## California Department of Transportation

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May 26, 2022







11-SD-8, 15, 52, 67, 125 PM VAR

East County Advanced Water Purification Project MND/SCH#2022040551

Ms. Rebecca Abbott
Engineering Manager
East County Advanced Water Purification Joint Powers Authority
9300 Fanita Parkway
Santee, CA 92072

Dear Ms. Abbott:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the East County Advanced Water Purification Project located near Interstates 8 (I-8) and 15 (I-15) and State Routes 52 (SR-52) 67 (SR-67) and 125 (SR-125). 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 East County Advanced Water Purification Joint Powers Authority (JPA) in areas where the JPA 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 Impact Study

- Per Encroachment Permit Manual section 600: "Underground installations on highway right-of-way must be performed using a trenchless technology method (Bore & Jack, Horizontal Directional Drilling, Microtunneling, Pipe Bursting or Pipe Ramming), unless specified otherwise by permit. Open trenching is authorized only when the applicant demonstrates that all alternatives have been investigated and that installation by a trenchless technology is not feasible. Procedures that must be followed in evaluating applications for open trenching are shown in Table 6.11."
- If open trenching is approved on local streets under Caltrans Jurisdiction, then see Standard Specifications Section 7, section 7-1.04, Public Safety, for clarification.
  - On city streets within Caltrans' Right-of-Way (R/W) it is fine to trench within 15 feet of live lane as long as there is a note on the traffic control plan that the trench will be back filled or covered by steel plates at the end of the work shift that day.
  - o If the trenching is less than 6 feet from a live lane then close the adjacent lane for public and worker safety reasons.
  - Please refer to the Installation of Type K temporary railing requirements in this section.
- All traffic control that encroaches within Caltrans' R/W will require an encroachment permit from Caltrans.
- Provide pedestrian detour if closing the sidewalk or provide adequate alternatives.

#### **Utilities**

- Without prior Caltrans' authorization, no open trenching is allowed within State R/W.
- Pipe shall be encased crossing within Caltrans' R/W.
- Document reasons why the construction needs to be in Caltrans' R/W.

## Design

Construction needs to be 15 feet from bridge foundations underground.

- Caltrans Headquarters Structures and Maintenance needs to review the proposed project plans.
- Put cross section clearance from base of bridge on plans.
- Impacts to interstates may require review and concurrence from FHWA.

#### Geotechnical

- Identify if any of the potential areas for blasting could be in or close to Caltrans' R/W.
- Please provide geotechnical report.

#### **Hydrology and Drainage Studies**

- Please provide off site hydrology and hydraulics studies, proposed drainage and proposed grading plans for Caltrans to review.
  - Provide drainage plans and details. Provide existing and proposed drainage facilities. Indicate where the Caltrans' drainage systems are located, if any. Include drainage systems on plans, along with profiles.
  - Provide existing and proposed 2-foot contour grading with legible call outs.
  - Include detention basin details of inlets/outlet and proposed basin grading, include in detention basin calculations:
    - Plan schematic
    - Elevation vs storage tables
    - Elevation vs area tables
    - Elevation vs outlet flow (stage outflow)
    - Inflow vs outflow
    - Elevation vs time (stage time)
    - Volume vs time (storage time)
- Provide a Drainage Study showing 100-year storm event calculations and 25- year storm event calculations.
- Provide on-site hydrology and hydraulic studies per the Highway Design Manual methodologies and per Caltrans policies and procedures.
  - o Provide all available Caltrans drainage facility as-built and R/W Maps.
  - Provide survey data of onsite system that the development will be draining to.
- On all plans, show Caltrans' R/W and route centerlines (I-8, I-15, SR-52, SR-67 and SR-125).
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

## **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.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Please assure bicyclists and pedestrians are able to cross Mapleview St. at SR-67. Mobile home parks, trail access, and other trip generators are within proximity to the project site. Users will need access across project scope. Mapleview St. is designated as a Class II Bike Facility per San Diego County Bike Plan.

## **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

Potential impacts to the highway facilities (I-8, I-15, SR-52, SR-67 and SR-125) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

East County Advanced Water Purification Joint Powers Authority shall prepare and submit to Caltrans District 11 a Traffic Control Plan closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-8, I-15, SR-52, SR-67, and SR-125 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the

crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

#### **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 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 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.

#### **Hazardous Waste**

A hazardous waste concern for this project is aerially deposited lead (ADL). Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is usually found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the surface. The Department of Toxic Substances Control (DTSC) sets regulatory thresholds for lead in soil, based on risk assessment work performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). It is the Permittee's responsibility to comply with the DTSC ADL requirements for roadway soil management.

## Landscape Maintenance

To avoid and/or minimize potential visual impacts in State R/W the project should:

- Protect vegetation outside of the work area limits by prohibiting material storage, parking and construction access in vegetated areas.
- Contact the Caltrans' Landscape Maintenance Area supervisor(s) prior to construction to advise him/her of the proposed work and construction schedule.
- Review the site with Caltrans' Maintenance to locate existing irrigation facilities within the work area such as irrigation conduit under the paving, mainline, control wire, valves, heads and valve boxes/pull boxes. Cut and cap irrigation facilities within the work area prior to construction.
- Minimize the time that irrigation systems are shut down. Provide temporary
  water by highlining to existing systems beyond the work area if irrigation mainline
  in the work area is shut off during construction.
- Repair or replace all impacted irrigation facilities.
- Hydroseed disturbed areas with a CA Native Seed Mix (See attached suggested Hydroseed Mix).

#### **Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) 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.

## 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 <a href="mailto:D11.Permits@dot.ca.gov">D11.Permits@dot.ca.gov</a> or by visiting the website at <a href="https://dot.ca.gov/programs/traffic-operations/ep">https://dot.ca.gov/programs/traffic-operations/ep</a>. Early coordination with Caltrans is strongly advised for all encroachment permits.

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. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

Please see the following chapters in the Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and State R/W: <a href="https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a1ly.pdf">https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a1ly.pdf</a>.
- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and State R/W: <a href="https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf">https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf</a>
- Chapter 17 of the Project Development Procedures Manual <a href="https://dot.ca.gov/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf">https://dot.ca.gov/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf</a>.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

# Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

Attachment: Hydroseed Mix