

California Department of Transportation

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Governor's Office of Planning & Research

June 28 2021

STATE CLEARINGHOUSE

June 25, 2021

11-SD-15, 94, 805
PM VAR

Federal Boulevard De-Channelization and Trail Project
MND/SCH# 2021050537

Ms. Jamie Kennedy
City of San Diego
1222 1st Avenue
San Diego, CA 92101

Dear Ms. Kennedy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Federal Boulevard De-Channelization and Trail Project located near Interstate 15 (I-15), Interstate 805 (I-805) and State Route 94 (SR-94). 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.

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 continued collaboration to bring this project to completion. After reviewing provided information, Caltrans has the following comments to work through prior to design completion and issuing an encroachment permit:

Traffic Impact Study

- All construction access, materials, and construction activity should be done within the project site and Federal Boulevard. No construction access should be allowed through Caltrans SR-94 connector lanes or freeway mainlanes for the safety of the public and workers.
- The proposed limits of temporary grading extend into Caltrans Right-of-Way(R/W), therefore encroachment permits will be required.
- The Caltrans R/W is shown incorrectly on the Figure 4 plan sheets. Please confirm latest R/W line and update plan sheet and any impacts within Caltrans R/W.
- Any traffic control required during construction on Caltrans R/W, that includes the portion of Federal Boulevard that is within Caltrans jurisdiction, will require an approved traffic control plan and encroachment permit approval.
- Proposed Trail or sidewalk will need to follow Caltrans DIB 82-06 Pedestrian Accessibility guidelines and Caltrans HDM requirements.
- ADA components of the proposed project will need to be reviewed by Caltrans staff.
- Any modifications to the access control will need both Caltrans and FHWA approval. This is an important standard to maintain on the Interstate System and it would need very strong justification if it were to be granted. This requires an Encroachment Policy Exception (EPE) to document the proposed crossing of the access control lines at the two ends (PDPM Chapter 17, Article 2, Section 3, Non-Motorized Paths).

Design

- Reinforcing the existing slopes and additional retaining walls will need to be studied so that it does not affect existing and proposed infrastructure.
- The project will also need to document the proposed grading and/or any significant changes in drainage for the channel.
- The I-805/SR-94 overcrossing bridges span over the proposed trail and trail enhancement/landscaping (as shown on the map on page 47 of the main MND document) within Caltrans' R/W, however, Caltrans' Structures Maintenance and Investigation will need to review if any structure on, around or under the bridge that may be impacted. Early coordination with the structures design/review is encouraged as this need a lead time.
- Page 8 of main MND document: "After project completion, the City's Transportation and Stormwater Department (TSW) and Caltrans will be responsible for long-term maintenance of the widened Chollas Creek pending City and Caltrans approval." There is a current maintenance agreement for this area between the City and Caltrans. It potentially will need to be updated for the elements of this project.

Hydrology and Drainage Studies

Drainage Design Report Volume 1 & 2:

1. Due to the scope and nature of the proposed improvements and submitted documents, 14 days was an insufficient time period to perform an adequate review. Comments herein are not all inclusive. We will continue coordinating with the applicant.
2. Caltrans' Hydraulics Branch (Branch) submitted comments regarding this project on September 10, 2019. Many of these comments remain unaddressed and requested approvals of methodologies by Caltrans were never obtained by the Project Applicant. Please contact us for the appropriate references to determine these methodologies.
3. The Branch does not approve the submitted Drainage Design Reports and proposed channel design.
4. §3.1.1 -The datum used for analysis should be NAVD 88. Please revise.
5. §3.1.6 - The Hydraulics Branch does not approve of the 3:1 (H:V) concrete drop spillway within Caltrans' Right of Way (R/W).
6. §3.4 - This paragraph states that the Floodway "*should not increase the regulatory floodway water surface elevations.*" It is not stated that it will not increase water surface elevations nor is there any empirical evidence submitted to prove that the proposed improvements do not. This information is necessary to determine impacts of the proposed improvements.
7. §4.1 - Provide the justification of the calculations that derived the 2, 5 and 10-year storms flowrates.
8. §4.2, 2nd paragraph, last sentence - The Branch does not agree with this sentence.
9. §4.2.1 - The Drainage Report should include all applicable FEMA models, including the effective model and the duplicate effective model. A through written explanation should be provided as to the changes between each of the models from effective model through proposed model. As all the required models were not included as part of this study, the proposed design cannot be properly nor fully vetted.
10. §4.2.3 Methodology and Calculations- Using City of San Diego methodology within the Caltrans' R/W is not appropriate. All designs and values used with the Caltrans' R/W must conform with Caltrans' Highway Design Manual and supporting documents and Caltrans' approved methodologies.
11. §4.3 Stone Sizing - Using City of San Diego and the Army Corps methodology within the Caltrans' R/W is not appropriate. All designs and values used with Caltrans' R/W must conform with the Caltrans' Highway Design Manual and supporting documents and Caltrans' approved methodologies.
12. §4.3.1 - Proposed rock size classifications with the Caltrans' R/W are consistent with the Caltrans' classification standards. Please update to current classifications.

