

**Response to Comment Letter S1**

**California Department of Transportation (Caltrans)**  
**Maurice Eaton**  
**July 18, 2017**

**S1-1** The City of Escondido (City) acknowledges the comment as an introduction to comments that follow. This comment is included in the Final Environmental Impact Report (EIR) for review and consideration by the decision makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

**S1-2** As detailed in the Transportation Impact Analysis (TIA), Section 4.2.1, intersections were properly modeled, and traffic impacts were analyzed using the methodology in Chapter 18 of the *2010 Highway Capacity Manual* (HCM 2010), with the assistance of Synchro (version 9) software. Thus, the TIA used Synchro software and applied HCM 2010 methodology. Based on this analytical method, no significant impacts are predicted to occur at the subject intersection.

HCM 2010 is an established and well-supported model for analyzing traffic impacts. Prepared by the Transportation Research Board in collaboration with Federal Highway Administration and American Association of State Highway and Transportation

**Comment Letter S1**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY  
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HERMUNO G. BROWN, Jr., Governor  
 Making Conservation a California Way of Life.

July 18, 2017

11-SD-15  
 PM 32.9  
 The Villages – Escondido Country Club  
 DEIR SCH 2017011060  
 TIA June 19, 2017

Mr. Kristin Blackson  
 City of Escondido  
 201 North Broadway  
 Escondido, CA 92025-2798

Dear Ms. Blackson:

The California Department of Transportation (Caltrans) has received the Draft Environmental Impact Report (DEIR) for The Villages project. The project will be located northwest of Interstate 15 (I-15) and El Norte Parkway. Caltrans appreciates the opportunity for this review and would like to make the following comments:

The project proposes development of 392 single-family residential dwelling units, local market, clubhouse and its amenities such as pool, meeting spaces and banquet facilities. Project is to generate 4,280 ADT with 319 AM peak hour and 420 PM peak hour.

- As shown on Table 9-1 Near-Term Intersection Operations; intersection #14 El Norte Pkwy/I-15 NB Ramps had Level of service (LOS)/delay of C/32.2 for existing, and LOS/delay of D/36.7 for existing+project both in the PM Peak hours. However, Synchro data file submitted shows LOS/delay of D/52.9 for existing, and E/56.2 for existing+project. The Synchro data file LOS changed from LOS D to E, which had an increased delay of 3.3 seconds and is beyond the threshold of 2 seconds of delay stated in Table 5-3 Traffic Impact Significant Threshold. (Please also reference the attached samples from the TIA)
- Also shown on Table 9-1, existing+cumulative had a LOS/delay of D/40.7, and existing+cumulative+project had a LOS/delay of D/47.3 with a 6.6 seconds increased delay. (Please also reference the attached samples from the TIA)

S1-1

S1-2

S1-3

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	<p>Officials, HCM 2010 provides guidelines and computational procedures for analyzing various traffic systems (see page 2.7-7, Section 2.7.1.2, Regulatory Setting, of the EIR for additional information). HCM 2010 is currently the most widely used traffic modeling and provides consistent end results for evaluating impacts among and between various jurisdictions.</p> <p>The City’s General Plan requires that traffic impacts be evaluated against HCM 2010 standards (see EIR Section 2.7.1.2, Regulatory Setting, page 2.7-14, and Section 2.7.2.3, Analysis, page 2.7-18). Local and regional guidelines and standards in the San Diego region prefer that intersection analyses be completed using the HCM 2010 methodology. The <i>SANTEC/ITE Guidelines for Traffic Impact Studies [TIS] in the San Diego Region</i> specifically notes “consistency with the Highway Capacity Manual (HCM) is advocated in most cases” to evaluate traffic impacts (San Diego Regional Traffic Standards Task Force 2000). The <i>City of Escondido Traffic Impact Analysis Guidelines</i> require compliance with the SANTEC/ITE Guidelines in evaluating traffic impacts (EIR Section 2.7.1.2, page 2.7-14). Furthermore, the California Department of Transportation (Caltrans) <i>Guide for the Preparation of Traffic Impact Studies</i> states that consistency with HCM 2010 is advocated in most cases, including for signalized intersections (Caltrans 2002).</p>
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For these reasons, the City has determined that HCM 2010 is an appropriate methodology for the analysis of intersections within the City, and therefore, the EIR has analyzed Project traffic impacts using the HCM 2010 methodology/modeling (EIR Section 2.7.1.3, Analysis). In combination with the HCM 2010 methodology, the TIA used Synchro software as a tool to model impacts pursuant to the HCM 2010 standards.

