

DEPARTMENT OF TRANSPORTATION

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APR 06 2020

STATE CLEARINGHOUSE

April 6, 2020

11-SD-78

PM 18.07

Membrane Filtration Reverse Osmosis Facility
IS/MND/SCH # 2020039020

Mr. Adam Finestone
Project Manager
City of Escondido Community Development Department
201 North Broadway
Escondido, CA 92025

Dear Mr. Finestone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Initial Study (IS) /Mitigated Negative Declaration (MND) (SCH# 2020039020) on the Membrane Filtration Reverse Osmosis (MFRO) Facility on East Washington Avenue also known as State Route 78 (SR-78) at North Broadway in the city of Escondido. 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:

Caltrans is working on a project that overlaps the MFRO project. The project information is as follows:

"This is a capital preventative maintenance project for pavement rehabilitation on SR-78 in Escondido from Post Mile (PM) N17.60 (freeway termini of SR-78 at Lincoln Parkway and Broadway/ SR-78) to PM R21.30 (intersection of Flora Vista Street and San Pasqual Valley Road/ SR-78). The purpose of this project is to improve the ride quality and extend the service life of this section of existing pavement. The anticipated construction start date is December 2020 with a 200 working day schedule".

The overlap happens on East Washington Avenue between North Broadway and Waverly Place. The project activities in the affected area include the following:

- 0.6' Pavement Rehabilitation [0.45' HOT MIX ASPHALT (TYPE A) (LARGE STONE MATRIX), 0.15' RUBBERIZED HOT MIX ASPHALT (GAP GRADED)]
- ADA curb ramp improvements
- 2" Fiber Optic Cable System (18" deep, including vaults and cabinets)
- Modifying Signal and Lighting Systems (including loop detectors)
- Upgrades to Signing and Striping facilities

Please see the proposed MFRO schedule below, which shows that pipeline construction will start in September 2020 and finish in February 2021. Therefore, this MFRO pipeline portion of the project needs to coordinate with this project so that brand new pavement is not ripped out shortly after it is placed.

Caltrans recommends that the MFRO project prioritize work within the overlap portion due to the two project concurrent schedules.

**Table 9
 ANTICIPATED CONSTRUCTION SCHEDULE**

Construction Activity	Construction Period		
	Start	End	Number of Working Days
Demolition	7/1/2020	7/28/2020	20
Site Preparation/Grading	7/29/2020	9/8/2020	30
Pipeline Excavation and Construction	9/9/2020	2/9/2021	110
Architectural Coating	2/10/2021	3/5/2021	18
Building Construction	3/6/2021	4/29/2022	300
Paving	4/30/2022	5/25/2022	18
Architectural Coating	5/26/2022	6/28/2022	24

Source: CalEEMod

Note: Output data is provided in Appendix A.

The project will need an Encroachment Policy Exception (EPE) since the line is a pressurized underground facility that is not proposing to encase the pipeline

within State R/W. Please provide the information needed (see attached) on the EPE to Caltrans.

Hydrology

1. Provide a set of plans for work proposed within Caltrans R/W.
2. Since no plan set was submitted the following previous comments still apply:
 - a. Pipeline will be placed under a stress reducing slab for sections of pipeline with less than 42" of cover.
 - b. The trench back-fill zone should be as far away as physically possible from any Caltrans drainage facility backfill zones.
 - c. Provide copy of As-Builts for all existing Caltrans drainage facilities within the project limits.
 - d. Coordination with various Caltrans Branches is needed to determine acceptable locations for cathodic protection stations, air-valves, and blow-offs.
 - e. Caltrans R/W, centerline and stationing should be shown on all applicable plans that will show SR-78.
 - f. Offsets to drainage, curb, R/W, centerline, etc. should be shown on plans.
 - g. All existing drainage facilities should be shown on plans.
 - h. Include a typical section showing drainage, proposed pipeline, roadway structure thickness, etc.
 - i. Include a detail showing the minimum horizontal and vertical distance required from existing drainage back-fill zones.
 - j. Include a Load Resistance Factor Design (LRFD) concrete encasement detail. This detail requires Headquarters Underground Structures review and approval.

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 Impact Report (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, the final environmental documents need to include any CEQA determinations or exemptions. 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 IS/MND.

The pipeline alignment may impact a portion of SR-78 near Washington Avenue and the soil may contain Aerially Deposited Lead (ADL). A Lead Compliance Plan may be required. There was no discussion of ADL in the Hazard Waste Report or the IS/MND.

Soil and groundwater at the site appear to have previous impacts of various chemicals of concern, including: petroleum hydrocarbons, fuel oxygenates, Perchloroethylene (PCE), and metals. These contaminants of concerns (COCs) were identified in the provided Environmental Site Assessment (ESA) performed by Ninyo and Moore, dated May 23, 2019. Ninyo and Moore recommended a soil and groundwater management plan be prepared to facilitate the handling and mitigate exposure of adverse environmental conditions during the project activities.

As such, groundwater generated from the project site may not be suitable for reuse for agricultural purposes. Additionally, any soil generated from the site will need to be tested and characterized for potential onsite reuse or offsite disposal.

Right of Way

Plans need to show the R/W and centerlines of SR-78 and intersecting streets. Also please show dimensions from the water line to the centerline

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and R/W.

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 Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch