

California Department of Transportation

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March 9, 2026

11-SD-15
PM R28.883
Alexan Escondido and Bethel Baptist Church Project
DEIR / SCH #2023090610

Mr. Ivan Flores
Principal Planner
City of Escondido
Development Services
201 N. Broadway
Escondido, CA 92025

Dear Mr. Flores:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Review (DEIR) for the Alexan Escondido and Bethel Baptist Church Project located near Interstate 15 (I-15) and Felicita Road/Citracado Parkway. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. 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.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Escondido in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Engineering & Analysis (TEA)

Caltrans reviewed the DEIR and the revised Local Mobility Analysis (LMA) and found that all previous comments have been addressed. Previously agreed to mitigations are shown listed and there is fair share of improvements to Caltrans ramps intersections. The proposed Fair Share mitigations identified on Caltrans' Right-of-Way (R/W) are:

- Citracado Parkway/I-15 Northbound Ramps: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.
- Gamble Lane/I-15 Southbound Off-ramp: Contribute a fair share towards constructing an all-way stop-control, a traffic signal, or a roundabout.

The applicant will only need to come to Caltrans for minor Traffic Control Permit since all proposed mitigation is on City Right-of-Way (R/W).

Hydraulics

Plans

- Provide drainage profile of the proposed 54" and double 30" RCP that is connecting to existing 54" RCP.
- Provide details of the junction structure that is replacing the existing head wall.
- Provide details of the detention vault.

Hydrology and Hydraulics Study (Alexan Escondido)

- In the "Existing and Proposed Surface Runoff" section, the summation of all the basin Q's were calculated. Basin 1 and Basin 2 are two separate basins that have two separate points of confluence (POC), where the Q's are calculated. Compare the existing and proposed runoff of Basin 1 and Basin 2 separately, remove the summation comparison.
- The proposed drainage system is undergrounding the existing conditions via pipe network and replacing the existing headwall with junction structure at the existing 54" RCP. Include a drainage engineering profile that includes but is not limited to Energy Grade Line (EGL), Hydraulic Grade Line (HGL), pipe size, discharge, velocity etc.
- Profile should include the existing dual pipes on Brotherton Road, the proposed 54" and double 30" RCP going into the proposed junction structure that is connecting to the existing 54" RCP and the existing 54" RCP as well.
- Run a Q100 for the profile.

- Engineering profile is a part of the Hydraulics study, not a part of the design plan set.
- According to the Hydrology Study under the "Existing Drainage" section, it states that a "42" and 48" RCP storm drain discharges directly onsite via a concrete headwall at Brotherton Road." The proposed hydrology map and the preliminary grading/improvement plans show a 42" and a 54" RCP at Brotherton Road. Confirm if the drainage system is a 54" or a 48" RCP.
- Include the Q of each drainage system that connect to the proposed 54" RCP.

System Planning

Alexan Escondido and Bethel Baptist Church Project, DEIR.

- The DEIR indicates that the project would result in a potentially significant Vehicle Miles Travelled (VMT) impact. It is noted that the level of significance after mitigation would be less than significant. Please see below in this response for recommended guidance which may help provide additional resources to decrease the number of automobile trips and reduce VMT.
- Section 4.11.1.3 Public Transit Network – It is acknowledged that there are no bus routes along the surrounding streets within the proposed project area. The DEIR describes the closest route offered by North County Transit District (NCTD) and notes that the bus route connects with two local transit stations. Please consider including information about paratransit services that may be offered through NCTD Lift as their service area is just within the project study area. Caltrans System Planning recommends adding information about San Diego Metropolitan Transit System (MTS) routes that service the Escondido community and connect to other areas of San Diego County (these routes are listed in Appendix J of the DEIR, Figure 13-3):
 - MTS Route Rapid 235
 - MTS Route Rapid Express 280
 - NCTD Arterial Rapid 350
- Please also note that there is a study in development by SANDAG to explore a route between Riverside County to San Diego County, Rapid 483, that would connect Temecula to Escondido and San Marcos, <https://www.sandag.org/projects-and-programs/transit/transit-projects/rapid-bus-routes/rapid-483>.
- 3.3.1.2 Access, Circulation and Parking
 - [Appendix D. Local Actions of the California Air Resources Board \(CARB\) 2022 Scoping Plan for Achieving Carbon Neutrality](#) This resource mentions strategies for Vehicle Miles Traveled (VMT) reduction, greenhouse gas (GHG) reduction, and potentially deploying renewable energy production in parking areas.
 - Consider installing solar panels above the proposed carports to maximize opportunities for clean energy collection.

