffic analysis. Therefore, no changes to the PEIR have been made in response to this comment.

- S3-3** This comment discusses the project study's approach to analyzing the function of the Palomar Airport Road / I-5 northbound ramps intersection. Specifically, the comment states that Caltrans does not accept having a level of service lower than D per leg.

Following submittal of Caltrans' comments to the Draft PEIR, County staff met with Caltrans to discuss this comment on April 16 and April 19, 2018, and both parties reached an agreement the PEIR analysis is appropriate. Specifically, the PEIR intersection analysis methodology is consistent with the common rules as set forth in the currently utilized Caltrans published guidance, which does not require a "per leg" analysis. Similarly,

SANTEC guidance, City of Carlsbad standards, and other major public and private traffic impact studies in the region are not conducted with a “per leg” analysis. Both Caltrans and County staff concurred at the aforementioned meetings that the County’s approach to the analysis of the intersection was valid and consistent with regional standards which require that significance is determined by assessing the entire intersection and not based on the level of service for the individual legs (per leg) of an intersection.

In addition, in consideration of Caltrans’ comment, the County agreed to supplement the CEQA analysis by also looking at project impacts on a per-leg basis incorporating optimized traffic signal phasing in a manner consistent with Caltrans signal timing. As such, the County re-modeled the intersection’s Synchro analysis of the Palomar Airport Road/I-5 northbound ramps intersection during the AM and PM commuter peak hours on a per-leg basis and shows no significant impact would occur as the off-ramp leg of the intersection would operate at LOS D or better. The PEIR has been revised to reflect these calculations. It was further discussed that Caltrans controls the signal timing and can adjust the timing to minimize backups onto I-5.

On May 1, 2018, the County submitted a letter to Caltrans summarizing the above discussion and resolution. On May 16, 2018, Caltrans submitted a response letter to the County confirming their original March 15, 2018 comment letter on the Draft PEIR is no longer applicable, and Caltrans concurs with the PEIR traffic analysis. Therefore, no changes to the PEIR have been made in response to this comment.

- S3-4** The comment states that any work performed within Caltrans right-of-way would require discretionary review and approval by Caltrans and an encroachment permit. At this time, the County does not propose any improvements or encroachment within Caltrans right-of-way. If this would occur, the County would coordinate with Caltrans to seek applicable review and permit approvals. Therefore, no changes to the PEIR have been made in response to this comment.