

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



October 5, 2026

11-SD-78

PM 12.18

Creek Plan Specific Plan Update
EIR/SCH#2025090620

Mr. Sean del Solar
Principal Planner
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

Dear Mr. del Solar:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (EIR) for Creek Plan Specific Plan Update project located near State Route 78 (SR-78). 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.

We look forward to working with the City of San Marcos 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

Per the Caltrans "Local Development Review Safety Review Practitioner's Guidance" Appendix E - Safety Review Screening Guidelines, the project is not screened out from performing a safety review because additional vehicle trips generated by the project are

added to the State Highway System. Please provide a safety review of the SR-78 Eastbound (EB) and Westbound (WB) Exit Ramps to Las Posas Road (Intersections 1 and 3) interchanges and the SR-78 EB and WB Exit Ramps to San Marcos Blvd (Intersection 15 and 16) interchanges.

Please provide the peak-hour 95th-percentile queue table with queue lengths for all exit ramp movements at the SR-78 EB and WB exit ramps to Las Posas Road (Intersections 1 and 3) and SR-78 EB and WB exit ramps to San Marcos Blvd (Intersection 15 and 16) for all conditions.

SimTraffic calibration for the peak-hour queue should be set up with a Seeding time of 15 minutes and a Recording period of 60 minutes for all conditions.

The Synchro files for the *"Horizon Year + Project with Recommended Improvements"* did not accurately depict the existing roadway geometry for the SR-78 exit ramp to Las Posas Road. The SR-78 WB exit ramp to Las Posas Road is a one-lane exit ramp (Intersection 3). Please correct Synchro to show one lane after 300 feet from the limit line to accurately depict the existing roadway geometry, as this will affect the queue-length results and the level of service of the ramp when comparing a one-lane versus a two-lane exit ramp. Please update the revised Synchro model results in the report.

If the Synchro files for the *"Horizon Year + Project with Recommended Improvements"* condition showing the SR-78 exit ramp to Las Posas Road being improved to a two-lane exit ramp are correct, then please revise the Local Mobility Analysis, Section ES.4, Intersection Analysis, #3, bullet one (page 13) to include it in the recommended improvements: "Update the southbound approach to one left-turn lane, one shared through-right turn lane, and one right-turn lane configuration with a two-lane exit ramp from the freeway".

Please revise Synchro files and resubmit to Caltrans for review.

In instances where trips generated by the Project cause 95th-percentile queue lengths at Caltrans off-ramp intersections to exceed the available storage to create an adverse effect, improvement would be required through coordination with Caltrans.

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 carsharing, 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.

Complete Streets

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promote a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Marcos, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

Caltrans recommends the following along San Marcos Boulevard:

- Installing "No turn on red" signage in the signalized intersections to improve safety for bicyclists.
- To install leading pedestrian interval (LPI) to improve pedestrian safety and visibility.
- Improving existing crosswalks into enhanced high visibility crosswalks.
- Improving and upgrading existing Class II bike lanes to a Class II buffered bike lane or Class IV separated bikeways with conflict zone green markings.

Caltrans recommends the following along Discovery Street:

- Improving and upgrading existing Class II buffered bikeway to a Class IV separated bikeway with conflict zone green markings.

- Throughout the project area, where sidewalks and bikeways are located, installing bike and pedestrian scale lighting to increase visibility, security, and safety.

Section 4.10.4.1 Specific Plan Update:

- Goal LU.5: Caltrans recommends including language to require new developments to also address bicycle facilities in terms of improving existing bike facilities and/or installing new bike facilities where feasible. Currently, only language addressing pedestrian needs is present.

System Planning

Program Subsequent Environmental Impact Report for the Creek Plan Specific Plan Update

- In addition to the already noted goals for public transit improvements, please consider adding goals that address lighting, weather protection, benches, designated paratransit stops at major centers, and security.
- Under the areas where the Roadway Network and Public Transit are discussed, please consider adding language that recognizes paratransit ridership.

Several planning documents frequently utilized by the Caltrans System Planning Branch discuss the importance of transportation and connectivity, land use planning, safety, and vehicle miles travelled (VMT) mitigation strategies. 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.

[North County Comprehensive Multimodal Corridor Plan \(CMCP\)](#) – Thank you for including the North County CMCP as part of the Transportation section of the EIR. The CMCP is a joint effort from SANDAG and Caltrans that identified potential improvements to enhance the way people travel throughout San Diego County utilizing the SR-78 corridor.

- Please consider updating the quote that was used in page 205 of the PDF under, “b. North County Comprehensive Multimodal Corridor Plan”, to read: ...a strategic blueprint for identifying and implementing multimodal projects and services within North County communities predominantly located along State Route 78.”
- Please update the North County CMCP document link on page 471 of the PDF under “4.10 Transportation”; that link is no longer working. Please utilize the link noted at the beginning of 2.a in this letter.

[Interstate 15 \(I-15\) Comprehensive Multimodal Corridor Plan \(CMCP\)](#) – Please consider including information about the I-15 CMCP. Caltrans and SANDAG are working together to develop the I-15 CMCP with a scheduled completion date of June 2028. The plan will include wide-ranging information that supports your project as it relates to transportation.

