

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research

APR 19 2019

STATE CLEARINGHOUSE

Making Conservation  
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April 19, 2019

11-SD-5

PM VAR

TL674A Reconfiguration and TL666D Removal Project  
SCH#2018121014

Mr. John Forsythe  
California Public Utilities Commission  
300 Capitol Mall, Suite 418  
Sacramento, CA 95814

Dear Mr. Forsythe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the TL674A Reconfiguration and TL666D Removal Project located near Interstate 5 (I-5) and for the response to Caltrans comment letter dated January 7, 2019. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

It is requested that on Page 5.1-26 Lines 21 and 22 "Though such views are expected to be during nighttime hours, and would be temporary and thus likely only visible to a limited number of observers because Caltrans would schedule a temporary closure of the affected portion I-5 to safely complete the work." be clarified to make the statement that Caltrans is not doing the reconfiguration and removal work. The following statement is recommended:

"Though such views are expected to be during nighttime hours, and would be temporary and thus likely only visible to a limited number of observers. SDG&E, to safely complete the work, would request from Caltrans a temporary closure of the affected portion of I-5."

**Right-of-Way**

Any work performed within Caltrans' right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the

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encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies. Please highlight the following that occur within the Caltrans' R/W: specific environmental impacts (depth of trench), mitigation elements that could impact, and any resource agency permits that would be required.

Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/trafficops/ep/manual.html>

Please see Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/design/cadd/manuals/ppm.html>

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov).

Sincerely,



MELINA PEREIRA, Acting Branch Chief  
Local Development and Intergovernmental Review Branch

Enclosure

Response to Caltrans comment letter dated January 7, 2019

1 **Comment Letter C**  
2 **California Department of Transportation**  
3

STATE OF CALIFORNIA--CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN, Jr., Governor

**DEPARTMENT OF TRANSPORTATION**

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January 7, 2019

11-SD-5

PM VAR

TL674A Reconfiguration and TL666D Removal Project

SCH#2018121014

Mr. John Forsythe  
California Public Utilities Commission  
300 Capitol Mall, Suite 418  
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Dear Mr. Forsythe:

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Caltrans has the following comments:

**Hydrology and Drainage Studies**

Please see attached the drainage as-builts for the Via de la Valle work in the Caltrans Right-of-Way (R/W) (Appendix J Map 2 of 13 in the IS-MND Report.) The typical trench section for the 69-kV Duct Bank (pg. 4-14) shows the depth as "Per Spec." Please review the attached drainage culvert as-builts to determine how close the proposed work is to the cross culverts under Via de la Valle.

C-1

**Noise and Hazardous Waste and Air**

A health and safety plan for lead and asbestos, PCB, prepared by a Certified Industrial Hygienist (CIH) shall be provided by the contractor, including items in 8 CA of Regs §1532.1. It shall be implemented for all workers handling the soil, asbestos containing material, PCB within the R/W and dispose of them in accordance with all applicable environmental regulations.

C-2

If any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or has a total lead concentration at or below 80mg/kg.

C-3

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to enhance California's economy and livability"*

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January 7, 2019  
Page 2

Electrical System

Please see the attached As Builts for the existing Caltrans' Electrical System at Via De La Valle. The attached As Builts may not cover all existing electrical facilities. Because of this the Contractor will need to reference the Subsurface Locator as a work item prior to excavating in Via De La Valle to identify the existing Caltrans' underground facilities.

C-4

Please also contact the Caltrans Electrical Maintenance staff prior to work on this project.

Traffic Control Plan/Hauling

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System. Additional information is provided online at:  
<http://www.dot.ca.gov/trafficops/permits/index.html>

C-5

A Traffic Control Plan will need to be submitted to Caltrans District 11, including the interchanges at Interstate 5/Via de la Valle, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (Interstate 5) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

C-6

Right-of-Way

The ongoing Caltrans I-5 North Coast Corridor (I-5 NCC) project along I-5 is in the area of this projects. Any work near the construction zone may require coordination with the Caltrans construction contractor.

C-7

California Public Utilities Commission shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

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Mr. John Forsythe  
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The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

C-8

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies. Please highlight the following that occur within the Caltrans' R/W: specific environmental impacts (depth of trench), mitigation elements that could impact, and any resource agency permits that would be required.

C-9

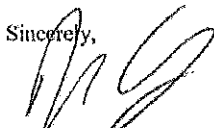
Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/trafficops/ep/manual.html>

C-10

Please see Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/design/cadd/manuals/ppm.html>

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov).

