

California Department of Transportation

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PM 2.989

Scripps Mercy Hospital Campus
Draft Environmental Impact Report (DEIR)/SCH# 2021040374

Mr. Jeffrey Szymanski
Senior Planner
City of San Diego, Development Services Department
1222 1st Avenue
San Diego, CA 92101

Dear Mr. Szymanski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Scripps Mercy Hospital Campus Project located near State Route 163 (SR-163). 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.

We look forward to working with the City of San Diego (City) 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:

Hydrology and Drainage Studies

Appendix K - Drainage Study:

- Show Caltrans Right-of-Way (R/W) on all drainage maps.
- Post Development Calculations (100-Year):
 - a. Verify V100 for Basins 1 & 2 are calculated correctly. Please show steps of calculation.
- Delineate flow paths for each basin for both pre- and post-developed conditions with both elevations and lengths labeled.

- Why was a portion of Basin 1 excluded from the hydraulic calculations?
- Why is a portion of the canyon included in the watershed delineation for both the pre- and post-developed conditions? This area depicts no project improvements, and therefore should not be included in the total watershed area for Basin 1.
- Exhibit B shows a discharge point to an 18" private storm main (per pts #666510) located west of 6th Avenue, Exhibit C does not show the same point of connection. Point of connection in Exhibit C is shown to be approximately 75' south of the point of connection shown in Exhibit B. Will there be two different points of connection to existing city storm drains?
- Proposed storm drains should be designed to convey the peak discharge from a 100-year storm event, not a 50-year event. Please revise hydraulic calculations.
- Due to the inconsistencies found within the drainage study, Caltrans cannot ascertain that the proposed project development does not have an adverse impact on Caltrans' facilities.
- On all plans, show Caltrans' R/W and SR-163 centerline and stationing.
- Early coordination with Caltrans is recommended.
- 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 (i.e., hydrological and water quality impacts to the highways, bridges, culverts, and drains) 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 Final 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 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 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 final environmental document.

Hazardous Waste

The DEIR provided for review did not contain a Hazards and Hazardous Material section for the proposed project. Hazardous waste concerns for this project include asbestos and lead paint in the structures identified for demolition. Asbestos and lead paint are common in structures built and/or remodeled prior to 1980 and after 1994. Public structures including Hospitals are of particular interest under National Emission Standards for Hazardous Air Pollutants (NESHAP). San Diego County Air Pollution Control District (SDAPCD) requires, "Prior to commencement of renovation or demolition operations and prior to submitting the notifications required by Section (e) of Rule 1206, a facility survey shall be performed to determine the presence or absence of ACM, regardless of the age of the facility."

Unknown underground storage tanks or other wastes may be present in the subsurface. Excavation and grading activities may unearth unknown wastes. As such, local oversight agencies such as San Diego County Department of Public Health or the City, San Diego Fire Authority, etc. should be alerted if hazardous materials/hazardous wastes are discovered during demolition and/or excavation/grading activities.

If a Caltrans encroachment Permit is required for this project, Caltrans District 11 will require all hazardous materials/hazardous waste documents to be provided to the Environmental Engineering Unit for review and concurrence.

Broadband

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of Vehicles Miles Traveled and decreases the amount of greenhouse gas emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

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 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 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, LDR Coordinator, at (619) 985-4766 or by e-mail sent to Charlie.Lecourtois@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

c: California Governor's OPR State Clearinghouse