

California Department of Transportation

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11-SD SR-52, SR-67, SR-125

PM VAR

City of Santee Land Use Element Update

PEIR/SCH#2025051050

Ms. Madeline Mattson
Principal Planner
City of Santee
Planning and Building Department
10601 Magnolia Avenue
Santee, CA 92071

Dear Ms. Mattson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Program Environmental Impact Report (PEIR) for the City of Santee Land Use Element Update located near State Routes 52, 67 and 125 (SR-52, SR-67, SR-125). 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 Santee 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:

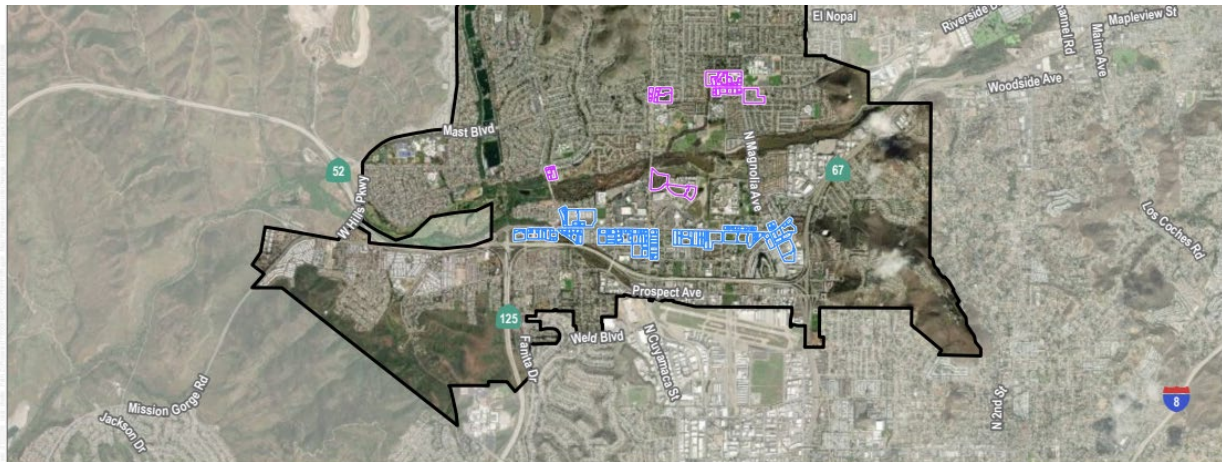
Traffic Engineering and Analysis

- Section 4.15.5 Level of Significance After Mitigation, indicates: “At a program level of review with no specific development proposals available for review, it is not guaranteed that each individual project would be able to fully mitigate the potential impacts. While MM-TRA-1 and MM-TRA-2 would minimize Vehicle Miles Traveled (VMT) impacts associated with future development, impacts would not be fully mitigated. Therefore, impacts associated with VMT would remain significant and unavoidable.” It is recommended that future development projects be required to fully mitigate VMT impacts. A potential option would be to have a development fee system for situations that cannot be fully mitigated by VMT reduction measures, similar to the City of San Diego, or condition for fair share towards transportation projects.
- Future Projects that are within the Land Use Element Update will need to be evaluated using with the Caltrans “Local Development Review (LDR) Safety Review Practitioner’s Guidance” <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-all.pdf> to determine if the project meets both of the screening criteria. If both screening criteria are not met, then a safety review will be needed.
- It was noted that the Transportation portion of the Draft PEIR has “significant and unavoidable” Impact, but it is not clear if there will be impacts to Caltrans freeway and R/W facilities yet. Please see references on next page. Please clarify if there will be impacts to Caltrans freeway and R/W facilities.

Transportation			
Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less-than-significant impact	No mitigation measures are required.	Less-than-significant impact
Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Potentially significant impact	MM-TRA-1. Transportation Demand Management Measures. For development projects located in parcel clusters that were identified to have an impact related to vehicle miles traveled (VMT) under Mitigation Measure (MM) TRA-1 , the City shall require that future projects are compliant with Mobility Element Policies 9.1 through 9.5, which encourage the use of Transportation Demand Management (TDM) strategies, such as ride-sharing programs, flexible work schedule programs, and incentives for employees to use transit. Additionally, alternative transportation modes, such as walking, cycling, and public transit are encouraged to reduce peak hour vehicular trips, save energy, and improve air quality. Sample TDM measures that may be applied at the project-level are provided below: <ul style="list-style-type: none"> ▪ Increase mixed-use development ▪ Increase transit accessibility 	Significant and unavoidable

Plan.

MM-TRA-2. Project-Level VMT Analysis. For projects requiring discretionary review, if the proposed development does not meet any of the screening criteria outlined in the City of Santee (City) VMT Analysis Guidelines (April 13, 2022) or subsequently updated version, the applicant shall conduct a project-level vehicle miles traveled (VMT) analysis and identify VMT impacts associated with the proposed development. The project applicant shall reduce project-induced VMT impacts through implementation of VMT-reducing infrastructure and/or strategies that would mitigate the project's VMT-related impacts identified, but not limited to, measures from **Mitigation Measure (MM) TRA-1**, Transportation Demand Management Measures. Using applicable measures, the applicant shall prepare a Transportation Demand Management (TDM) Plan, which will be subject to the City's review and approval. No development shall proceed until the TDM Plan is deemed acceptable by the City.



SOURCE: City of Santee 2025

FIGURE 3-2

Proposed Land Use Changes
 City of Santee Land Use Element PEIR



- Proposed land use changes in Figure 3-2 are adjacent to Caltrans freeway and Right-of-Way (R/W). New developments resulting from the City of Santee Land Use Element should provide a Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) and/or Local Mobility Analysis should be provided prior to development, showing the impacts to Caltrans freeways, ramps, and R/W, especially those impacts to SR-52, SR-67 and SR-125.
- Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.¹
- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

¹ California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

- Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies. The City of Santee should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Vehicle Miles Traveled (VMT)

We encourage the City to utilize strategies that will help the City achieve conformance with State GHG emission and VMT reduction goals. Potential measures to reduce VMT include, but are not limited to:

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle, and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming measures and strategies.
- Provide bicycle parking.
- Limit or eliminate parking supply.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options.
- Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

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.

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 Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

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