

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

Dec 23 2020

STATE CLEARINGHOUSE

December 22, 2020

11-SD-54,805

PM VAR

National City CarMax Project

DEIR/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 environmental review process for the Draft Environmental Impact Report (DEIR) for the CarMax Project located near Interstate 805 (I-805) and State Route 54 (SR-54) in National City. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Engineering Analysis

- In accordance with Senate Bill (SB) 743 as of July 1, 2020, public agencies are required to use vehicle miles traveled (VMT) as the metric to evaluate transportation impacts associated with future developments. Please provide a VMT-based traffic impact study using the Caltrans Vehicles Miles Traveled-Focused Transportation Impact Study Guide dated May 20, 2020.
- In addition to a VMT analysis, a VMT based traffic impact study (TIS) will also be required to review all safety and operations impacts along SR-54. Please include the intersections and segments at SR-54/Reo Dr./Plaza Bonita Center Way and SR-54/Bonita Rd. Please use the Governor's Office of Planning and Research (OPR) Guidance to identify VMT related impacts.

- 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.
- During the COVID-19 pandemic, vehicle volumes along California's highways and local arterials have decreased. Ideally, the State would accept traffic volumes collected within the last two years. However, if traffic counts have not been recently collected (prior to March 13, 2020) it has been determined that utilizing historical traffic data as foundation from past projects and partner agencies may be used to replace existing traffic counts, subject to sound engineering justification. Volumes older than 2 years will be allowed if accompanied by justification and/or an appropriate growth rate for this traffic study. Traffic counts collected during the COVID-19 pandemic will not be accepted unless historical or alternative traffic data is not available, and a justified increase factor is applied.
- All improvements within Caltrans Right of Way (R/W) will be required to comply with Caltrans Highway Design Manual (HDM) guidelines and standards. Please provide proposed improvement plans for review.
- Please submit an estimate of the proposed backfill construction work and retaining wall that is proposed to be on Caltrans R/W line and within Caltrans R/W only. It is recommended that all backfill construction work be done away from the SR-54 main lanes and connectors, so traffic operations and safety are not impacted.
- Any roadwork, retaining wall structures, striping, and traffic control encroaching within Caltrans R/W will require an approved Caltrans Encroachment Permit. Please see attached marked up site plan for comments and details.

Hydrology and Drainage Studies

1. Provide a detailed Hydrology and Hydraulics (H&H) Study for the modification to the Caltrans drainage facilities using the current Caltrans HDM criteria.

- a. Consult Caltrans HDM chapters 800-890. The H&H Study shall contain existing and proposed watershed basin maps with individual basins for each affected Caltrans pipe system.
 - b. Provide water surface profiles for the Caltrans drainage facilities in both existing and proposed conditions.
 - c. Consult NOAA Atlas 14 for rainfall intensities and precipitation depth values.
 - d. Provide ditch size calculations, if applicable.
 - e. Include copy of drainage related plans and records within the Study (i.e. As-builts, record drawings, etc.).
 - f. Include copy of referenced information from other approved development reports.
 - g. Caltrans offsite drainage facilities are designed using the 100-year storm event.
2. Use the County of San Diego/City of National City's final approved (post project) Federal Emergency Management Agency (FEMA) regulated water surface for tail-water condition.
 3. Consult HEC-22 Tables 7-4 c and d for pipe expansion coefficients.
 4. For channelized runoff using roadway embankment and retaining wall within and adjacent to Caltrans R/W or easement- provide SRH 2D Scour Analysis per Caltrans and Federal Highway Administration (FHWA) Guidance.
 5. Provide City/FEMA approved HEC-RAS model.
 6. Provide concurrence from the Floodplain Manager(s) for final Floodplain/Floodway design with FEMA approved Base Flood Elevations.
 7. Caltrans maintains that a floodway should not be created within State R/W or Easement.
 8. Provide existing and proposed conditions map with the 100-year Water Surface Elevation (WSE).
 9. Will this improvement remap the flood plain boundary to a new location that is outside of State R/W or (Slope) Easement?
 10. If a slope easement is required for the I-805/SR-54 roadway embankment which alters or resides within the existing/proposed floodplain, the developer is obliging Caltrans to alter a floodplain for a third-party benefit. From a Caltrans Hydraulics perspective, this does not constitute a benefit to the State.
 11. The developer cannot submit a CLOMR nor a LOMR on Caltrans' behalf.

Comments for the DEIR

1. S1.1 Paragraph (2) – Revise the statement that says Caltrans would be “temporarily” impacted during construction. Project proposes permanent grading impacts to Caltrans R/W and facilities.
2. S.3 Paragraph (1) – Include Floodplain Encroachment as an Area of Controversy.
3. S.4 Paragraph (1) – The City needs to resolve if the floodplain encroachment is acceptable.
4. Chapter 1 Pg. 1-1 Paragraph (2) – Revise the statement that Caltrans would be “temporarily” impacted during construction. The Project proposes permanent grading impacts to Caltrans R/W and facilities.
5. Developer has not proven that proposed grading in the floodplain will not adversely impact existing Caltrans drainage facilities.
6. 1.2.2 Pg. 1-2 The Project proposes alteration to FEMA mapped floodplain. Should FEMA be included as a responsible agency?
7. 1.3.1 Pg. 1-4 Paragraph (2) – Include Floodplain as a significant impact.
8. 2.3.4 Pg. 2-6 Paragraph (1) – Verify that the Project lies within the Sweetwater River “Floodway.”
9. 3.2.2.2 Pg. 5-6 Paragraph (1) – Address FEMA Floodplain impacts.
10. 3.2.2.3 Pg. 5-6 Paragraph (1) – Impacts to Caltrans R/W include permanent grading and fill and are not temporary.
11. 3.2.6.1 Pg. 5-9 Paragraph (1) – Address FEMA Floodplain impacts.
12. Project proposes to realign and channelize the “Unnamed Channel” with a flowrate of 1389.7 cfs adjacent to Caltrans roadway embankment and proposed site development. Will the City designate the new flood control channel as a Floodway pursuant to FEMA Regulations?
13. Provide a City and FEMA approved Floodplain study.
14. Show FEMA floodplain existing and proposed limits on grading plan with State R/W for SR-54 and I-805.
15. DEIR Figures: Verify/revise R/W callouts. Examples 4.3-6, 4.3-9, 4.3-10, etc.

Comments for the Site Plan C-01 (7/2/2020)/Full Preliminary Grading Plan

1. Site Plan provided with the DEIR is inconsistent with the Site Plan (7/2/2020) submitted to Caltrans.
2. Site grading plan does not account for existing Caltrans 36" and 30" CSP culvert outlets (As-built 11-110184). Fill elevations at slope catch point (27.5' – 30.5') are above culvert outlets 24.7' +/- (NGVD 29- 22.5').
3. Show FEMA floodplain existing and proposed limits on grading plan with State R/W for SR-54 and I-805.
4. Roadway embankment slope adjacent to Caltrans R/W may require a Slope Easement.
5. For Roadway Embankment and Retaining Wall within and adjacent to Caltrans R/W or Easement- Provide SRH 2D Scour Analysis per Caltrans and FHWA Guidance.
6. Wall design at Caltrans 10' x 6' RCB outlet will need Headquarters Structure Design concurrence.
7. Is the RSP at Caltrans 10' x 6' RCB outlet to be reconfigured or remain in place?
8. Caltrans 24" RCP aligned under Sweetwater Road shows no callout for extension or realignment.
9. Show and label (size, type, etc.) all Caltrans drainage facilities within and adjacent to the Project footprint.
10. A junction structure/cleanout at R/W line prior to entering the proposed site for Caltrans 24" RCP aligned under Sweetwater Road is required.
11. Coordinate with Caltrans' Survey Branch to obtain SR-54 and I-805 R/W to be shown and labeled on all plans and maps containing SR-54 and I-805. Clearly label Caltrans R/W vs City/County R/W vs Private R/W.
12. Coordinate with Caltrans' Survey Branch to obtain SR-54 and I-805 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing SR-54 and I-805.

Comments on the Benefit Analysis to the State Technical Write-Up for CarMax of National City (2/18/18)

The Benefit Analysis to the State refers to a previous design. Please provide an updated Benefit Analysis technical write-up that is consistent with current proposed site plan and design.

Complete Streets and Mobility Network

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 system. 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 promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego or other lead agency, 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.

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 system 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, as well as coordinate with Caltrans as development proceeds and funds become

available to ensure that the capacity of on-ramps and off-ramps is adequate, and that queues attributable to the development do not cause safety issues.

Traffic Control Plan/Hauling

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 Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System.

Additional information is provided online at:

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

A Traffic Control Plan may need to be submitted to Caltrans District 11, including the interchanges at SR-54 and I-805, 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-54 and I-805) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Glare

As stated on Section 4.1.6.1 of the DEIR, the project proposes new lighting sources including interior lighting, exterior lighting, and parking lot lighting.

The proximity of the project site to SR-54 and I-805 raises some concerns regarding potential glare that could pose a potential risk to motorists. General information was provided in the DEIR describing the reflective characteristics of these types of facilities, which is described as minimal. The project's potential glare characteristics should be considered as part of the City's/County's Permit approval. Caltrans would want to ensure that all lighting, including reflected sunlight and reflected night lighting, within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on SR-54 and I-805.

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 (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DEIR.

CULTURAL RESOURCES

No historical resources were found within Caltrans' R/W. Based on this review, it is unlikely that the proposed undertaking has potential to affect historical resources, and therefore the proposed undertaking is exempt from further review. No additional studies are required at this time, and the CEQA cultural resource component and Public Resources Code Section 5024 compliance are complete.

HAZARDOUS WASTE/MATERIALS

Phase I ESA

An Aerially Deposited Lead (ADL) study is required for disturbed soil areas both within and outside of Caltrans R/W:

- Within Caltrans R/W: Work within Caltrans R/W (via encroachment permit) will involve soil disturbance. The Permittee is responsible for proper identification (including sampling and analysis) and management of any excess soil that is removed and/or excavated from the work site. It is the Permittee's responsibility to comply with the California Department of Toxic Substances Control (DTSC) ADL requirements for soil management. "Hazardous materials and Hazardous Waste Management Special Provisions" (TR-0408) must be included in the Permit (See Appendix K of Caltrans Encroachment Permit Manual).
- A Lead Compliance plan, prepared by a Certified Industrial Hygienist (CIH), must be prepared and implemented for all workers handling the soil.
- Outside Caltrans R/W: ADL testing of soils to determine appropriate handling, transportation, and disposal requirements per regulations of the California Department of Toxic Substances Control.

STEWARDSHIP/PERMITS

Have the following permits been applied for and received by the project proponent? The following should be included in the Encroachment Permit application:

- Clean Water Act Section 404 Standard Individual Permit
- Clean Water Act Section 401 Water Quality Certification
- Clean Water Act Section 408 Public Works Permit
- Fish and Game Code 1602 Lake and Streambed Alteration Agreement

VISUAL RESOURCES

To avoid and/or minimize potential visual impacts the design permit shall perform the following:

Vegetation Protection

Protect vegetation outside of the work area limits by prohibiting material storage, parking and construction access in vegetated areas and especially under the dripline of tree canopies.

Concrete Features

- Integrally color drainage headwalls, ditches, channels and aprons tan;
- Retaining walls shall be integrally colored tan and be textured;

Weed Control

- Clear the Project work area of weeds before disturbing soil. Kill and remove invasive exotic plants as described below;
- Minimize soil disturbance outside the slope stake limits. Monitor and control any disturbed area from weed invasion, and revegetate the disturbed areas;
- Monitor gravel, rock, borrow, and imported topsoil being used on the Project for weeds and control weed growth with post-emergent herbicides;
- Prior to planting or seeding, germinate, kill and remove weeds;
- After planting, eradicate all weeds by use of selective, and nonselective herbicides. Hand pull weeds in plant basins;
- Kill weeds before the weeds reach the seed stage of growth or exceed 6" in height whichever occurs first;
- If using chemical weed control, it must be applied by a Qualified Applicator licensed by the California Department of Pesticide Regulations. Ensure that the product will not damage or kill the surrounding desirable plant material.

The Permittee shall kill and remove Invasive exotic plants as follows:

- All seed stalks and flower heads shall be bagged for disposal immediately after being removed.
- All above ground plant mass shall be cut and removed prior to removal of stumps, roots or rhizomes.
- Plant stumps, roots or rhizomes may be removed by chemical or manual means.
- Chemical removal shall include cutting plants off 2" above the ground and applying pesticide immediately (within one minute) to the cut.

- Manual removal shall include removing the entire root crown or mass and rhizomes.
- Plant or root pieces shall not be left in or on the soil following removal.
- Stolon type weeds shall be killed with glyphosate.
- Tumbleweeds shall be removed by hand pulling before the tumbleweeds reach a height of six inches.
- Removed material shall be disposed of outside the highway R/W.

Existing Irrigation Facilities

- The permittee shall maintain water supply and automatic irrigation to all existing irrigation systems during the life of the contract. Water supply and control systems cannot be disrupted. Clearing, grubbing, and earthwork operations shall not be performed in areas where existing irrigation facilities (such as mainline, sprinkler control wire and irrigation crossovers) are to remain in place until existing irrigation facilities have been checked for proper operation in conformance with the provisions in "Existing Highway Irrigation Facilities" of the standard specifications.
- Existing irrigation facilities outside of work areas that are affected by the constructing work shall be checked for missing or damaged components and proper operation prior to performing clearing and grubbing or earthwork operations. The permittee shall correct deficiencies found by checking the existing facilities.
- Locate existing irrigation water line crossovers and conduits prior to working on the irrigation system. Either repair irrigation crossovers or install new ones to maintain water supply to existing irrigation systems.

Sequence for Slope Preparation and Landscape Work

1. Kill and remove weeds.
2. Grade slope per plan. Slopes shall be 2:1 or flatter.
3. Apply a 2" layer of compost to the newly graded area.
4. Rip the area to a 12" depth.
5. Grade to the proposed slope gradient and lightly compact.
6. Hydraulically apply straw to the slope and sheep foot punch to a 4" depth and lightly compact.
7. Install a temporary, below-grade automatic irrigation system connected to a private water meter and irrigation controller.

8. Install compost socks or permanent fiber rolls.
9. Germinate and kill weeds prior to planting.
10. Plant native trees and shrubs.
11. Hydraulically-apply Biotic Erosion Control Matrix (BECM) with a native seed mix to all disturbed areas and 1/2" compost to the surface. Avoid directly spraying onto plants.
12. Hose off or irrigate plants within a week after applying BECM.

Erosion Control Materials

All above grade temporary and permanent erosion control measures such as fiber rolls, netting, rope, jute mesh, blankets are to be biodegradable. Photodegradable plastics may not be used. Metal stakes may not be used.

Irrigation

- Permittee shall provide a water source and an automatic, below-grade irrigation spray system for new slope plantings and hydroseeded areas within Caltrans R/W. These areas would be temporarily irrigated with the goal of turning water off after a **three-year** plant establishment period. Locate remote control valves within Private R/W. Install a gate valve for each remote-control valve inside Caltrans R/W with a paddle marker labeled "Caltrans Water Shut-Off" for use by Caltrans maintenance. Permanently irrigate trees beyond the plant establishment period via a separate bubbler system connected to a separate shut off gate valve.
- Spray systems shall utilize rotor type heads. Use largest radius head for the space. Spray heads on the same lateral circuit shall be balanced for matched precipitation rates. Use pop-up sprinklers on the edge in flat areas (not on a slope). Do not use pop-ups when behind guardrail or barriers. Eliminate or minimize the use of shrub sprays – only use when necessary. Drip systems are not recommended.
- Sprinklers shall incorporate flow shutoff device on risers to automatically and instantly stop the flow of water from a riser when the riser is broken on the downstream side of the device.
- Layout sprinkler systems along contours (a system on bottom of slope, a system mid slope and a system on the top). Separate half heads and full heads on their own valves. Center feed each sprinkler system. Go around

walls wherever possible. Avoid going through walls. Install isolation gate valves when there is a long run of mainline.

- Use bubbler systems with underground bubblers for all trees. Use District 11 C-2 modified sprinklers (underground) detail for all bubblers.
- Provide irrigation crossovers where irrigation lines cross under paved surfaces such as slope paving, bike paths and maintenance access roads. Install a gate valve before (upstream) of each crossover.