- Sidewalks and bicycle lanes – The DEIR identifies pedestrian and bicycle network gaps near Caltrans facilities and within proximity of the proposed project. It is acknowledged that mitigation steps have been proposed. Please see in this response for recommended guidance which may help provide additional resources on this topic.

Appendix J: Local Mobility Analysis

- The project is anticipated to generate more than 200 ADT, and the site is located over half a mile from an existing major transit stop; thus, a significant VMT impact is anticipated. Please see this response for recommended guidance which may help provide additional resources to decrease the number of automobile trips and reduce VMT.
- 13.3 – Transit Mobility: Appendix J focuses on the 2-mile radius around the project site. Please note that while Escondido Transit Center is located about 2.5 miles north of the project site, NCTD plans to extend the SPRINTER to North County Mall by 2050, which may impact the project area. Routing details for this extension are not yet available.
- It is noted that there are gaps in the sidewalk network along the project area's perimeter and that a new sidewalk will be built along Felicita Road. Please see this response for recommended guidance to ensure that this new sidewalk adheres to accessibility guidelines.

Several planning documents frequently utilized by the Caltrans System Planning Branch discuss the importance of transportation and connectivity, land use planning, and safety. These documents may provide further background on state and regional planning in relation to the proposed project. Below are several examples that may be utilized.

- *I-15 Comprehensive Multimodal Corridor Plan (CMCP)* – The *I-15 Comprehensive Multimodal Corridor Plan* is a joint effort from SANDAG and Caltrans that will identify potential improvements to enhance the way people travel throughout San Diego County utilizing the I-15 Corridor. I-15 is a major north-south route in San Diego County, serving cities and communities such as San Diego, Kearny Mesa, Mira Mesa, Rancho Peñasquitos, Poway, and Escondido and providing connections to Riverside County. Projects will prioritize safety, access to opportunities, and reduction of VMT through improved access and function of multimodal transportation modes such as walking, biking, and transit. This project is in development.
 - [Caltrans - I-15 Comprehensive Multimodal Corridor Plan](#)
- [California Transportation Plan 2050 \(CTP 2050\)](#) – The CTP 2050 provides a common framework for guiding transportation decisions and investments by all levels of government and the private sector. Statutorily mandated federal and state law requires that Caltrans facilitate, develop, and prepare the CTP.

