

**City of Irvine 2045 General Plan Update
Program Environmental Impact Report
SCH #2023070463**

Letters of Comment and Responses

The following letters of comment were received from interested parties, local agencies, state agencies, and individuals who attended a Transportation Commission Special Meeting during the public review period (March 15 to April 29, 2024) of the Draft PEIR. A copy of each comment letter along with corresponding staff responses is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. Some of the comments received resulted in changes to the Draft PEIR text. These text changes are indicated by ~~strikeout~~ (deleted) and underline (inserted) markings in the Final PEIR text. Revisions to the Draft PEIR are intended to correct minor discrepancies and provide additional clarification. The revisions do not affect the conclusions of the document.

Letter	Author	Page Number
Interested Parties		
A	Michael Chambers	RTC-3
B	Haibo Liu	RTC-4
C	Nissreen Qamhiyah	RTC-5
D	J. H. Zech (3/17/24)	RTC-6
E	David O	RTC-8
F	Susan Sayre	RTC-9
G	J. H. Zech (4/20/24)	RTC-10
H	John Brock (4/22/24)	RTC-12
I	California Cultural Resource Preservation Alliance, Inc.	RTC-14
J	Adriana Maestas	RTC-15
K	J. H. Zech (4/29/24)	RTC-16
L	John Brock (4/29/24)	RTC-17
M	Climate Action Campaign	RTC-19
N	Irvine Ranch Conservancy	RTC-27
Local Agencies		
O	Irvine Ranch Water District	RTC-30
P	South Coast Air Quality Management District	RTC-32
Q	Orange County Transit Authority	RTC-36
R	Irvine Unified School District	RTC-41
State Agencies		
S	California Department of Forestry and Fire	RTC-46
T	California Department of Conservation	RTC-66
U	California Department of Transportation	RTC-69

Letter	Author	Page Number
V	California Department of Fish and Wildlife	RTC-74
Transportation Special Meeting		
W	Transportation Commission Special Meeting	RTC-87

Letter U

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

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a California Way of Life.

April 29, 2024

Ms. Alyssa Matheus
Principal Planner
City of Irvine
1 Civic Center Plaza
Irvine, CA 92606

File: LDR/CEQA
SCH#: 2023070463
12-ORA-2023-02516

Dear Ms. Matheus,

U-1 Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report for the Irvine 2045 General Plan Update (Plan) in the City of Irvine (City). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment.

The plan will serve as the long-range vision for the City for the next 20 to 25 years. The City is required to update the appropriate Elements of the General Plan to accommodate the residential site inventory from the 2021-2029 Housing Element. Regional access to the project area is provided by State Route 261 (SR 261), State Route 241 (SR 241), State Route 133 (SR 133), State Route 55 (SR 55), State Route 73 (SR 73), Interstate 405 (I-405), Interstate 5 (I-5), and State Route 55 (SR 55). Caltrans is a commenting agency for this project and upon review, we have the following comments:

U-2 Active Transportation

1. In the *Policies Section in Goal 11, Objective EPCA-11 (Page 4.2-13)*, consider adding a discussion on first-last mile connections.

U-3 2. In *Goal 3, Objective C-3 (Page 4.13-16)*, this objective highlights enhancing pedestrian connectivity to major destinations and various land uses. Please ensure pedestrian improvements that are inclusive for all types of pedestrians with differing needs, such as those who walk more slowly, need more crossing time, have visual impairments, wheelchairs, strollers, etc.

U-4 3. Caltrans supports and strives to make rail and transit modes of transportation a viable option for all. The Department supports transportation projects that bring all modes of transportation together to increase connectivity, expand the use of public transportation, and advance equity and livability in all communities.

Please consider including a discussion on identifying strategies to meet mobility needs such as multimodal strategies on transit connectivity and opportunities to connect bus services to include nearby train stations for regional connectivity.

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U-1 This comment is introductory and does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration.

U-2 This comment does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration. However, it should be noted that first-last mile connections are discussed under Goal 9 of the Circulation Element. Specifically, the Circulation Element includes the following implementation action:
Enhance first and last mile connectivity by improving pedestrian and bicycle infrastructure, implementing transit and ridesharing services, and providing secure bike parking facilities to facilitate convenient access to transit stops and destinations.

U-3 However, it should be noted that the City will continue to provide and/or require pedestrian improvements that are inclusive of all types of pedestrians with varying needs.

