

California Department of Transportation

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September 18, 2024

11-SD-8
PM R23.3
Evolve Student Housing Project
NOP/SCH# 2024080979

Ms. Kara Peterson
Director of Planning
San Diego State University
Director of Planning
5500 Campanile Drive
San Diego, CA 92182

Dear Ms. Peterson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process of the Notice of Preparation (NOP) of the Evolve Student Housing Project on the campus of San Diego State University (SDSU) located near Interstate 8 (I-8) and College Avenue 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 SDSU in areas where the University 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 Engineering and Analysis

The Draft Environmental Impact Report needs to include a safety review that follows the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf>.

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

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.

Hydraulics

1. Please provide Evolve Student Housing Project Improvement Plans and include:

- Grading Plans with 1-foot contours.
- Drainage Infrastructure Plans (existing and proposed).
- Complete Hydrology and Hydraulics Report.
- Show Caltrans' Right-of-Way (R/W) and I-8 centerline.

2. Provide any development and/or improvement within Caltrans' R/W and include:

- Existing and Proposed Grading Plans with 1-foot contour intervals.
- Existing and Proposed Drainage Features.
- Caltrans' R/W and I-8 centerline.
- Existing and Proposed Roadway Features.
- I-8 onsite Hydrology and Hydraulics Studies in accordance with Caltrans Highway Design Manual (HDM) for the existing and proposed conditions.
- I-8 offsite existing and proposed Hydrology and Hydraulics Studies, if necessary.

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

Early coordination with Caltrans is recommended.

Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

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.

System Planning

System Planning recommends incorporating further discussion of the planned potential transportation-related projects found in the [Kumeyaay Corridor CMCP](#).

- Appendix E: Transportation Solutions, Cost Estimates, and Phasing Results
 - ID: AT3, Strategy Name: 63rd Street Class II, Description: From Montezuma Road to El Cajon Boulevard.
 - ID: AT18, Strategy Name: Baja Drive Class III, Description: From 54th Street to Eastern terminus.
 - ID: AT36, Strategy Name: Campanile Drive Class III, Description: From Hardy Avenue to Baja Drive.
 - ID: AT54, Strategy Name: College Avenue Class I (north), Description: From Del Cerro Boulevard to El Cajon Boulevard.
 - ID: AT180, Strategy Name: Montezuma Drive Class IV, Description: From Fairmount Avenue to El Cajon Boulevard.
 - ID: AT181, Strategy Name: Montezuma Road Class I (east), Description: From 54th Street to 55th Street.
 - ID: R26.5, Strategy Name: College Avenue Interchange, Description: The concept includes widening of College Avenue across I-8 to reduce conflicts, weaving, provide for Class IV cycle tracks, and enhanced pedestrian environment.
 - ID: R38, Strategy Name: El Cajon Boulevard- College Avenue to Montezuma Road, Description: Repurpose El Cajon Boulevard to provide Class IVs, wider sidewalks, bus pull-out.
 - ID: R39, Strategy Name: Montezuma Road - College Avenue to El Cajon Boulevard, Description: Repurpose Montezuma Road to provide for Class IVs and linear park.
 - ID: R54, Strategy Name: College Avenue - Transit Improvement, Description: Convert 2 general purpose lane to flex lanes and provide Class II buffer bike

lanes. Including a short segment along Montezuma Road and Campanile Drive to provide connectivity to the SDSU Transit Center.

- ID T3, Strategy Name: LRT 530, Description: Green Line Double/Third Track and Grade Separations.
- ID: T13, Strategy Name: Rapid 215, Description: Rapid 215- SDSU- Downtown via El Cajon Boulevard.
- ID: T14, Strategy Name: Rapid 625, Description: SDSU to Palomar Station via East San Diego, Southeast San Diego, National City.
- ID: T15, Strategy Name: Rapid 11, Description Rapid overlay on Route 11.
- ID: T19, Strategy Name: Lemon Grove Rapid 856, Description: Convert Route 856 to Rapid.
- ID: FF6, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – micromobility.
- ID: FF7, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – NEV.
- ID: FF8, Strategy Name: Flexible Fleets, Description: Flexible Fleet Enhanced Area in SDSU – Carshare.
- ID: MH4, Strategy Name: Mobility Hub-SDSU, Description: Parking Corrals for rideables, multilingual Interactive Kiosks, EV and e-bike chargers, Dynamic curb management, landscaping and shade, placemaking, personal delivery lockers, bike parking and fix-it stations.
- ID NO21, Strategy Name: Next OS - flex lanes Intersections - College Avenue, Description: Install flex lanes intersection technology to give priority to transit, freight and emergency vehicles and reduce intersection conflicts between vehicles, pedestrians, and cyclists, improving safety for vulnerable road users.
- ID: NO22, Strategy Name: Next OS - flex lanes Intersections - Montezuma Road, Description: Install flex lanes intersection technology to give priority to transit, freight and emergency vehicles and reduce intersection conflicts between vehicles, pedestrians, and cyclists, improving safety for vulnerable road users.
- ID: NO54, Strategy Name: Flex lanes Parking – SDSU, Description: Implement flex lanes parking functionality which provides enhanced information on parking availability, time limitations, costs, and payment in conjunction with curb management. Support ATDM functionality.
- ID: NO40, Strategy Name: Next OS - Flex Lane - Montezuma Road, Description: Flex lanes to be dynamically reserved for transit, shuttles, rideshare, carshare, HOV, and/or electric vehicles to relieve congestion and improve travel times.
- ID: NO39, Strategy Name: Next OS - Flex Lane - College Avenue, Description: Flex lanes to be dynamically reserved for transit, shuttles, rideshare, carshare, HOV, and/or electric vehicles to relieve congestion and improve travel times.
- ID: Other5, Strategy Name: Add Fiber Optics, CCTV and Detector Stations (Loops) to replace regular supply line from Fairmount Road to West Main Street, Description: This improvement is planned for the 2013 10 Year SHOPP List.

The 2021 Regional Transportation Plan relates to various aspects of the Evolve Student Housing Project-SDSU and aligns with various topics covered in the Plan.

- Appendix A: Transportation Projects, Programs, and Phasing:
(<https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/2021-regional-plan-appendix-a-2021-12-01.pdf>)
 - South Bay to Sorrento (Page A-14)
 - Project ID:TL 43, Year Built: 2035, Category: Transit Leap, Project Name: Rapid 625, Description: SDSU to Palomar Station via East San Diego, Southeast San Diego, National City.
 - Interstate 8 (Pages A39-A40)
 - ID: TL17, Category: Transit Leap, Project Name: LRT 530, Description: Green Line (Santee to Downtown, double/third tracking and grade separations).
 - ID: CC024, Category: Complete Corridor: ML/Goods Movement, Description: I-8 (I-805 to College Avenue).
 - Transit leap Frequency and Span of Service (Page A1-1).
 - Commuter Rail- Route 581 (Downtown to El Cajon via SDSU and La Mesa).
 - Commuter Rail- Route 581B (Central Mobility Hub to El Cajon via SDSU and La Mesa).
 - Rapid- Route 215 (SDSU- Downtown via El Cajon Boulevard).
 - Rapid- Route 295 (Spring Valley to Clairemont via La Mesa and Kearny Mesa).
 - Local Bus- Route 11 (SDSU- Downtown San Diego).
 - Local Bus- Route 115 (El Cajon Transit Center- SDSU Transit Center).
 - Local Bus- Route 856 (SDSU- Cuyamaca College).
 - Local Bus- Route 936 (Spring Valley- SDSU).
 - Local Bus- Route 955 (National City- SDSU).
- Appendix K: Regional Housing Needs Assessment Plan states
(<https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/2021-regional-plan-appendix-k-2021-05-01.pdf>)

“The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction. The major universities and community colleges in the San Diego region are located in urban areas served by the existing transportation network. The City of San Diego is home to San Diego State University...” (Page 36). The Evolve Student Housing Project-SDSU supports this statement by planning more student housing near existing transit and transit links.

The College Area Community Plan was adopted in 1989. A [new College Area Community Plan](#) is in draft form, with an expected final release date in late 2024.

The following planning documents frequently utilized by Caltrans System Planning should be reviewed and incorporated in the development of the Evolve Student Housing Project-SDSU. These documents may provide further background on state planning.

[California Transportation Plan 2050](#)

Encourage Efficient Land Use (Page 124).

[Climate Action Plan for Transportation Infrastructure](#)

- Executive Order N-19-19 (Page 6).
- Guiding Principle: Promoting compact infill development while protecting residents and businesses from displacement by funding transportation projects that support housing for low-income residents near job centers, provide walkable communities, and address affordability to reduce the housing-transportation cost burden and auto trips (Page 17).
- S7. Strengthen Transportation-Land Use Connections (Page 32).

Upcoming Regional Projects

- Purple Line project has potential alignments through the SDSU Mission Valley campus that could support the transportation connectivity for the future increase in student housing population.

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. Please indicate our status as a Responsible Agency for the Final Environmental Document. 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 that include the work in Caltrans' R/W, 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 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.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to 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.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review