Planting

Permittee shall provide the following planting to all disturbed areas:

- Planting – Coastal Sage Scrub (1 gallon): Plant entire disturbed area with the following shrubs at 8 feet on center triangular spacing: 20% California Sagebrush (*Artemisia californica*), 20% Bush Sunflower *Encelia californica*, 20% California Buckwheat *Eriogonum fasciculatum*, 20% Iva hayesiana (Poverty Weed) and 20% Black Sage (*Salvia mellifera*).
- Planting – Large Shrubs (5 gallon): Plant Lemonade berry (*Rhus integrifolia*) and Toyon (*Heteromeles arbutifolia*) near top of slope in random clusters of 3 and 5 plants. Total quantity is one shrub per 400 square feet of entire disturbed area.
- Planting – Trees (15-gallon minimum size): Plant one tree per 400 square feet of entire disturbed area. Plant upland trees such as Coastal Live Oak (*Quercus agrifolia*) at mid-slope. Plant riparian Trees such as Western Sycamore (*Platanus racemosa*) and Western Elderberry (*Sambucus Mexicana*) near toe of slope.
- Hydroseed Mix: Apply hydroseed to entire disturbed area. Seed mix shall contain a minimum of 8 southern California native plant species. Seed shall be from 25-35 lbs. Pure Live Seed/acre. Suggested seed species include: *Acmispon glaber* (Deerweed); *Deinandra fasciculata* (Fascicled Tarweed); *Encelia californica* (Bush Sunflower); *Eriogonum fasciculatum* var, *fasciculatum* (Flat-topped Buckwheat); *Eschscholzia californica* (California Poppy); *Lasthenia californica* (Dwarf Goldfields), *Lupinus bicolor* (Pygmy-Leaf Lupine); *Lupinus succulentus* (Arroyo Lupine); *Nasella pulchra* (Purple Needlegrass), and *Bahiopsis (Viguiera) laciniata* (San Diego Sunflower). Mixes are subject to the approval of the Department.

Plant Establishment

- Plant Establishment shall be Type 2 for a period of **three years**.
- Weeds within plant basins, native sod and groundcover areas shall be controlled by pulling. Weeds in mulch areas and outside of basins, sod and groundcover areas shall be controlled by killing.
- Weeds within pavement, curbs, sidewalks, textured paving, guardrail and other surfaced areas shall be controlled by killing.

PLAN REVIEW COMMENTS

- Please include information on the proposed retaining wall type including easement for footings and other below grade features. Please include information on proposed architectural texture treatment, cable barrier protection and replacement of impacted chain link fencing.
- Please provide Landscape Design Plans by a qualified landscape architect; and coordinated with Caltrans for full planting, hydroseeding and irrigation of impacted areas within State R/W.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the CEQA and NEPA standards.

Caltrans recommends consideration of “fair share” funds towards future improvements associated with the SR-54 corridor. Since the CarMax in National City Project’s cumulative impact is considered significant, feasible mitigation measures to State facilities should be identified in the TIS and DEIR. Impacts that are significant and unmitigated/unavoidable need to have an alternative mitigation identified in the DEIR and TIS.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any “fair share” monies, as well as the

appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans may negotiate and execute a Traffic Mitigation Agreement.

Design

1. The following policy points from the Project Development Procedures Manual (PDPM), Chapter 17, Article 2, "Encroachments Policies" may apply to the proposed grading within Caltrans R/W.
 - a. Encroachments Prohibited by State Constitution – Caltrans has no authority to allow use of highway R/W that would be a betterment to adjacent parcels or entity or for a proposed development to be viable without equal or comparable benefit or compensation.
 - b. Encroachments Prohibited Under any Circumstance – Removal of material solely to benefit a developer or individual, such as to eliminate the need by the developer or individual to import material to their private property or to improve visibility to a development, as this is considered a gift of public funds (see the heading "Earthwork" under "Non-Utility Encroachments" in this article for more information).
 - a. Non-Utility Encroachments, Earthwork – Grading, placement, or removal of material by others in the State R/W is prohibited.
 - b. Preliminary investigation of the R/W along the northern boundary of the project site has shown that I-805 R/W, as well as SR-54 R/W, may be involved, and, therefore, any evaluation and/or required documentation regarding non-compliance with PDPM encroachment policies would involve District 11, Caltrans Headquarters, and FHWA.
 - c. A NEPA environmental determination/documentation for those areas within interstate R/W would be required.
2. Based on the information provided in the previous comment, the following policy point from PDPM, Chapter 17, Article 4, "Federal Highway Administration (FHWA) approvals may also apply to the proposed grading within the R/W."