13. §4.3.2 - Stone Filter Bedding - Using the HEC-11 methodology within the Caltrans' R/W is not appropriate. All designs and values used with Caltrans' R/W must conform with the Caltrans' Highway Design Manual and supporting documents and Caltrans' approved methodologies.
14. §4.3.4 - Energy Dissipator - Using the USBR Hydraulic Design and Stilling Basin and Energy Dissipators, Engineering Monograph 25, 1984 within the Caltrans' R/W is not appropriate. All designs and values used with Caltrans' R/W must conform with the Caltrans' Highway Design Manual and supporting documents and Caltrans' approved methodologies.
15. §4.4 - Sediment Transport - Sediment transport calculations with the Caltrans' R/W are to be compliant with the Caltrans' "Sediment Transport and Fluvial Geomorphology at Crossing Structures Design Guidance (Sept 2019)".
16. Place a junction structure per the Caltrans' standards on all Caltrans' on-site drainage systems at the Caltrans' R/W upstream of the proposed retaining wall.
17. Appendix A - identify all FEMA FIS cross sections on all FEMA Work Maps.
18. Appendix B - Caltrans does not agree with the proposed Manning's 'n' values within Caltrans' R/W. Provide Manning's 'n' calculations based on approved Caltrans' Methodologies.
19. Provide all survey information.
20. Sufficient calculations providing the validity of the proposed channel design and features were not provided. Therefore, it is undetermined if the channel design and features are appropriate.
21. The methodologies used to derive the channel designs are not valid within the Caltrans' R/W. Therefore, these features require a re-evaluation and re-design to comply with the Caltrans' standards.
22. Where is the discussion regarding feasible alternatives to the rock channel design?
 - a. Was an enclosed box with a trail over the enclosed box design considered?
 - b. What other alternatives were considered? Why were they rejected?
 - c. Why is the open channel rock design the preferred alternative?
23. Where is the discussion regarding how the safety of the trail users will be addressed?
24. What are the proposed safety measures to ensure the safety of the trail users?
25. Where is the discussion regarding the maintenance of the proposed channel?

Federal Blvd Chollas Creek Restoration and Trail Project Plans

26. The Branch does not approve of the plans as provided.
27. The provided plans do not include sufficient details to determine the validity of the design.

28. The design of the channel features within the Caltrans' R/W are not compliant with the Caltrans' standards nor compliant with the Caltrans' methodologies. Please revise.
29. The broken concrete is not an appropriate bedding for the gravel filter nor the rock channel lining. The gravel filter is meant to sit on original ground and that is how the calculation provided are based on.
30. Thank you for incorporating the gravel filter. The Filter bedding is required to be placed under the RSP channel and the RSP dissipators throughout the Caltrans' R/W.

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 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 promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego 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 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.

Traffic Control Plan/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>

A Traffic Control Plan is to be submitted to Caltrans District 11 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-94, I-15 and/or I-805) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the California Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-94, I-15 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 MND 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.

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.
- There is an existing access control fence that runs along Federal Boulevard.
- Attached are R/W maps for reference.

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 and often coordination with Caltrans is strongly advised for this project.

If you have any questions or concerns, please feel free to contact Karen Jewel, at (619) 405-2535 or by e-mail sent to karen.jewel@dot.ca.gov.

Sincerely,



ANN M. FOX
Deputy District Director
Planning and Local Assistance

Attachments:

1. Right-of-Way Maps