

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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August 6, 2025

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GTS #: 04-SM-2023-00701
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Co/Rt/Pm: SM/82/19.186

Peter Gilli, Community Development Director
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: Tanforan Redevelopment Project – Draft Environmental Impact Report (DEIR)

Dear Peter Gilli:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Tanforan Redevelopment 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 June 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 would demolish 785,489 square feet (s.f.) of existing retail uses to construct new residential and commercial uses on the 44-acre project site. Proposed new development includes approximately 111,950 to 211,950 s.f. of new retail space, between 1,014 to 1,514 multi-family residential units, 1,174,000 to 1,723,580 s.f. of life-science laboratory and office uses, a 125,000 s.f. 170-room hotel, as well as associated parking structures and amenity uses. The project site is located directly adjacent to State Route (SR) 82 and Interstate (I-) 380.

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. Per the DEIR, this project is consistent with LCI screening criteria for a transit-oriented project and was therefore presumed to have a less than significant VMT impact. However, it is stated in the *Appendix 3.14-1*

Transportation Analysis Summary that expected vehicular trip generation for both project scenarios would exceed the estimated existing Tanforan Mall vehicular trip generation, which represents a net increase in vehicle trips. Related to this, the *Appendix 3.14-2 Level of Service Memorandum* also concludes that level of service (LOS) and vehicle delay will worsen at the I-380 ramps at SR 82 and the U.S. Route 101 (US-101) ramps at San Bruno Ave with the addition of project vehicle trips.

Although these results account for site internal trip matching that can be expected with mixed land uses, they do not account for potential further trip reductions from implementing transportation demand management (TDM) measures that could further reduce VMT and project vehicle trips distributed onto the surrounding roadway network. In accordance with the City/County Association of Governments of San Mateo County (C/CAG) requirements for transit-oriented developments, the project will be required to implement a TDM program designed to meet a 25 percent reduction in vehicle trips. Depending on the amount of TDM measures in place, however, the project may still result in a net increase of trips over those generated by the existing Tanforan Mall.

Given these factors, the City of San Bruno should consider TDM requirements and incentives for the future developer(s) that could further reduce project VMT and vehicle trips, such as employer-sponsored ridesharing, vanpools, priced workplace parking, and parking cashout; and residential measures such as limiting provided parking supply, unbundled parking costs from property cost, and provision of transit passes to residents and on-site employees. These and many more measures are detailed in the 2023 Caltrans Transportation Demand Management Toolbox ([link](#)). Limiting parking supply should be considered, given the substantial onsite parking supply proposed under both project development scenarios (up to 6,221 stalls in Scenario A, which is acknowledged to be below City minimum parking requirements) and the project site's adjacency to the San Bruno BART Station.

Proposed mitigation measures should also be documented with annual monitoring reports to demonstrate effectiveness.

Fair Share Contributions

We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

The City may also consider encouraging fair share contributions from future development projects to multimodal projects that promote mode shift and reduce single-occupancy vehicle travel to mitigate VMT impacts. Caltrans suggests the following projects for future fair share contribution considerations:

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Corridor & Interchange Improvements on I-380 (Plan Bay Area 2050 (PBA 2050) Regional Transportation Plan (RTP) Project 21-T06-018)	This programmed project includes funding to implement interchange improvements at US-101 and El Camino Real and a new eastbound freeway lane between I-280 and El Camino Real.
San Mateo 101 Managed Lanes Project North of I-380 (PBA 2050 RTP Project 21-T-12-116)	This is a managed lane facility project for US-101 from 1 mile south of the US-101 and I-380 separation to the San Mateo/San Francisco County line. Project sponsors include San Mateo County Transportation Authority and C/CAG. The project is currently in Project Approval and Environmental Document (PA/ED) phase with construction anticipated by December 2028.
US-101 and San Bruno Avenue Interchange Improvements	This project would reconfigure the partial cloverleaf to a compact diamond layout. The project also includes a proposed free-flow right turn lane onto I-380, bypassing the tight signalized intersection. This project is currently in the project initiation phase.

Bicycle and Pedestrian Planning

Please review and include reference to the *Caltrans Bay Area 4 Bike Plan Update (2025)* in *Chapter 3.14 Transportation* of the DEIR. This plan studied existing conditions for 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 ensure that *Section 3.14.2.1 Regulatory Setting* includes discussion of whether there are any conflicts between the Caltrans Bike Plan and the bicycle improvements proposed with this project. Please also clarify the type of bicycle facilities that will be provided on Seabiscuit Ave, B Street, and C Street within the project site.

Please be advised that the proposed off-site improvements for this project overlap with Caltrans project EA 04-0AA32/Project ID 0419000463. The Caltrans project includes the planned construction of a Class IV bikeway on SR 82 from Sneath Ln to Arroyo Dr. Please coordinate with Caltrans to ensure that the proposed two-way cycle track on the south side of Sneath Ln between SR 82 and Huntington Ave, as well as the lane configurations and pedestrian islands at the SR 82/Sneath Lane intersection, are compatible with the bicycle and pedestrian facilities planned under project EA 04-0AA32. Please contact Rommel Pardo, Regional Project Manager for San Mateo

County, at Rommel.Pardo@dot.ca.gov with questions or to discuss project coordination and kindly reference EA 04-0AA32 or Project ID 0419000463.

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 proposed onsite storm drain system for the new development would have connections to the San Bruno storm drain system and the proposed project will alter the paved areas close to SR 82 in the City of San Bruno. Consequently, the development may impact the existing drainage systems at SR 82. The Office of Hydraulics would like to ensure no surface flow will get into the roadside gutter within SR 82. Please submit plan views, profiles, cross-sections, and details of all drainage facilities for review during the Encroachment Permit application stage.

Air Quality and Noise

Ambient air quality data for the project area appears to be available for the year 2024 from the California Air Resources Board (CARB) and Environmental Protection Agency (EPA). Please consider updating *Table 3.1-4 Ambient Air Quality Data for the Project Area (2021-2023)* with the 2024 data.

Under the *Carbon Monoxide* subsection of *Chapter 3.1.3.1 Thresholds of Significance*, the statement, "If the screening criteria are not met, a quantitative analysis, through site-specific dispersion modeling of project-related CO concentrations, would not be necessary," appears to be inconsistent with the referenced Bay Area Air Quality Management District (BAAQMD) screening criteria ([link](#)), which states, "If all screening criteria for criteria air pollutants and precursors are met by a proposed project, then the lead agency would not need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions." Please consider rephrasing the statement in the DEIR for clarity.

Cultural Resources

For any construction activities within Caltrans' Right-of-Way (ROW) that take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

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. 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 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,


MELISSA HERNANDEZ

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

Peter Gilli, Community Development Director
August 6, 2025
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c: State Clearinghouse