

California Department of Transportation

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December 17, 2025

11-SD-67

PM 3.054

Palisade Santee Commerce Center
FEIR/SCH#2023090144

Ms. Sandi Sawa
Director of Planning & Building
City of Santee
Planning & Building Department
10601 Magnolia
Santee, CA 92071

Dear Ms. Sawa:

Thank you for including the California Department of Transportation (Caltrans) in the review of the Final Environmental Impact Report (FEIR) for the Palisade Santee Commerce Center located at 10990 North Woodside Avenue near State Route 67 (SR-67) in Santee.

We look forward to working with the City of Santee to improve the transportation network and connections between all modes of travel to improve the experience of those who use the transportation system. During the review process information provided was either changed or incorrect while other data has not yet received. However, Caltrans can provide some feedback.

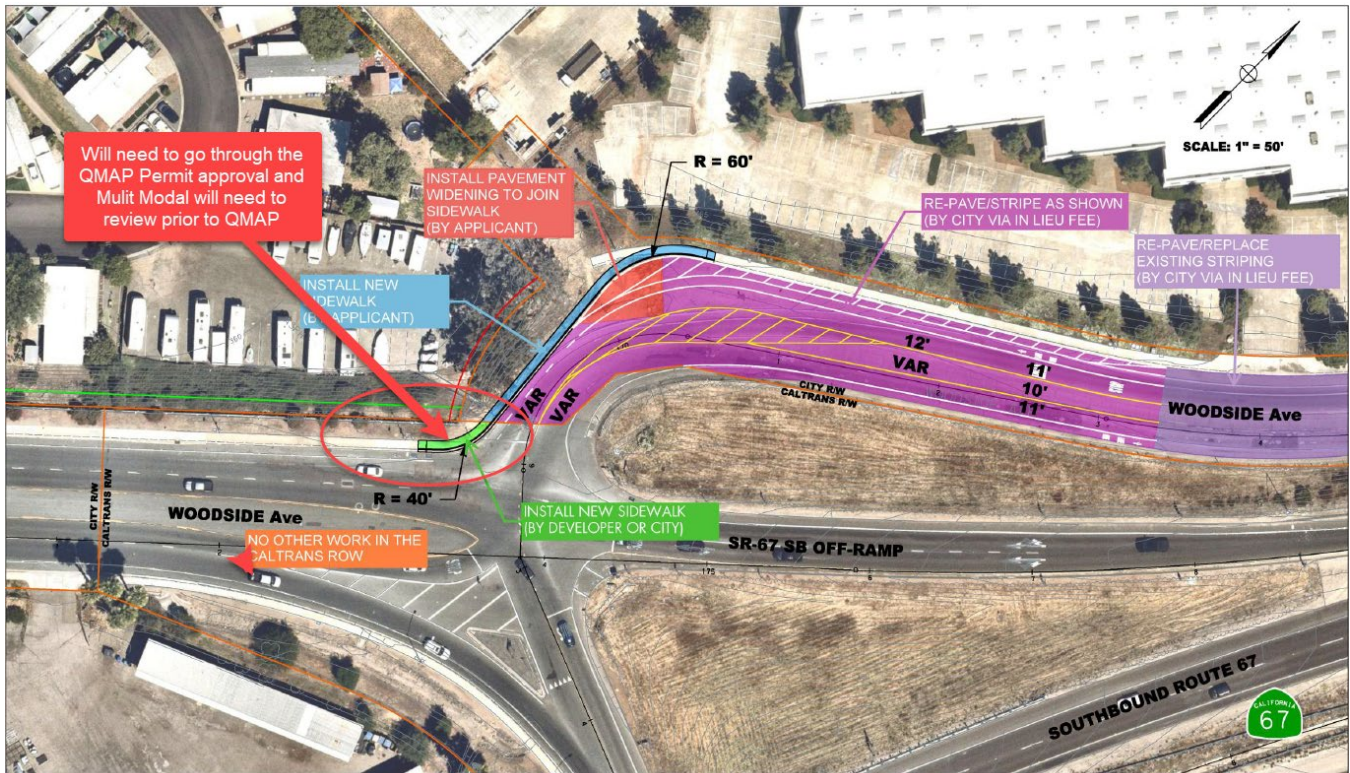
Caltrans has the following comments:

Traffic Engineering and Analysis

It was noted that a revised Traffic Impact Study (TIS) and Synchro Model has not been provided to Caltrans by the developer. We received comments to their April 2025 TIS that had the traffic analysis for the widening of North Woodside Avenue and other improvements on Caltrans' Right-of-Way (R/W). Also, previously Synchro files sent were incorrect. The Developer has changed the scope of work inside Caltrans' R/W with this latest submittal and Caltrans is required to review the updated TIS and Synchro Model with the new proposed changes.

