

California Department of Transportation

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September 19, 2025

11-SD-8
PM 1.859
Midway Rising
PRJ-1106734
Final SEIR/SCH#2023120451

Ms. Martha Blake
Supervising Project Manager
City of San Diego
Project Management
Development Services Department
7650 Mission Valley Road, MS DSD 1A
San Diego, CA 92108

Dear Ms. Blake:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Final Subsequent Environmental Impact Report (SEIR) 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:

Traffic Impact Study

Please see attached redlined comments to the City's Response to Comments of Caltrans letter dated May 5, 2025.

Hydrology and Drainage Studies

- Please provide Grading plans.
 - Include existing condition with 2-foot labeled contours.
 - Provide proposed grading plans with 2-foot labeled contours.
- Please provide drainage plans for any proposed drainage facilities.
 - Include drainage layouts, drainage profile and drainage details on plans.
- Please provide centerline for I-8 with labeled stations.
- Provide Right-of-Way (R/W) lines on all plan sheets with clearly labeled Caltrans and County R/W.
- Include any existing Caltrans facilities around the proposed project site.

Environmental

Caltrans appreciates the opportunity to comment on the Final SEIR. The proposed project will have an impact on Caltrans R/W for traffic circulation support. Therefore, Caltrans has discretionary authority on a portion of the project within Caltrans R/W through the form of an encroachment permit process.

Please contact us when an encroachment permit was submitted as we would like to meet with you to discuss the elements of the SEIR that Caltrans will use for our subsequent environmental compliance. Caltrans would welcome the opportunity to be Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

There is a small portion within Caltrans R/W (Rosecrans Street under Interstate 5) where the City is proposing off-site improvements (Page 3-55, Figure 3-17 of the Final SEIR). Therefore, this project is a type of projects that will affect Caltrans R/W which will require an encroachment permit.

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. 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

Attachment – Redlined Comments on the Response to Comments to Caltrans Letter dated May 7, 2025.

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation



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May 7, 2025

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Midway Rising
Draft Subsequent EIR/SCH#2023120451

Ms. Anne Jarque
Senior Planner
City of San Diego
1222 1st 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.

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"Improving lives and communities through transportation"

S1-1

S1-1: The Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report (Midway-Pacific Highway CPU PEIR) analyzed environmental impacts associated with the 2018 Midway-Pacific Highway Community Plan (2018 Community Plan), including policies and recommendations related to a range of topics in each section of the 2018 Community Plan, such as multi-modal mobility, urban design, environmental conservation, recreation opportunities, neighborhood character, and historic preservation, in accordance with the general goals stated in the 2008 City of San Diego General Plan, as amended (2008 General Plan). As discussed in Chapter 1.0, Introduction, of the Final Subsequent Environmental Impact Report (SEIR) for the Midway Rising Project (Project), pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15152, the Final SEIR "tiers" from the Midway-Pacific Highway CPU PEIR. Therefore, Final SEIR Section 5.2, Transportation and Circulation, provides a summary of the Midway-Pacific Highway CPU PEIR impact analysis before the Project-specific analysis for each threshold. Mitigation Measures TRANS 5.2-17 through TRANS 5.2-24 were identified as transportation improvements for the 2018 Community Plan and are not mitigation measures identified for the Project.

Ms. Anne Jarque, Senior Planner
 May 7, 2025
 Page 2

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:

S1-1
 cont.

"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.

S1-2

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S1-2: The Caltrans Local Development Review Safety Review Practitioner's Guidance (Caltrans Guidance) was published in February 2024, after the Project's Notice of Preparation, which was released in December 2023. Therefore, the Caltrans Guidance would not apply to the Project. Also, the Caltrans Guidance was drafted to serve as an internal document for Caltrans staff use when a proposed project is located within or immediately adjacent to Caltrans right-of-way (ROW) and Caltrans has land use authority over a project. In this instance, no encroachment permits or other entitlements are anticipated from Caltrans. However, the below addresses the specific bullet points in comment S1-2.

