



City of San Diego
Councilmember Scott Sherman
Seventh District

MEMORANDUM

DATE: November 18, 2019
TO: President Adela de la Torre, San Diego State University
FROM: Councilmember Scott Sherman
RE: SDSU Mission Valley Campus Draft Environmental Impact Report & Mission Valley Stadium Site Purchase & Sale Agreement

I'm greatly encouraged by the progress of the negotiations for the sale of the Mission Valley stadium site. As I have stated repeatedly, although I didn't support Measure G I have always supported development of the site. The voters made their choice so I am committed to making the SDSU West project a success that will positively transform our region. Part of that commitment includes holding SDSU and their development partners to the same standards to which the City holds all developers. SDSU must do its fair share of mitigating the impacts this project has on surrounding communities.

The updated purchase price offer of \$86.2 million lives up to the promises of Measure G. We're getting very close to an offer and terms that match what the voters approved in November 2018. As the Councilmember representing Mission Valley, and a resident who will be affected by the impacts of this project just as my neighbors and constituents will be, it is very important to me to get this right. The quality of life for residents in Mission Valley, Serra Mesa, Grantville, and North Park depends on it.

This is a once-in-a-generation opportunity and every aspect of this deal is worthy of careful public scrutiny. I appreciate the very thorough analysis performed by our City Planning staff, as well as by Caltrans, MTS, and SANDAG, which is represented in the robust comments submitted by these agencies in response to the SDSU Mission Valley Campus Master Plan Draft Environmental Impact Report (DEIR). Due to the complex technical nature of the transportation impacts of the proposed project, it would be wise if traffic and planning engineers at each of

these agencies coordinated together in a comprehensive manner to ensure the best outcome for our regional transportation goals.

Lest the excitement surrounding the progress on the purchase price and other major deal points overshadow the important technical analysis performed by the above-named agencies' engineering staff, I am summarizing some of those points below that are of greatest importance to the communities I represent. If the Final EIR adequately responds to these points, even I, the biggest Measure G critic on the Council, would be able to support this sale.

My concern, if the Final EIR inadequately mitigates traffic impacts, is that [history will repeat itself](#). The 2007 SDSU Campus Master Plan was litigated for 10 years until finally the [California Supreme Court decertified](#) the Transportation section of the EIR, forcing SDSU to [update it with a plan to fund traffic](#) mitigation that it left out of their original EIR. The future of the Mission Valley Stadium site is too important to allow lawsuits from a poorly written EIR to delay the project for a decade or more.

Issue 1: Onsite Vs. Offsite Traffic Impact Mitigation

The Oct. 15th [letter from Tom McCarron](#), Senior Vice President SDSU Mission Valley Development, ¹ outlines \$21 million in proposed transportation improvements. The letter describes three specific intersections as “offsite-mitigation.” (Figure 1 below - Friars Rd. & Stadium Way; Mission Village Drive & Friars Road WB Ramps; Mission Village Drive & Friars Road EB Ramps)

¹ See Attachment “SDSU Mission Valley Campus Master Plan Proposed Transportation Improvements City of San Diego Facilities”

Figure 1 – Page 2 of Oct. 15th letter “SDSU Mission Valley Campus Master Plan Proposed Transportation Improvements City of San Diego Facilities”

3. Friars Road & Stadium Way

Cost Estimate: \$3.4M; SDSU Estimated Share: \$3.4M (100%)

Install a new traffic signal, replace the existing free eastbound right-turn lane with a single right-turn lane (squared up at the signal), install an eastbound protected bike lane, and construct two westbound left-turn lanes. Reconstruct Stadium Way at Friars Road to accommodate two southbound departure lanes, and modify the northbound approach to include two left-turn lanes and two-right turn lanes. Lanes can be temporarily reconfigured during major stadium events as part of the TMP noted above. Existing buffered bike lanes on Friars Road will remain. Sidewalk on Friars Road will be improved to standard concrete construction. Reconstruction of the intersection will eliminate sweeping right turns, improving pedestrian and bicycle safety.

4. Mission Village Drive & Friars Road Westbound Ramps

Cost Estimate \$7.3M; SDSU Estimated Share: \$7.3M (100%)

Widen the Friars Road Westbound Off-Ramp to add a separate westbound left-turn pocket (maintaining the existing shared through/left-turn lane). Widen the Mission Village Drive overpass to Friars Road in both directions to provide a second northbound left-turn lane at this intersection (and a second southbound left-turn lane at (Intersection 13). Buffered bike lanes and sidewalks on Mission Village Drive will be maintained.

5. Mission Village Drive & Friars Road Eastbound Ramps

Cost Estimate \$6.7M; SDSU Estimated Share: \$6.7M (100%)

Widen the eastbound off-ramp approach to include a shared left-turn/through lane and dual right turn lanes at Mission Village Drive. Widen the northbound approach to provide dual right-turn lanes, and widen the Eastbound on-ramp from Mission Village Road to Friars Road to two lanes along the entire length and extend a new lane to the I-15 S Ramps intersection. This includes widening of the Friars Road bridge over tank farm access road. A bike path connecting to the project site will be provided on the southbound approach and a shared use-path will be provided on the northbound approach.

6. Realign San Diego Mission Road to Mission Village Drive (On-site Improvement)

Cost Estimate \$1.9M; SDSU Estimated Share: \$1.9M (100%)

Realign San Diego Mission Road through the project site to connect with Mission Village Drive from south of the Friars Road Eastbound Ramps. The realignment will consist of portions of Street D, Street 4, and Street F and include new intersections. Realigning San Diego Mission will provide standard four-legged intersection configurations and will enhance bicycle and pedestrian safety along this street. A shared-use path will be provided within the site along the south and east side of the realignment.

7. River Run Drive & Friars Road

Cost Estimate: \$15,000; SDSU Estimated Share: \$7,165 (47%)

Optimize traffic signals within corridor of Friars Road from River Run Drive to Stadium Way.

However, it is clear from the [Transportation Impact Analysis](#) (pages 71-72, 248) that those three improvements are project features, and not proposed mitigation to the project's traffic impacts (see Figure 2 below).

Figure 2 – “Table 57” Page 248 of the Transportation Impact Analysis

SDSU Mission Valley Campus Project

Transportation Impact Analysis

July 29, 2019

TABLE 57 – TRANSPORTATION IMPROVEMENT IMPLEMENTATION PLAN

Improvement	Development Trigger (DUEs ¹)	Project Share of Future Growth ²
Initial Improvements with Stadium Only		
Stadium Transportation and Parking Management Plan (TPMP)	w/Stadium only	N/A
Proposed Project Features		
Intersection 11. Friars Road & Stadium Way (Street A) – Feature: Install a new traffic signal, replace the existing free eastbound right-turn lane with a single right-turn lane (squared up at the signal), install an eastbound protected bike lane, and construct and two westbound left-turn lanes. Reconstruct Stadium Way (Street A) at Friars Road to accommodate two southbound departure lanes and modify the northbound approach to include two left-turn lanes and two-right turn lanes. Lanes can be temporarily reconfigured during major stadium events as part of the TPMP noted above. See Figure 11 .	w/first office building on main campus or completion of the shared use campus loop path	N/A
Intersection 13. Mission Village Drive/Street D & Friars Road EB Ramps/San Diego Mission Rd – Feature: Widen the eastbound off-ramp approach to include a shared left-turn/through lane and dual right turn lanes at Mission Village Drive. Widen the northbound approach to provide dual right-turn lanes, and widen the EB-on ramp from Mission Village Road to Friars Road to two lanes along the entire length and extend a new lane to the I-15 S Ramps intersection. This includes widening of the Friars Road bridge over tank farm access road. See Figure 11 .	4,270	N/A
Intersection 12. Mission Village Drive & Friars Road WB Ramps – Feature: Widen the Friars Road WB Off-Ramp to add a separate westbound left-turn pocket (maintaining the existing shared through/left-turn lane). Widen the Mission Village Drive overpass to Friars Road in both directions to provide a second northbound left-turn lane at this intersection (and a second southbound left-turn lane at (Intersection 13). Buffered bike lanes and sidewalks will be maintained. See Figure 11 .	7,840	N/A
Proposed Project Mitigations		
Intersection 32. Ward Road & Rancho Mission Road – Mitigation: Install a traffic signal.	3,950	69.1%
Intersection 9. Fenton Parkway & Friars Road – Mitigation: Optimize signals within corridor of Friars Road from River Run Drive to Stadium Way (Street A).	4,510	41.5%
Intersection 31. Texas Street & Camino del Rio S – Mitigation: Restripe to convert WBT lane to a shared WBT/L lane and EBT to EBT/L lane; re-optimize signal timing splits.	5,130	9.0%
Intersection 8. River Run Drive & Friars Road – Mitigation: Optimize signals within corridor of Friars Road from River Run Drive to Stadium Way (Street A).	5,160	47.8%
Intersection 10. Northside Drive & Friars Road – Mitigation: Optimize signals within corridor of Friars Road from River Run Drive to Stadium Way (Street A).	5,270	44.2%

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Nowhere in the DEIR [Executive Summary](#), [Transportation section](#), or [Transportation Impact Analysis appendix](#) are mitigation measures contemplated for those three intersections. Appropriately recategorizing those three projects to “onsite improvements” changes the calculation of **the value of SDSU’s proposed traffic mitigation to slightly over \$1 million, not the \$18.4 million as the letter states** (see Figure 3 below).

Figure 3 – Corrected calculation of the value of SDSU’s proposed traffic mitigation

Streets	SDSU Estimated Share	Location	
Stadium Way to Fenton Parkway including Street I in the Mission Valley Community Plan	\$1,160,000	Onsite	
Realign San Diego Mission Road to Mission Village Drive	\$1,900,000	Onsite	
Friars Road & Stadium Way*	\$3,400,000	Onsite	
Mission Village Drive & Friars Road Westbound Ramps*	\$7,300,000	Onsite	
Mission Village Drive & Friars Road Eastbound Ramps*	\$6,700,000	Onsite	
		Onsite total	\$20,460,000
River Run Drive & Friars Road	\$7,165	Offsite	
Fenton Parkway & Friars Road	\$15,000	Offsite	
Fairmount Ave & San Diego Mission Rd/Twain Ave	\$496,100	Offsite	
Texas Street & Camino del Rio S	\$18,000	Offsite	
Ward Road & Rancho Mission Road	\$276,592	Offsite	
Fairmount Ave & Mission Gorge Rd	\$15,000	Offsite	
Ruffin Road & Aero Drive	\$15,000	Offsite	
Northside Drive & Friars Road	\$166,044	Offsite	
		Offsite total	\$1,008,901
		Total	\$21,468,901
Source: Oct 15, 2019 letter "SDSU Mission Valley Campus Master Plan Proposed Transportation Improvements City of San Diego Facilities"			
*Inaccurately described as "offsite mitigation" in Oct 15, 2019 Letter from SDSU			

*Issue 2: Proposed Mitigation of Significant Traffic Impacts Resulting from
the Mission Valley Campus Project*

City of San Diego staff provided [30 pages of official comments](#) in response to the DEIR, with substantial comments on the Transportation section.

All the identified significant traffic impacts and mitigation measures are summarized in [Table ES-2 Summary of Project Impacts “Transportation and Traffic” Pages ES-55 through ES-68](#) of the DEIR. Notably, each mitigation measure is considered infeasible by SDSU because they do not have jurisdiction over City streets to implement the recommended improvements, or they can’t guarantee that Caltrans will be successful in obtaining funds from the Legislature to make the improvements at Caltrans intersections (see Table 1 below: “Significant Traffic Impacts, Identified Mitigation Measures, & Agency Comments.”)

[Section 4.15.10.3](#) of the DEIR lists the mitigation measures for City streets and states “However, if the City grants authorization, CSU will implement the recommended improvement, thereby reducing the project’s impact to less than significant.” City staff have made it clear that they will work with SDSU to ensure that transportation improvements can be implemented. Furthermore, the recently updated Mission Valley Community Plan (MVCP) includes mobility improvements and the forthcoming MVCP Impact Fee Study (IFS) includes mobility facilities that SDSU can contribute to, therefore many feasible mitigation opportunities exist.

With respect to Caltrans intersections, the [Caltrans comment letter](#) to the DEIR cites [City of San Diego v. Board of Trustees of California State University](#), and asks SDSU “...please delete each of the sentences identified with the state highway mitigation that provide: *To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project’s proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible.*”

Figure 4 – Excerpt from Caltrans Comment letter to the SDSU Mission Valley Campus Master Plan DEIR

As the lead agency, CSU has responsibility for discussing mitigation measures proposed for the project, including any needed improvements to the state transportation system. (14 C.F.R., section 15126.4) Further, consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. It would appear that CSU is making the erroneous assumption that off-site mitigation is solely the responsibility of Caltrans. CSU has the responsibility of mitigating CSU's effects of regional infrastructure, unless it can be shown that another agency has exclusive responsibility. (City of San Diego v. Board of Trustees of California State University (2015) 61 Cal. 4th 945, 957)

[City of San Diego v. Board of Trustees of California State University](#) was the result of a lawsuit challenging SDSU's 2007 Campus Master Plan EIR Transportation Impact Mitigations. That EIR's traffic mitigation measures were deemed inadequate by the courts because SDSU made the requirement to pay the City of San Diego for traffic improvements contingent on the Legislature specifically appropriated the funds. The state Supreme Court decertified the transportation section of SDSU's 2007 Campus Master Plan EIR. In 2018, the University had to [redo the document](#) with commitments to fund or complete specific mitigation measures.

In the new version of the Campus Master Plan, the language that says "CSU cannot guarantee that Caltrans will get the funding necessary to make the proposed improvements, therefore they are considered infeasible" is **deleted**. Instead, there are specific commitments with development threshold triggers stating "SDSU shall, to the reasonable satisfaction of the City of San Diego Engineer and provided the City approves, [make the proposed improvement]."

For example, [Section 3.11.2](#) "Mitigation Measures" on Page 75 specifies improvements necessary to mitigate the project's significant impact at the College Avenue and the I-8 Eastbound Ramp, and includes the threshold when that improvement must take place.

Figure 5 Excerpts of Page 75 & 76 of the revised 2007 SDSU Campus Master Plan

Near-Term (2022) Mitigation Measures**Intersections**

AATCP-1 College Avenue / I-8 Eastbound Ramps (Intersection #8). The improvement necessary to mitigate the Project's significant impact at the College Avenue / I-8 Eastbound Ramp is to widen the northbound College Avenue approach to the on-ramp to provide an additional lane on College Avenue between Canyon Crest Drive and the I-8 EB on-ramp.

Prior to SDSU Full-Time Equivalent (FTE) enrollment reaching 25,056⁴ or its equivalent, SDSU shall commence and to the extent feasible complete construction of the widening of the northbound College Avenue approach to the College Avenue / I-8 Eastbound Ramp to provide an additional (third) northbound lane between Canyon Crest Drive and the I-8 EB on-ramp by the identified trigger, to the reasonable satisfaction of the City of San Diego City Engineer and Caltrans. To implement the improvements, SDSU shall prepare design plans and submit such plans to the City of San Diego and Caltrans for review and approval. Following City and Caltrans approval, SDSU shall obtain any necessary construction permits and provide bond assurances to the reasonable satisfaction of Caltrans and the City Engineer prior to constructing the subject improvements consistent with the approved City and Caltrans plans. In the event the proposed improvements are not approved and constructed by the above identified trigger, the impact would remain temporarily significant and unavoidable until approval and construction of the improvements, but in no event shall said improvement be delayed beyond the identified trigger without good cause and reasonable coordination with the City of San Diego Engineer. (Note: The phrase "or its equivalent" as used in this and other mitigation measures refers to the fact that the near-term construction of the Adobe Falls Faculty/Staff Housing could trigger the identified significant impact prior to FTE enrollment actually reaching the designated number, in this case, 25,056. Accordingly, Table AA3.14-34, Mitigation Trigger Analysis, of this Draft Additional Analysis, identifies the number of FTE equivalent faculty/staff housing that would trigger the identified impact requiring mitigation.)

I will be looking to see this level of commitment and specificity in the final EIR for the Mission Valley Campus project.

A provision of SDSU's offer letter(s) that needs clarification is the proposed \$5 million for additional traffic improvements. In the [Oct. 14th offer letter](#), item number 12 states "As described in the DEIR, SDSU intends to provide approximately \$21,000,000 in off-site and major on-site improvements, pursuant to the mitigation measures identified in the DEIR. SDSU will also provide \$5,000,000 in additional traffic improvements as an accommodation to the City, provided SDSU does not become responsible for other traffic improvements."

In SDSU's [Oct. 15th letter](#) which describes the planned \$21 million in transportation improvements and erroneously attributes \$17.4 million as off-site when it is actually on-site, it states "Per SDSU's offer letter, SDSU will also provide \$5 million in additional traffic improvements as an accommodation to the City, provided SDSU does not become responsible for other traffic improvements."

The [Oct. 28th offer letter](#) *Transportation Improvements* point states "In addition to the transportation mitigation responsibilities under the Final Environmental Impact Report ("FEIR"), SDSU will provide \$5,000,000 for additional traffic improvements in coordination with the City."

Please clarify that the \$5,000,000 for additional traffic improvements will be in addition to whatever the final dollar amount of improvements is required by the Final EIR, and is not contingent on the City absolving SDSU of other required traffic improvements.

Furthermore, the [Caltrans comment letter](#) to the DEIR asserts that signal optimization is routine maintenance and is not a mitigation measure. Four out of the eight "offsite improvements" proposed in SDSU's Oct. 15th letter are signal optimizations at a value of \$15,000 each. Caltrans states that installing Adaptive Traffic Signal Controls can be utilized as a mitigation measure, which cost approximately \$50,000 each. City of San Diego transportation and planning staff also concur that signal optimization is routine maintenance already performed by staff and would not mitigate traffic impacts caused by the SDSU West project.

In 2014 the City of San Diego adopted the [Traffic Signal Communication Master Plan](#) which identifies adaptive signal operations for approximately one-third of the traffic signals in the City. The City has already installed Adaptive Signal Controls on Friars near the Fashion Valley Mall, and Caltrans will be installing more upon completion of the construction at Friars and SR 163. To maximize the effectiveness of the technology, adaptive controls need to be installed at each intersection along Friars road heading east. This is an existing City CIP project and a feasible mitigation measure to which SDSU can contribute.

In fact, when the Transportation section of 2007 SDSU Campus Master Plan was [decertified by the courts](#) and then redone by SDSU, [Adaptive Signal Controls were identified as a mitigation measure](#)².

The Final EIR for the project must properly mitigate the identified traffic impacts to the satisfaction of the City and Caltrans, regardless of whatever terms SDSU is offering for the Purchase and Sale Agreement (PSA). It shouldn't take another ten-year lawsuit, like the City endured with the SDSU 2007 Campus Master Plan EIR, to get the traffic improvements required by CEQA law. Let's get it right the first time.

TABLE 1 - Significant Traffic Impacts, Identified Mitigation Measures, & Agency Comments

➤ City intersections

1. River Run & Friars Road – SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Traffic signal optimization. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City and Caltrans.

2. Fenton Parkway & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Traffic signal optimization. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City and Caltrans.

3. Northside Drive & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Pay a fair share contribution to add a second northbound right turn lane and optimize traffic signals along Friars Road. However, there is no existing plan to contribute a fair share payment, therefore the mitigation is considered infeasible.

² San Diego State University 2007 Campus Master Plan Revision, Section 2.3.2 Mitigation Measures, Page 22 (May 2018)

City Comment: SDSU should implement any feasible mitigations such as adding a second northbound right turn lane and traffic signal improvements in coordination with the City.

4. Rancho Mission Road & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Optimize traffic signals at I-15 Northbound Ramps & Friars Road intersection. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as adding a second northbound right turn lane and traffic signal improvements in coordination with the City and Caltrans.

Caltrans Comment: "... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

5. Fairmount Ave & San Diego Mission Road/Twain Ave - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Restripe San Diego Mission Road to add a separate eastbound left turn lane and restripe the westbound approach of Twain Ave. to provide a separate left turn lane. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as restriping and traffic signal improvements in coordination with the City.

6. Texas Street & Camino del Rio North - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Restripe both the east bound and westbound through lanes to be shared left-turn and through lanes and perform signal re-optimization. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as restriping and traffic signal improvements in coordination with the City.

7. Ward Road & Rancho Mission Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Install a traffic signal at this intersection. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as installation of a traffic signal at this intersection in coordination with the City.

8. Fairmount Ave. & Mission Gorge Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Traffic signal optimization. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City.

