

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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John Swiecki, Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: Brisbane Baylands Specific Plan Project — Draft Environmental Impact Report (DEIR)

Dear John Swiecki:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Brisbane Baylands Specific Plan Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2025 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project is to develop the Brisbane Baylands Specific Plan (BBSP), which will guide development in the approximately 680.1-acre Specific Plan area. Proposed development includes 2,200 residential units, 6.5 million square feet of commercial office and retail uses, 500,000 square feet of hotel use, a new middle school campus, open space, parks, and trails. Additionally, several transportation network changes are proposed to improve circulation in the Specific Plan area, including several projects within Caltrans right-of-way (ROW). The project area is bordered by U.S. Route 101 (U.S. 101) along its eastern boundary.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical Advisory and employs the 2022 California Air Resources Board (CARB) Scoping Plan's more conservative threshold of 30 percent below the

regional average. Per the DEIR, this project is found to have a less than significant VMT impact as it is a residential mixed-use development on underutilized property with most of the proposed residential development contained within a Transit Priority Area. The project would additionally implement several Transportation Demand Management (TDM) measures and proposes TDM plans for each applicable site-specific development project to further encourage and incentivize alternative transportation modes, therefore working towards meeting the State's VMT reduction goals. Proposed mitigation measures should be documented with annual monitoring reports to demonstrate effectiveness.

As U.S. 101 serves as the primary regional access to and from the project site and the Specific Plan proposes some improvements for local connections to the corridor, please review and include reference to the Caltrans *US 101 South Comprehensive Multimodal Corridor Plan* ([link](#)) in the DEIR. The plan was developed by the Caltrans District 4 System Planning Branch in May 2023 to serve as a guide for long-range planning of U.S. 101 within the counties of San Francisco, San Mateo, and Santa Clara.

Highway Operations

Per the Transportation Impact Study (TIS), it is anticipated that full buildout of the BBSP is expected to impact highway operations on U.S. 101. Please see the following comments for the *Appendix F1 TIS*:

Table 6: Maximum Off-Street Parking Spaces per Land Use Type (page 14): Please confirm if the table includes the maximum off-street parking spaces for all proposed land use types.

Existing Traffic Conditions (page 26): It is stated that the 2022 peak hour traffic volumes are lower than 2019 and 2020 pre-COVID conditions by approximately 10 to 25 percent. However, the TIS *Appendix A: Existing Traffic Conditions Memo* shows that the 2022 peak hour traffic volumes are lower than the 2019 volumes by 0 to 25 percent during the AM peak period only. During the PM peak period, there is a difference of 6 to 18 percent between the 2019 and 2022 peak hour traffic volumes. Please clarify how the approximation of 10 to 25 percent was determined given the peak hour traffic volumes presented in Appendix A. Please also specify the hours for the AM and PM peak periods.

Existing Transit Service (pages 29-32): Please consider updating this section using 2019-2023 American Community Survey (ACS) data and include all transit data as an attachment to the TIS.

Existing Transit Service (MUNI, page 29): Please note that the T-Third Street light rail southbound terminus station is Bayshore Blvd and Sunnydale Ave, not Third St and Sunnydale Ave.

Bicycle Facilities (pages 36-37): Please consider updating this section using 2019-2023 ACS data and include all bicycle data as an attachment to the TIS.

Table 16: Land Use by Traffic Analysis Zone (page 74): Please include a copy of the January 2022 Fiscal Impact Analysis of the Baylands Specific Plan by EPS in TIS Appendix C.

Table 20: Overall Trip Generation Results (page 79): Highway operations would like to review the calculations to verify the total vehicle trips for each phase. Please include the detailed trip generation calculations in the TIS Appendix C.

