

California Department of Transportation

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July 7, 2026

11-SD-67

11-SD-125

PM VAR

El Monte Pipeline No. 2 Rehab Project
MND/SCH#2026060425

Ms. Nancy Graham
Program Manager
City of San Diego
8525 Gibbs Drive, Suite 302 MS 912
San Diego, CA 92123

Dear Ms. Graham:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the El Monte Pipeline No. 2 Rehabilitation Project located near State Routes (SR-67 and SR-125). 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.

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:

Design

- Please make sure that Caltrans' Right-of-Way (R/W) is clearly defined on all sheets where the R/W is included and where the pipeline is within Caltrans' R/W.
- Please follow the Project Development Procedures Manual (PDPM) and the Permit Manual for all clearances and other policies that need to be followed.
- Any time the pipeline crosses Caltrans' R/W, it needs to be encased and installed by a boring method, no trenching. If the pipeline is not encased within Caltrans' R/W, City of San Diego will need to submit an application for an Encroachment Policy Exception (EPE), with proper justification as to why the pipeline cannot be encased.
- Any time the pipeline runs longitudinally within Caltrans' R/W, it needs to be as close to the R/W fence as possible, and it will need to be documented in an EPE with proper justification as to why it can't be relocated outside Caltrans' R/W.
- Any fire hydrant or valves within Caltrans' R/W will need to be included in an EPE as Maintenance Access Points.
- Proposed impacts to interstates may require FHWA review and approval.

Planning R/W

On all plans, indicate Caltrans' R/W lines. It's important to clearly delineate Caltrans' R/W limits by calling them out on your plans so we can identify any impacts to Caltrans State facilities. You can access Caltrans' R/W lines/maps by following the link to the Caltrans public website below.

<https://experience.arcgis.com/experience/04ae3745190047c5adf8f33714af9e3a>

Hydrology and Drainage Studies

General comments:

- Project range looks to overlap or is within the vicinity of I-8, SR-67 and SR-125.
- Please provide layout plans showing waterline alignment, include existing Caltrans drainage facilities in plans.
- Please also provide profiles and include existing facilities.
- Please provide cross section.

Floodplain comments:

Los Coches Creek is located at the intersection of SR-67 and Wintergarden Boulevard. Los Coches is classified as a Zone A flood plain.

- The proposed project features may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to the SR-67 facilities. Caltrans requests that the City of San Diego, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department regarding floodplain administration and allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from this project. In addition,
- Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to the Caltrans when the City of San Diego approves the permit to alter the floodplain and/or when the Developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).

Structures

The proposed improvements Station 530+10 at location south of Fletcher Parkway and beneath State Route 125 will need to be reviewed by Caltrans HQ Structure Maintenance and Investigations.

Hauling

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 network. Additional information is provided online at: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Potential impacts to the highway facilities (SR-67 and SR-125) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Mitigated Negative Declaration that Caltrans will use for our subsequent environmental compliance.

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 approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, any CEQA determinations or exemptions.

Provide a safe and reliable transportation network that serves all people and respects the environment" The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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 lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the CEQA and National Environmental Policy Act (NEPA) standards.

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.

Please see the following chapters in Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a11y.pdf>.
- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf>

- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf>.
- 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.
- Early coordination with Caltrans is strongly advised for all encroachment permits.

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.

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 CEQA determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

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