Comment Letter S3 STATE OF CALIFORNIA-CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Gaverno DEPARTMENT OF TRANSPORTATION DISTRICT 11, DIVISION OF PLANNING 4050 TAYLOR ST, M.S. 240 SAN DIEGO, CA 92110 Making Conservation PHONE (619) 688-6960 A California Way of Life FAX (619) 688-4299 TTY 711 www.dot.ca.gov May 8, 2017 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 Ms. Michelle Irace County of San Diego Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123 Dear Ms. Irace: 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: 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 S3-1 (Monday through Thursday). Please refer to the original comment to compare your one day counts with the Caltrans traffic counts, if needed. 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 S3-2 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. New Comment: The revised TIA, Section 10.0 Project Access and On-Site Circulation, S3-3 states that "The Ultimate Improvements are not needed to mitigate the Project's "Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability

Response to Comment Letter S3

Department of Transportation, District 11 Maurice Eaton, Chief May 8, 2017

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.

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.

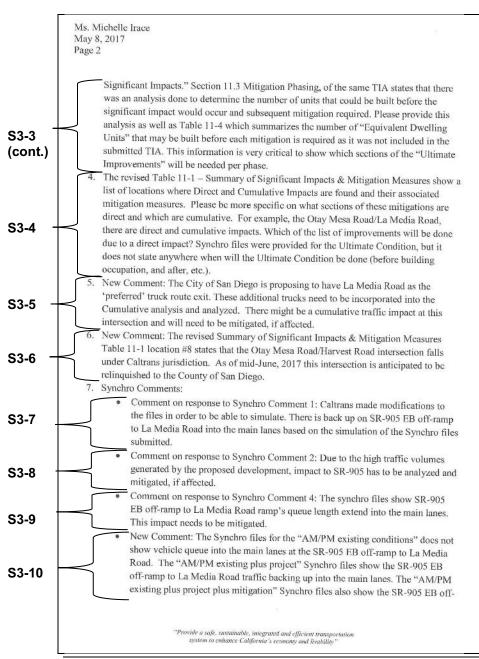
LLG checked all existing traffic count sheets in the appendices of the TIA and found that they matched those reported in the TIA. The counts in the TIA were found to be accurate.

- **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:
 - 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.
 - 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 offpeak periods. Lower tolls function as an inducement for commuters to use SR-125 over other more congested routes like I-805.

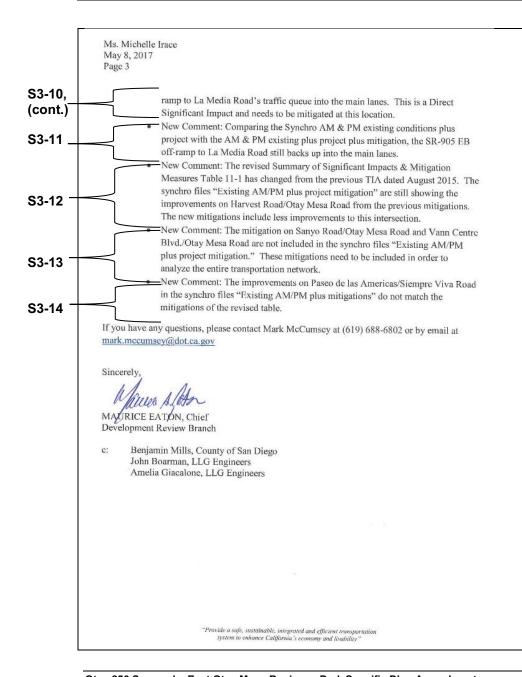
S3-3 A sensitivity analysis (i.e., running the analysis assuming an increasing number of dwelling units until the impact is triggered) was conducted to determine the amount of equivalent dwelling units which could be built before the mitigation is required. There is not a physical analysis sheet that 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	



- **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.
- **S3-5 The** applicant has contacted the City and has confirmed that plans are not finalized. Therefore, the analysis as presented will not change.
- **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
- 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.
- **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.
- S3-9 See response no. S3-7.
- S3-10See response no. S3-7.



\$3-11See response no. \$3-7.

- **\$3-12** The August 2015 TIA recommends the following improvements at the intersection of Otay Mesa Road / Harvest Road:
 - 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.

The December 2016 TIA recommends the following impact mitigation improvements at the intersection of Otay Mesa Road / Harvest Road:

- 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.

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.

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.

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.