U-4 This comment does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration. However, it should be noted that multimodal strategies are included throughout the Circulation Element, including in objectives, policies, and implementation actions listed under Goal 7 (aims to foster collaboration with regional transportation agencies to improve connectivity, accessibility, and efficiency of transportation networks), Goal 9 (aims to improve transportation efficiency and accessibility), Goal 10 (aims to provide sustainable transportation options and improve access to transit stops and stations), Goal 11 (aims to bolster mobility and maximize access to transit), and Goal 12 (aims to provide sustainable transportation and enhance mobility).

LETTER

RESPONSE

City of Irvine
April 29, 2024
Page 2

Providing improved multimodal connections to housing will improve public health and can encourage Irvine residents, future visitors, and workers to utilize alternative transportation options, thus minimizing single occupant vehicle trips, reducing Greenhouse Gas (GHG) emissions, congestion, and Vehicle Miles Traveled (VMT).

U-5

4. Increased density can increase traffic impacts. Consider opportunities to encourage multimodal transportation and mode shifts through the planning and implementation of high-quality Complete Streets that are safe and accessible for people of all ages and abilities.

Caltrans supports the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, wayfinding signage, transit stop amenities, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. Continue to incorporate Complete Streets in future projects.

U-6 **Transit**

5. In Section 4.13.1.2 *Public Transit System* (Page 4.13-3), provide further information about existing bus route services to include any intracounty, intercounty, and regional including connectivity to rail services from the nearest train stations in all proposed project locations provided by Metrolink and Amtrak Pacific Surfliner.

U-7

6. Identify transit services that provide access to and from John Wayne Airport.

Traffic Operations

U-8

7. In Section 4.13.5.1 *Impact Analysis* (Page 4.13-21), it is concluded that increased demand for the future development of 57,656 residential units would require improvements and expansion to the existing system. However, 4.13.5.2 Significance of Impacts Section says impacts would be less than significant and therefore per 4.13.5.3 no mitigation would be advised. This may be contradictory to the conclusions.

U-9

8. For future developments, please submit a VMT-based Traffic Impact Study. Please follow the Governor's Office of Planning and Research Guidance to identify VMT related impacts that includes any potential mitigation measures necessary.

With the enactment of Senate Bill 743 (SB 743), Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies,

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U-5

This comment does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration. However, it should be noted that the City agrees with Caltrans on the importance of designing Complete Streets, and as such, has included multimodal strategies throughout the Circulation Element, as noted above. The following policies and implementation actions also specifically address Complete Streets, which will be considered in the design of future projects:

Goal 2, Policy (n): Encourage development projects to support the principles of the Complete Streets principles and engage stakeholders and local community affected by proposed design.

Goal 3, Policy (b): Encourage proposed developments to provide safe, convenient, and direct pedestrian access to surrounding land uses, on-street parking, and transit stops, as applicable, emphasizing active transportation and supporting the Complete Streets Act.

Goal 3, Implementation Action: Continue to encourage pedestrian-friendly policies, such as complete streets ordinances, pedestrian-oriented design standards, and pedestrian priority zones, to integrate walking into the transportation planning process.

Goal 5, Policy (a): Implement Complete Streets design principles to ensure that all roadway projects accommodate the needs of pedestrians, cyclists, and transit users, in addition to motorized vehicles, by incorporating features such as widened sidewalks, dedicated bike lanes, pedestrian crossings, and traffic calming measures.

Goal 9, Implementation Action: Implement complete streets policies that prioritize the needs of all road users, including pedestrians, cyclists, motorists, and public transit riders, in street design and redevelopment projects to create safer, more accessible, and user-friendly streetscapes.

Goal 11, Policy (b): Implement Complete Streets design standards and guidelines to integrate transportation and land use planning considerations into street design, ensuring that streets accommodate the needs of all users, including pedestrians, cyclists, motorists, and transit riders, while fostering vibrant and accessible communities.

LETTER

RESPONSE

	U-6 Information regarding regional bus service and connectivity to rail service is provided in the first two bullets on page 4.13-5 of the Transportation section of the PEIR, which describes Metrolink and local transit services. U-7 The following statement has been added to page 4.13-5 of the Final PEIR: <u>OCTA Route 76 provides service between John Wayne Airport and Huntington Beach, and operates from 6:00 a.m. to 6:00 p.m., Monday through Friday. The bus stops in front of Terminal B on the Arrival (lower) Level.</u> U-8 Page 4.13-21 of the Final PEIR has been revised to state the following: <i>Implementation of the proposed project would increase the demand for public transit, bicycle, pedestrian, and airport facilities, particularly within the three Focus Areas where most of the planned residential units are located. However, the Circulation Element includes objectives and policies aimed at improving the existing roadway network in order to accommodate this increased demand ~~would require improvements and expansions to the existing circulation system.~~</i> Please also note the footnote on page 4.13-20 of the PEIR which states the following: <i>As a separate policy requirement, the City conducted an LOS analysis for the proposed project, which resulted in recommended infrastructure improvements. Specific projects associated with recommended improvements are not proposed as part of the project and have not yet been identified. However, future infrastructure projects would be required to undergo a separate environmental review process and would likely be identified in the City's CIP at the time they are proposed and details on such projects are available.</i> U-9 This comment does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration. It should be noted that all future projects requiring a transportation analysis will be required to conduct a VMT assessment in accordance with SB 743 and the City's Traffic Study Guidelines.
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City of Irvine
April 29, 2024
Page 3

and multimodal improvements. For more information on how Caltrans assess VMT analysis for land use projects, please review Caltrans' Transportation Impact Study Guide to ensure a complete VMT-based Traffic Impact Study is prepared.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

U-10 Freight

9. Please ensure that the General Plan Update analyzes the challenges in goods movement that are unique to the City. The Plan should also address how the City works to achieve an inter-regional network for longer distance travel and freight movement. Connecting towns, cities, and regions to each other, business centers to major intermodal freight transfer points, and commuters to Irvine and Orange County in general in a sustainable and efficient manner, should be an important objective.
10. Please consider leveraging strategic investments to maintain and modernize a multimodal freight transportation system with innovative approaches, including advanced technology to optimize integrated network efficiency, improve travel time reliability, and achieve sustainable congestion reduction.
11. Consider including a discussion on incorporating designated areas/parking for freight delivery, package, and transportation network company's pickup and drop-off.
12. In the Environmental Justice Element, consider including a discussion identifying potential conflict areas with environmental justice communities.

U-11 Safety

13. Safety is one of Caltrans' strategic goals. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners.

We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

U-12 Climate Change

14. Caltrans acknowledges that one of the most serious threats and disruption to the wellbeing of the SCAG region is Climate Change. Full coordination from all levels and agents of decision making is required to ensure the protection and safety of

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U-10 It should be noted that the Circulation Element addresses goods movement that are unique to the City, including multimodal connectivity within the City and greater region. Additionally, Policy (e) under Goal 10 specifically aims to implement green freight strategies to reduce emissions from freight transportation activities, such as promoting low-emissions vehicles, optimizing freight routing and delivery schedules, and incentivizing the adoption of sustainable freight practices among businesses and logistics providers.

It should further be noted that the proposed General Plan Update does not include a standalone Environmental Justice Element, but rather addresses environmental justice throughout the General Plan Elements. No changes have been made to these policies, as the project complies with SB 1000.

U-11 It should be noted that the City agrees with Caltrans on the importance of collaborating with our partners, and as such, has included Goal 7 in the Circulation Element which specifically aims to foster collaboration with transportation agencies. Designing and operating a safe circulation network is also addressed throughout the Circulation Element.

U-12 It should be noted that the City agrees with Caltrans on the importance of coordinating with other agencies to address threats and disruptions to the region resulting from climate change. The City will continue to coordinate with Caltrans and other partners on this issue in an effort to maintain a sustainable transportation network.

LETTER

RESPONSE

City of Irvine
April 29, 2024
Page 4

the region's people, built-, and natural environment. Please coordinate with Caltrans and local partners on strategies which support a sustainable transportation network.

U-13 Equity

15. Caltrans recognizes our responsibility to assist communities of color and underserved communities by removing barriers to provide a more equitable transportation system for all.

The Department firmly embraces racial equity, inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system.

We acknowledge and support the City of Irvine's efforts to meet its Regional Housing Needs Assessment (RHNA) allocation per the California Department of Housing & Community Development (HCD).

U-14 Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Joseph Jamoralin at (805) 732-8047 or Joseph.Jamoralin@dot.ca.gov

Sincerely,

Cole Iwamasa (for Scott Shelley)

SCOTT SHELLEY
Branch Chief, Local Development Review-Climate Change-Transit Planning
District 12

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U-13 This comment does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration. It should be noted that the City agrees with Caltrans on the importance of addressing equity in all decisions, including those related to the City's RHNA, circulation network, and land use planning.

U-14 This comment is conclusionary and does not address the adequacy of the PEIR, but it will be forwarded to the decision makers for their review and consideration.