Response to Comment Letter C

California Department of Transportation (Caltrans)
Kimberly D. Dodson, GISP, Branch Chief
May 30, 2025

C-1 The comment provides introductory remarks and a summary of the Project description. No response is required.

C-2 The comment provides general information on Caltrans' commitment to safety. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-3 The comment notes Caltrans is committed to equitable projects that help benefit underserved communities. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-4 The comment indicates Caltrans is looking forward to working with the City to improve the transportation network, including between various transportation modes. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-5 The comment requests confirmation that Caltrans' facilities will not be adversely impacted during and after construction of the underground components of the Project.

The Project's design phase would include an examination of existing underground utility infrastructure that would be mapped prior to construction to ensure implementation of the undergrounding work would not interfere or conflict with existing utility systems and services in the area (Draft PEIR, p. 3-5). The City, in coordination with the San Diego Gas & Electric Company, would obtain any required encroachment permits from affected jurisdictions outside of the City (e.g., Caltrans) for any work conducted within the right-of-way (ROW) of public transportation facilities (Draft PEIR, p. 4.8-7). This would ensure any Caltrans facilities would not be adversely affected by the Project.

C-6 The comment states the Project is proposing to underground distribution lines and not transmission lines over 50 kilovolts (kV). As stated on page 3-3 of the Draft PEIR, the Project is proposing to underground power distribution lines, telephone lines, cable lines, and other communications lines and does not include transmission lines. The Project does not propose undergrounding transmission lines over 50 kV.

C-7 The comment references information provided in Section 4.8, Transportation that notes work may occur within a ROW and would require an encroachment permit from Caltrans (Draft PEIR,

p. 4.8-1) and request the physical and geographic location of all Project work near state facilities be identified for Caltrans review.

The Draft PEIR explains in Chapter 1, Introduction on page 1-2, that "[A]t this time, the scope of each individual project to be implemented under the Project is not precisely defined; however, potential environmental impacts can be estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements." When project-specific plans are available for each individual undergrounding project alignment, the City can either approve the activity without additional environmental documentation if the activities are determined to be adequately analyzed in this PEIR, or tier from this PEIR and prepare a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent EIR. Once Project plans are available, the City and/or San Diego Gas & Electric Company would reach out to affected jurisdictions outside of the City to obtain any required permits (e.g., encroachment permit).

C-8 The comment provides information on Caltrans requirements for special permits for oversize/overweight vehicles. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-9 The comment requires a Traffic Control Plan be submitted that includes specific information to Caltrans District 11 a minimum of 30 days prior to the start of construction and lists specific interchanges. Please see Response to Comment C-7 regarding subsequent project-specific alignment review. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-10 The comment references the need to address potential impacts to highway facilities and the public due to construction activities. Please see Response to Comment C-7 regarding subsequent project-specific alignment review. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-11 The comment recognizes that Caltrans is a Responsible Agency under CEQA and would coordinate with the City or San Diego Gas & Electric in the event an encroachment permit would be required and also would appreciate a meeting to discuss Caltrans CEQA compliance. It is anticipated Caltrans would rely on the CEQA document prepared for any subsequent projects that would require an encroachment permit for their CEQA clearance to issue the permit as a Responsible Agency. However, when an encroachment permit is requested from Caltrans for any applicable future projects, Caltrans will confirm whether the Draft PEIR adequately covers environmental impacts associated with the project-specific activities in question, or if subsequent environmental review may be required prior to issuance of any permit by Caltrans.

C-12 The comment provides information on Caltrans requirements for encroachment permits. Please see Response to Comment C-7 regarding subsequent project-specific alignment review. The

comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-13 The comment includes a recommendation that the Project's potential impacts that may occur within a Caltrans ROW be identified including any revised mitigation measures. Please see Response to Comment C-7 regarding subsequent project-specific alignment review. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.

C-14 The comment provides specific guidance regarding how to obtain an encroachment permit from Caltrans and lists chapters from the Caltrans manual. Please see Response to Comment C-7 regarding subsequent project-specific alignment review. The comment does not raise any concerns regarding the adequacy of the Draft PEIR. The comment is noted, and no further response is required.