CALIFORNIA COASTAL COMMISSION
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SAN DIEGO, CA 92108-4402
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Th16a

6-22-0196 (City of San Diego, El Camino Real Bridge/Road Widening)

February 29, 2024

CORRESPONDENCE

From:	Christopher Pederson
To:	SanDiegoCoast@Coastal
Cc:	Huckelbridge, Kate@Coastal; Schwing, Karl@Coastal; Lilly, Diana@Coastal; Escaron, Melissa@Coastal; Warren, Louise@Coastal; Mayer, Robin@Coastal
Subject:	Public Comment on March 2024 Agenda Item Thursday 16a - Application No. 6-22-0196 (San Diego El Camino Real Bridge/Road Replacement, San Diego)
Date:	Thursday, February 29, 2024 9:02:29 AM

Dear Chair Hart and Commissioners:

The Commission should postpone action on the San Diego El Camino Real Bridge/Road Replacement project and direct staff (1) to evaluate a two-lane version of proposed project that includes truly protected bicycle lanes and pedestrian walkways and (2) to evaluate whether four-lane versions of the project will induce additional travel and thereby undercut predicted public access benefits and predicted reductions in traffic congestion, vehicle miles traveled, and greenhouse gas emissions. The current staff report does not provide the Commission with sufficient information to evaluate the purported public access and traffic congestion benefits of the project, is internally inconsistent about whether the project is intended to increase traffic capacity, and conflicts with judicial and Commission precedents regarding the analysis of road expansion projects located in wetlands and ESHA.

The Staff Report Does Not Substantiate Claims Regarding Public Access Benefits and Reduced Congestion

El Camino Real is the inland-most of the four roads in the coastal zone that cross the San Dieguito River. (The other three are Camino del Mar (aka U.S. Highway 101), Jimmy Durante Blvd., and I-5.) Although the staff report repeatedly asserts that expanding the current road from two lanes to four will provide significant public access benefits for vehicle drivers, the staff report does not provide any information about what proportion of drivers using the portion of El Camino Real at issue here use it for coastal access purposes. Given the nearby availability of other parallel routes that are closer to the coast, the claimed public access benefits of the project are not at all obvious. They deserve closer and more skeptical scrutiny given the project's significant impacts on wetlands and ESHA.

The report states without elaboration that El Camino Real operates at level of service (LOS) F. According to the traffic study prepared for the project, LOS surveys were conducted during the AM and PM peak hours on two weekdays. (Urban Systems Associates, Inc., Transportation Analysis for El Camino Real Road and Bridge Widening Project (Dec. 19, 2012) (hereafter "Transportation Analysis").) There is no information about LOS conditions during other times of the day on weekdays and no information at all about traffic conditions on weekends and holidays, which are the times when recreational travel to the coast is most likely to occur.

The report also includes unsubstantiated claims that this project to double the number of road lanes will not induce additional travel and will reduce vehicle miles traveled, energy consumption, and greenhouse gas emissions. The project EIR states that predictions regarding 2035 traffic conditions were developed in the following manner: "Year 2035 segment and peak hour forecast volumes were developed by the traffic consultants, reviewed by City staff, and agreed on for analysis." (El Camino Real Bridge/Road Widening Project, Recirculated Final Environmental Impact Report (FEIR), at pg 3.2-11.) The sum total of the explanation in the Transportation Analysis for how the projections of 2035 were prepared is the following

sentence: “Year 2035 segment and peak hour forecast volumes were developed, reviewed by City staff and agreed on for analysis.” (Transportation Analysis at pg. 7-1.) Neither the FEIR nor the Transportation Analysis even refer to the concept of induced travel, much less provide any analysis to substantiate the assertion that induced travel will not occur.

The claim that this road expansion project will not induce additional travel is especially surprising given extensive literature about how road projects intended to reduce traffic congestion often induce enough additional vehicle travel that the claimed congestion reduction benefits prove to be transitory. (See, e.g., Volker & Handy, *Updating the Induced Travel Calculator*, National Center for Sustainable Transportation and UC Davis Institute of Transportation Studies (Sept. 2022) https://escholarship.org/uc/item/1hh9b9mf; California Dept. of Transportation, *Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects* (2020) https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-1st-edition-taf-fnl-a11y.pdf.)

If the claim that the project will not induce additional travel is incorrect, then the predicted reductions in traffic congestion, vehicle miles traveled, energy consumption, and greenhouse gas emissions are also all incorrect. In addition, the FEIR determined vehicle miles traveled and their associated greenhouse gas emissions by looking only at the length of travel along the 0.8 mile length of the project. (FEIR at pg 3.13-7.) If the project induces additional trips, the associated vehicle miles traveled and greenhouse gas emissions would be much larger than the portion of each of those trips that passes through the project area.

The Commission should direct staff to provide an actual analysis of the potential of the project to induce additional travel and how that will affect predictions about public access benefits, traffic congestion, vehicle miles traveled, energy consumption, and greenhouse gas emissions.

The Project Is Not an Allowable Use Within Wetlands

The report’s findings that the project qualifies as an “incidental public service” that is an eligible purpose for wetland fill conflict with judicial precedent and the Commission’s longstanding criteria for when projects qualify as an incidental public service. Pursuant to the Commission’s interpretive guidelines regarding wetlands, Coastal Act section 30233 allows fill of wetlands for road widening projects only when no alternative exists and the expansion is necessary to maintain *existing* traffic capacity. (*See Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal.App.4th 493, 516-517.) Limited widening of a road to address hazardous road conditions can qualify as an incidental public service, but the proposed project goes far beyond that.

When addressing the incidental public service issue, the report implausibly asserts that the project will not increase road capacity despite doubling the size of the road from two lanes to four. To support that counterintuitive assertion, the report states that El Camino Real connects with a two-lane road to the north, Via de la Valle. That ignores that the non-coastal zone portion of this project involves widening a connected portion of Via de la Valle from two lanes to four.

Other portions of the report are crystal clear that one of the primary purposes of the project is to reduce traffic congestion by expanding the capacity of the road to handle more traffic. For example, at page 27 the report rejects the “Bicycle Safety Alternative” which would not increase the number of road lanes precisely because that alternative would not include

additional travel lanes to reduce congestion. The FEIR is also explicit that one of the core purposes of the project is to reduce traffic congestion, which is another way to describe increasing traffic capacity. (FEIR, at pg. ES-1.)

Because the proposed project is clearly a road expansion project that is intended to allow the road to handle a larger volume of traffic before it becomes congested, the project does not qualify as an incidental public service. The road expansion component of the project is therefore inconsistent with Coastal Act section 30233.

The Report Does Not Demonstrate That the Project is the Least Environmentally Damaging Feasible Alternative

Even if the road expansion component of the project did qualify as an allowable use within wetlands, the staff report does not substantiate that the proposed project is the least environmentally damaging feasible alternative. The staff report summarizes the alternatives evaluated in the EIR. The only alternatives discussed that do not include doubling the road capacity from two lanes to four were the "no project alternative" and the "bicycle safety alternative." Inexplicably, the bicycle safety alternative does not include pedestrian improvements. One of the primary reasons given for rejecting this alternative was that it did not include the same multimodal benefits as the proposed project, but the report gives no explanation for the seemingly arbitrary decision not to include pedestrian improvements in the bicycle safety alternative.

The report also faults the bicycle safety alternative for not adding travel lanes to reduce congestion, but, as explained above, adding new lanes to increase traffic capacity is not an allowable use in wetlands. Finally, because the applicant did not provide analysis of the potential of the project to induce additional travel, the report does not establish that the proposed project will actually provide durable, long-lasting relief from congestion or the associated claimed public access benefits.

The Commission should therefore direct staff to prepare an evaluation of a project alternative that is in the same general location of the proposed development and that includes pedestrian improvements and genuinely protected bike lanes in both directions, but that includes only two vehicle lanes through the stretch of the project that involves impacts to wetlands and ESHA.

The Project Does Not Qualify for Conflict Resolution

Largely for reasons already explained, the conflict resolution section of the report regarding the project's impacts on ESHA is also insufficient. As explained above, the report does not substantiate the project's purported benefits regarding improved public access and reduced vehicle miles traveled, energy consumption, and greenhouse gas emissions. If the project will not actually provide those benefits, then denial of the project would not conflict with any Coastal Act policy. In addition, because the applicant failed to provide any analysis of a two-lane version of the project that provides protected bicycle lanes and pedestrian improvements, the Commission does not have a sufficient basis to conclude that the proposed project is the least environmentally damaging feasible alternative for complying with Coastal Act requirements. Absent that analysis, the Commission cannot find that the proposed project resolves conflicts between Coastal Act policies "in the manner which on balance is the most protective of significant coastal resources. " (*See* Pub. Resources Code, § 30007.5.)

Proposed Protections for Bicyclists Are Unclear and Inadequate

Finally, the staff report characterizes the proposed bike lanes as being protected with flexible posts. Exhibit 3 of the staff report, however, only shows a stripe of paint on the road without flexible posts or any other more substantial protection. The FEIR also does not refer to or depict any protection for the bike lanes. Given that the proposed project is designed for vehicles traveling 55 miles per hour, paint and (possibly) flexible posts would be entirely inadequate protection for bicyclists. By contrast, the project proposes a raised median between the northbound and southbound vehicle lanes. It's not clear why motorists inside vehicles would receive more protection than much more vulnerable bicyclists.The report should clarify exactly what kind of protection from vehicles the bike lanes will provide and should evaluate whether more substantial protective barriers should be included.

The Commission should therefore postpone action on this item and direct staff to prepare analysis (1) of a two-lane version of the project that includes both genuinely protected bicycle lanes and pedestrian walkways and (2) of whether four-lane versions of the project will induce additional travel that undermines predicted public access benefits and predicted reductions in traffic congestion, vehicle miles traveled, energy consumption, and greenhouse gas emissions.

Thank you for your consideration of my comments.

Sincerely,

Christopher Pederson

The City of SAN DIEGO
Engineering & Capital Projects
Stormwater & Transportation Project Delivery Division

March 11th, 2024

Mr. Christoper Pederson
Pederson Law
cpedersonlaw@gmail.com

Subject: CA Coastal Commission Public Comment on March 2024 Agenda Item Thursday 16a – Application No. 6-22-0196 (El Camino Real Bridge/Road Replacement, San Diego)

Thank you for formulating and submitting comments on the subject item. This letter is to provide information addresseing the concerns communicated to the California Coastal Commission on Thursday, February 29th, 2024.

1. The Staff Report Does Not Substantiate Claims Regarding Public Access Benefits and Reduced Congestion:

a. El Camino Real south of San Dieguito Road is currently constructed and functions as a 4 lane major roadway. Currently, the northbound traffic experiences a bottleneck when reaching San Dieguito Rd due to capacity constraints. This in turn increases the amount of time vehicles spend idling and emitting pollutants when transiting the area due to limited east-west routes that connect the communities north and south of the San Dieguito River to the regional access points at Interstate 5 (I-5). An alternate route to El Camino Real requires a seven mile detour east across the following 2-lane collector roads: east on San Dieguito Rd, north on El Apajo, west on Calzada Del Bosque, and south on Via De La Valle. This project will provide more direct access to the adjacent communities, thereby alleviating congestion along the alternate routes.

b. With the exception of the bridge and bridge abutments, the realignment goes through already developed areas (south of the San Dieguito River: Fairbanks Golf Course and utility company access road; north of the River: Polo Fields parking). This project included an agreement with SANDAG to sell 21.67 acres (parcel 299-040-49) to facilitate the Joint Power Authority (JPA) W-19 Restoration Project. A condition of the sale was the use of this parcel as a "Bridge Mitigation Area," which offsets any permanent impact to the area by the project. This agreement is captured in SANDAG Contract No. 5004883. The project's drainage design addresses key drainage concerns along Via De La Valle, by facilitating the flow of storm water through modular wetlands and towards the San Dieguito River Basin.

c. The widening of the subject roadway segment from a 2-lane collector to a 4-lane major is in accordance with the approved community plan circulation element (*See* City of San Diego Fairbanks Country Club Specific & Via de la Valle Specific Plans). The current roadway capacity and conditions do not support existing and future land use intensities and demand. As a result, the area experiences potential increase in GHG and vehicle miles traveled due to latent demand and diverted trips caused by the circulation network's

inability to meet present demand. The technical studies (*See* FEIR Project No. 2982, Transportation Analysis for El Camino Real Road and Bridge Widening Project) prepared to assess the traffic flows within the vicinity of the project determined that the roadway segment is functionally obsolete with a LOS F rating. The City of San Diego (City) conducted a traffic study, analyzed traffic flows, and met with area stakeholders (community organizations and local businesses) to address this deficiency. Weekday AM/PM peak hours were determined to be the heaviest volume periods for vehicle traffic. Stakeholder feedback pointed to the present roadway capacity's inability to accommodate local high traffic volume demand caused by weekend trips to the coast and special events held at the polo fields, fairgrounds, racetrack, or the golf course.

2. The Project Is Not an Allowable Use Within Wetlands:

a. In conjunction with the SANDAG agreement to facilitate the W-19 Restoration Project, the project design calls for the demolition of the old bridge and use of CIDH Concrete Piling to create a smaller footprint in the river corridor than its predecessor. The CIDH Concrete Piling design is the same one used in the construction of the West Mission Bay Drive Bridge. This construction approach coupled with the demolition of the old bridge and revegetation of the area with native species decreases the impacts on wetlands within the San Diegutio River Corridor.

b. The expansion of a portion of Via De La Valle is necessary for two reasons. One, it facilitates the transition from a 4-lane major onto the 2-lane collector road by creating improved traffic flows in the form of turn lane pockets and designated turn lanes for east and west travel. Two, it allows the El Camino Real Project to tie into a future Private Project that expands Via De La Valle from a 2-lane collector to a 4-lane major.

c. The City appreciates your insight into the Coastal Act section 30233 and will ensure it works closely with the California Coastal Commission to ensure all concerns are addressed.

3. The Report Does Not Demonstrate That the Project is the Least Environmentally Damaging Feasible Alternative:

a. The City does not concur with the need for an additional evaluation of a project alternative in the same general location that includes enhanced pedestrian improvements and protected bike lanes in both directions. The current project, as proposed, adequately addresses the need for pedestrian improvements and protected bike lanes by way of the 6ft separated walkways, canopy cover for the walkways, connections to the existing Coast-to-Crest Trail, and flex-post delineators separating cyclists and vehicles.

b. Section 5.1.5 Task Force Alternatives of the 2016 FEIR examines a 54ft wide paved roadway cross section that is comprised of two 14ft wide travel lanes, one 14ft wide emergency vehicle center lane, and 6ft wide bicycle lanes plus parkways (total width of 60-70ft). The Task Force Report determined this design was similar to the Bicycle Safety

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Alternative and therefore did not require additional study. This roadway cross section was found to not improve traffic operational conditions to the level necessary to satisfy the project purpose and need because only two travel lanes were provided.

4. The Project Does Not Qualify for Conflict Resolution:

a. The City acknowledges your recommendation. In addition to the information provided within this letter, the City is working with the California Coastal Commission to ensure all stated concerns are addressed.

5. Proposed Protections for Bicyclists Are Unclear and Inadequate:

a. The City acknowledges your concerns regarding the safety of bicyclists, which is one of the many multimodal transportation modes this project aims to facilitate. The addition of flex posts was a recent design modification and captured in the final design (*See* Encl 1). Per the City Transporation Department's (TD) bicycle usage studies, it was determined that this roadway segment is not considered a commuter route. A design using bike lanes with striping only was developed based on input from the local community planning groups and input from the City TD's multimodal team. The City updated the bicycle facility design by implementing additional flexible post demarcations in an effort to promote an increase in bicycle commuter traffic. Other bicycle infrastructure improvement measures that were incorporated in the design include new signage, new bike lane striping, green bicycle path lines, and green bicycle boxes at intersections. Upgraded traffic signals will add a factor of safety through the addition of protected turn arrows and pedestrian push-button features.

Postponement of action on this item to faciliate an additional study and analysis is not warranted. The original technical studies utilized to inform the FEIR have adequately addressed the requested analysis. A two-lane version of the project is unable to address the existing latent demand and provide the adequate capacity to meet the community's existing and future land use intensities need. The City firmly believes the design developed through collaboration with community planning groups, local businesses, and multiple resource agencies provides the greatest benefit while minimizing impacts to environmentally sensitive habitiat areas. Based on the technical studies and information provided on this subject, the City recommends the Commission approve this project in an effort to better serve the mobility needs of the surrounding communities.

Sincerely,

Jacob Randles
Project Manager
E&CP – SW&T P.D. Division

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JR/rr

Encl: 1. Attachment A ECR Cross Sections 20231206

cc: George Ghossain, Deputy Director, Stormwater & Transportation P.D. Div.
Mastaneh Ashrafzadeh, Asst. Deputy Dir., Stormwater & Transportation P.D.Div.
Ronak Rekani, P.E. Senior Civil Engineer, Stormwater & Transportation P.D.Div.
Jacob Randles, Project Manager, Stormwater & Transportation P.D.Div.
Jerry Jakubauskas, Project Officer II, Env & Permitting, Project & Planning Div.
Karl Lintvedt, Associate Planner, Env & Permitting, Project & Planning Div.

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STAGING AREA KEY MAP

C-5

NOTES:
1. THE STAGING AREA PROVIDED ON THIS PLAN HAS OBTAINED THE NECESSARY TEMPORARY CONSTRUCTION ACCESS PERMISSIONS FROM THE IMPACTED PRIVATE PROPERTY OWNER(S).
2. THE CONTRACTOR IS ALLOWED TO UTILIZE OTHER AREAS FOR STAGING WITHIN THE PROJECT LIMITS EXCEPT WITHIN SENSITIVE HABITAT AND AT THE DISCRETION OF THE RESIDENT ENGINEER.
3. IF THE CONTRACTOR WANTS TO UTILIZE ADDITIONAL AREAS OUTSIDE OF THE PROJECT LIMITS FOR STAGING IT WILL BE THE RESPONSIBILITY OF THE CONTRACTOR TO OBTAIN THE NECESSARY PERMISSIONS AND APPROVALS FROM THE AFFECTED PROPERTY OWNER.

KEY MAP
NO SCALE

EL CAMINO REAL BRIDGE/
ROAD WIDENING

STAGING AREA KEY MAP

CITY OF SAN DIEGO, CALIFORNIA
ENGINEERING & CAPITAL PROJECTS DEPARTMENT
SHEET 16 OF 176 SHEETS

WBS S-00856

APPROVED:
FOR CITY ENGINEER _____ DATE
RONAK REKANI 86523
PRINT DCE NAME RCE#

SUBMITTED BY:
JACOB RANDLES
PROJECT MANAGER

CHECKED BY:
MATTHEW LOVI
PROJECT ENGINEER

DESCRIPTION	BY	APPROVED	DATE	FILMED
ORIGINAL	RICK			

SEE EACH SHEET
CCS27 COORDINATE

SEE EACH SHEET
CCS83 COORDINATE

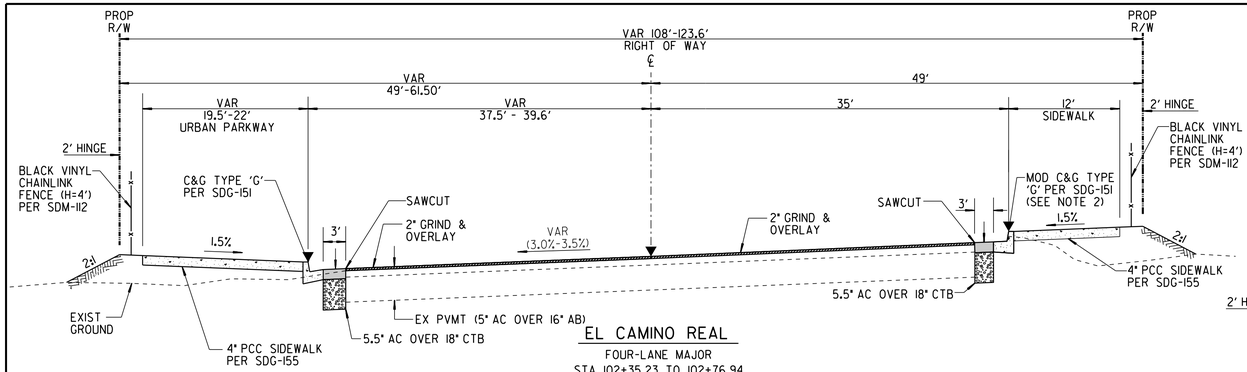
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REGISTERED PROFESSIONAL ENGINEER
EDGAR A. CARREÑO
NO. 58844
STATE OF CALIFORNIA

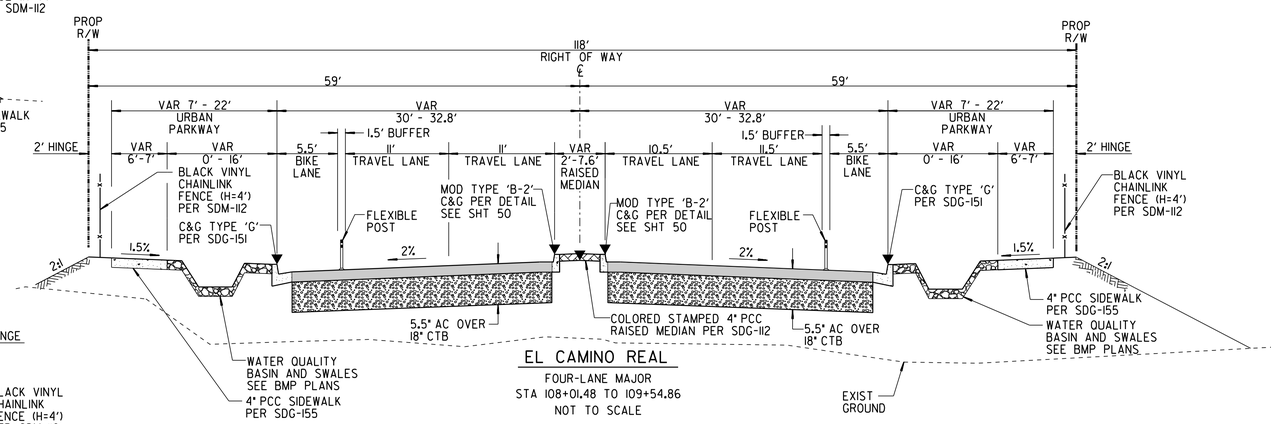
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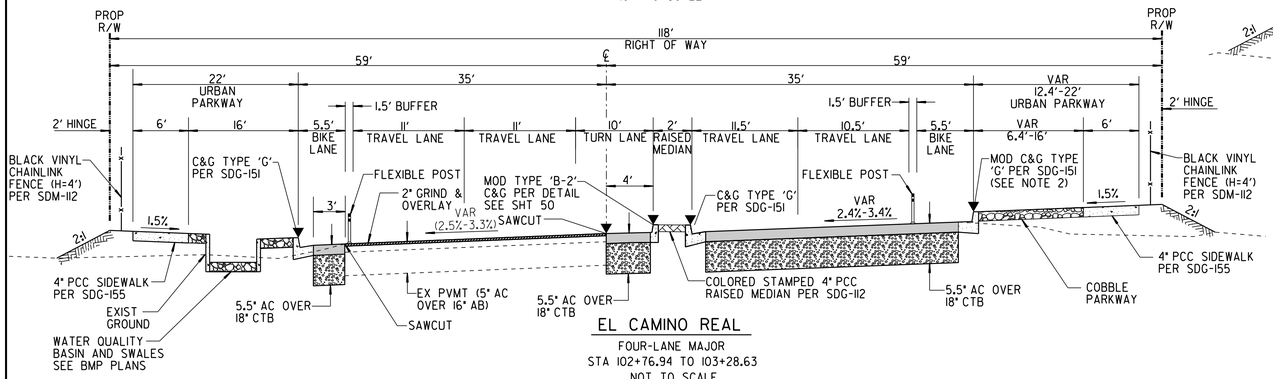
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NOT TO SCALE



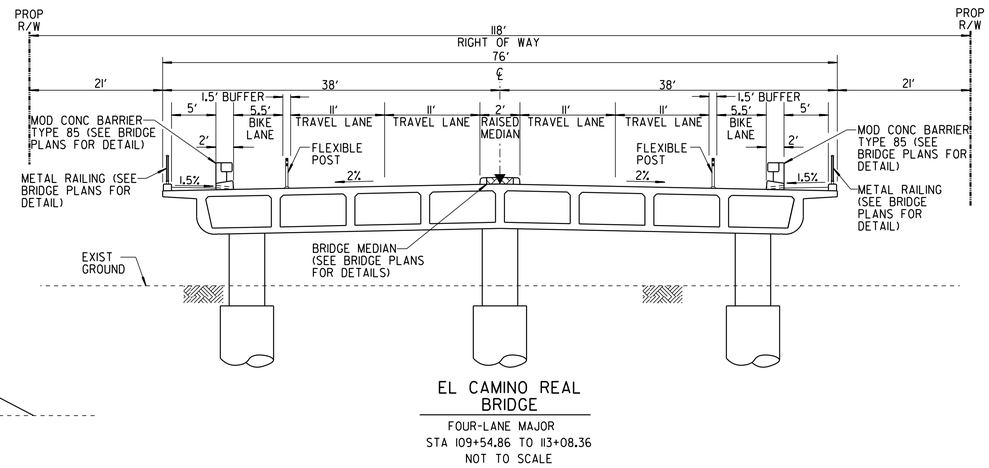
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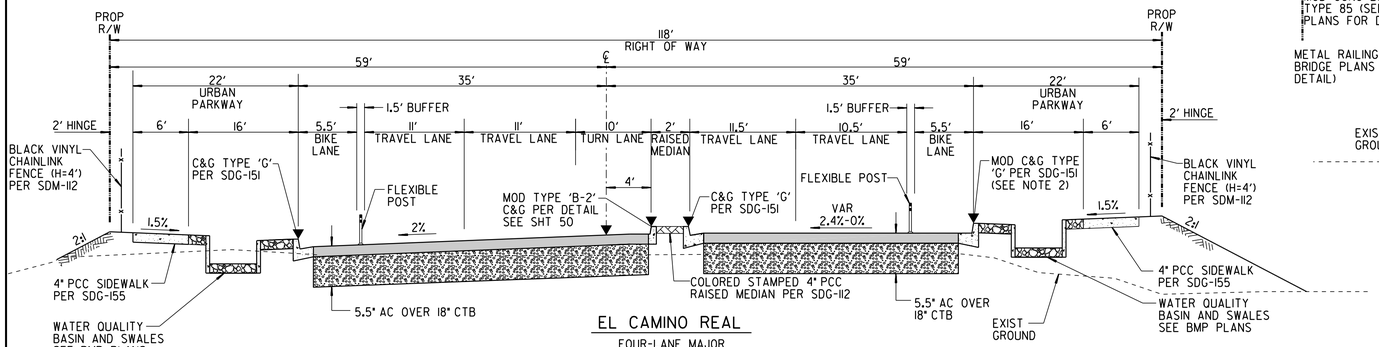
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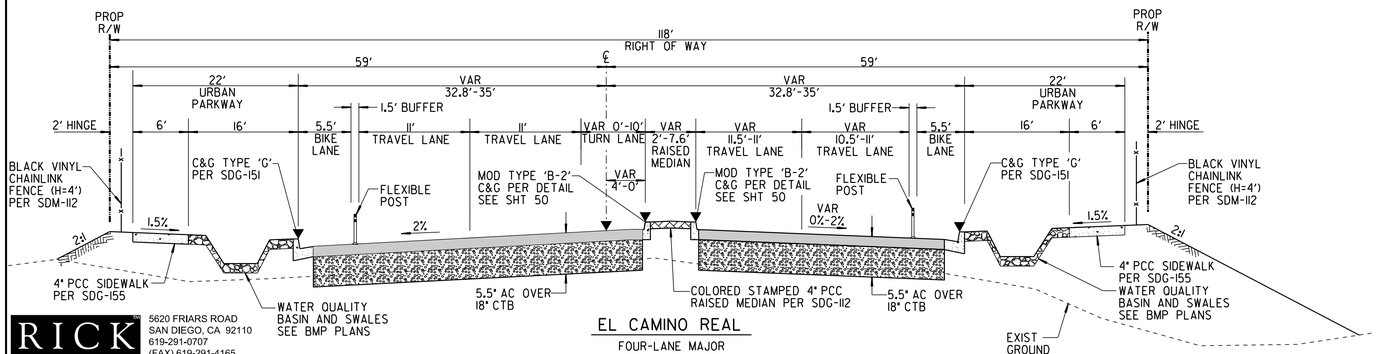
EL CAMINO REAL BRIDGE

FOUR-LANE MAJOR
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EL CAMINO REAL

FOUR-LANE MAJOR
STA 103+28.63 TO 104+33.30
NOT TO SCALE



EL CAMINO REAL

FOUR-LANE MAJOR
STA 104+33.30 TO 108+01.48
NOT TO SCALE

NOTES:
1. STAMPED CONCRETE PER SDG-112. BOMANITE, BOMACRON STAMPED CONCRETE- RIVER ROCK PATTERN/COLOR TO BE SOMBRERO BUFF OR APPROVED EQUAL

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3. ASPHALT CONCRETE TO BE LEFT 2" LOW. THE FINAL 2" OVERLAY OF AC TO BE INSTALLED RIGHT BEFORE FINAL STRIPING.

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C-6

EL CAMINO REAL BRIDGE/ ROAD WIDENING

TYPICAL SECTIONS 1

CITY OF SAN DIEGO, CALIFORNIA
ENGINEERING & CAPITAL PROJECTS DEPARTMENT
SHEET 17 OF 176 SHEETS

WBS S-00856

REGISTERED PROFESSIONAL ENGINEER — EDGAR A. CABRERA — NO. 58844 — STATE OF CALIFORNIA

APPROVED:
FOR CITY ENGINEER _____ DATE
RONAK REKANI 86523
PRINT DCE NAME RCE#

SUBMITTED BY: JACOB RANDLES, PROJECT MANAGER
CHECKED BY: MATTHEW LOVI, PROJECT ENGINEER

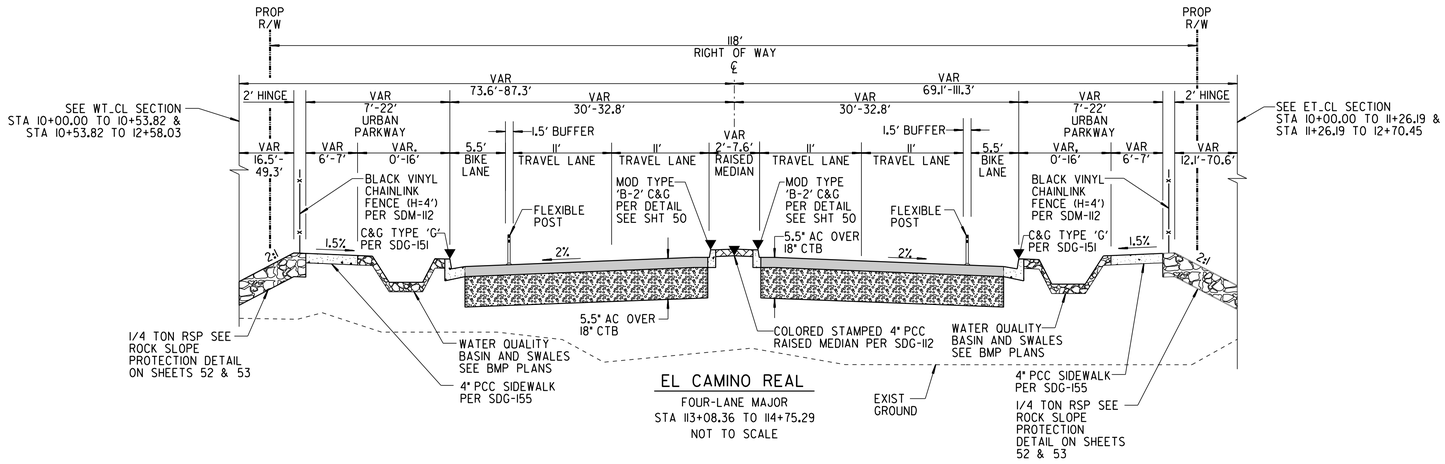
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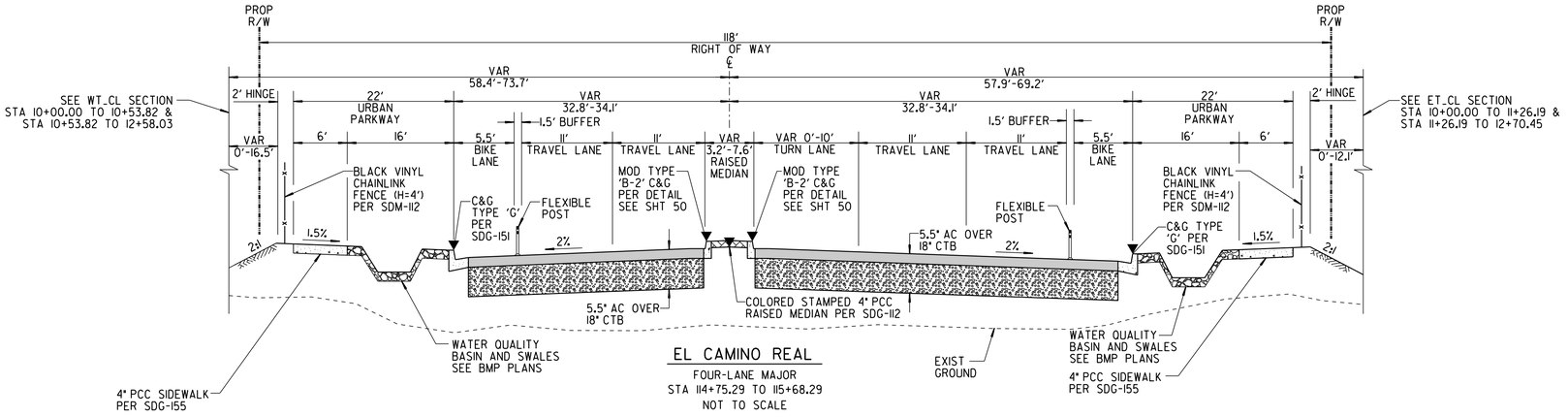
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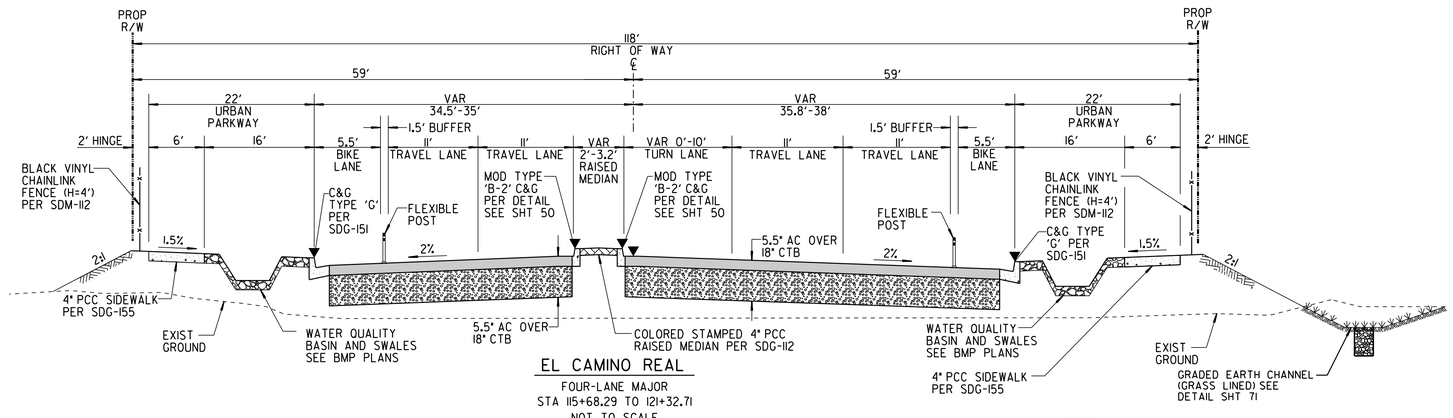
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TYPICAL SECTIONS 1

FINAL SUBMITTAL







NOTES:
1. STAMPED CONCRETE PER SDG-112. BOMANITE, BOMACRON STAMPED CONCRETE- RIVER ROCK PATTERN/COLOR TO BE SOMBRERO BUFF OR APPROVED EQUAL

2. ASPHALT CONCRETE TO BE LEFT 2" LOW. THE FINAL 2" OVERLAY OF AC TO BE INSTALLED RIGHT BEFORE FINAL STRIPING.

▼ INDICATES ELEVATIONS SHOWN ON PROFILE

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REGISTERED PROFESSIONAL ENGINEER
EDGAR A. CABRERA
NO. 58844
STATE OF CALIFORNIA

DESCRIPTION	BY	APPROVED	DATE	FILMED
ORIGINAL	RICK			

CONTRACTOR _____ NTP DATE _____
INSPECTOR _____ NOC DATE _____

TYPICAL SECTIONS 2

C-7

EL CAMINO REAL BRIDGE/ ROAD WIDENING

TYPICAL SECTIONS 2

CITY OF SAN DIEGO, CALIFORNIA
ENGINEERING & CAPITAL PROJECTS DEPARTMENT
SHEET 18 OF 176 SHEETS

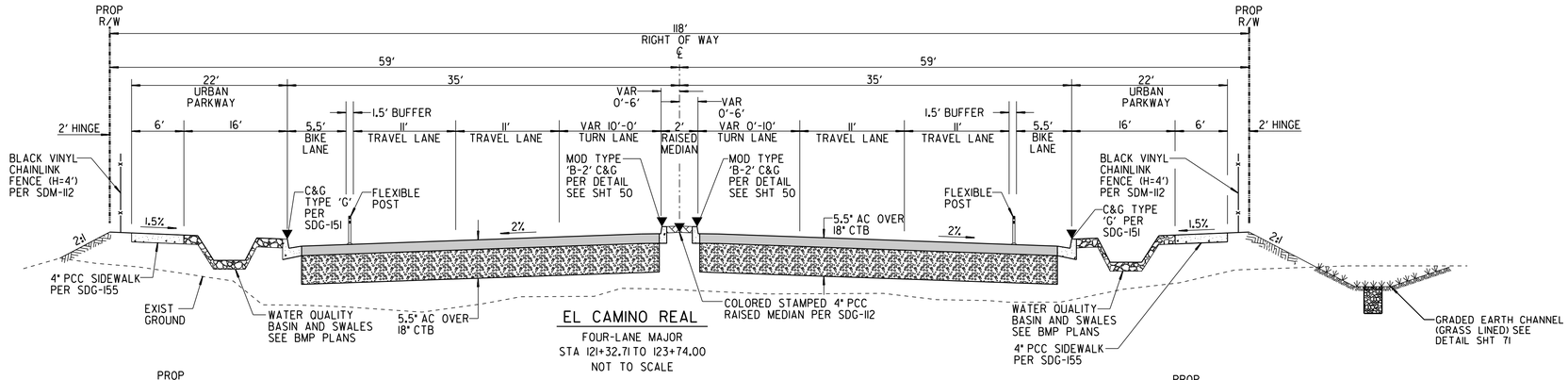
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APPROVED: _____ DATE
FOR CITY ENGINEER
RONAK REKANI 86523
PRINT DOE NAME RCE#

SUBMITTED BY: JACOB RANDLES, PROJECT MANAGER
CHECKED BY: MATTHEW LOVI, PROJECT ENGINEER
SEE EACH SHEET, CCS27 COORDINATE
SEE EACH SHEET, CCS83 COORDINATE

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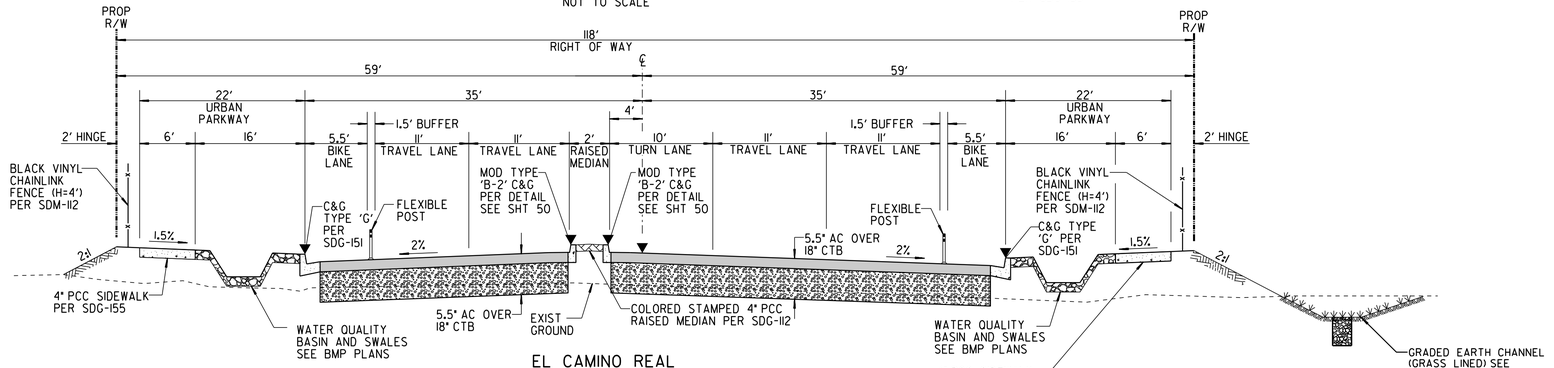


EL CAMINO REAL

FOUR-LANE MAJOR

STA 121+32.71 TO 123+74.00

NOT TO SCALE

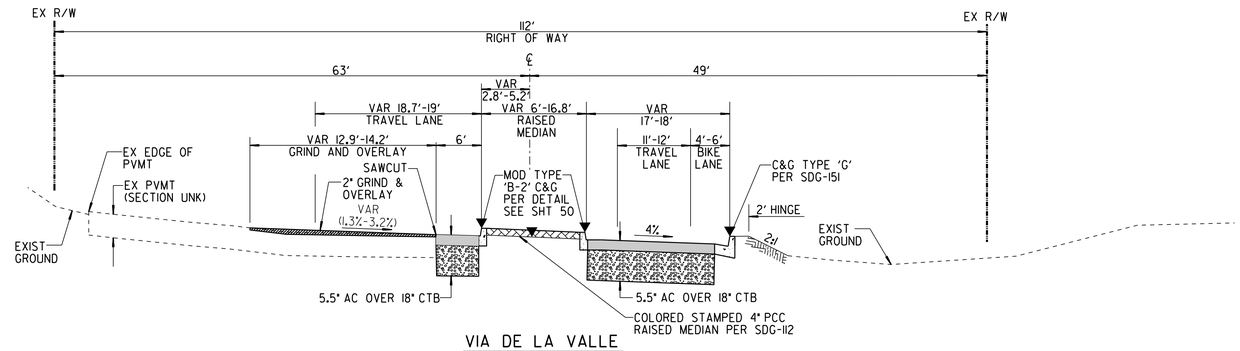


EL CAMINO REAL

FOUR-LANE MAJOR

STA 123+74.00 TO 128+60.06

NOT TO SCALE



VIA DE LA VALLE

FOUR-LANE MAJOR

STA 100+00.00 TO 101+68.77

NOT TO SCALE

NOTES:

1. STAMPED CONCRETE PER SDG-112. BOMANITE, BOMACRON STAMPED CONCRETE- RIVER ROCK PATTERN/COLOR TO BE SOMBRERO BUFF OR APPROVED EQUAL

2. ASPHALT CONCRETE TO BE LEFT 2" LOW. THE FINAL 2" OVERLAY OF AC TO BE INSTALLED RIGHT BEFORE FINAL STRIPING.

▼ INDICATES ELEVATIONS SHOWN ON PROFILE

RICK ENGINEERING COMPANY
San Diego
5620 FRIARS ROAD
SAN DIEGO, CA 92110
619-291-0707
(FAX) 619-291-4165
rickengineering.com
Riverside - Orange - Sacramento - San Luis Obispo - Phoenix - Tucson - Denver

REGISTERED PROFESSIONAL ENGINEER — EDGAR A. CABRERA — NO. 58844 — STATE OF CALIFORNIA

C-8

EL CAMINO REAL BRIDGE/ ROAD WIDENING

TYPICAL SECTIONS 3

CITY OF SAN DIEGO, CALIFORNIA
ENGINEERING & CAPITAL PROJECTS DEPARTMENT
SHEET 19 OF 176 SHEETS

WBS S-00856

APPROVED: FOR CITY ENGINEER — DATE
RONAK REKANI — PRINT DCE NAME — 86523 RCE#

SUBMITTED BY: JACOB RANDLES, PROJECT MANAGER

CHECKED BY: MATTHEW LOVI, PROJECT ENGINEER

DESCRIPTION	BY	APPROVED	DATE	FILMED
ORIGINAL	RICK			

SEE EACH SHEET CCS27 COORDINATE

SEE EACH SHEET CCS83 COORDINATE

CONTRACTOR — NTP DATE
INSPECTOR — NOC DATE

42011-19-D

TYPICAL SECTIONS 3

FINAL SUBMITTAL