

California Department of Transportation

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December 28, 2023

11-SD-5, 76
PM VAR

Eddie Jones Warehouse, Manufacturing & Distribution Facility
DEIR/SCH#2022070365

Mr. Rob Dmohowski
Principal Planner
City of Oceanside
300 N. Coast Highway
Oceanside, CA 92057

Governor's Office of Planning & Research

Dec 28 2023

STATE CLEARINGHOUSE

Dear Mr. Dmohowski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Eddie (Eddy) Jones Warehouse, Manufacturing & Distribution Facility project located near Interstate 5 (I-5) and State Route 76 (SR-76). 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.

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 is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of Oceanside 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:

Traffic Engineering and Analysis

Please revise the following:

- The project distributions in figure 8 of the Local Transportation Study do not add up. There are 60% project trips going out at the SR-76 and I-5 interchange, but only 30% project trips going in.
- The AM existing plus project Synchro file does not match figure 10 of the Local Transportation Study for the SR-76 and Foussat Road intersection, the SR-76 and I-5 southbound ramps intersection and the SR-76 and I-5 northbound ramps intersection.
- The AM existing Synchro file shows a volume of 0 for the I-5 southbound to SR-76 eastbound movement.
- The AM existing and existing plus project Sim Traffic does not run due to a fatal error.
- The Synchro files need to be revised to include the I-5 and SR-76 interchange connected to the SR-76 segment to show the entire network and how it interacts.
- The Synchro files incorrectly model the I-5 and SR-76 interchange including not showing the correct lane configurations and having volumes of zero.

Please see the following comments:

- Per section 4.14.4 Traffic and Circulation Impacts Analysis of the Draft Environmental Impact Report, the project proposes a fair share payment of 8.5% towards the provisions of converting the existing eastbound and westbound right turn lanes to a combination through-right lane in the eastbound and westbound direction resulting in three through lanes in each direction. However, the three through lanes are only temporary, then followed by merge tapers. Additionally, the provided Synchro models with this mitigation do not accurately depict what is proposed in Appendix P of the Local Transportation Study. Please revise the Synchro files accordingly. Further analysis and discussions with Caltrans functional units is needed to determine if this proposed mitigation will be beneficial.
- The signal timing at SR-76 and Benet Road does not match the Caltrans Signal Timing sheets. Please revise accordingly.

- Please provide a Synchro and Sim Traffic queuing analysis after the comments are addressed above regarding Synchro and Sim Traffic.

Electric Vehicle

- It is recommended that Electric Freight/Fleet Vehicles be utilized as much as possible for the proposed fleet/freight trips.
- Please clarify if the proposed 89 Elective Vehicle parking spaces includes freight vehicles.
- Please clarify if the proposed 45 electric vehicle chargers include access for freight vehicles.
- If electric vehicle fleets are not currently proposed for this site, please identify approximately a time frame when electric freight/fleet vehicles would be incorporated into the fleets at this location.

Hydrology and Drainage Studies

- Please clarify what is the impact due to the proposed project to the Federal Emergency Management Agency (FEMA) defined Floodplain and associated water surface elevations at the Caltrans' Right-of-Way (R/W) along SR-76.
- The Hydrology and Hydraulics Report states that levees exist on both sides of the San Luis Rey River, but the Federal levee project has not yet been certified by FEMA. Please provide more information on why the levees have not yet been certified by FEMA. Please provide a date as to when will the levees be certified.
- The National Levee Database describes the levees next to the project as the San Luis Rey River 3 (SLR3) Levee System. It states that in future the responsibility will be turned over to the City of Oceanside for post-construction operation and maintenance. Please confirm if the City is currently maintaining the levees.
- The Hydrology and Hydraulics Report shows an exhibit with a proposed floodwall around the project. Provide more details on this floodwall and how it will impact the floodplain.
- The Hydrology and Hydraulics Report states that the Manning's roughness coefficient used for the 2D model was 0.06. Please verify if this coefficient used in all models - effective, existing, proposed. Please provide copies of models/backup to verify.
- The proposed project features may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area. Please confirm if the FEMA Flood Insurance Rate Map (FIRM) be remapped. Caltrans requests proof of coordination with the

City of Oceanside acting as the Local FEMA Administrator.

- Caltrans requests that formal notification be sent for review when the City approves the permit to alter the floodplain and/or when the Developer applies for the Conditional Letter of Map Revision (CLOMR) and a Letter of Map Revision (LOMR). Please provide this information to Caltrans when it is available.

Design

Vehicle Miles Travelled Analysis (Appendix J) for this project calculated trip generation using the Institute of Transportation Engineers *11th Edition Trip Generation*, September 2021. However, the City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020, requires that the consultant for the project shall identify the number of trips generated by the project using SANDAG's "*Not so Brief Guide of Vehicular Traffic Generation Rates for San Diego Region*" (2002) trip generation rates. Using SANDAG's guide results in 2,670 Average Daily Trips (ADT). According to the Cities' guidelines, the SANDAG Regional Travel Demand Model will be used for any project that generates over 2,400 ADT (Appendix J, pg. 7). Therefore, the regional model should be used for determining VMT impacts. This may not substantially alter the results of the analysis, but perhaps the City can authorize the use of the 2021 Institute of Transport Engineers (ITE) trip rates if other goals and policies from the Cities' stated guidelines are not implemented.

One of the City of Oceanside's goals is to require new developments to provide connections and/or extensions of the bicycle and pedestrian networks where applicable. The proposed manufacturing/distribution facility will increase large truck traffic at the intersection at Benet Road and SR-76. Pedestrians and bicyclists are permitted along the shoulders of SR-76, and this intersection does not currently have a crosswalk to cross Benet Road on the northern side of the state route. Caltrans prioritizes the safety of vulnerable users of the transportation system; therefore, it is recommended that a crosswalk be added as part of the project at this location.

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

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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 Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to shannon_aston@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, G.I.S.P.
Acting Branch Chief
Local Development Review