[SANDAG 2025 Regional Plan](#) – Please note that the link in page 470 of the PDF under section “4.7 Land Use/Planning” is broken. The link we have included at the beginning of this section is operational.

- The following transit projects are adjacent to the study area, listed in [Appendix A: Transportation Projects, Programs, Policies, and Phasing](#):
 - Mixed Rapid 483 - Commuter Express: Riverside (Temecula) to Palomar College via I-15, SR-78, CSUSM (pg. A.20)
 - Arterial Rapid 440 - Carlsbad to Escondido Transit Center via Palomar Airport Road (pg. A.20)
 - Mixed Rapid 484 - Commuter Express: Carlsbad to Kearny Mesa via I-15; Palomar Airport Road, SR 78, I-15 Rancho Bernardo Transit Center (pg. A.21)

[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 and 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 EIR 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.

[Caltrans District 11 Active Transportation Plan](#) – The Caltrans District 11 Active Transportation (CAT) Plan identifies specific locations and specific bike or pedestrian needs ("location-based needs", or LBNs) which can be referenced to help in the scoping of projects.

Other proposed improvements – Please be aware of the existing Caltrans projects near the proposed project near Caltrans postmile 12.13:

- On SR-78 between PM 6.00/60.40, work is currently underway for landscape and hardscape improvements.
- On SR-78 between PM 0.60/R13.20, work is proposed for HOV/managed lanes. It is currently in the environmental stage.
- On SR-78 between PM 0.00/N17.70, work is currently underway for pavement rehabilitation, ADA curb ramps, ITS, operational improvements, complete streets, and bridge rail. The project is expected to close out on 03/01/31.

Hydrology and Drainage Studies

Caltrans has been coordinating with the City of San Marcos (City) regarding the San Marcos Creek for the past 18+ years. It is our understanding that the City was in pursuit of an option that would eliminate the split flow condition upstream of SR-78. Caltrans has had many discussions with the City regarding the planning components required to pursue a solution that eliminates the split flow:

New hydrology studies are required to update the Federal Emergency Management Agency (FEMA) Flood Insurance Study (FIS) flowrates. The FIS study 100-year flowrate was calculated in 1989 as 15,700 cfs. To pursue evaluations of a SR-78 improvement, new flowrates are required and those flowrates must be approved by FEMA.

The 100-year flowrate reported for the "off-site" solution was 13,400 cfs. This is considerably less than the 15,700 cfs calculated in 1989 and reported in the current FIS. Caltrans recently conducted a qualitative study and comparison of the San Marcos Creek watershed comparing the 1985 watershed development condition to April of 2025 watershed development condition. The conclusion was that it appeared that significant development of the watershed has occurred between December 1985 and April of 2025. Therefore, it is counterintuitive that the 100-year flow rate used to determine an "off-site" alternative is less than the effective FIS 100-year flow rate.

In 2008, the City approached Caltrans with an "off-site" solution of adding a bridge across SR-78 just to the east of the existing reinforced concrete boxes (RCBs) to eliminate the split flow. The City was directed by the Army Corps of Engineer (ACOE) regulatory branch that the existing RCBs under SR-78 must remain in place to preserve the existing habitat. From the Caltrans' perspective, Caltrans and the City have been pursuing feasibility studies that concentrate on the bridge and existing RCBs solutions. However, this solution is not included in the San Marcos Creek Specific Plan. If the City is interested in pursuing the feasibility of eliminating the split flow by increasing the capacity under SR-78, then the following components of studies are advised for Caltrans' participation:

- Updated FIS 50-year and 100-year flowrates.
- Two-Dimensional hydraulics studies to determine impacts to upstream and downstream properties due to the elimination of the split flow.
- The determination whether floodwalls, levees, or other mitigation features are necessary to mitigate for the impacts of the elimination of the split flow.
- The determination of proposed improvements under consideration within Caltrans' R/W. Caltrans standards, methodologies, policies and procedures must be applied.

If the City is no longer interested in coordinating a solution with Caltrans, please contact the Caltrans District 11 Regional Program Director North County Corridors and the Caltrans District 11 Deputy District Director of Planning and Local Assistance. The Caltrans District 11 LDR Branch can help facilitate this coordination.

Throughout the project development process, Caltrans requests close coordination with the City of San Marcos to ensure the proposed improvements described in the specific plan are compatible with the future highway improvements of SR-78.

Please explain if the utilization of levees and/or floodwalls along the San Marcos Creek Corridor, as mentioned in the 2007 EIR, continue to be considered as a viable flood control strategy.

Please ensure the on-site solutions depicted in the exhibits in Appendix D, are constructed outside of Caltrans' R/W.

Please note all future improvements cannot impact water surface elevations at Caltrans bridges or increase the potential for scour.

The proposed project features may significantly alter the FEMA-defined Floodplain, Floodway, and associated water surface elevations through the project area and have potential adverse impacts to the SR-78 facilities. Caltrans requests that the City of San Marcos, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department regarding floodplain administration and allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from this project.

Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to Caltrans when the City of San Marcos approves the permit to alter the floodplain and/or when the Developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).

Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

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. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

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.

Land Use and Smart Growth

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 should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Hauling/Traffic Control Plan

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at SR-78, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (SR-78) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

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.

Mr. Sean del Solar, Principal Planner

October 5, 2026

Page 10

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 Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to shannon.aston@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review