9. Ruffin Road & Aero Drive - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Traffic signal optimization. But CSU does not have jurisdiction and can't guarantee implementation of the recommended improvement, therefore the mitigation is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City.

10. Frazee Road & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: N/A

City Comment: The DEIR should explain why mitigations measures and levels of significance are listed as "N/A." SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

11. River Run Drive & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: N/A

City Comment: The DEIR should explain why mitigations measures and levels of significance are listed as “N/A.” SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

12. Mission Village Drive/Aztec Way & Street 2 - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: N/A

City Comment: The DEIR should explain why mitigations measures and levels of significance are listed as “N/A.” SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

13. Mission Gorge Road & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: N/A

City Comment: The DEIR should explain why mitigations measures and levels of significance are listed as “N/A.” SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

➤ Caltrans intersections

1. I-15 SB Ramps & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Add a second eastbound left turn lane, a second eastbound right turn lane, and a second west bound right turn lane. Signal re-optimization is assumed. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations in coordination with the City and Caltrans. The Mission Valley Community Plan Update (MVCPU) Final Program Environmental Impact Report (PEIR) also identified impacts at these location and recommends that a Project Study Report (PSR) be funded to identify the appropriate, more holistic improvements that would address all modes of travel.

Caltrans Comment: “... please delete each of the sentences identified with the state highway mitigation that provide:

“To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project’s proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible.

Optimizing the signal timing is not considered mitigation as this is routinely performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.”

2. I-15 NB Ramps & Friars Road - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Add a second eastbound left turn lane. Signal re-optimization is assumed. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations in coordination with the City and Caltrans. The MVCPU Final PEIR also identified impacts at these locations and recommends that a Project Study Report (PSR) be funded to identify the appropriate, more holistic improvements that would address all modes of travel.

Caltrans Comment: “... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project’s proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible.

Optimizing the signal timing is not considered mitigation as this is routinely performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.”

3. Fairmount Ave & Camino del Rio North - SIGNIFICANT TRAFFIC IMPACTS

SDSU Identified Mitigation: Restripe the eastbound approach to provide a second eastbound right turn lane and signal re-optimization. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

Caltrans Comment: "... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

4. **1-15 SB/I-8 Loop On-ramp from Friars Road - SIGNIFICANT TRAFFIC IMPACTS**

SDSU Identified Mitigation: Add a second mixed flow lane on this ramp. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

Caltrans Comment: "... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

5. **I-15 SB Direct On-ramp from Friars Road - SIGNIFICANT TRAFFIC IMPACTS**

SDSU Identified Mitigation: Add a second mixed flow lane on this ramp. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

Caltrans Comment: "... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

6. **SR 163 Southbound Ramps/Ulrich Street & Friars Road - SIGNIFICANT TRAFFIC IMPACTS**

SDSU Identified Mitigation: Re-optimize the coordinated signal offset. CSU will support Caltrans in its effort to obtain funds from the legislature or other available funding sources. However, since CSU cannot guarantee that Caltrans will be able to obtain the funds, the improvement is considered infeasible.

City Comment: SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City and Caltrans.

Caltrans Comment: "... please delete each of the sentences identified with the state highway mitigation that provide:

To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

Optimizing the signal timing is not considered mitigation as this is routinely performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure."

7. **17 Individual Freeway Segments - SIGNIFICANT TRAFFIC IMPACTS**

SDSU Identified Mitigation: N/A

City Comment: The DEIR should explain why mitigations measures and levels of significance are listed as "N/A." SDSU should implement any feasible mitigations in coordination with the City and Caltrans.

In conclusion, City Transportation staff and Caltrans identified serious flaws in the DEIR that need to be corrected in the Final EIR. \$1 million in offsite mitigation does not adequately address the project's traffic impacts. We don't want history to repeat itself like the 2007 Campus Master Plan and let lawsuits delay the project for over a decade.

Conclusion

I am pleased with the progress of the negotiations on the sale of the Mission Valley Stadium site and look forward to reviewing a final PSA by early 2020. There are still significant unresolved concerns with traffic that need to be addressed in the Final EIR in order for the City Council to agree to the sale. SDSU must be held to the same standard as any other developer to mitigate the impacts of their project. I look forward to continuing our progress and finalizing plans for a development of we can all be proud.