

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



May 30, 2023

11-SD-5, 8
PM VAR

Coastal Resilience Master Plan
NOP/SCH#2023050148

Ms. Jordan Moore
Senior Environmental Planner
City of San Diego
9485 Aero Drive
San Diego, CA 92123

Dear Ms. Moore:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) for the Coastal Resilience Master Plan located near Interstate 5 (I-5) and Interstate 8 (I-8). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between

various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Impact Study

- A Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) should be provided for this project, if applicable. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.¹
- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

Climate Change

Caltrans District 11 supports the City's goal to further evaluate coastal climate impacts in order to identify adaptation options and improve resilience. During the development of the detailed site analyses please consider Caltrans' and other agency's previous work regarding coastal climate resilience and nature-based solutions including, but not limited to, the below examples:

- *Caltrans Climate Change Vulnerability Assessment*
- *Caltrans Climate Change Adaptation Priorities Report*
- *Caltrans Design Manual for Hybrid Coastal Protection Strategies*
- *Caltrans Climate Change Adaptation for Pacific Coast Highway Bicycle & Pedestrian Infrastructure* (estimated release date 7/2023)
- *The California Coastal Commission's Sea Level Rise Coastal Adaptation Planning Guidance for Critical Infrastructure*
- *The Federal Highway Administration's Nature-Based Solutions for Coastal Highway Resilience*
- *The California Natural Resource Agency's Toward Natural Shoreline Infrastructure to Manage Coastal Change in California*
- *The Ocean Protection Council's State Agency Sea-Level Rise Action Plan for California*

When considering adaptation concepts and design feasibility please consider the impacts not only from sea level rise and storm surge, but also coastal erosion, changes in stillwater level, riverine flooding, scour, groundwater, earthquakes, liquefaction,

¹ California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

tsunami, wildfire and other stressors associated with climate change. In addition, when evaluating potential sea level rise adaptation strategies, please consider emphasizing phased adaptation/resilience solutions and management strategies rather than large capital projects. Phased adaptation solutions allow for change over time and may be more cost effective when compared to large capital projects. Phased solutions are also preferred for their less permanent impact to the environment and allow for less disruptive impacts to natural processes.

Please include Caltrans in the stakeholder engagement process during the development of this master plan. Caltrans looks forward to reviewing the detailed analysis of the ten sites within the PEIR and will provide additional comments once released.

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 EIR 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 draft Environmental Document.

Right-of-Way

- 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 contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1598 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Farah Kushkaki for

MAURICE A. EATON
Branch Chief
Local Development Review