

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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GTS #: 35316
GTS ID: 04-SM-2025-00655
Co/Rt/Pm: SM/280/R20.113

Sandrine Ganry, Senior Engineer
City of San Bruno, Public Works Department
567 El Camino Real
San Bruno, CA 94066

Re: (Cunningham Tank) Replacement Project – Draft Mitigated Negative Declaration (MND)

Dear Sandrine Ganry:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Water Tank 1 (Cunningham Tank) Replacement Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the February 2025 draft MND.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The purpose of the proposed project is to replace an outdated and seismically deficient water tank in the City of San Bruno. The project would also include widening of the access road, construction of a retaining wall along the access road, construction of a new chemical building with a retaining wall, replacement of an existing drainage pipe, and revising arrangement and depth of waterlines and site drainage among other components to accommodate the larger capacity of the new tank. The project site is directly adjacent Caltrans right-of-way at the northbound Interstate 280 (I-280) on-ramp from Cunningham Way.

Geotechnical

The Caltrans Office of Geotechnical Design reviewed the February 2024 Geotechnical Report for the proposed project and would like to note or clarify the following:

Section 3.1, Surface Conditions (page 4): Please clarify the slope ratio of 0.5H:1V, which is different than the ratio of 1.75H:1V that was provided in Section 1.1 (page 1) of this report.

Section 3.6, Seismic Design Parameters (page 5): This section states that the project is classified as Site Class C per Chapter 20 of American Society of Civil Engineers (ASCE) 7-16 standard. The classification of Site Class C is inconsistent with the referenced ENGEO Geotechnical Data Report, dated July 13, 2023. Please confirm the correct classification. Additionally, please verify whether ASCE 7-22 should be used for this project design rather than ASCE 7-16.

Section 4.1, Geotechnical Units and Properties (page 7): This section states that the onsite undisturbed soils are anticipated to be mostly composed of lightly cemented, dense to very dense, coarse-grained soils whereas the attached ENGEO boring log showed medium stiff to stiff sandy silt and dense silty sand. Please clarify the composition of the onsite undisturbed soils.

Table 2, Interpreted Units and Adopted Geotechnical Properties (page 7): Please provide references for the cohesions for Fill and Collovia, Weathered Colma Formation (SM-SC), and Colma Formation (SM-SC) as they seem too high to combine with a friction angle of 30 degrees. Please clarify if cohesion should be ignored in slope stability performance for long-term conditions.

Section 4.2.3.7, Temporary Slopes and Shoring (page 12): This section states an assumption of an active pressure of 25 pounds per square foot (psf) and passive equivalent pressure of 550 psf. Please clarify and/or provide references for both the active pressure and passive equivalent pressure. Please confirm whether sloping ground condition was considered for the active pressure.

Section 4.3, Soil Nail Wall (page 13): This section states the wall should be designed assuming a slope stability seismic coefficient of $K_h=0.43g$ for internal stability and $K_h=0.29g$ for global stability. Please verify these K_h values. The section also states the wall should be designed assuming a Soil to Ground Bond Capacity of 5.65 kilopound-force per square foot (ksf). This grout bond capacity seems too high. Please clarify and/or provide references of any soil nail test performed in a similar condition.

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

The proposed project may impact the existing drainage systems along the northbound I-280 on-ramp from Cunningham Way. The Office of Hydraulics would like to ensure that no surface flow will get into the roadside ditch between the project site and the on-ramp and that no discharge or runoff from the project will flow into the roadside ditch during the construction phase. In the Encroachment Permit application, please provide plan views, profiles, cross-sections, details of all drainage facilities, and hydrologic calculations showing pre- and post-construction conditions.

Encroachment Permit

Please note that Section 2.5, Required Approvals (page 39) of the draft MND needs to be revised. The draft MND generally mentions that an encroachment permit will be needed from Caltrans for staging near the ramp, however this section contemplates an easement from Caltrans for the staging. Please be advised that Caltrans will not grant superior rights to the City for this work. Please revise to state that the staging will be done under an encroachment permit, consistent with how it is stated throughout other portions of the report.

Please be advised that a Caltrans encroachment permit is needed for the proposed soil nail retaining wall. An Encroachment Policy Exception may be required due to the project site's adjacency to an access-controlled freeway facility. Please provide design plans for the proposed retaining wall for encroachment permit review. Caltrans would like to ensure that the design of the soil nail wall will mitigate impacts to the I-280 on-ramp embankment.

The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Flowchart, Figure 1.2 in Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval may take 30 days to 6 months or more depending on the project scope, size, complexity, completeness, compliance with policies and quality of the permit package submitted. Projects requiring exceptions to design standards or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). When the applicant is ready to pursue a Caltrans encroachment permit, please contact D4Permits@dot.ca.gov to initiate the process.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse