DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-3137
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 3, 2019

11-SD-8, 15, 163, 805
PM VAR
San Diego State University Mission Valley Master Plan
DEIR/SCH#2019011042

Ms. Laura Shinn
Director
SDSU Facilities Planning, Design and Construction
5500 Campanile Drive
San Diego, CA 92182

Dear Ms. Shinn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the San Diego State University Mission Valley Master Plan located near Interstate 8, Interstate 15, Interstate 805, State Route 163 (I-8, I-15, I-805 and SR-163). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans reviewed the DEIR and appendices. The multi-modal access from the main campus, VMT reduction, reduction in parking, and mobility hubs were all not clearly demonstrated in the document. A project that reduces VMT should also see a reduction in direct traffic impacts, however, the project currently has multiple direct impacts to state highways and local roads.

Per State planning goals, Caltrans recommends that CSU include strategies to reduce VMT by strategically directing discretionary transportation investments in support of housing production near available jobs, and funding by CSU of transportation options that contribute to the overall health of Californians and reduce greenhouse gas emissions such as transit, walking, and biking.

The SDSU Mission Valley Master Plan is an ideal project to establish van pools, mobility hubs, establish a transit center that is central to the project, create off-

site bike and pedestrian connectivity to SDSU Main Campus, and decrease single occupancy vehicle trips.

Coordination with the City of San Diego, Caltrans, San Diego Metropolitan Transit System (MTS), SANDAG and SDSU in a working group is recommended.

Caltrans has the following technical comments:

Mitigation statements

In the mitigation section pages 11555 ES-55 through ES-63, ES-65 to ES-66, ES-68 to ES-69, please delete each of the sentences identified with the state highway mitigation that provide:

> "To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

As the lead agency, CSU has responsibility for discussing mitigation measures proposed for the project, including any needed improvements to the state transportation system. (14 C.F.R., section 15126.4) Further, consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. It would appear that CSU is making the erroneous assumption that off-site mitigation is solely the responsibility of Caltrans. CSU has the responsibility of mitigating CSU's effects of regional infrastructure, unless it can be shown that another agency has *exclusive* responsibility. (City of San Diego v. Board of Trustees of California State University (2015) 61 Cal. 4th 945, 957)

Traffic Impact Study

1. Traffic signal optimization or signal timing is performed on a continual basis by the Caltrans Signal Operations Branch, therefore, signal timing is not

considered a mitigation measure. Adaptive Traffic Signal Controls can be utilized as a mitigation measure.

2. A direct impact was identified along Friars Rd /Interstate 15 (I-15) Interchange from the SDSU Mission Valley project. The draft TIA is assuming that a different developer (Quarry Falls Project) will be building some improvements at the mentioned interchange. The Quarry Falls Project has not moved forward and SDSU should analyze this interchange as is. The proposed improvements by Quarry Falls do not mitigate the SDSU's direct impacts. SDSU Mission Valley project should be considering the ultimate condition for the Friars Rd interchange/bridge to include standard lane widths, wide sidewalks, and class IV bike lanes.
3. A direct impact was identified at the southbound (SB) I-15/Friars Rd ramps intersection for the AM & PM peak hour without event conditions. The SDSU Mission Valley Project is proposing to optimize the above-mentioned intersection's signal timings. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.
4. A direct impact was identified at the northbound (NB) I-15/Friars Rd ramps intersection for the AM and PM peak hours without event conditions. The SDSU Mission Valley Project is proposing to optimize the above-mentioned intersection's signal timings. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.
5. A possible mitigation measure in addition to bringing the Friars Rd interchange to design standard is to add adaptive signals along Friars Rd between I-15 and State Route 163 (SR-163).
6. The horizon year (2037) identifies a direct impact at the SB & NB I-15 ramps/Friars Rd intersections for the AM and PM peak hours. The SDSU Mission Valley Project is proposing to partially add improvement beyond what the Quarry Falls development is required to if the development moves forward. However, it stops short in the proposal to widen the existing Friars Rd bridge to add wide sidewalks and bike lanes. The draft TIA states that "it is expected that pedestrian activity will be very low [through the bridge] given the limited surrounding uses and, therefore pedestrian calls will be very rare and were not included in the operation analysis." Caltrans disagrees with this statement, there are a lot of residences east of the I-15 that will most likely walk/bike towards the SDSU Mission Valley Project. The I-15/Friars Rd bridge needs to be widened to

accommodate capacity for bicycles and pedestrians for bike and pedestrian safety.

7. Caltrans disagrees with the statement "the adjacent ramp meter causes queuing through this intersection (NB & SB I-15/Friars Rd) and without improving ramp meter operations, the operations will remain above the threshold – therefore improvements are infeasible." Caltrans uses the ramp metering system as part of the Transportation Systems Management and Operations (TSM&O) to operate the highway system at full potential. By controlling the rate of the ramp meter, traffic entering the freeway main lanes, Caltrans can manage the demand at a level near freeway capacity and maximize flow efficiency on the freeway. Loop detectors and/or other detection technologies are placed on the freeway upstream of the ramp entrance to gather travel information necessary to monitor freeway performance and establishing optimal meter rates. By just increasing the ramp release without an evaluation of the whole system, more vehicles will merge into the main lanes, pushing the demand passing the critical operation threshold, creating an unstable, stop and go condition on both the main lanes and the ramp. This causes an increase in congestion, not a traffic mitigation. Consider other forms of mitigation at these locations.
8. The horizon year (2037) identifies a direct impact at the SB SR-163 ramps/Friars Rd intersection for the PM peak hour. The SDSU Mission Valley Project is proposing to optimize the signal phasing as a mitigation measure for this impact. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please proposed a valid mitigation measure.
9. The intersection at westbound (WB) Interstate 8 (I-8) exit ramp at Fairmount Ave/Alvarado Canyon Rd/Camino del Rio North was not identified as having a direct impact for the horizon year (2037) in the draft TIA. However, based on the data shown, an increase of delay during the AM and PM peak hour increasing the queue length beyond the storage capacity of the exit ramp and into the main lanes. A mitigation measure should be proposed, including improvements to Fairmount Ave along with the existing adjacent bridges on I-8, squaring up the existing entrance and exit ramps, and providing improved pedestrian and bike facilities that would benefit the entire community.

10. A detailed Traffic Management Plan should also be developed as part of the DEIR for event traffic handling. Stating event traffic impacts as significant and unavoidable is not adequate.
11. Table 1 of the Draft TIA concludes to have 14.4% to 14.7% of overall trip reductions. Please provide the data used to calculate these percentages.
12. There is an existing Metropolitan Transit System Rapid Bus Route 235 that currently travels from Downtown San Diego to Escondido. Approximately 35% of generated vehicular trips are arriving/departing from I-15, yet no plans on adding a transit stop within the SDSU Mission Valley Campus or Trolley are being proposed.
13. In order to encourage active transportation and public transit, and reduce VMT and Greenhouse Gas Emissions (GHG), we recommend that the Project consider a reduction in parking supply in compliance with City of San Diego recently adopted Ordinance 21057.
14. Page 4.15-9 identifies the Individual Reduction for Neighborhood Site Enhancements as 11.08%. Please provide the calculations, descriptions and supporting data for this and the remaining CAPCOA Category Transportation Demand Management (TDM) Trip Reductions in Table 4.15-1.

Synchro:

15. Submitted Synchro files were not running and have major fatal geometry flaws. Please provide us with working electronic files and complete our analysis.
16. EB Friars Rd from Ulric Street to SR-163 NB exit ramp to Friars Road missing 2 lanes.
17. EB Friars Rd at the I-15 Interchange is incorrect, three through lanes going towards the bridge with only two lanes.
18. Traffic volumes for the SB Fairmount Ave to WB I-8 and the NB Fairmount Ave to WB I-8 entrance ramps.
19. Traffic volumes for the NB Fairmount Ave to EB I-8 entrance ramp.

Vehicle Miles of Travel (VMT) Analysis

A VMT analysis is included in the DEIR appendices (Transportation Impact Analysis, 4.15-1) that contains a VMT analysis on pages 250-255.

1. The analysis makes use of a "service population" denominator for a mixed-use development, rather than examining each use individually and comparing to recommended thresholds. Please refer to the use the Technical Advisory guidance and resources found at the webpage for the Governor's Office of Planning and Research. http://www.opr.ca.gov/ceqa/updates/sb-743/.

2. Using a per-service-population basis rather than an absolute VMT as recommended in the Technical Advisory does not properly reflect the impact of additional new VMT from the SDSU Mission Valley campus project. There is no way to choose a service population denominator that is not arbitrary.

Caltrans does not agree with the findings of the VMT analysis. With the proposed addition of 4,500 new housing units, approximately 40,000-45,000 average daily trips can be expected to be generated by the SDSU Mission Valley campus project. A rational approach that accurately identifies and describes the Project VMT and related impacts should be provided.

Air Quality

Caltrans recognizes the project may violate the Regional Air Quality Standards (RAQS) and State Implementation Plan (SIP) and may cause or contribute to exceedances of California Ambient Air Quality Standards and suggest that this be rectified in a recirculated DEIR or in the Final environmental document.

Hazardous Waste/Materials

The project DEIR has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed development. It is recommended that a Phase II site assessment be performed prior to construction in order to understand the magnitude of any potential cost, scope or schedule impacts associated with contaminated from lead-based paint, asbestos, contaminated groundwater and any other constituents of concern identified in the DEIR.

Caltrans shall be notified if any hazardous waste concerns that may impact Caltrans Right-of-Way (R/W) are known during project activities.

Noise

This project is not eligible for federal aid participation in accordance with 23 CFR 772 and Caltrans is not responsible for existing or future traffic noise impacts associated with the adjacent freeways of I-8 and I-15.

Visual

Comments on section 4.1 Aesthetic of the DEIR for visual impacts to freeway viewers and to require measures to reduce any adverse visual impacts.

- Senate Bill 743 and Public Resources Code Section 21099:
  The Study contends that, "any aesthetics impact the proposed project may produce, including damage to scenic resources within a state highway, as measured under the Appendix G outlines, above cannot be considered a significant impact on the environment."

  Please discuss how the new stadium, the 20 to 24-story hotel and the residential tower(s) would be protected by Senate Bill 743 and Public Resources Code 21099.

  The project proposes three (3) very large, double-sided illuminated pylon signs adjacent to Friars Road and the I-15 freeway. Please justify why this large-scale, illuminated signage should be protected from a significant impact finding.

- Project Outdoor Advertising Signage

  The I-15 freeway users are a sensitive viewer group, due to the volume of users and the close proximity of the proposed project. The impact of the proposed project sign pylon at the east perimeter has not been adequately addressed. (See Sign 3 in Appendix B of the Lighting Study).

1. Please discuss the visual impacts of Sign #3 for freeway viewers.
2. Please describe Sign #3. Will it have moveable elements? Why will it have a brightness of 600 candelas per square meter? What will be displayed?

3. Please provide a Visual Sim to show the double-sided sign pylon with the 40-feet wide X 50-feet high sign panel on the 70-feet pole for freeway viewers.
4. Please discuss if outdoor advertising signage of this magnitude would be covered by Public Resources Code Section 21099, and if the sign could be considered a significant impact on the environment.
5. Please be advised that Caltrans has outdoor advertising permit requirements for signage adjacent to an interstate, which may limit the size, location and content of the proposed signage. Please refer to Caltrans Traffic Operations resources for statues and regulations regarding outdoor advertising (https://dot.ca.gov/programs/traffic-operations/oda/laws).
6. Please add the pylon sign(s) to all affected Visual Sims.

Interstate 805 (I-805) Freeway Users, Viewpoint #9, NB I-805:
Viewpoint #9 does not adequately depict the potentially adverse visual impacts for the freeway user. This viewpoint appears to be above eye level and is located over the river. If the viewpoint is moved north of the river and lowered to eye level, the proposed project may potentially obstruct eastward scenic views to prominent peaks.

Please adjust the location of Viewpoint #9 to be north of the right and to be at eye-level.

Please adjust Visual Sim #8 to correspond to the Viewpoint location. Please re-assess the potential visual impacts to the freeway viewer.

Minor Comments:
Table 4.1-1, Viewpoint #4 Title – At View Direction and Location, change "I-5 On-Ramp" to "Friars Road SB On-Ramp to I-8".

Visual Sim #3: Existing conditions Title: change "I-5 On-Ramp" to "Friars Road SB On-Ramp to I-8".

Hydrology and Drainage Studies

1. Our review of the appendices section of the DEIR online document found that the preliminary and high-level study of the impacts to the floodplain

were centered on the impacts to the Project property and make no mention of the impacts to I-15 nor I-8. Also, the comparison between existing and proposed conditions is not appropriate. Caltrans requires more detailed studies that analyze the Project property's impacts to the floodplain and subsequent impacts to Caltrans' properties. These studies should include all interim conditions as separate models. Adverse impacts to Caltrans' properties for any phase of the Project will not be permitted.

2. Caltrans requests that all draft Floodplain studies be submitted to Caltrans for review and comment prior to approvals for all phases and stages of the Project.
3. Post project drainage conditions for Caltrans' drainage facilities must remain unchanged from existing conditions.
4. Please clarify if there will be any improvements or alterations to Murphy Canyon Creek.
5. Caltrans must be notified in writing of floodplain impacts during Condition Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR) submittal process. State of California property does not appear on county property tax rolls.
6. There should be no floodplain impacts to the trolley under I-15 to ensure no impediment of its service.

Transit

1. Caltrans requests additional detail or plans be provided on the alignment, design, and physical connectivity of the green line trolley to the proposed purple line trolley, and green line trolley to rapid bus or local bus services.
2. Please substantiate, in detail with documentation, how the anticipated number of trolley and transit trips to and from the SDSU Mission Valley campus would be achieved. Include discussion and analyses of the number of trolleys, buses, and other transit modes, ridership, and frequency, to establish any claims of trip reductions or VMT reductions.
3. A discussion with substantiation, and a plan to provide transit services to the SDSU Mission Valley campus needs to be included as part of the DEIR to ensure that transit connectivity and adjacency is accommodated within the campus design, and is consistent with local and regional mobility plans and goals.
4. The SDSU Mission Valley project has a unique opportunity to highlight the State's goals for Transit Oriented Development.

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 system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and San Diego State University is encouraged.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

San Diego State University should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges, as well as coordinate with Caltrans as campus development proceeds and funds become available to ensure that all modes of transportation are accounted for as part of the SDSU Mission Valley campus mitigations.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Per CEQA, Caltrans requests CSU provide "fair share" funds for direct and cumulative impacts towards future improvements associated with I-8, I-15, I-805, and SR-163 corridors. Since the San Diego State University Mission Valley Master

Plan Project's direct impacts are considered significant, feasible mitigation measures to State facilities should be identified in the TIS. Impacts that are significant and unmitigated/unavoidable need to have alternative mitigation identified in the DEIR and TIS. Recommended feasible mitigation measures include "fair share" contribution towards:

- Adaptive Traffic Signals along Friars Road from I-15 to SR-163
- City of San Diego SR-163/Friars Road Interchange Project Phase 2
- Bike/pedestrian improvements to Fairmount Avenue near I – 8/Fairmount Avenue to Camino de la Reina between SDSU Main Campus and SDSU Mission Valley Campus
- I-15/Friars Road NB and SB on-ramps and off-ramps improvements
- I-15/Friars Road Bridge widening for bike and pedestrian safety improvements

Caltrans supports transit passes provided to event ticket holders to park at SDSU Main Campus and take the green line trolley to SDSU Mission Valley Stadium.

Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (http://www.dot.ca.gov/trafficops/ice.html).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement, or Cooperative Agreement.

Right-of-Way

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 within the Caltrans' R/W, and any corresponding technical studies.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review