Multimodal Transportation Planning

Please review and include reference to the *Caltrans District 4 Pedestrian Plan (2021)* and the *Caltrans District 4 Bike Plan (2018)* in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please also consider the following recommendations to further improve bicycle and pedestrian circulation and safety:

- Improve the interchange crossings around the Bay Trail access point within the project area to improve access and comfort for cyclists and pedestrians.
- Incorporate traffic calming measures, such as warning signs for motorists to be cautious of pedestrians and cyclists on Beatty Ave, Alana Way, and the surrounding roadway.
- Install "Yield to Pedestrians" signs in residential and commercial streets with higher volumes of pedestrian traffic to calm traffic within the project site.
- Install proper wayfinding signs for bicyclists and pedestrians to improve navigability of trails within the Specific Plan area.
- In the BBSP, include temporary bicycle storage in the residential and mixed-use facilities built during construction as well as permanent facilities in the project completion process.
- Incorporate measures to enhance visibility for bicyclists in conflict areas within the Specific Plan area where motorists operate.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be

required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Please be aware that the San Mateo 101 Managed Lanes Project North of Interstate 380 ([link](#)) is within the vicinity of the proposed project and may require coordination with Caltrans, the San Mateo County Transportation Authority (SMCTA), and the City and County Association of Governments of San Mateo County (C/CAG) to avoid potential construction conflicts. The project proposes to add a managed lane in each direction of U.S. 101 between the U.S. 101/Interstate 380 (I-380) interchange and the San Mateo/San Francisco County line. For any questions about this project or to discuss coordination with Caltrans, please contact Kelly Ma, Project Manager, at Kelly.Ma@dot.ca.gov and kindly reference the project ID 0420000182.

Landscape Architecture

A portion of the project area is located adjacent to a segment of U.S. 101 that is a classified landscaped freeway. Please see the following questions regarding mitigation measures (MM) discussed in *Chapter 4.5, Aesthetic and Visual Resources*, of the DEIR:

- Please explain how it was determined that the building heights stipulated in MM AES-1a and MM AES-1b are sufficient to preserve views and visual quality below the level of significance.
- Please explain how the locations, quantity, and widths of the view corridors in MM AES-1c will be determined.

Climate Adaptation Planning

Please note that District 4 will adapt and build resilience within its own right-of-way based on sea level rise projections 100 years from the start of construction. For example, if construction is expected to begin in 2030, projections for the year 2130 will be applied. Caltrans also adheres to the Ocean Protection Council's (OPC) Intermediate-High scenario. Therefore, the 2130 Intermediate-High projections will be used. Given this information and the proximity of the Specific Plan area to U.S. 101, please coordinate with the Caltrans Climate Change Adaptation Branch to discuss the City's choice of 2100 as the point in time for assessing future vulnerability.

Below is an image highlighting the vulnerability of U.S. 101 to sea level rise (SLR) that was created for internal Caltrans use utilizing data from the 2020 Caltrans District 4 Adaptation Priorities Report. The red shading indicates that the roadway itself is highly vulnerable, while the deeper red highlights segments of the corridor identified on the priority list. At this location, the northbound lanes are ranked 2 out of 5 and the southbound lanes 3 out of 5, with 1 being the highest priority and 5 the lowest.



Source: Internal Caltrans Planning Viewer Map

As noted in the supporting documents, while it is true that wave energy from king tides and storm surge tends to dissipate east of the highway, Caltrans must still consider how future climate impacts will affect our ROW. We are committed to working collaboratively with the City to identify integrated solutions that enhance resilience for both the U.S. 101 corridor and the adjacent Baylands.

Please reach out to the Climate Change Branch at D4_ClimateResilience@dot.ca.gov for any questions or concerns.

Air Quality and Noise

The Caltrans Office of Environmental Engineering reviewed the Air Quality, Greenhouse Gas Emissions, Energy Resources, and Noise and Vibration chapters of the DEIR and recommends review of the following sections:

Section 4.9.2-c. Ambient Air Quality – Criteria Air pollutants (page 4.9-5): Please note that the reference to Table 4.9.1 in the narrative states that number of days between 2017 and 2021 were identified, however the table shows data for 2018-2022. Please verify the information and update accordingly.

