

## California Department of Transportation

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11-SD-8  
PM 1.859  
Midway Rising  
Draft Subsequent EIR/SCH#2023120451

Ms. Anne Jarque  
Senior Planner  
City of San Diego  
1222 1<sup>st</sup> Avenue, MS 501  
San Diego, CA 92101

Dear Ms. Jarque:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Draft Subsequent Environmental Impact Report (EIR) for the Midway Rising project located near Interstate 8 (I-8) and Sports Arena Boulevard/West Mission Bay Drive 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 the City of San Diego 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:

The environmental document refers to the *Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report* dated May 2018. The document states for mitigation measures:

**“TRANS 5.2-17 through TRANS 5.2-24** would be implemented by Caltrans to reduce impacts to freeway segments and ramp meters; however, impacts to Caltrans facilities would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance would be implemented prior to occurrence of the impact.”

Caltrans is not responsible for mitigation of development project(s) impacts to state Right-of-Way (R/W). It is the responsibility for the development project to mitigate impacts to state R/W.

### **Traffic Impact Study**

- Provide a Queuing Analysis per the “Caltrans Local Development Review Safety Review Practitioner’s Guidance Appendix B Freeway Exit-Ramp Queuing Analysis” for the following locations:
  - The I-8 westbound exit to Camino Del Rio West.
  - The I-8 westbound exit to Sports Arena Boulevard.
  - The I-5 southbound exit to Camino Del Rio West.
  - The I-5 southbound exit to Sea World Drive.
- The provided Synchro model does not include the I-5 southbound exit to Camino Del Rio West. There needs to be a queuing analysis per comment #1 above.
- The Synchro link distance for the segment of Camino Del Rio West between Moore Street and the I-5, I-8 exits is modeled incorrectly showing 4009 feet and incorrect lane configurations. Revise accordingly and there needs to be a queuing analysis per comment #1 above.
- The Synchro link distance of 1500 is incorrect for the I-5 southbound exit to Sea World Drive, and there are not two lanes for the full length of the exit ramp. Revise accordingly and there needs to be a queuing analysis per comment #1 above.
- The I-5 northbound ramps and Sea World Drive intersection needs to be included in the Synchro analysis to accurately model the I-5 and Sea World Drive interchange operations, revise accordingly.
- The Synchro link distance of 2600 is incorrect for the I-8 westbound exit to Sports Arena Boulevard, and there are not four lanes for the full length of the exit ramp.

Revise accordingly and there needs to be a queuing analysis per comment #1 above.

- When there is queuing on southbound Camino Del Rio West that reaches the I-5 southbound exit and I-8 westbound exit, provide mitigation to clear out the queue. A potential solution is providing an extended synchronized and coordinated green time for the traffic signals between Hancock Street and Lytton Street. This could be triggered by placing loops at the freeway exits that are connected to the traffic signals to initiate the green time sequence.
- Include in the proposed project pedestrian scale lighting and other features on the multi-use path to increase user comfort.
- A feasibility study is recommended, including a cost estimate, to construct a Sports Arena to San Diego River Path Class 1 Bridge (over I-8) from San Diego River Trail (south) to Hancock Street to Kurtz Street.

### **Hydrology and Drainage Studies**

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.
- Provide a pre and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details. Include detention basin details of inlets/outlet.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' R/W.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modifications to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.
- Call out Caltrans drainage facilities.

### **Design**

- The draft PEIR identified significant impacts to I-5/I-8 Main lanes and interchanges. We recommend partnering with SANDAG and Caltrans to determine appropriate mitigations that includes Multi-modal and Manage Lanes Improvements.
- Please confirm if the City of San Diego will consider revising the Study Area to go beyond the immediate surface streets. As mentioned, we see significant impacts to the state highway system due to the addition of housing and commercial establishments.
- We did not see mention of the SANDAG CMH-CMCP that overlaps with this project. Will there be coordination with that plan/project?

## System Planning

1. Midway Rising Draft Subsequent EIR
  - a. Regarding various mitigation measures related to transit such as TRANS 5.2-1: Commercial Shuttle and MM TRANS 5.2-2: Employee Transit Subsidy, Caltrans System Planning Branch is interested in the development of these elements, and we encourage collaboration with the Caltrans Transit Coordinator. Related to MM TRANS 5.2-2: Employee Transit Subsidy, we recommend conducting a feasibility study to analyze the number of employees that will purchase the pass and if the Vehicle Miles Travelled (VMT) mitigation method will be successful.
  - b. Section 2.4.7 2022 City of San Diego Climate Action Plan; to further comply with its implementation plan, Strategy 3: Mobility and Land Use, we recommend developing a Safe Routes to Schools safety plan for nearby schools. This also conforms with the [California Air Resources Board \(CARB\) 2022 Scoping Plan for Achieving Carbon Neutrality](#) to reduce VMT impact, ensure equitable access, and increase active transportation choices.
  - c. Section 2.4.8 2021 San Diego Forward: The Regional Plan; we recommend that the [Draft Proposed 2025 Regional Plan Transportation Network](#) be reviewed for relevance.
  - d. Section 3.3.3.2 Frontage and Off-Site Improvement: Sports Arena Boulevard; changing roadway classification for Sports Arena Boulevard from six-lane prime to four-lane prime with bus-only lanes may cause traffic increases on Camino del Rio West impacting the nearby state routes of I-5 and I-8 off and on ramps. Please coordinate with the Caltrans Transit Coordinator and System Planning Branch to discuss bus-only lanes and their potential connection to the state highway system (SHS).
  - e. Section 3.3.3.2 Frontage and Off-Site Improvement: Kurtz Street; a single-lane roundabout proposed for the three-way intersection of Kurtz Street and Hancock Street may impact Caltrans' R/W, please coordinate with Caltrans.
  - f. Section 3.3.3.5 Transit and Event Shuttles, please include projected shuttle service frequency and expected shuttle size and passenger amount. We encourage implementing a zero emissions vehicle (ZEV) shuttle.
  - g. Table 3-3, we suggest including an additional column on the table for the total sum of phases 1 and 2.
  - h. Update the map legend on Figure 3-3 to include what the different shades of green represent.
  - i. State Route 209 shield is noted on several maps; however, it is no longer active within the Caltrans' State Highway System. Please remove it from all figures where it appears.
  - j. Figure 3-20 Transit Diagram Bus Stops, we recommend using a different icon color to represent proposed new local bus stop to avoid confusion with the existing local bus stop.
  - k. Section 5.2.2.3 Regional
    - i. We recommend including mention of the SANDAG [Draft Proposed 2025 Regional Plan Transportation Network](#). The draft environmental impact report is expected to be released in summer 2025.

- ii. The SANDAG Board adopted the [2025 Regional Transportation Improvement Plan](#) in 2024. It incrementally implements the SANDAG 2021 Regional Plan.
- iii. The City of San Diego began an update in 2024 to its [2013 City of San Diego Bicycle Master Plan](#)
- iv. Please consider including a review of the [City of San Diego 2025 Mobility Master Plan](#).
- I. Chapter 6, Cumulative Impacts
  - i. 6.3.2.1 Summary of Midway-Pacific Highway Community Plan Update (CPU) PEIR Impact Analysis; we recommend reviewing the [California Action Plan for Transportation Impact](#) (CAPTI) and [CAPTI 2.0](#) to find strategies that will help reduce significance on environment impact mitigation measures TRANS 5.2.-17 through TRANS 5.2-24. Examples of those strategies are VMT mitigation banks and exchanges to align infill housing development with state climate policies.
2. Comprehensive Multimodal Corridor Plans (CMCPs)
  - a. [The Central Mobility Hub and Connections CMCP](#) includes a general discussion of the redevelopment of the existing Sports Arena facility and related transportation improvements in the main document. Please review [Appendix D, Transportation Solution Strategies](#), for a listing of various proposed strategies relevant to this project.
  - b. [The I-8 Kumeyaay Corridor CMCP](#) includes the Sports Arena and Midway area within its study area. Please review [Appendix E, Transportation Solutions, Cost Estimates, and Phasing Results](#), for a listing of various proposed strategies relevant to this project.
3. Several planning documents frequently utilized by the Caltrans System Planning Branch discuss the importance of transportation and connectivity, land use planning, and safety. These documents may provide further background on state and regional planning in relation to the Midway Rising project. Below are several examples that may be utilized.
  - a. [SANDAG 2021 Regional Plan](#)
    - i. Please see [Appendix A. Transportation Projects, Programs, and Phasing](#), for relevant projects.
      - Midway-Pacific Highway
        - Urban Core Mobility Hub
        - Commuter Rail 581 (2050)
        - Commuter Rail 581B (2050)
        - Commuter Rail 583 (2050)
        - Rapid 10 (2025)
        - Rapid 28 (2035)
        - Rapid 640 (2035)
        - Pacific Coast Highway/Central Mobility Bikeway (2035)
      - Central Mobility Hub
        - TL23: Rapid 28 (Point Loma to Kearny Mesa via Central Mobility Hub, Linda Vista)
      - Interstate 8

- TL19: Rapid 10 Phase 1 (La Mesa to Ocean Beach via Mid-City, Hillcrest, Old Town- light version of Rapid)
  - TL20: Rapid 10 Phase 2 (La Mesa to Ocean Beach via Mid-City, Hillcrest, Central Mobility Hub- full version of Rapid)
  - b. [SANDAG Draft Proposed 2025 Regional Plan Transportation Network](#)
    - i. Please see the section on Central & East County Transportation Projects for relevant projects.
      - Rapid 210: La Mesa to Ocean Beach
      - Rapid 229: Downtown to Pacific Beach
      - NEV Service Area: Ocean Beach
      - On-Street Bikeway (2036-2050)
      - Please note, extension of Rapid Bus Route 10 is not listed in the draft 2025 Regional Plan
  - c. [California Transportation Plan \(CTP\) 2050](#)
    - i. Consider looking ahead to potential future travel modes changes such as connected and autonomous vehicles (CAVs). CTP 2050 states automated vehicles, such as automated taxi fleets, could travel 20-95% of U.S. roads by 2030. CAVs could offer congestion relief, less demand for parking, and improve safety and network performance benefits.
    - ii. The CTP 2050 discusses improving and expanding airport access. The San Diego International Airport (SDIA) is located 1.8 miles from project site and the North Island Air Station Airport is located 2.8 miles from project site. Please consider encouraging mobility and transportation options near project area to enhance airport access opportunities.
  - d. [Smart Mobility Framework 2010](#)
    - i. Consider reviewing parking fee opportunities in project parking areas to decrease single occupant vehicle travel.
4. Other Proposed Improvements
- a. On I-5 at post miles 0.30 to 36.0, Bridge preservation in San Diego County at various locations from Vesta Street undercrossing to Old Town viaduct. The nearest post mile (PM) to the project area is PM 19.7.

## **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.

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 the City to evaluate potential Complete Streets projects.

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.

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

### **Noise**

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-8.

### **Environmental**

Caltrans has discretionary authority over any portion of the project that is or will be within Caltrans' R/W. Thus, Caltrans is a Responsible Agency under the California Environmental Quality Act (CEQA). An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. This includes work related to traffic mitigation that is located within Caltrans' R/W. The encroachment permit application should include an Environmental Document that identifies scope of work, potential impacts, and, if needed, mitigation measures within Caltrans' R/W. Supporting technical studies may also be requested.

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 Final 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 visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process
- have an approved environmental document

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to [D11.QMAP.Permits@dot.ca.gov](mailto:D11.QMAP.Permits@dot.ca.gov). 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](mailto:Mark.McCumsey@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review