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Local Development and Intergovernmental Review Branch

Attachments:

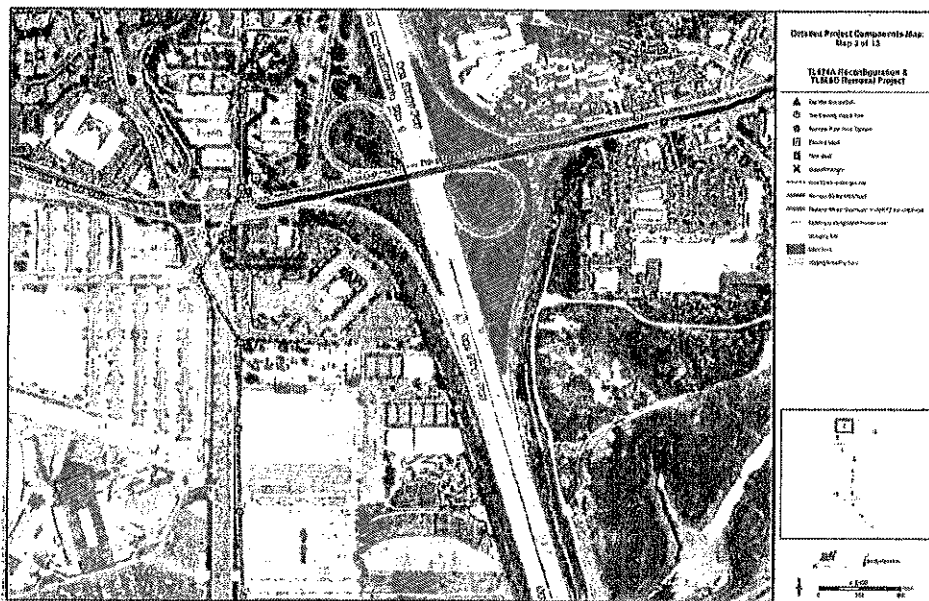
Appendix J: Detailed Project Components Maps  
As-Built for Existing Caltrans' Electrical System at Via De La Valle

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to enhance California's economy and livability"*

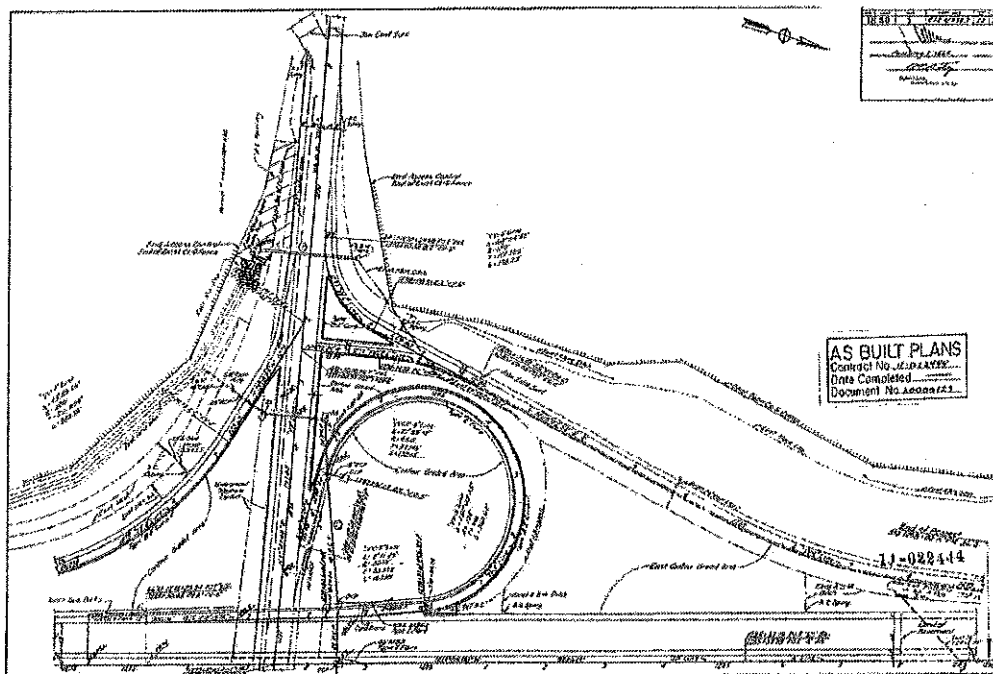
*Appendix J*  
*Detailed Project Components Maps*