Accordingly, under the applicable HCM 2010 standards and modeling, TIA Table 9-1, Near-Term Intersection Operations, correctly states the delays for intersection 14 El Norte Parkway/Interstate (I-) 15 northbound ramps as level of service (LOS)/delay of C/32.2 for existing conditions and LOS D/36.7 for existing + project conditions under the PM peak-hour scenario.

The commenter erroneously relies on analysis results based on application of Synchro's proprietary methodology rather than the HCM 2010 standards that were used in the TIA analysis. However, the Synchro software allows for modeling using various methodologies to evaluate intersection performance. While one of these methods is the Synchro software's proprietary methodology called the "Percentile Method," another method is the HCM 2010 method. The files provided by and relied on by the commenter use the Synchro software's "Percentile Method," not the City's required HCM 2010 methodology.

	<p>Synchro’s methodology is not consistent with HCM 2010. Using Synchro’s core calculations would not comply with the City’s modeling requirements or HCM 2010 standards or present an apple-to-apples comparison to the City’s adopted HCM 2010–based thresholds of significance. As a result, the City declines to follow the Sychro proprietary methodology suggested by the commenter.</p> <p>The City is entitled to rely on the HCM 2010 methodology and conclusions reached in the EIR to “resolve conflicting factual conclusions about the extent of traffic” that may result from the Project (<i>Saltonstall v. City of Sacramento</i> 2015). An agency does not need to follow the analytical methods put forth by other agencies in evaluating impacts in an EIR as long as the analysis is supported by substantial evidence (<i>North Coast Rivers Alliance v. Marin Municipal Water District Board of Directors</i> 2013; <i>California Native Plant Society v. Rancho Cordova</i> 2009). Furthermore, “disagreement among experts does not make an EIR inadequate” (<i>Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.</i> 1988). The EIR’s analysis, which uses HCM 2010 methodology—the preferred analytical model of the City and the San Diego region and an accepted traffic modeling methodology—provides an appropriate and adequate evaluation of traffic impacts. The EIR correctly discloses that the Project would not result in</p>
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Ms. Kristin Blackson  
 July 18, 2017  
 Page 2

- Page 8 of the TIA states that, "Lastly, the Project proposes to provide *Adaptive Signal Control* to the El Norte Parkway corridor within the study area, from Woodland Parkway to the west to the I-15 Southbound Ramps intersection to the east".

However, any changes to the traffic signal timing that affects traffic operations within the State right-of-way will require concurrence and approval from Caltrans. The specific terms will need to be worked out, but some important features will need to include:

1. The adaptive system must function with the current hardware/software ICM (Integrated Corridor Management) system;
2. Caltrans operations & maintenance staff must be able to override the adaptive system and return control of the signal to our software system at any time, on-site or remotely;
3. The adaptive system should only adjust green times, and shall not adjust yellow or all-red times;
4. Caltrans would request before-and-after performance measures to ensure the system is improving the intersection.

Please contact Said Noroozi at (858) 467-3031 for information or questions regarding traffic signalization. (Please also reference the attached samples from the TIA)

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](mailto:trent.clark@dot.ca.gov).

Sincerely,

  
 MAURICE EATON, Branch Chief  
 Development Review Branch

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S1-4

a significant impact at Intersection 14, and no further evaluation is required.

**S1-3**

See the response to S1-1 concerning the methodology used to evaluate traffic impacts at the El Norte Parkway/I-15 northbound ramps intersection.

The comment restates information in the EIR. The EIR discloses that the Project will result in LOS D and a 6.6 second increased delay at the El Norte Parkway/I-15 northbound ramps intersection under existing + cumulative + project conditions. The EIR correctly finds that this delay would result in a less-than-significant impact because, although the delay exceeds 2 seconds, the resulting LOS, LOS D, is an acceptable operation for urban locations, including the City, based on Caltrans standards (EIR Section 2.7.1.2, pages 2.7-15 through 2.1-16; EIR Appendix 2.1-7, Transportation Impact Analysis, Section 5.4, Caltrans Criteria, page 22).

**S1-4**

The comment regards conditions upon which Caltrans will accept the Project's proposed enhancements to signal timing coordination (Adaptive Signal Control) along the El Norte Parkway corridor from the I-15 southbound ramps intersection to the Borden Road intersection.

Implementation of the Adaptive Signal Control is proposed as a Project Design Feature rather than mitigation for a specifically identified significant

	<p>impact. As such, the results of the analysis are not dependent on its implementation. Additionally, prior to the City accepting this proposed enhancement, the applicant will confirm the ability of the selected system to function with the current hardware/software Integrated Corridor Management system as requested. Any system that includes Caltrans equipment will be capable of override by Caltrans staff as requested. The adaptive system will evaluate the potential benefits of adjusting green, yellow, and all-red times. No system selection will be made without coordination and approval by Caltrans. Pre- and post-operational performance measures will be provided as requested.</p>
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