

California Department of Transportation

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February 17, 2025

11-SD-8
PM 7.688
Evolve Student Housing Project
DEIR/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 Draft Environmental Impact Report (DEIR) of the Evolve Student Housing Project on the campus of San Diego State University (SDSU) located near Interstate 8 (I-8) and Interstate 15 (I-15) in San Diego. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with 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:

Coordination with the City of San Diego College Area Community Plan is recommended.

Traffic Engineering and Analysis

**TABLE 5-1
 PROJECT TRIP GENERATION**

Land Use	Size	Daily Trip Ends (ADTs)	
		Rate	Volume
Trips Added			
Resident Student	4,468 Students	0.64 /Student	2,860 ^a
Trips Removed			
Non-Resident Student	-4,468 Students	1.30 /Student	-5,808
Total		—	-2,948

Footnotes:

a. There may be a small increase in staff associated with the increase in student housing. However, this increase would be minimal and would have an indiscernible mathematical effect on the calculations above.

- The report claims that the new student housing will result in students that were living off campus to now living on campus in the new housing. Additionally, the report states that no increase in student enrollment beyond the previously approved 35,000 full-time equivalent students is proposed as part of the Project.
 - Please provide further documentation regarding the 35,000 student enrollment number being set at this time and not increasing by any other factors outside this project.
 - For how long will the enrollment remain at 35,000 students? Will the traffic analysis be revisited for this project and/or the entire campus if the student enrollment increases? Please clarify.

The Draft City of San Diego College Area Community Plan acknowledges that a portion of the College Area is within a very high-fire hazard severity zone. Please coordinate with City of San Diego and Caltrans regarding wildfire emergency evacuation plans and egress.

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 configurations of I-8 and I-15.

Glare

As stated on page 4.1-5 of the DEIR:

In addition to existing two- and three-story student housing development on the Peninsula Component site, there are numerous sources of existing light and glare.

The proximity of the project site to I-8 raises some concerns regarding potential glare that could pose a potential risk to motorists traveling on I-8. General information was provided to Caltrans describing the reflective characteristics of these types of facilities, which is described as minimal. Caltrans would want to ensure that all lighting, including reflected sunlight and reflected night lighting, within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on I-8.

California Code, Vehicle Code - VEH § 21466.5. Current as of January 01, 2023

No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 1 1/2 -degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

The provisions of this section shall not apply to railroads as defined in Section 229 of the Public Utilities Code.

Hydraulics

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review for the proposed project improvements adjacent to and south of I-8.
- 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' Right of Way (R/W).
- 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.

System Planning

- Caltrans 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 AT2: 54th Street Class III
 - ID AT35: Camino Del Rio South Class IV
 - ID AT40: Catoctin Drive Class III
 - ID AT59: Collwood Boulevard/54th Street Class IV
 - ID AT296: SDSU to Adobe Falls Road Class I Bridge
 - ID T11: Rapid 295 – Spring Valley to Clairemont via La Mesa to Kearny Mesa
 - ID R20: I-8 Segment 3 – RTP Complete Corridor: ML/ Goods Movement from I-805 to College Avenue
 - ID NO41: Next OS Flex Lane – Fairmount Avenue
 - ID NO42: Next OS Flex Lane – Camino del Rio
- [2025 Regional Plan Concept](#)
 - San Diego Region
 - 42 – Green Line Improvements
 - 55 – Rapid 211: SDSU to Downtown via Adams Avenue
 - 57 – Rapid 215: SDSU to Downtown
 - 69 – SDSU to Rancho San Diego/ Cuyamaca College
 - 71 – Rapid 265: Otay Mesa POE to SDSU West via SR 125, I-805, I-15

- 76 – Rapid 295: South Bay to Clairmont
 - 86 – Rapid 625: SDSU to Palomar Station
 - Central & East County
 - 22 – I-15 @ SDSU West DAR
 - 31 – Green Line Improvements
 - 36 – Rapid 211: SDSU to Downtown
 - 38 – Rapid 215: SDSU to Downtown
 - 49 – Rapid 256: SDSU to Rancho SD/Cuyama College
 - 51 – Rapid 265: Otay Mesa POE to SDSU West via SR 125, I-805, I-15
 - 58 – Rapid 625: SDSU to Palomar Station
 - Note that Solution ID CC024 Complete Corridor/ML Goods Movement for I-8 from 2021 Regional Plan/Solution ID R20 from Kumeyaay Corridor CMCP does not appear in the 2025 Concept.
- [College Area Community Plan](#): System Planning noted a draft Community Plan Update (CPU) in progress in the September 2024 letter.
 - EIR refers to the College Area CPU (1989) and acknowledges draft CPU in progress.
 - Draft College Area CPU was released in January 2025
 - EIR explains project will not be subject to regional or local planning documents such as the CPU since SDSU is a component of the CSU system, a state agency (p. 532)
 - SDSU/CSU system is subject to state/federal agency planning documents.
 - Park & Community Improvement Projects
 - Montezuma Park Improvement
 - Montezuma Road Promenade
 - College Avenue Recreation Center
 - Adams-Baja Trail and Trailhead Pocket Park Concept
 - Brockbank Place Overlook Park
 - 62nd Street Park
 - Saranac Pocket Park
 - Alvarado Creek Park
- [Purple Line](#)
 - The Purple Line project development team has concluded, and the Conceptual Planning Study has been finalized.
 - The next steps are to study different alternatives for the project.
- [California Transportation Plan \(CTP\) 2050](#)
 - Mid-2025, a Draft CTP 2050 update will become available for review.

- Additional Comments
 - We recommend SDSU to reach out to San Diego Metropolitan Transit System (MTS) to coordinate a potential increase in student ridership from the Evolve Student Housing Project.
 - Implement air quality mitigation measures such as clean construction practices, green building standards, and promoting transit-oriented development to reduce traffic emissions.
 - If construction activities (pile driving, heavy equipment operation) occur near Caltrans infrastructure, vibration levels could affect the stability of nearby roadways and bridges. Implementing vibration monitoring and restrict certain construction activities during sensitive periods may be necessary.
 - Encourage the implementation of green infrastructure (rain gardens, vegetated swales) and on-site water retention systems that help mitigate flooding risks on nearby highways, near I-8 and its interchanges.
 - Caltrans should require the developer to implement traffic monitoring programs during and after construction to ensure that traffic congestion, air quality, and other environmental impacts are properly managed.

Environmental

Caltrans appreciates the opportunity to comment on this DEIR. The analysis presented does not have any impact on Caltrans' R/W. Should elements of the project and/or mitigation measures change to effect Caltrans' R/W, we would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process.

Please contact us when you discover that Caltrans' R/W is affected as we would appreciate meeting with you to discuss the elements of the Environmental Impact Report (EIR) that Caltrans will use for our subsequent environmental compliance. Caltrans would welcome the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

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.

Ms. Kara Peterson, Director of Planning
February 17, 2025
Page 7

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