- a. Non-Utility Encroachments – FHWA approval is required for all non-utility encroachments on an Interstate highway facility, including: Use of highway R/W for grading or removal of materials by other public agencies, developers, or private individuals (see bullet point 3).
- b. Per PDPM Chapter 17, Article 2, “Encroachments Policies,” Encroachments Prohibited without an Approved Policy Exception – Potential drainage diversions within Caltrans R/W would require submittal of an encroachment policy exception.
- c. Proposed structures and their associated foundations, such as retaining walls, headwalls and other such features, should be located outside of Caltrans R/W.
- d. Based on the complexity and/or project cost within the Caltrans R/W, the project may be designated as an Oversight Project, which would require a highway improvement agreement (HIA). Please refer to the Encroachment Permit Manual, Section 108.1 “Oversight Projects vs Encroachment Permit Projects” for additional information.

Geotechnical Design

- There is a proposed retaining wall at the northeast side of the project area, along the Caltrans R/W. Per the Geotechnical Report, the underlying ground has high groundwater and very loose liquefiable sand. The wall will be likely founded on piles. The applicant doesn't have a Foundation time. Piling may have associated environmental impact.

Right-of-Way

- Where is the footing for the wall that is showing on the plans? Is the plan to place the footing along Caltrans R/W, and what type of wall is being proposed? The DEIR is showing a retaining wall and wing wall to be placed within Caltrans R/W as part of this project. The plans appear to propose not just grading, but a permanent structure within Caltrans R/W. Generally, Caltrans does not permit permanent structures for private land uses to be placed within Caltrans R/W.
- The outlet being modified is part of a huge drainage system. With the proposed modifications, there may be a need for an easement outside of Caltrans R/W, as the proposed improvement and modification to the outlet extends outside of Caltrans R/W.

Mr. Martin Reeder
December 22, 2020
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- 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 contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Charlie Lecourtois, of the Caltrans Development Review Branch, at (619) 985-4766 or by e-mail sent to Charlie.Lecourtois@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review



LOS Engineering, Inc.
Traffic and Transportation

11622 El Camino Real, Suite 100, San Diego, CA 92130
 Phone 619-890-1253, Email: justin@losengineering.com

September 30, 2020

Mr. Roberto Yano, P.E.
 City of National City
 Engineering & Public Works Department
 1243 National City Blvd
 National City, CA 91950

Subject: Vehicle Miles Traveled Screen-line Analysis for the proposed CarMax Auto Sales Dealership on Plaza Bonita Road in National City, California.

Dear Mr. Yano:

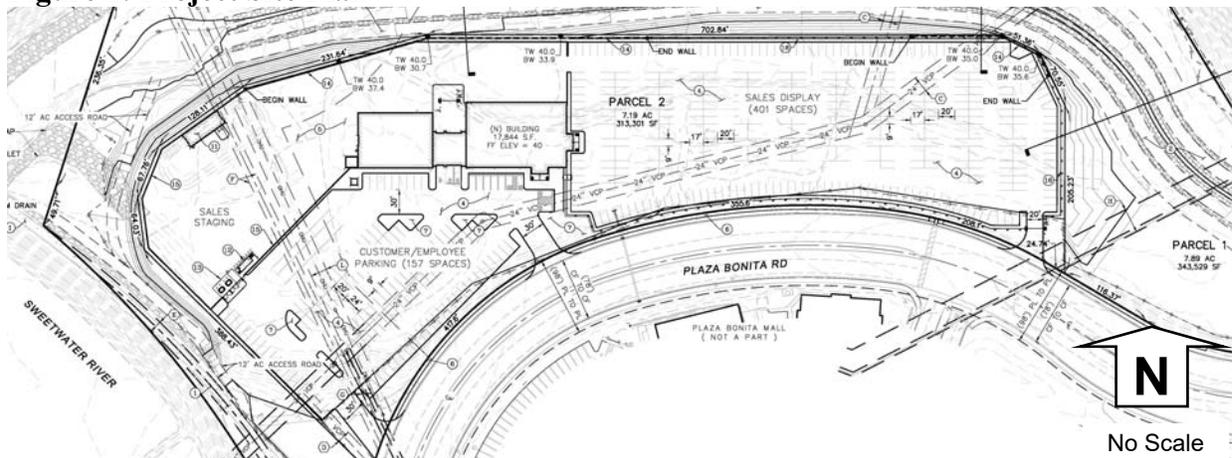
LOS Engineering, Inc. is pleased to present this Vehicle Miles Traveled (VMT) screen-line analysis for the CarMax auto sales dealership proposed on the north side of Plaza Bonita Road (northwest area of Plaza Bonita) in National City, California.

