


	<p style="text-align: center;">Response to Comment Letter S3</p>
<div style="text-align: center; border: 1px solid black; padding: 2px; margin-bottom: 10px;">Comment Letter S3</div> <p>STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN, Jr., Governor</p> <p>DEPARTMENT OF TRANSPORTATION DISTRICT 11, DIVISION OF PLANNING 4050 TAYLOR ST, M.S. 240 SAN DIEGO, CA 92110 PHONE (619) 688-6960 FAX (619) 688-4299 TTY 711 www.dot.ca.gov</p> <div style="text-align: right;">  <i>Making Conservation A California Way of Life.</i> </div> <p style="text-align: right;">11-SD-125, PM 0.0 11-SD-905, PM 8.5 & 9.5 Otay 250 Sunroad - East Otay Mesa Business Park Draft SEIR SCH #2016031028</p> <p>May 8, 2017</p> <p>Ms. Michelle Irace County of San Diego Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> <p>Dear Ms. Irace:</p> <p>The California Department of Transportation (Caltrans) has reviewed the Draft Supplement Environmental Impact Report (DSEIR) and the responses to Caltrans Comments dated August 23, 2016, the revised Traffic Impact Analysis (TIA) dated December 08, 2016 and has the following comments:</p> <ol style="list-style-type: none"> 1. Comment on response to Comment 1: Caltrans existing volumes are taken for a 7 day/24 hour period duration. Taking traffic counts for one day does not give a good representation of actual volume counts. If possible, take counts for an additional day (Monday through Thursday). Please refer to the original comment to compare your one day counts with the Caltrans traffic counts, if needed. 2. Comment on response to Comment 2: Caltrans agrees that the State Route 125 (SR-125) is much less congested, that it is closest to the proposed development, and that San Diego Association of Governments (SANDAG) reduced toll prices as of June 30, 2012. The reality is that even though SANDAG reduced the toll prices, Caltrans has not seen a 70:30 split in usage by travelers. This could be because the travelers' destination would still take them to either Eastbound (EB) SR-54, EB SR-94, or EB SR-52, which are all congested. Taking the SR-125 would only take them to a congested route and they would have to pay a toll versus taking the SR-905 to the Interstate (I) 805 would still be congested, but they do not have to pay a toll. Caltrans believes that 32% assumption of traffic volumes using Northbound (NB) SR-125 is too high. 3. New Comment: The revised TIA, Section 10.0 Project Access and On-Site Circulation, states that "The Ultimate Improvements are not needed to mitigate the Project's <p style="text-align: center; font-size: small;"><i>"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"</i></p>	<p style="text-align: center;">Department of Transportation, District 11 Maurice Eaton, Chief May 8, 2017</p> <p>S3-1 The standard of practice for conducting intersection traffic counts in traffic impact studies in the San Diego region is to count on one weekday. Additional count days are not warranted.</p> <p>LLG retained a sub-consultant, Accurate Video Counts, Inc. (AVC) to conduct the traffic counts which were conducted on Thursday, May 14, 2015. AVC specializes in conducting traffic counts and has completed thousands of such counts in the past few years. The counts were conducted using video technology. It is not clear during what time period Caltrans' counts were conducted.</p> <p>LLG checked all existing traffic count sheets in the appendices of the TIA and found that they matched those reported in the TIA. The counts in the TIA were found to be accurate.</p> <p>S3-2 It is understood that Caltrans believes the 32 percent distribution on SR 125 is high. The distribution is believed to be accurate for the following reasons:</p> <ol style="list-style-type: none"> a. The SR-125 operates with much less congestion as compared to the I-805 which likely makes the SR-125 a preferred route choice. b. The SR-125 is located less than one mile from the Project site, as compared to I-805 which is located over five miles from the Project site which would make SR-125 a likelier preferred route choice. c. Several segments of I-805 operate at LOS F during the peak hours and are among the most congested in the County. d. As the operator of SR-125, SANDAG reduces prices for using the facility by up to 40% to adjust for peak and off-peak periods. Lower tolls function as an inducement for commuters to use SR-125 over other more congested routes like I-805.

S3-1

S3-2


S3-3

S3-3 A sensitivity analysis (i.e., running the analysis assuming an increasing number of dwelling units until the impact is triggered) was conducted to determine the amount of equivalent dwelling units which could be built before the mitigation is required. There is not a physical analysis sheet that can be provided. Table 11-4 is provided below and has been added to Section 2.8 of the SEIR as Table 2-18.

TABLE 11-4
PROJECT MITIGATION PHASING SUMMARY

Impacted Location	EDU Before Impact is Triggered
Intersections	
4. Otay Mesa Road / La Media Road	35 EDU
8. Otay Mesa Road / Harvest Road	35 EDU
9. Otay Mesa Road / Sanyo Avenue	1,980 EDU
10. Otay Mesa Road / Vann Centre Boulevard	1,530 EDU
Street Segments	
Otay Mesa Road: Sanyo Ave to Vann Centre Blvd	60 EDU

<p>Ms. Michelle Irace May 8, 2017 Page 2</p> <p>S3-3 (cont.) Significant Impacts.” Section 11.3 Mitigation Phasing, of the same TIA states that there was an analysis done to determine the number of units that could be built before the significant impact would occur and subsequent mitigation required. Please provide this analysis as well as Table 11-4 which summarizes the number of “Equivalent Dwelling Units” that may be built before each mitigation is required as it was not included in the submitted TIA. This information is very critical to show which sections of the “Ultimate Improvements” will be needed per phase.</p> <p>S3-4 4. The revised Table 11-1 – Summary of Significant Impacts & Mitigation Measures show a list of locations where Direct and Cumulative Impacts are found and their associated mitigation measures. Please be more specific on what sections of these mitigations are direct and which are cumulative. For example, the Otay Mesa Road/La Media Road, there are direct and cumulative impacts. Which of the list of improvements will be done due to a direct impact? Synchro files were provided for the Ultimate Condition, but it does not state anywhere when will the Ultimate Condition be done (before building occupation, and after, etc.).</p> <p>S3-5 5. New Comment: The City of San Diego is proposing to have La Media Road as the ‘preferred’ truck route exit. These additional trucks need to be incorporated into the Cumulative analysis and analyzed. There might be a cumulative traffic impact at this intersection and will need to be mitigated, if affected.</p> <p>S3-6 6. New Comment: The revised Summary of Significant Impacts & Mitigation Measures Table 11-1 location #8 states that the Otay Mesa Road/Harvest Road intersection falls under Caltrans jurisdiction. As of mid-June, 2017 this intersection is anticipated to be relinquished to the County of San Diego.</p> <p>S3-7 7. Synchro Comments:</p> <ul style="list-style-type: none"> • Comment on response to Synchro Comment 1: Caltrans made modifications to the files in order to be able to simulate. There is back up on SR-905 EB off-ramp to La Media Road into the main lanes based on the simulation of the Synchro files submitted. <p>S3-8 • Comment on response to Synchro Comment 2: Due to the high traffic volumes generated by the proposed development, impact to SR-905 has to be analyzed and mitigated, if affected.</p> <p>S3-9 • Comment on response to Synchro Comment 4: The synchro files show SR-905 EB off-ramp to La Media Road ramp’s queue length extend into the main lanes. This impact needs to be mitigated.</p> <p>S3-10 • New Comment: The Synchro files for the “AM/PM existing conditions” does not show vehicle queue into the main lanes at the SR-905 EB off-ramp to La Media Road. The “AM/PM existing plus project” Synchro files show the SR-905 EB off-ramp to La Media Road traffic backing up into the main lanes. The “AM/PM existing plus project plus mitigation” Synchro files also show the SR-905 EB off-</p> <p style="text-align: center;"><i>“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”</i></p>	<p>S3-4 All mitigation for “direct and cumulative” impacts must be implemented per the phasing summary. The Project Mitigation Summary Table has been added as Table 11-4 of the traffic study dated December 8, 2016 and Table 2-18 in the SEIR. The timing of when the mitigation must be implemented is included in the environmental document.</p> <p>S3-5 The applicant has contacted the City and has confirmed that plans are not finalized. Therefore, the analysis as presented will not change.</p> <p>S3-6 As of the date the traffic study was prepared, the Otay Mesa Road/ Harvest Road was under Caltrans jurisdiction and therefore, it is appropriate to assume it is a Caltrans-controlled intersection. Even if it was assumed to be County controlled by June 2017, no change to the analysis would occur</p> <p>S3-7 The variable/measure of effectiveness utilized to determine significant impacts in both the Caltrans and County of San Diego Guidelines is Level of Service (LOS) delay and not queues. Therefore, queues are not used to determine significant impacts. The analysis shows that acceptable LOS B/C is calculated at the La Media Road / SR 905 eastbound ramps intersection (see Table 9-1 of the traffic study). The intersection capacity analysis does not indicate a queue issue. Therefore, no significant impacts are calculated.</p> <p>S3-8 Table 9-3 of the traffic study contains a full analysis of SR 905, which is calculated to operate at LOS C or better under Year 2020 conditions.</p> <p>S3-9 See response no. S3-7.</p> <p>S3-10 See response no. S3-7.</p>