- Please review this guidance for topics on safety and operations, GHG emissions reduction and VMT mitigation, multimodal transportation, land use and more.
- [Climate Action Plan for Transportation Infrastructure \(CAPTI\)](#) – The California State Transportation Agency (CalSTA) adopted the CAPTI in 2021, which details how the state recommends investing billions of discretionary transportation dollars annually to aggressively combat and adapt to climate change while supporting public health, safety and equity.
- CAPTI builds on executive orders signed by Governor Gavin Newsom in [2019](#) and [2020](#) targeted at reducing GHG emissions in transportation, which account for more than 40 percent of all emissions, to reach the state's ambitious climate goals. Throughout 2024, CalSTA engaged with stakeholders through multiple listening sessions, public workshops, and a public comment period to develop four new strategies and 14 new actions to further implement the existing CAPTI investment framework. The update, [CAPTI 2.0](#), was released in February 2025.
 - Please review this guidance as it relates to goals for reduction of GHG emissions, VMT mitigation, transportation and land use connections, multimodal transportation options, and zero emission vehicle infrastructure.
- [Smart Mobility Framework 2010](#) – The Smart Mobility Framework (SMF) was prepared by Caltrans in partnership with the US Environmental Protection Agency, the Governor's Office of Planning & Research, and the California Department of Housing & Community Development to address both long-range challenges and short-term programmatic actions to implement multi-modal and sustainable transportation strategies in California. The SMF is a planning framework that helps guide and assess how well plans, programs, and projects meet a definition of "smart mobility". It can be used by both Caltrans and partner agencies in all geographic parts of the State to transform transportation decisions. Ideally, the SMF can be applied to various levels of plans, programs, or projects (e.g., Regional Transportation and Blueprint Plans, General Plans, corridor plans, specific development proposals, etc.) in all parts of the state (i.e., urban, suburban, and rural).
 - Please review this guide for details on housing, improved accessibility, social equity, reduction of environmental impacts, and more.
 - Please review this guide for information on VMT mitigation and GHG emissions reduction.
 - Please see the Smart Mobility Place Types exhibits to research the appropriate mode that may assist in your planning needs.

- [Toward an Active California State Bicycle – Pedestrian Plan](#) – This document is California's first statewide plan that lays out the policies and actions that Caltrans and its partner agencies will take to achieve the department's ambitious statewide goals to double walking and triple bicycling trips by 2020.
 - The DEIR for the Alexan Escondido - Bethel Baptist Church Project references bicycle and pedestrian improvements; please use this guidance to reference goals from Caltrans and other partner agencies, as it relates to the Caltrans Planning Framework and Active Transportation Policies.
- [California Statewide Transit Strategic Plan](#) – The California Statewide Transit Strategic Plan is one of the modal plans under the umbrella of the California Transportation Plan 2040. The Statewide Transit Strategic Plan will highlight a sustainable transportation system that supports the outcomes of the California Transportation Plan, the California State Rail Plan, and the California State Bike and Pedestrian Plan.
 - Although the project's location is not within close proximity to public transportation facilities, as detailed in the DEIR, we offer this guidance to assist in planning efforts that support your topics on multimodal transportation networks.
- [Caltrans Active Transportation Plans](#), Caltrans Active Transportation (CAT) Plans identify specific locations and specific bike or pedestrian needs ("location-based needs", or LBNs) which can be referenced to help scope projects.

Other proposed improvements – Please be aware of the existing Caltrans projects near the proposed project near Caltrans postmile 28.9:

- On I-15 at postmiles 26.90-52.10 (I-15 between Via Rancho Parkway through Rainbow Valley Boulevard), work is proposed to be taking place around April 2033 to provide pavement rehabilitation, culverts and overhead sign structures rehabilitation and ADA curb ramp repair.
- On I-15 at postmiles 17.9-44.80 (I-15 between Poway Road to 0.6 Mile North of West Lilac Road Overcrossing), work is proposed to be taking place beginning around December 2026 to provide ADA and CCTV upgrades, install high tension cable repair barriers, and restore wrong-way driving preventative measures.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final Environmental Impact Report.

For subsequent approvals, this project must specifically identify and assess potential impacts caused by the project and/or impacts from mitigation efforts that occur within or indirectly affects Caltrans' R/W that includes but is not limited to impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in the analysis for any work identified in Caltrans' R/W and any additional mitigation measures identified for the Final Environmental Impact Report.

The following is a list of impacts that are typical to Caltrans' facilities, and we recommend that they be addressed if appropriate environmental and supporting documents for this project:

- Noise
- Air Quality
- Hazardous Materials
- Community Impacts
- Visual/Aesthetic Impacts (including any removal of vegetation or trees)
- Biological Resources
- Cultural Resources
- Water Quality
- Agricultural/Farmland Impacts
- Traffic/Circulation

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

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.

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Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for QMAP process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

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

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

Kimberly D. Dodson, GISP
Branch Chief
Local Development Review