

California Department of Transportation

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Governor's Office of Planning & Research

Oct 13 2021

October 12, 2021

STATE CLEARINGHOUSE

11-SD-54,805

PM VAR

National City CarMax Auto Superstore
FEIR, Drainage Study/SCH#2016111035

Mr. Martin Reeder
Principal Planner
City of National City – Planning Department
1243 National City Blvd.
National City, CA 91950

Dear Mr. Reeder:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Final Environmental Impact Report (FEIR) and the revised Drainage Study (August 2021) for the National City CarMax Project located near State Route 54 and Interstate 805 (SR-54 and I-805). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development-Intergovernmental Review (LD-IGR) 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 has the following comments:

Traffic Engineering and Analysis

- Caltrans' Right-of-Way (R/W) was not accurately shown on the Site Plan (Figure 3-1 Overall Site Plan) and cross section C. Please correct.

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

- Please see attached marked up Site Plan for comments and details.
- It is recommended that all construction activity be away from the SR-54 and I-805 mainlanes and connectors, so traffic operations and safety is not impacted. All development construction access shall be made via Plaza Bonita Road or private access and not from Caltrans' R/W.
- All permanent fixtures need to be outside Caltrans' R/W (including retaining wall foundations). If anything affects Caltrans' R/W, including Traffic Control, an approved encroachment permit will be required.

Hydrology and Drainage Studies

Drainage Study (August 2021)

- The applicant has shown that hydraulic impacts to Caltrans' drainage facilities are negligible for this phase of the project, however the hydrology/ peak flow rates seem overly conservative - see following comments.
- Sheet flow calculations seem to use an overly conservative flow paths and Mannings 'n' value. Example - System 83 assumes a flow path and roadway "n" value = 0.014, whereas some of the locations draining within the basin have growth that may increase travel time and could decrease the intensity for the basin.
- Caltrans onsite drainage design assumes a 5 minute minimum Time of Concentration (Tc). Example- System 83 (Lower Reach) calculations show a Tc= 1.92 minutes. For Caltrans Tc's less than 5 minutes, revise to assume the 5 minute minimum.
- Please provide StormCad schematics (layouts) for each Caltrans system.
- StormCad labelling should reflect as-built system and unit lettering.

Hauling

The California Department of Transportation (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:

<http://www.dot.ca.gov/trafficops/permits/index.html>

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 EIR that Caltrans will use for our subsequent environmental compliance.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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 lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

BIOLOGY: The project description and footnotes in the Bio section say that all permanent impacts were removed from Caltrans' R/W. The technical report still shows permanent impacts on Caltrans' R/W on figure 4.3-7 thru -10 and shows mitigation for wetland impacts in Caltrans' R/W. The claim was it was conservative, however, no wetland mitigation will be allowed in Caltrans' R/W. The biological figures should be corrected, and all mitigation activities shall remain outside of Caltrans' R/W.

HAZARDOUS WASTE/MATERIALS: Section 4.8-Hazard and hazardous waste impacts from the proposed project.

A hazardous waste concern for this project is aerially deposited lead (ADL). Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is usually found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the

surface. The Department of Toxic Substances Control (DTSC) sets regulatory thresholds for lead in soil, based on risk assessment work performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). It is the Permittee's responsibility to comply with the DTSC ADL requirements for roadway soil management.

NOISE: The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-54 and I-805.

VISUAL: Figure 3-1 "Overall Site Plan" and Figure 3-3 "Conceptual Landscape Plan" If the project no longer proposes "Backfill", (Caltrans' R/W) (Separate Permit), then remove this item in the Legend and the hatch pattern on the plans. Re: 4.1 Aesthetics Scenic resources within the proposed CarMax project area are limited to the open space trees and vegetation similar to the adjacent Sweetwater River. The proposed tree removal would degrade the existing visual character and quality of views to the site from the freeway. To reduce visual impacts, it is recommended that riparian trees be planted in the open space used for construction and along the restored earthen channel near the northwestern boundary of the project site.

Figure 3-3 "Conceptual Landscape Plan"

Planting is recommended for the open space used for construction and for the restored earthen channel near the northwestern boundary of the project site. The areas should be temporarily irrigated and planted with California native trees and shrubs from containers. The plantings would function as a permanent erosion control and would reduce adverse visual impacts to views of the project site from the freeway.

Right-of-Way Utilities

CarMax shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closures or partial closures of SR-54 and I-805 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

The Environmental Document should be clearer on the impact to SDG&E Electrical Transmission poles. This is a significant item to be impacting. It appears this Electric line carries both Transmission and Distribution (one impacts the overall community, the other impacts direct service/s). Moving a pole, could upset the entire crossing, by angles, and by vertical clearances. This could trigger new/adjust poles way beyond their footprint. Caltrans permits crossings, but does not permit poles, guys or guy poles in State R/W. Grading and features on their lot could impact the vertical clearances that are governed by SDG&E/PUC. In addition, they have easements, and altering the easement, and the language/recording of it needs be considered. Please clarify if moving a Transmission pole would likely need an Environmental Document of its own, if not incorporated here, and discussions with SDG&E included.

Non highway utilities in State R/W must comply with the Encroachment Handbook and Project Development Procedures Manual (PDPM) Chapter 17. Any utility relocations or new utility appurtenances needed within Caltrans' R/W will need to comply with current encroachment and utility policies found in the PDPM, Chapter 17.

Please see the following chapters in the Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a11y.pdf>.
- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf>
- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf>.

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 contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Charlie Lecourtois, IGR Coordinator, at (619) 985-4766 or by e-mail sent to Charlie.Lecourtois@dot.ca.gov.

Sincerely,

Kimberly Dodson for

MAURICE A. EATON
Branch Chief
Local Development and Intergovernmental Review

Attachment: Site Plans