

California Department of Transportation

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May 28, 2024

11-SD-8,15
PM VAR
Fenton Parkway Bridge Project
DEIR/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 Draft Environmental Impact Report (DEIR) for the Fenton Parkway Bridge Project located near Interstate 8 (I-8) and Interstate 15 (I-15) in San Diego. 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 California State University, San Diego also known as San Diego State University (SDSU) in areas where SDSU 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:

Hydrology and Drainage Studies

- The proposed project features may significantly alter the Federal Emergency Management Agency (FEMA) defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to the Interstate-8 and Interstate-15 facilities. Caltrans requests that the City of San Diego, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department regarding floodplain administration and allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the permit issue, to assure that Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from this project. In addition,
- Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to the Caltrans when the City of San Diego approves the permit to alter the floodplain and/or when the Developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).

Project Plans:

- At the intersection of Camino Del Rio North and Mission City Pkwy, an existing 54" RCP storm drain is to be relocated. Please clarify:
 - a) Who owns the existing drainage system?
 - b) Who will maintain the proposed drainage system?
 - c) For the portion of the existing storm drain system to be abandoned – is it a removal or abandon by slurry backfill?
- Please provide the detail plans and calculations for the outlet headwall with rip rap.

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 and SDSU 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.

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.

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 network integrated through applicable "smart growth" type land use planning and policies.

SDSU should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

System Planning

- Comprehensive Multimodal Corridor Plans (CMCPs):
 - The South Bay to Sorrento CMCP lists proposed transportation solutions and projects for the study area. Attachment A: Recommended Transportation Solution Set includes the project Bridge Construction at Fenton Parkway, which includes the construction of a bridge to provide an alternate route from Fenton Parkway to Camino Del Rio North 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 draft form, with an expected final release date in summer 2024. 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. Appendix E: Transportation Solutions, Cost Estimates, and Phasing Results of the draft CMCP includes the project R21 Fenton Parkway. This project includes the extension of Fenton Parkway from the existing southern terminus to Camino Del Rio North and Mission City Parkway. Continued collaboration between Caltrans, SANDAG, City of San Diego and SDSU is recommended.
- 2021 Regional Transportation Plan
 - Appendix A: Transportation Projects, Programs, and Phasing lists Transit Leap and Span of Service projects relevant to the Fenton Parkway Bridge Project. Local Bus 647 includes the Mission Valley Loop via Friars Road, Fenton Parkway, and Camino Del Rio South as well as Local Bus 648 which also

includes Mission Valley Loop via Grantville, Camino Del Rio South, and Fenton Parkway. Both local bus routes have an estimated 10-minute frequency with the start of service beginning in the year 2035.

- Planned Projects:
 - The Purple Line project could have potential alignments through the SDSU Mission Valley campus that could impact vehicle miles traveled around the Fenton Parkway Bridge project area.
- Americans with Disabilities Act (ADA) Accessibility: The Draft EIR and other materials provided do not include a discussion of ADA accessibility on or adjacent to the bridge. Please incorporate this discussion into the Final EIR.
- Please confirm the proposed speed limit for the bridge.
- It is recommended to coordinate with San Diego Metropolitan Transit System (MTS) to create a bus stop at the MTS Green Line Fenton Parkway Station to encourage multimodal transit connectivity within the area.
- Within DEIR Appendix A: Notice of Preparation and Scoping Comments, several of the 16 comment letters received regarding the Notice of Preparation appear to be missing, including the Caltrans comment letter. Please include them in the Final EIR.

Hauling/Traffic Control Plan

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at:

<http://www.dot.ca.gov/trafficops/permits/index.html>

A Traffic Control Plan may need to be submitted to Caltrans District 11, including the interchanges at I-8/Camino del Rio North, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (I-8) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

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 draft Environmental Document.

Sustainability

Caltrans recommends collaboration between our agency and SDSU on the proposed transportation related topics including adaptation strategies to help improve resilience to potential climate change impacts and strategies to reduce vehicle miles traveled (VMT), and off-road and on-road greenhouse gas (GHG) emissions.

Caltrans recognizes that transportation is a leading contributor to GHG emissions in the region and is dedicated to reducing and mitigating transportation related emissions. We recommend collaborating with Caltrans on the following measures brought up by this plan in Table 2.5: increasing the use of zero emission vehicles, installing electric vehicle (EV) charging stations, identifying right-of-way areas to be used for carbon sequestration, and complete streets.

The existing climate hazards discussed in this document will have an impact of the transportation system. We recommend working with Caltrans on determining the preventative strategies the Caltrans can take to keep roadways operational and

Ms. Anne Collins-Doehne, Director

May 28, 2024

Page 6

ensure their longevity against climate stressors such as increased temperatures, changes in precipitation patterns, wildfire, and flooding. Caltrans recognizes the central role that transportation planning plays in safety and ensuring that when these natural hazards do occur, citizens have a reliable evacuation route.

Broadband

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

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 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