The first and second bullet points in this comment request a queuing analysis for four off-ramp locations, and states that the Synchro model does not include the intersection of Interstate (I)-5 Southbound Off-Ramp/Camino Del Rio West. The study area for the Local Mobility Analysis (LMA) (Final SEIR Appendix D1) includes all four off-ramp locations listed. The I-5 Southbound Off-Ramp/Camino Del Rio West exit ramp and I-5 southbound exit ramps to Camino Del Rio West were appropriately combined in the model. There are three southbound lanes at intersection #17 representing the single lane for I-5 southbound and two lanes for I-8 westbound. Queues for the four off-ramp locations were analyzed based on results for the following three intersections:

This is incorrect and the exit ramps being combined does not accurately model the traffic impacts and queuing. The distance from the Camino Del Rio West intersection to the gore point of the I-8 connector is approximately 2,365 feet and the distance to the I-5 southbound main lanes gore point is 3,110 feet. Adding this segment to the I-8 westbound exit does not correctly show the queuing and impacts of the I-5 southbound exit to Camino Del Rio West in relation to the vehicles traveling on the I-5 southbound connector to I-8 eastbound and vehicles traveling on the I-5 southbound main lanes.

Caltrans Performance Measurement System (PeMS) data could be used or location-based data collection services can be used to determine the speed data

- **Intersection 1:** West Mission Bay Drive/I-8 Westbound Off-ramp
- **Intersection 17:** Camino Del Rio West/Hancock Street (includes I-8 westbound exit to Camino Del Rio West and I-5 southbound exit to Camino Del Rio West)
- **Intersection 32:** I-5 Southbound On-Ramp/Sea World Drive/I-5 Southbound Off-Ramp

Pursuant to Appendix B of the Caltrans Guidance, the requested analysis for evaluating freeway off-ramps is based on speed differentials and is not required because there is no reliable Performance Measurement System data for the study area, and no other sources of speed data by lane are available. The three intersections within the study area that are located at ramp terminus locations for freeways, as listed previously, operate under conditions where queuing already exists on the freeway exit ramps (refer to Table 3-6 of Final SEIR Appendix D1). While queue lengths for these three locations were identified and provided in the LMA, the specific requested queue analysis was not performed.

Queue analysis needs to be performed with an accurate model based on previous comments and to show the differences in queuing from existing to existing plus project.

Per Appendix B of the Caltrans Guidance, the following strategies are recommended (for a potential safety impact), which the Project has already committed to:

- **Transportation Demand Management** – The Project includes a Transportation Demand Management

The third item from Appendix B of the Caltrans Guidance states: "Potential change(s) to the ramp terminal operations including, but not limited to lane reassignment, traffic signalization, signal phasing or timing modifications, turn lane extensions to accommodate the additional project traffic." The LMA did not examine all these mitigations measures and needs to analyze and show if these provide benefits. Furthermore, the response to comments has not addressed the previous comment regarding a potential solution: "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." This solution could potentially be applied to all the exit ramps with queuing issues.

program (Final SEIR Appendix D4) with strategies intended to reduce the Project's trip generation.

- **Active Transportation Investments** – The Project includes a network of multi-modal transportation improvements with additional pedestrian, bicycle, and transit improvements that exceed the City's planned facilities as identified in the 2018 Community Plan.

The LMA analyzed alternative lane configurations for the off-ramp intersections, and determined that lane reassignments or other ramp terminal operation modifications would not be necessary, as the intersections operate at acceptable level of service (LOS) and queue lengths similar to existing conditions which are not anticipated to exceed the existing auxiliary lanes. The Project proposes downstream improvements at the intersection of Camino Del Rio West/Rosecrans Street and Sports Arena Boulevard, per the Midway-Pacific Highway Community Plan Amendment (Final SEIR Appendix D3, Section 2.2) to provide network benefits upstream along Camino Del Rio West.

Thus, the Project is consistent with Caltrans' recommendations regarding transportation strategies to provide separated and protected bicycle facilities and pedestrian improvements, and the additional analysis recommended by Caltrans would not result in further improvements.

The model is inaccurate and until revisions are made this statement is not verified

Striping is not considered a barrier to a speed differential. The queuing needs to be modeled correctly to show if there are stopped vehicles in the exit ramp queue that are adjacent to main lane vehicles traveling at a speed of 30 mph or greater.

The distance from the Camino Del Rio West and Moore Street intersection is approximately 1,374 feet to the gore point to the I-5 southbound connector. The impacts and queuing to this location are not shown in the analysis.

The distance from the Camino Del Rio West and Moore Street intersection is approximately 2,240 feet to the gore point to the Morena Boulevard connector. The impacts and queuing to this location are not shown in the analysis.

The distance from the Camino Del Rio West and Moore Street intersection is approximately 3,250 feet to the gore point to the I-8 westbound main lanes. The impacts and queuing to this location are not shown in the analysis.

This explanation is incorrect because the queuing needs to be determined in relation to adjacent lanes and if there is a speed differential

The distance is approximately 1,090 feet to the gore point to the I-5 southbound main lanes. This explanation is incorrect because the queuing needs to be determined in relation to adjacent lanes and if there is a speed differential. Striping is not considered a barrier to a speed differential. The queuing needs to be modeled correctly to show if there are stopped vehicles in the exit ramp queue that are adjacent to main lane vehicles traveling at a speed of 30 mph or greater.

There is not 3,700 feet on an exit ramp separated from the main lanes in terms of speed differential analysis, there is only about 1,090 feet.

The third bullet point in this comment raises a concern regarding a Synchro analysis input for Camino Del Rio West and requests a queuing analysis. The Synchro link distance was measured from the Camino del Rio West & Moore Street intersection back to the painted gore point at the I-8 freeway mainline (approximately 4,000 feet). In reality, the ramp storage extends much longer to the point where the exit ramp trap lanes are differentiated from the mainline (over a mile long for both I-8 and I-5 exit ramps), so the link distance provided in the Synchro model is appropriately used to estimate the queue lengths. Please refer to the previous explanation as to why the specific type of queuing analysis requested was not performed.

The fourth bullet point in this comment raises a concern regarding a Synchro analysis input and requests a queuing analysis. The Synchro link distance was measured from the I-5 Southbound On-Ramp/Sea World Drive/I-5 Southbound Off-Ramp intersection to the painted gore at the freeway mainline (approximately 1,500 feet). In reality, the ramp storage length extends much longer to the point where the exit ramp trap lane is differentiated from the mainline (approximately 3,700 feet). The model is representative of the capacity available for the off ramp in lane miles although the two lanes are not present for the full length of the exit ramp. Please refer to the previous explanation as to why the specific type of queuing analysis requested was not performed. The fifth bullet point in this comment

Appendix N Figure 12 of the Local Mobility Analysis shows 75 PM trips entering the I-5 SB ramps and Sea World Drive intersection from westbound Sea World Drive. These trips have to pass through the I-5 NB ramps and Sea World Drive intersection.

Appendix N Figure 13 of the Local Mobility Analysis shows 130 trips entering the I-5 SB ramps and Sea World Drive intersection from westbound Sea World Drive. These trips have to pass through the I-5 NB ramps and Sea World Drive intersection.

The distance is approximately 1,260 feet for the 4 lane exit ramp, showing a link distance in Synchro of 2,600 feet models a false capacity that is more than double the actual. Then there is approximately 480 feet of 2 lane exit ramp until the gore point with the I-8 eastbound main lanes. This is the point at where the impacts a queuing in relation to a speed differential need to be analyzed

This distance is actually 1,740 feet. Striping is not considered a barrier to a speed differential. The queuing needs to be modeled correctly to show if there are stopped vehicles in the exit ramp queue that are adjacent to main lane vehicles traveling at a speed of 30 mph or greater.

requests the inclusion of the intersection of I-5 Northbound ramp/Sea World Drive in the analysis. The Project study area was defined per the guidelines, which require signalized intersections where a project will add 50 or more peak-hour trips to any turning movement at the intersection to be included in the study area. As described in Final SEIR Appendix D1, to estimate the number of inbound and outbound trips, the Project's trip generation was applied to the study intersections and roadway segments using the trip distribution patterns for their respective peaks. Based on the trip distribution analysis, the Project is not expected to add 50 or more primary AM or PM net new trips at the I-5 northbound ramps and Sea World Drive intersection. Therefore, this intersection was not included in the Project study area.

The sixth bullet point in this comment raises a concern regarding a Synchro analysis input and requests a queuing analysis. The Synchro link distance was measured from the West Mission Bay Drive/I-8 Westbound Off-ramp intersection to the point where the single exit ramp lane opens to two exit ramp lanes (approximately 2,700 feet). In reality, the ramp storage length extends much longer to the point where the exit ramp trap lane is differentiated from the mainline (approximately 4,200 feet). The model is representative of the capacity available for the off ramp in lane miles although the four lanes are not present for the full length of the exit ramp. Please refer to the previous explanation as to why the specific type of queuing analysis

There is no previous explanation in the response to comments that specifically addressed the previous comment regarding a potential solution: "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." This is a reasonable and feasible mitigation that needs to be analyzed further.

S1-2 cont.	<p>Revise accordingly and there needs to be a queuing analysis per comment #1 above.</p> <ul style="list-style-type: none"> 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.
S1-3	<ul style="list-style-type: none"> Include in the proposed project pedestrian scale lighting and other features on the multi-use path to increase user comfort.
S1-4	<ul style="list-style-type: none"> 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	
S1-5	<ul style="list-style-type: none"> 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	
S1-6	<ul style="list-style-type: none"> 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?

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requested was not performed. The seventh bullet point discusses potential queuing on southbound Camino Del Rio West and its effect on the I-5 Southbound exit and I-8 Westbound exit and potential operational strategies to address this queue. Please refer to the previous explanation as to why the specific type of queuing analysis requested was not performed.

S1-3: The Project will install pedestrian scale lighting throughout the Project site; please refer to Appendix O of the Final SEIR, (Sheets 18-20) of the Vesting Tentative Map that identifies the locations of this lighting.

S1-4: The 2018 Community Plan includes recommendations for a Bay-to-Bay multi-use urban path (Class I facility) that crosses I-8 at two locations: along Mission Bay Drive (recently constructed by the City of San Diego [City]) and aligned with the future Kemper Street through the Project site.

The Project's multi-modal facilities proposed on Kemper Street, Frontier Drive, and Kurtz Street do not preclude future connectivity over I-8 via a multi-use path pursuant to the 2018 Community Plan. However, the Project does not include construction of a connection over or under I-8 as it was not identified as a transportation effect or required project improvement.

This comment does not raise an environmental issue related to the adequacy or accuracy of the Final SEIR, and no further response is required.

- S1-5:** This comment requests to review hydraulic studies, drainage plans, and grading plans associated with the Project. Please refer to Final SEIR Appendix I1, Preliminary Drainage Report, and Final SEIR Appendix O to review these documents.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Final SEIR. Therefore, no further response is required.

- S1-6:** In response to Question 1, CEQA mandates the evaluation of environmental impacts of proposed projects. In 2013, Senate Bill 743 was signed into law with a goal of reducing greenhouse gas emissions, promoting the development of infill land use projects and multi-modal transportation networks, and promoting a diversity of land uses within developments. Per Senate Bill 743, automobile delay and congestion, commonly known as LOS, is no longer a metric for determining significant transportation impacts under CEQA. Instead, the primary metric has shifted from LOS to vehicle miles traveled (VMT).

The Final EIS for Naval Information Warfare Systems Command was developed using the previous metric of LOS

as the primary metric for identifying transportation impacts, while the Final SEIR for the Midway Rising Project was developed using VMT. Therefore, no significant impacts were identified for the I-5/I-8 main lines and interchange, and no mitigation is required.

While LOS is no longer the primary metric under CEQA for determining transportation impacts, it remains relevant for understanding traffic flow and operations for the City. LOS and queues are summarized in Final SEIR Appendix D1, LMA. The LMA was developed in coordination with the City, San Diego Association of Governments (SANDAG), and San Diego Metropolitan Transit System (MTS) and provides a comprehensive set of improvements for all users of the roadway to create a network for vehicle access and distribution of traffic, provide safe and comfortable multi-modal infrastructure, enhance first/last-mile access to transit, and promote connectivity with the neighboring communities. The mixed-use nature of the Project site supports the reduced need for vehicle trips to access local destinations. The robust set of multi-modal improvements and amenities (summarized in Final SEIR Section 13.1) would encourage the use of alternative modes that are more accessible and competitive options, especially with the Project's proximity to the Old Town Transit Center. The roadway and intersection improvements would increase traffic flow and distribute vehicles more evenly to the surrounding roadway network.

In response to the second bullet point, the Project does not intend to expand the study area. Refer to Response to Comment S1-2 from information on how the study area was defined.

The LMA relies on traffic counts taken throughout the study area described in Section 3.2, Traffic Volumes. These counts are presumed to accurately represent the existing traffic conditions within the study area. The Project trip distribution, described in Section 4.3, Trip Distribution, was determined using the Streetlight Insight tool, which provides origin-destination analysis regarding “top routes” that drivers typically use when moving between analysis zones.

In response to the third bullet point, the LMA (Appendix D1) was developed in coordination with the City, SANDAG, and San Diego MTS. The LMA includes mention of the SANDAG Central Mobility Hub Comprehensive Multimodal Corridor Plan, which identifies a future MTS Rapid Route planned with service along the Project’s Sports Arena Boulevard frontage. This planned MTS Rapid Route was accounted for in the development of the Project site plan. As mentioned in Appendix D1, the Project would enhance the existing local bus station to a rapid station, and Business Access and Transit (BAT) lanes would be implemented on Sports Arena Boulevard to increase reliability and performance for transit services.

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.

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S1-7: As discussed in Final SEIR Section 5.2, Transportation and Circulation, the transit subsidy would be offered to all employees at 50 percent of the current monthly pass rate. Parking would not be provided on the site for employees, so employees would be required to pay to park on site or use alternative forms of transportation, including walking, biking, or using transit. Since it is anticipated that many employees may not live within walking or biking distance, transit use would be encouraged and monetarily incentivized for the employees.

In light of the comments submitted for the Final SEIR, Mitigation Measure Trans 5.2-2 has been revised so that the Project Applicant will offer the employee transit subsidy for the life of the entertainment center.

The net increase in average daily VMT for the entertainment center is 2,299, which will be fully mitigated with implementation of the employee transit subsidy as explained in Final SEIR Section 5.2.7.2. The VMT analysis estimated that approximately 50 percent of the employees would use the subsidy. Therefore, with the revised plan to provide Mitigation Measure TRANS 5.2.2 for the operational life of the entertainment center, the entertainment center's transportation VMT impact would be mitigated to a level of less than significance.

S1-8: This comment requests that the Project develops a Safe Routes to Schools plan for nearby schools. As discussed in

Response to Comment S-14, the Project will construct multi-modal facilities internal to the site and along its frontage to promote alternative modes of transportation for pedestrians and bicycle users to local destinations including schools. Safe Routes to Schools plans are typically developed by local school districts and/or municipalities and not private development.

This comment does not raise an environmental issue related to the adequacy or accuracy of the Final SEIR, and no further response is required.

S1-9: The 2021 San Diego Forward: The Regional Plan and the Draft 2025 Regional Plan Transportation Plan were reviewed for relevance as part of preparation of the Project's transportation studies.

S1-10: Table ES-5 of Final SEIR Appendix D1 summarizes the capacity and demand for the various segments of Sports Arena Boulevard under each analysis scenario. The Project proposes BAT lanes on Sports Arena Boulevard Segment IDs 5 (Kemper Street to Frontier Drive), 6 (Frontier Drive to East Drive), and 7 (East Drive to Camino Del Rio West) to provide a more reliable option for residents and visitors to access Old Town Transit Center and the rest of the regional transportation network. Currently, Sports Arena Boulevard currently operates at LOS A or B on these segments. With the addition of Project traffic and the proposed BAT lanes,

the segments are anticipated to operate at LOS D or better, which is an acceptable level of traffic operations.

The Camino Del Rio West/Rosecrans Street/Sports Arena Boulevard intersection would only include BAT lanes on the eastbound and westbound approaches, not the southbound approach of Camino Del Rio West. Instead, the Camino del Rio West approach to this intersection would match the lane geometry proposed as part of the 2018 Community Plan (Figure 3-15). The BAT lanes would help reduce travel times for transit users while maintaining local vehicle access via turning movements into the Project site.

- S1-11:** The preliminary design of the proposed roundabout at Kurtz Street /Hancock Street anticipates that it would be located within City ROW. However, the Applicant will coordinate with the California Department of Transportation (Caltrans) ROW division regarding all components of its design due to its adjacency to I-8.
- S1-12:** The parking shuttles may vary in type and are anticipated to operate at a high frequency (5 minutes) with capacity for up to 40 passengers. Zero-emissions vehicles shuttles would be considered when determining the appropriate vehicle type and size to service the need.
- S1-13:** This comment suggests editorial revisions to Final SEIR Table 3-3, Figure 3-3, and Figure 3-20. Editorial revisions are not required and do not raise a significant environmental issue regarding the adequacy or accuracy of

Ms. Anne Jarque, Senior Planner
 May 7, 2025
 Page 5

S1-14 cont.	<ul style="list-style-type: none"> 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.
S1-15	<ul style="list-style-type: none"> I. Chapter 6, Cumulative Impacts <ul style="list-style-type: none"> 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.
S1-16	<ul style="list-style-type: none"> 2. Comprehensive Multimodal Corridor Plans (CMCPs) <ul style="list-style-type: none"> 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.
S1-17	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> a. SANDAG 2021 Regional Plan <ul style="list-style-type: none"> i. Please see Appendix A, Transportation Projects, Programs, and Phasing, for relevant projects. <ul style="list-style-type: none"> • Midway-Pacific Highway <ul style="list-style-type: none"> ▪ 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 <ul style="list-style-type: none"> ▪ TL23: Rapid 28 (Point Loma to Kearny Mesa via Central Mobility Hub, Linda Vista) • Interstate 8

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the information provided in the Final SEIR. Therefore, no further response is required.

S1-14: The requested additions to the regulatory framework provided in this comment were either approved after the issuance of the Notice of Preparation for the Project (December 2023) or are currently still in draft form and, therefore, not relevant to the following analysis. As discussed in Final SEIR Section 5.1, Land Use, the Project would be consistent with the 2008 General Plan.

S1-15: Consistent with CEQA Guidelines Section 15130(d), this section summarizes and incorporates by reference portions of the cumulative effects analysis in the Midway-Pacific Highway CPU PEIR that adequately address each resource issue area. Mitigation Measures TRANS 5.2.-17 through TRANS 5.2-24 were not required for the Project. Please refer to Thematic Response – Cumulative Projects.

S1-16: The Central Mobility Hub and Connections Comprehensive Multimodal Corridor Plan (CMCP) and the I-8 Kumeyaay Corridor CMCP were reviewed and considered as part of the Project’s transportation studies. The Project’s LMA (Appendix D1 to the Final SEIR) includes strategies described in the CMCP document including micro-transit (parking and retail shuttles), ride hailing services such as areas for Lyft and Uber, short-term bicycle parking spaces and lockers, bike repair stations, protected bicycle intersections, e-bike chargers, dynamic/flexible parking,

Ms. Anne Jarque, Senior Planner
 May 7, 2025
 Page 6

- S1-17 cont.
- 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

S1-19

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.

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electric vehicle (EV) spaces, dedicated transit lanes, transit improvements, and separate space for persons who bicycle and walk as described in the CMCP's.

S1-17: The Project used planning documents relevant to the Project study area. Strategies for transportation demand management and multi-modal improvements relied on City and regional planning efforts prepared by the City and SANDAG including the adopted documents identified in this comment. This comment does not raise an environmental issue related to the adequacy or accuracy of the Final SEIR, and no further response is required.

S1-18: This comment does not raise an environmental issue related to the adequacy or accuracy of the Final SEIR, and no further response is required.

S1-19: As discussed in Final SEIR Chapter 3.0, Project Description, the Midway Rising Specific Plan identifies a multi-modal transportation network that would include new public streets, modified public streets, sidewalks, multi-use paths, bicycle facilities, promenades, and pedestrian paseo greens and paseo greenways. In addition, as discussed in Final SEIR Chapter 3.0, a Construction Management Plan and Traffic Control Plans would be required and implemented during construction by the Project applicant in accordance with City of San Diego standards (San Diego Municipal Code Section 129.0701 et seq.) and the Caltrans California Manual of Uniform Traffic Control Devices (2014

Ms. Anne Jarque, Senior Planner
 May 7, 2025
 Page 7

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.

S1-19
 cont.

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

S1-20

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

S1-21

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.

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Revision 8 Edition) as a standard condition of approval. These traffic management controls would include measures determined based on site-specific conditions. These measures would ensure that ingress and egress from the Project site would not interfere with emergency access to areas surrounding the Project site.

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Final SEIR. Therefore, no further response is required.

S1-20: This comment provides general information and does not raise an issue regarding the adequacy or accuracy of the analysis of the Final SEIR. Therefore, no further response is required.

S1-21: This comment provides a summary of Caltrans' role pursuant to CEQA and the Project's potential impacts to Caltrans' ROW.

Furthermore, this comment provides information on Caltrans' role should future projects affect Caltrans' ROW and its role as a CEQA responsible agency. The Project Applicant acknowledges Caltrans' role should coordination and /or an encroachment permit be required during construction.

Ms. Anne Jarque, Senior Planner
May 7, 2025
Page 8

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. 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 [REDACTED]

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Final SEIR. Therefore, no further response is required.

S1-21
cont.

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