

## California Department of Transportation

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November 17, 2021

11-SD-I-5

PM 9.64

Draft Environmental Impact Report (DEIR)  
National City Bayfront Projects SCH 2018121054

Governor's Office of Planning & Research

**Nov 18 2021**

**STATE CLEARINGHOUSE**

Anna Buzaitis  
San Diego Unified Port District  
Dept. of Planning  
3165 Pacific Highway  
San Diego, CA 92101

Dear Ms. Buzaitis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the National City Bayfront Projects located near Interstate 5 (I-5). 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 Port of San Diego in areas where the Port 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 Analysis**

The San Diego Unified Port District as the lead agency for this project, should be in alignment with state policies and state goals on evaluating transportation impacts under CEQA. Please see the following links for reference.

December 2018 Technical Advisory on Evaluating Transportation Impacts:  
[https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

Governor Office of Planning and Research:  
<https://opr.ca.gov/ceqa/sb-743/>

Tables ES.1, ES.2, and ES.3 in the Transportation Impact Analysis (appendix K) all identify impacts and mitigations to Caltrans facilities, but they are all labeled as “significant and unavoidable”. These impacts and mitigations should be included in the DEIR. Please coordinate with Caltrans as to what mitigation measures or other alternatives can be implemented to mitigate project impacts.

If the Bay Marina Drive full closure alternative proceeds the result is a significant increase in the volume of northbound left turns at the I-5 northbound off ramp to Civic Center Drive. The existing left turn AM queuing in synchro is 39 feet and the storage is 90 feet. The queuing increases to 693 feet with the addition of the total Bayfront projects and Bay Marina Drive closure, and further queuing in other scenarios. The queuing for the left turn lane exceeds the storage capacity and would result in a safety concern for a speed differential with stopped vehicles queuing into a through lane. The bridge columns prevent the opportunity to increase left turn lane storage capacity unless there was major bridge reconstruction. Therefore, the Bay Marina Drive closure alternative is not preferred by Caltrans.

At the I-5 southbound off ramp to Bay Marina Drive the existing right turn AM queuing in synchro is 44 feet and the storage is 265 feet. The queuing increases to 275 feet with the addition of the total Bayfront projects. These queuing distances exceed the storage capacity and would result in a safety concern for a speed differential with stopped vehicles queuing into a through lane. Please consider mitigation as this has the potential for a safety impact. Additionally, table ES.1 incorrectly states there is an existing southbound through/right lane, it is a though/left lane.

- Potential mitigation measures are restriping the off-ramp lane configurations and/or adding right turn storage capacity. Mitigation needs to be shown to be effective and will require Caltrans review/approval.

According to appendix L section 3.1 of the DEIR, closure of the Bay Marina Drive would lead to a significant VMT impact due to induced travel associated with the closure. The additional VMT as such would not align with state policy and goals.

Per appendix L section 3.2, the VMT impact is stated to remain a significant and unavoidable transportation related impact. This VMT impact is not in alignment with state VMT and emissions reduction goals. The project's VMT impacts need to be mitigated down to a level considered less than significant. The project needs to investigate additional methods to address this VMT impact. Some potential solutions to analyze are:

- Reducing the project size.
- Implementing additional VMT reductions.
- Implementing other transportation improvements that would be comparable to fully mitigating the VMT impact.

### **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 promote a complete and integrated transportation network. Early coordination with Caltrans in locations that may affect both Caltrans and other responsible agencies is encouraged.

To reduce greenhouse gas emissions and achieve California's climate change targets, Caltrans is implementing complete streets and climate change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. There are ongoing Caltrans SHOPP complete streets efforts underway in the vicinity of the project area. A Caltrans SHOPP project in development proposes complete streets and active transportation improvements on Bay Marina Drive/Mile of Cars Way at Interstate 5 (I-5).

Caltrans looks forward to working with the Port of San Diego and other responsible agencies to evaluate this project and other potential complete streets and active transportation SHOPP projects.

Additionally, Caltrans is currently working with the City of National City on its implementation of the Bayshore Bikeway Segment 5 and West 19<sup>th</sup> Street Greenway projects where they interface with I-5. Caltrans also looks forward to continued coordination on these projects.

Caltrans released the “Contextual Guidance for Bike Facilities” Memorandum in March 2020 to identify the preferred bikeway facility type in areas where bikeway facility installations are planned. Please utilize this guidance memorandum as a tool for selecting the most appropriate bicycle facility type in locations where improvements are proposed in Caltrans’ right-of-way. The following is a link to the “Contextual Guidance for Bike Facilities” Memorandum: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/planning-contextual-guidance-memo-03-11-20-a11y.pdf>.

### **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-5.

### **Environmental and Long-term Lease**

Across Volumes I, II & III of the DEIR document, there is conflicting language about who owns the jetty and Sweetwater Channel east of the high tide line. Please clarify.

The existing leases for the Port’s subtidal land are set up as an “in-kind” trade between the Port and Caltrans. This was done to allow Caltrans Environmental Department to develop an eel grass bed on a jetty on the sub-tidal land. If Caltrans and the Port of San Diego re-negotiate the jetty lease into a building lease, then it would no longer be an “in-kind” trade. Please coordinate with Caltrans to explore possible solutions to separating the leases while still preserving the eel grass bed lease.

Caltrans will not consider long term building leases due to challenges in having building structures in state right-of-way (R/W).

The Draft EIR mentions a new dock with slips for 30 boats being constructed on the southside of the jetty. Please coordinate with Caltrans appropriately on the development of this new dock.

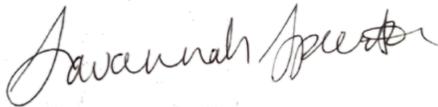
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**Right-of-Way**

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. As part of the encroachment permit process, the applicant must provide an approved final environmental document, corresponding technical studies, and necessary regulatory and resource agency permits, specifically, CEQA determination or exemption.

If you have any questions, please contact Roger Sanchez at (619) 987-1043 or by email at [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

Sincerely,



Savannah Speerstra  
Acting Branch Chief  
Local Development Review