Section 4.9.2-e Air Quality Index (page 4.9-13): Please note that that the reference to Table 4.9-3 in the narrative states that there was a total of 101 days with levels in

the “unhealthy for sensitive groups” to “very unhealthy ranges,” between 2019 and 2023, however the stated number of days may seem too high based on the values in table 4.9-3. Please verify the information and update accordingly.

Section 4.9.3-a: Federal Laws, Plans, Programs, and Regulations (page 4.9-20): Please note that the narrative of Clean Air Act states Table 4.9-5 summarizes attainment status for the air basin, however Table 4.9-5 on page 4.9-21 includes air quality standards for criteria pollutants. Please review and update accordingly.

Section 4.9.6-a – Threshold AQ1: Emissions of Criteria Air Pollutants for which the Basin is in Nonattainment (page 4.9-62): Please note that the narrative of *Net Increase in Operational Criteria Air Pollutant Emissions* states Table 4.9-8 presents the increase in operation emissions, however Table 4.9-8 does not appear to present any increase in emissions. Please verify the information and update accordingly.

Section 4.10.6-c – Impact GHG-3: Consistency with Applicable Greenhouse Gas Emissions Reduction Plans, Policies, Performance Standards, and Regulations (4.10-56): Please note that the narrative of the Significance Conclusion states Impact GHG-2 instead of Impact GHG-3. Please review and update accordingly.

Section 4.11.6-a – Impact EN-1: Consumption of Energy Resources in a Wasteful, Inefficient, or Unnecessary Way (page 4.11-37): Please note the narrative of Transportation Fuel Energy states that Table 4.11-3 shows approximations of mobile source petroleum-based fuel consumption as 5,595,123 gallons of gasoline and 466,558 gallons of diesel fuel annually during Phase 1, however these stated values do not match those listed in Table 4.11-3 or Table 4.11-4. Please verify the information and update accordingly.

Section 4.11.6-a – Impact EN-1: Consumption of Energy Resources in a Wasteful, Inefficient, or Unnecessary Way (page 4.11-38): Please note the narrative of Total Baylands Electricity Use states that total annual electricity consumption would be approximately 144,010 MWh when the first increment of the Baylands solar energy generating field comes online, however this stated value is not listed in Table 4.11-3 or Table 4.11-4. Please verify the information and update accordingly.

Section 4.11.6-a – Impact EN-1: Consumption of Energy Resources in a Wasteful, Inefficient, or Unnecessary Way (page 4.11-39): Please note the narrative of Total Specific Plan Fossil Fuel Use again lists a value of 466,558 gallons of diesel fuel during Phase 1 when the first increment of the Baylands solar energy generating field comes online, which does not match the value listed in Table 4.11-3 or Table 4.11-4. Please verify the information and update accordingly.

Section 4.12.3-c – Regional Plans and Programs (page 4.12-23): Please note that there appears to be an erroneous reference to Table 4.12-8 under the narrative of *San Francisco General Plan* when discussing maximum satisfactory noise levels compared to the City and County of San Francisco's noise levels. Additionally, some of the stated values also do not appear to match up with those listed in Table 4.12-11. Please review and update accordingly.

Section 4.12.5-d – Impact NOI-4: Exposure of People to Railroad, Freeway, and Airport Noise (page 4.12-85): Please note that the narrative under *Freeway and Railroad Noise* erroneously references Table 4.12-10 in two instances when discussing noise monitoring levels. Please review and update accordingly.

Section 4.12.5-d – Impact NOI-4: Exposure of People to Railroad, Freeway, and Airport Noise (page 4.12-84): Please note that the narrative under *Airport Noise* erroneously references Figure 4.12-2 when discussing the San Francisco International Airport (SFO) existing noise contours. It appears that Figure 4.12-3 should instead be referenced. Please review and update accordingly.

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

The Office of Hydraulic Engineering looks forward to reviewing future design plans that demonstrate how the proposed design solutions will address flooding, sea-level rise, drainage, and other hydraulic concerns and impacts to U.S. 101 and the project site as discussed in the DEIR.

Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet Americans with Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the Specific Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Please ensure that proposed work within Caltrans right-of-way conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)). Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.).

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects

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requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luo Yunsheng'.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse