

California Department of Transportation

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June 19, 2023

11-SD-8, 15
PM VAR
Fenton Parkway Bridge Project
NOP/IS/SCH#2023050534

Ms. Anne Collins-Doehne
Director, Land Use Planning and Environmental Review
The Board of Trustees of the California State University
401 Golden Shore
Long Beach, CA 90802

Dear Ms. Collins-Doehne:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation and Initial Study (NOP/IS) for the Fenton Parkway Bridge Project located near Interstate 8 (I-8) and Interstate 15 (I-15). 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.

We look forward to working with The Board of Trustees of the California State University 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. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.¹ Please include Caltrans ramps at the Texas Street/Qualcomm Way/I-8 and Fairmont Avenue/I-8/I-15 interchanges.
- Please provide a local mobility analysis, if available.
- 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.

System Planning

- Comprehensive Multimodal Corridor Plans (CMCPs)
 - The South Bay to Sorrento CMCP lists proposed transportation solutions and projects for the study area. One such solution is bridge construction at Fenton Parkway, which includes the construction of a bridge to provide an alternate route from Fenton Parkway to Camino Del Rio N over the San Diego River during flooding. The proposed Fenton Parkway Bridge Project appears to fulfill the purpose of this solution.
 - The Kumeyaay Corridor CMCP is currently in progress, with expected completion in late 2023. This CMCP will present transportation solutions within the Kumeyaay Corridor study area, a two-mile-wide east-west corridor along I-8 from its western terminus at Nimitz Boulevard to Lake Jennings Park Road in Lakeside. Continued collaboration between Caltrans, SANDAG, and The Board of Trustees of the California State University/San Diego State University is recommended.
- VMT Reduction Opportunities
 - Transit: System Planning recommends moving the location of the MTS Route 18 Bus Stop from Mission City Parkway to Camino Del Rio N. Please consider implementing a bus-only lane on the bridge and incorporating a bus connection to Fenton Parkway Trolley Station.
- Please incorporate Americans with Disabilities Act (ADA) accessibility for the proposed bridge project into the draft EIR.
- Please confirm the proposed speed limit for the bridge.

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

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 network. 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 network. Early coordination with Caltrans, in locations that may affect both Caltrans, San Diego State University Mission Valley and the City of San Diego is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with California State University (San Diego State University Mission Valley) and the City of San Diego to evaluate potential Complete Streets projects. Please coordinate with Caltrans for bike and pedestrian improvements on Mission City Parkway.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

It is recommended for at least 42 inches bridge railing on both sides of the proposed bridge.

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.

Wildfire

Caltrans looks forward to reviewing the potential impacts related to an adopted emergency response plan or emergency evacuation plan and the further evaluation included in the Draft EIR. Since the installation and maintenance of this project could also exacerbate the impacts of wildfire in the project location Caltrans also looks forward to reviewing the proposed mitigation measures taken to reduce risk of wildfire during construction of this project.

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) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Hanwen Yi P.E.
Acting on behalf of

MAURICE A. EATON
Branch Chief
Local Development Review