Updated Intersection Improvements comments:

- The latest updated intersection Improvement exhibit Figure RTC-1 has removed the previously proposed roadway widening of North Woodside Avenue approach leg to the SR-67 off-ramp intersection.
 - There are still sidewalk improvements being proposed on Caltrans' R/W. This will require an Encroachment Permit through the Quality Management Assessment Process (QMAP).
 - There are also bike lanes that can be improved.
 - This proposed project needs to follow Caltrans Design Information Bulletin 94 (DIB-94), "is to be used in conjunction with the Complete Streets Decision Document (CSDD) when making decisions to maximize the use of the public R/W to achieve sustainable and equitable mobility. DIB-94 and the CSDD will help to accomplish the State Highway System Management Plan performance objectives for Complete Streets projects and bicycle and pedestrian facilities."
 - DIB-94 provides guidance for the scoping and design of Complete Streets projects on the State Highway System (SHS).
 - As established in Director's Policy 36 "Road Safety" (DP-36), Caltrans is committed to a safety-first mindset to prioritize the elimination of fatal and serious injury crashes and eliminate disparities in road safety outcomes consistent with the Federal Highway Administration (FHWA) Safe System approach.
 - Per section 2.4 **Applying Complete Streets Standards to Local Projects** of DIB-94: "DP-37 calls for the provision of Complete Streets facilities in "... all transportation projects funded or overseen by Caltrans"17. For locally or privately funded projects (projects-funded-by-others) on State highway R/W, the project sponsor may work with Caltrans to accomplish the same Complete Streets goals of providing or improving a bicycle, pedestrian, or transit facility. In order to use the standards of this DIB on a Complete Streets project segment, the segment must meet the context criterion (a)and (b) in Section 2.3 and the project report, project approval document, or similar document from the project sponsor must document the reasons why this segment should use the Complete Streets standards of this DIB due to the specific project constraints."



SOURCE: Dokken Engineering 2025

FIGURE RTC-1

Updated Intersection Improvements
 Palisades Santee Commerce Center Project

DUDEK

Final Environmental Impact Report for the Palisades Santee Commerce Center Project review comments are the following:

- See attached redlined Final EIR Report for comments and details not mentioned here.
- Proposed improvements in Caltrans' R/W will need to go through the LDR process in which the Caltrans District 11 Multi-Modal Branch will review proposed improvements. Then after that through the QMAP Permit approval process.
- Regarding response comment S1-2: Yes, the previous comment meant to state April 2025 TIS.
- Regarding response comment S1-3: "the Project does not propose any roadway improvements to alleviate Level of Service (LOS) or traffic impacts at the North Woodside Avenue and SR-67 southbound (SB) off-ramp Intersection, per current CEQA guidelines for determining transportation impacts."
 - Previous TIS dated April 2025 and June 2024 showed Vehicles Miles Traveled (VMT) Impacts that require mitigation.
 - "Because the project's VMT is higher than the regional average of the census tract it is located within, the project would result in a significant VMT impact. Table 5 provides project's VMT summary. Figure 9 illustrates the SANDAG SB 743 VMT Map for the project site."

- A revised TIS has not been provided to Caltrans by the developer to verify the impacts due to the change in scope of the project which previously showed widening of North Woodside Avenue approach leg to the SR-67 SB off-ramp Intersection which now has changed.
- Regarding response comment S1-3: "The analysis indicates there are currently no queuing issues that may potentially spill back onto the SR-67 mainline."
 - A revised TIS has not been provided to Caltrans by the developer to verify the 95th percentile queue now associated with the project's change in scope.
 - A revised Synchro Model will need to be submitted for review along with the revised TIS to check foundation of the analysis.
- Regarding response comment S1-8: This response and the S1-3 response comment regarding the '*Caltrans Local Development Review (LDR) Safety Review Practitioners Guidance* (February 2024)' is not sufficient to negate the need for this Safety Review Policy.
 - Per the 'LOCAL DEVELOPMENTAL REVIEW SAFETY REVIEW PRACTITIONERS' GUIDANCE' the Developments are not required to go through a safety review if they meet both of the listed criteria. You can refer to the *LDR Safety Review Screening Guidelines (Appendix E)* for detailed information." Both criteria are not met:
 - This project makes physical modifications to the Highway System (SHS) R/W by the proposed installation of pedestrian infrastructure shown by developer.
 - The project results in additional (1,000) trips as stated in the response S1-3 and previous TIS. This development also will add potential pedestrians, bicyclists, and transit users to this intersection.
 - The Draft Environmental Impact Report needs to include a safety review that follows the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf>.
- Regarding response comment S1-46 through S1-48. A revised TIS with an updated 95th percentile table needs to be submitted to Caltrans for review along with the Synchro Model.
 - The revised TIS must show the latest change in scope of work at the intersection, which will most likely affect 95th percentile queues on all segments.
 - Please submit the latest revised TIS with revised 95th Percentile analysis.
 - Please submit the latest Synchro Model files for Caltrans to review.
- Previous comment not addressed regarding Adjusting 95th percentile after trip distributions have been updated.

Hydraulics

Confirm how will the proposed 24" HPDE pipe accept flows from the existing 24" culvert underneath SR-67. Please provide a plan, profile, and detail.

Show Caltrans' R/W and adjacent Caltrans drainage infrastructure.

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 Environmental Document 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 fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

Right-of-Way

There is one monument on the Caltrans' R/W. Since the rear set back is determined by the R/W, please confirm it has been properly surveyed. 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 visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for QMAP process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review