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<p>Ms. Michelle Irace May 8, 2017 Page 3</p> <p>S3-10, (cont.) ramp to La Media Road’s traffic queue into the main lanes. This is a Direct Significant Impact and needs to be mitigated at this location.</p> <p>S3-11 New Comment: Comparing the Synchro AM & PM existing conditions plus project with the AM & PM existing plus project plus mitigation, the SR-905 EB off-ramp to La Media Road still backs up into the main lanes.</p> <p>S3-12 New Comment: The revised Summary of Significant Impacts & Mitigation Measures Table 11-1 has changed from the previous TIA dated August 2015. The synchro files “Existing AM/PM plus project mitigation” are still showing the improvements on Harvest Road/Otay Mesa Road from the previous mitigations. The new mitigations include less improvements to this intersection.</p> <p>S3-13 New Comment: The mitigation on Sanyo Road/Otay Mesa Road and Vann Centre Blvd./Otay Mesa Road are not included in the synchro files “Existing AM/PM plus project mitigation.” These mitigations need to be included in order to analyze the entire transportation network.</p> <p>S3-14 New Comment: The improvements on Paseo de las Americas/Siempre Viva Road in the synchro files “Existing AM/PM plus mitigations” do not match the mitigations of the revised table.</p> <p>If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mcumsey@dot.ca.gov</p> <p>Sincerely,  MAURICE EATON, Chief Development Review Branch</p> <p>c: Benjamin Mills, County of San Diego John Boorman, LLG Engineers Amelia Giacalone, LLG Engineers</p> <p><small>“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”</small></p>	<p>S3-11 See response no. S3-7.</p> <p>S3-12 The August 2015 TIA recommends the following improvements at the intersection of Otay Mesa Road / Harvest Road:</p> <ul style="list-style-type: none"> • Southbound movement: two dedicated right turn lanes with overlap phasing and a shared thru / left turn lane. • Westbound movement: one dedicated right turn lane, three thru lanes and one dedicated left turn lane. • Northbound movement: one shared thru / right turn lane and one dedicated left turn lane. • Eastbound movement: one shared thru / right turn lane, two dedicated thru lanes and two dedicated left turn lanes. <p>The December 2016 TIA recommends the following impact mitigation improvements at the intersection of Otay Mesa Road / Harvest Road:</p> <ul style="list-style-type: none"> • Southbound movement: one dedicated right turn lane with overlap phasing and a shared thru / left turn lane. • Westbound movement: one shared thru / right turn lane, one dedicated thru lane and one dedicated left turn lane. • Northbound movement: one shared thru / right turn / left turn lane. • Eastbound movement: one shared thru / right turn lane, one dedicated thru lane and two dedicated left turn lanes. <p>This is the lane configuration that was assumed when conducting the post-mitigation analysis for the December 2016 study. The commenter should also review the ultimate access improvements shown in Figure 10-2 of the TIA.</p> <p>S3-13 The Synchro files in Appendix J of the traffic study were checked by the consulting traffic engineer and it was confirmed that reports for Sanyo Road/Otay Mesa Road as well as Vann Centre Blvd./Otay Mesa Road are included (See Intersection Analyses No. 9 and 10 of Appendix J of the traffic study). The mitigation measures are accurately included per Table 11-2 of the traffic study dated December 8, 2016.</p>
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	<p>S3-14 Post-mitigation analysis was included for direct Project impacts as outlined in Table 11-2 of the traffic study. Since the impact at Paseo de las Americas / Siempre Viva Road was a cumulative impact, a post mitigation analysis is not included in Table 11-2 of the traffic study.</p>
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