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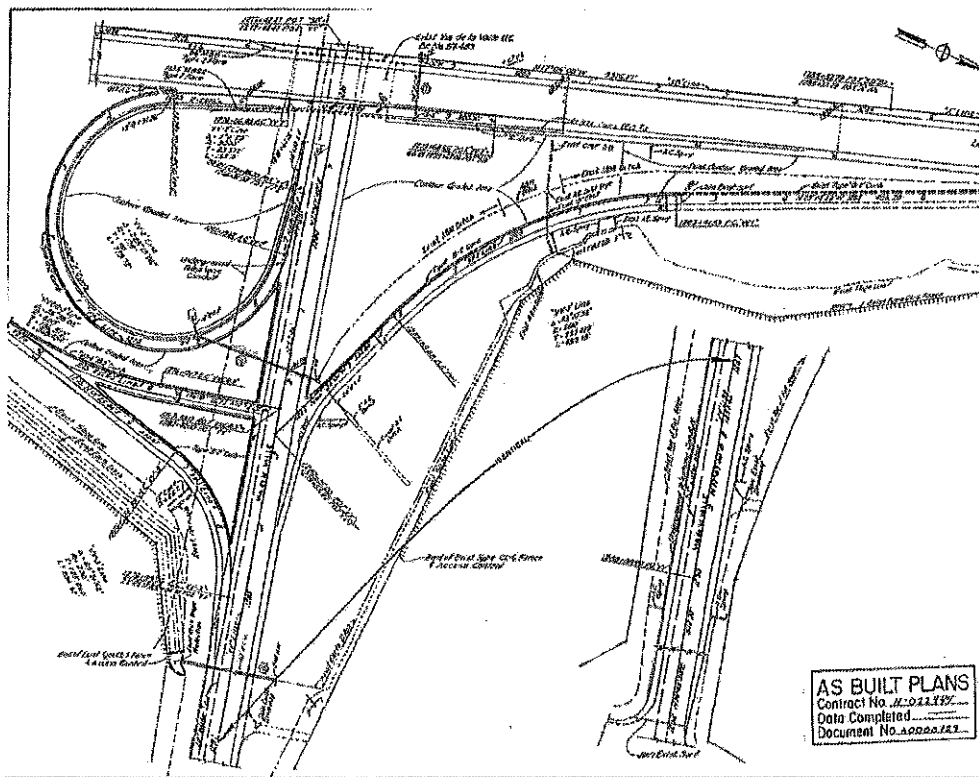
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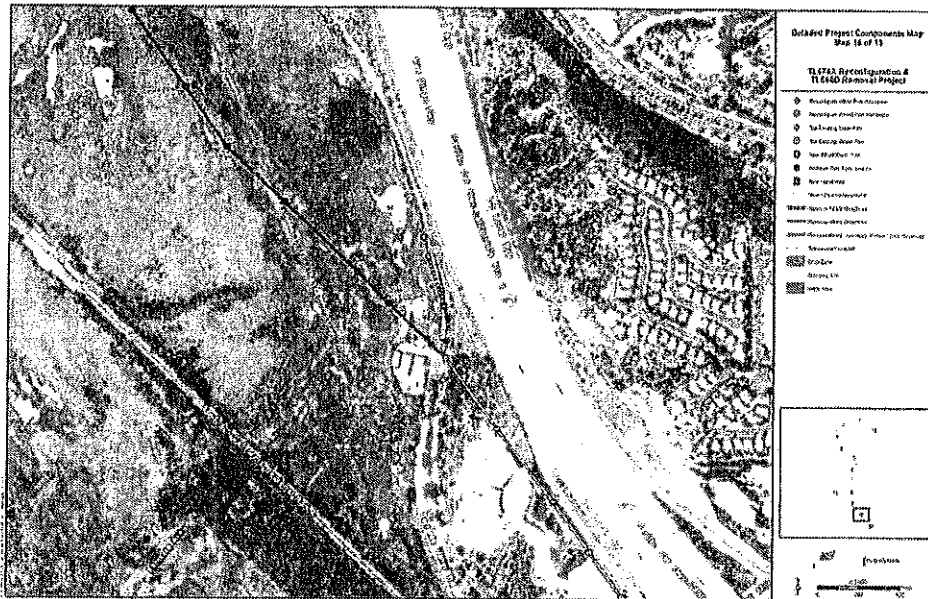


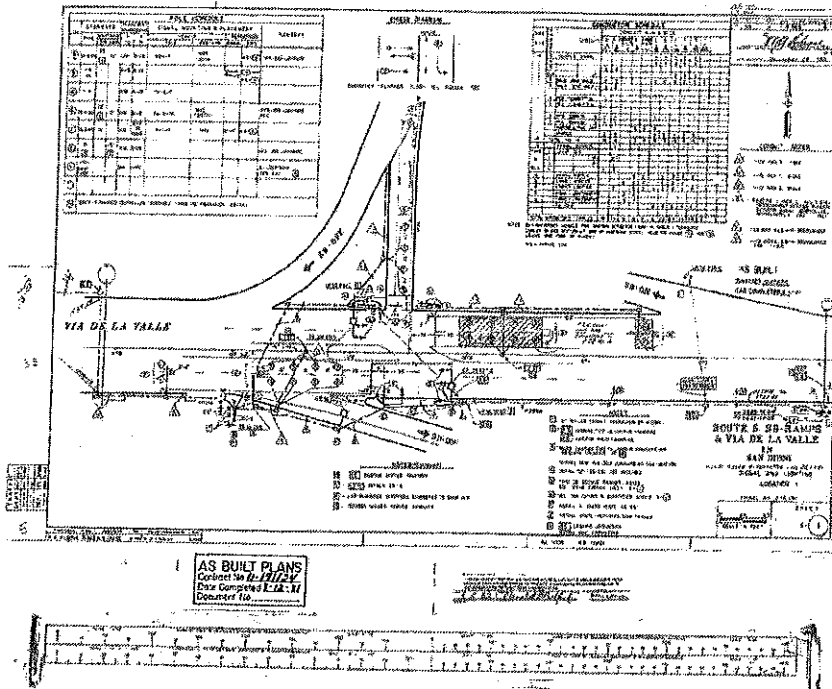
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**Response to Comment Letter C**  
**California Department of Transportation**

**C-1** The commenter requests that the applicant review attached drainage as-built drawings for the Via de la Valle work in the California Department of Transportation (Caltrans) right-of-way (ROW) to determine the proximity of the proposed work to the cross culverts under Via de la Valle.

The letter containing the attached drainage as-built drawings has been forwarded to the applicant. These drawings would be considered when determining how close the proposed work would be to the cross culverts under Via de la Valle during the final engineering design phase of the project.

**C-2** The commenter requests that a health and safety plan for lead, asbestos, and polychlorinated biphenyls (PCBs), prepared by a Certified Industrial Hygienist, be provided by the contractor, including items in 8 California Code of Regulations §1532.1. The health and safety plan would be implemented for all workers handling soil, asbestos-containing material, and PCBs within the ROW, and would direct workers to dispose of them in accordance with all applicable regulations.

Section 5.8 discusses hazards and hazardous materials. According to the applicant, management practices documented in SDG&E's "Best Management Practices Manual for Water Quality Construction," (BMP Manual; Appendix F) would be implemented during construction to reduce potential impacts from hazardous materials.

In addition to implementing BMPs, the applicant would comply with all applicable regulations pertaining to the management of hazardous materials and hazardous wastes. Removal or relocation of utility lines with components suspected to contain asbestos may require notification to the San Diego Air Pollution Control District (SDAPCD), an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M). The CPUC expects the applicant to adhere to all applicable laws and regulations, implement the applicant's BMP Manual, and conduct Safety and Environmental Awareness Program training. Furthermore, MM HAZ-1 requires the applicant to prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. Refer to Draft IS/MND pages 5.8-18 and 5.8-19 to see the full mitigation measure.

**C-3** The commenter requests that if any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or have a total lead concentration at or below 80 milligrams per kilogram.

As part of the proposed project, the applicant proposes to backfill holes and trenches with excavated soils as necessary. Should contaminated soil be encountered during trenching activities, the applicant would sample in place, test, profile, and transport the material to an appropriately permitted disposal facility in accordance with all federal, state, and local laws



and regulations. If any import borrow takes place, the CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including Health and Safety Code Section 57008, to adhere to the California Human Health Screening Level for lead and lead compounds in soil.

- C-4** The commenter requests that the applicant review attached as-built drawings for the existing Caltrans' electrical system at Via de la Valle. However, the commenter indicates that the as-built drawings may not cover all existing electrical facilities, so they also request that the contractor reference the subsurface locator as a work item prior to excavating in Via de la Valle to identify the existing Caltrans underground facilities and contact the Caltrans electrical maintenance staff prior to starting work for the proposed project.

The letter containing attached as-built drawings for the existing electrical system at Via de la Valle has been forwarded to the applicant. Since the as-built drawings may not cover all existing electrical facilities, the Contractor will reference the Subsurface Locator as a work item prior to excavating in Via de la Valle, in order to identify the existing Caltrans underground facilities, and contact the Caltrans electrical maintenance staff prior to starting work for the project.

- C-5** The commenter indicates that Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle, combination of vehicles, or special mobile equipment whose size and/or weight (including load) exceeds the maximum limitations specified in the California Vehicle Code. In addition, the commenter requests that a traffic control plan be submitted to Caltrans District 11, including the interchange at Interstate 5 (I-5)/Via de la Valle, at least 30 days prior to start of any construction. This plan would include suggested detours to use during closures, including routes and signage.

Impacts associated with construction traffic are addressed in Section 5.16, "Traffic and Transportation." Draft IS/MND page 5.16-6, Table 5.16.1, outlines relevant transportation policies and regulations, such as the need for the applicant to "obtain an encroachment permit for all proposed activities related to the placement of encroachment within, under, or over state highway right-of-way. The applicant must also obtain a special permit to operate a vehicle or combination of vehicles with special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations on state highways." The CPUC expects the applicant to comply with applicable state and municipal codes and regulations. Furthermore, the sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all highway crossings." Therefore, a Traffic Control Plan (TCP) would be submitted to Caltrans District 11, including the interchanges at I-5/Via de la Valle, at least 30 days prior to the start of any construction. The TCP would comprise outlining suggested detours to use during closures, including routes and signage.

C-6 The commenter requests that the IS/MND discuss and address potential impacts to I-5 and traveling public from detours, demolition, and other construction activities.

See response to Comment C-5. The proposed project would not involve demolition activities. Potential impacts from the proposed construction activities have been properly analyzed using criteria outlined in Appendix G of the CEQA Guidelines, as discussed in Section 5.16, "Traffic and Transportation" of the Draft IS/MND. Furthermore, the applicant would acquire encroachment permits and road crossing approvals, if required, and would meet the requirements of these authorizations, including implementation of a TCP that would outline detours, including routes and signage.

C-7 The commenter indicates that the ongoing Caltrans I-5 North Coast Corridor project along I-5 is in the area of the proposed project. Further, any work near the construction zone may require coordination with the Caltrans construction contractor. The commenter also states that the CPUC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times that would create the least possible inconvenience to the traveling public and that signage be posted prior to the closure in accordance with Caltrans requirements. In addition, the plans shall also outline suggested detours during the closures, including routes and signage.

See response to Comment C-5. Draft IS/MND Section 5.19, "Mandatory Findings," page 5.19-3, Table 5.19-1, lists the foreseeable projects considered in conjunction with the proposed project in the analysis of cumulative impacts. The I-5/State Route 56 Interchange Project (part of the I-5 North Coast Corridor Project) was one of the projects identified to be approved but not funded and has an estimated completion date of 2025. Since this foreseeable project has an unknown timeline, it may or may not overlap with the proposed project. Thus, the CPUC concurs that any work near the construction zone may require coordination with the Caltrans construction contractor to minimize a potential cumulative impact to traffic. Furthermore, as indicated in the Draft IS/MND, the applicant would acquire encroachment permits and road crossing approvals, if required, and would implement the requirements of these authorizations, including implementation of a traffic control plan that would outline closures and detours, including routes and signage.

C-8 The commenter indicates that the Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' ROW until an encroachment permit is approved.

See response to Comment C-5. The CPUC concurs that as part of the encroachment permit, the Highway Closure Plan should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. The sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by

Caltrans for all highway crossings." Therefore, the CPUC expects the applicant to adhere to Caltrans' procedure and recommendations of submitting a Highway Closure Plan to Caltrans District 11, as part of the encroachment permit.

- C-9 The commenter indicates that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans, and an encroachment permit would be required for any work within the Caltrans ROW prior to construction. In addition, as part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans ROW, and any corresponding technical studies. The commenter requests that the IS/MND highlight all of the following that occur within the Caltrans ROW: specific environmental impacts (depth of trench), potential impacts of the proposed project, and any resource agency permits that would be required to be involved.

The CPUC concurs that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans and that an encroachment permit would be required for any work within the Caltrans' ROW prior to construction. Prior to construction, the CPUC expects the applicant to obtain a Caltrans encroachment permit pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all work within the Caltrans ROW.

The CPUC prepared the MND to comply with the requirement of CEQA. Pursuant to CEQA, including Public Resources Code Section 21064.5 and 21082.2, the CPUC prepared the IS to determine whether significant adverse effects on the environment would result from implementation of the proposed project. The IS used the significance criteria outlined in Appendix G of the CEQA Guidelines as a basis for analysis. Potential impacts from the proposed project have been fully disclosed in the IS, which was used to support the MND. Furthermore, the Draft IS/MND, page 4-7, Table 4-1 identifies the permits that the lead and responsible agencies may require of the applicant in order to implement the proposed project.

- C-10 The commenter recommends that the applicant see Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW.

Comment noted. The letter containing the references to Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW has been forwarded to the applicant. The CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including the requirements regarding utilities and state ROW.