The State of California Governor’s Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 was used to determine if a detailed VMT analysis would be required for this project. Excerpts from the OPR Technical Advisory are included in **Attachment A**.

PROJECT DESCRIPTION

The proposed project consists of a combined 18,774 sf of building area that includes sales, service, car wash, and presentation area. A site plan is included in **Attachment B** with an excerpt shown in **Figure 1**.

Figure 1: Project Site Plan



The CarMax project is adding a new retail establishment of 18,774 sf that will provide an additional opportunity for buying vehicles. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* states on page 16 and 17:

“By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact.”

“Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers’ travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.”

Based on the OPR guidance, the proposed CarMax with less than 50,000 sf could be considered local-serving, thus the lead agency may presume such development creates a less-than-significant transportation impact.

PROJECT ACCESS

Project access is proposed from three driveways on Plaza Bonita Road. The easterly driveway is located immediately northeast of the Westfield parking access roadway connection at Plaza Bonita Road; therefore, this easterly project driveway should be signed and restricted to right-in/right-out movements. The project has a center driveway and westerly driveway on Plaza Bonita Road that are recommended to be full movement driveways. Left turns into the westerly and center project driveway would use the existing center two-way left turn lane along Plaza Bonita Drive. The project applicant should coordinate with the City on the planned striping for angled parking along the northern side of Plaza Bonita Drive. A graphic of the planned parking is included in **Attachment C**.

CONCLUSION

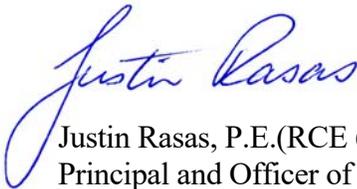
The purpose of this analysis was to determine if the proposed the CarMax auto sales dealership project would require a detailed VMT analysis. The proposed project consists of a combined 18,774 sf of building area that includes sales, service, car wash, and presentation area.

Based on the OPR guidance, the proposed CarMax with less than 50,000 sf could be considered local-serving, thus the lead agency may presume such development creates a less-than-significant transportation impact.

Project access is proposed from three driveways on Plaza Bonita Road. The easterly driveway is located immediately northeast of the Westfield parking access roadway connection at Plaza Bonita Road; therefore, this easterly project driveway should be signed and restricted to right-in/right-out movements. The project has a center driveway and westerly driveway on Plaza Bonita Road that are recommended to be full movement driveways. Left turns into the westerly and center project driveway would use the existing center two-way left turn lane along Plaza Bonita Drive.

Should there be any questions, please feel free to contact me.

Sincerely,
LOS Engineering, Inc.



Justin Rasas, P.E.(RCE 60690), PTOE
Principal and Officer of LOS Engineering, Inc.

Attachments

ATTACHMENT A

Excerpts from OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA



December 2018

These thresholds can be applied to either household (i.e., tour-based) VMT or home-based (i.e., trip-based) VMT assessments.²⁹ It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an “apples-to-apples” comparison. For example, if the agency uses a home-based VMT for the threshold, it should also be use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures.

Recommended threshold for office projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live.

Office VMT screening maps can be developed using tour-based data, considering either total employee VMT or employee work tour VMT. Similarly, tour-based analysis of office project VMT could consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT should be used throughout all steps of the analysis to maintain an “apples-to-apples” comparison.

Recommended threshold for retail projects: A net increase in total VMT may indicate a significant transportation impact.

Because new retail development typically redistributes shopping trips rather than creating new trips,³⁰ estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project’s transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.

Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-

²⁹ See Appendix 1 for a description of these approaches.

³⁰ Lovejoy, et al. (2013) *Measuring the impacts of local land-use policies on vehicle miles of travel: The case of the first big-box store in Davis, California*, *The Journal of Transport and Land Use*.

specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.

Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment.

Other Project Types

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends the quantified thresholds described above for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, § 15064.7).

Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

Redevelopment Projects

Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

As described above, a project or plan near transit which replaces affordable³¹ residential units with a smaller number of moderate- or high-income residential units may increase overall VMT, because

³¹ Including naturally-occurring affordable residential units.

ATTACHMENT B

Site Plan

ATTACHMENT C

Plaza Bonita Drive Planned Angled Parking

