

DEPARTMENT OF TRANSPORTATION

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April 3, 2008

11-SD/IMP-VAR
PM VAR
SDG&E Sunrise Powerlink
DEIR SCH 2006091071

Mr. Billie Blanchard, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Mr. Billie Blanchard:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the SDG&E Sunrise Powerlink Draft Environmental Impact Report (DEIR) (SCH 2006091071). Caltrans has the following comments:

- The proposed transmission line would cross I-8 in Imperial County and I-15, SR-67, SR-78, and SR-79 in San Diego County. Although widening improvements to some or these routes may not be proposed for the short-term, long term widening projects could be considered in the future.
- Any damage to State highways due to construction of the Powerlink must be repaired and paid for by SDG&E.
- Page D.9-4 ,Table D.9-1, Change "State Route 80" to "Imperial County Route S80"
- Pages D.9-4 to D.9-11. New 2006 Traffic Volumes (ADTs) for State Highways are now available. The 2006 Traffic Volumes can be found at the Caltrans website here:
<http://www.dot.ca.gov/hq/traffops/saferestr/trafdata/>
- Various pages from D.9-25 to D.9.64 Tables D.9-15 to D9.-20. No year listed for ADT. Add a year in the ADT column heading or footnote.
- All Caltrans standards for utility encroachments shall be met.
- Clearances of overhead crossings shall conform to regulations of the California PUC. The number of crossings shall be minimized.
- New installations under an existing roadbed shall be made by boring and jacking method. Trenching under traveled way will not be allowed.
- For freeways and expressways, placement of longitudinal encroachments is prohibited within controlled access rights-of-way.
- Utilities shall not be located in median areas.

- Transverse crossings should be normal (90 degrees) to the highway alignment where practical. If impractical, skews of up to 30 degrees from normal may be allowed.
- All transverse crossings, single ducts or pipes 6" or greater in diameter, shall be encased. If multiple encasements is requested, the distance between multiple encasements shall be the greater of either 24" or twice that of the diameter of the larger pipe being installed.
- New underground installations within existing or ultimate State highway right-of-way must be not less than 42 inches below existing ground level or finished grade. For further details, refer to Section 600 of the Encroachment Permits Manual.
- Supports for overhead lines crossing freeways shall be located outside the controlled access right of way and not on cut or fill slopes or impair sight distances. All installations shall be placed as close to right-of-way line as possible. Above-ground utilities shall be outside of the clear recovery zone (20 feet from edge-of-travelway for conventional highways and 30 feet for freeways and expressways). Allowance should be made for future widening of the highways.
- New installations shall not impair sight distances.
- A transportation management plan (TMP) is required. The TMP must identify potential traffic delays and keep the delays to a maximum of 30 minutes. Any proposed lane closures or detours during project construction must be approved by the District Traffic Manager. Construction activities affecting the traveling public may be limited to Monday through Friday only during peak seasons. All Bus and Rail Transit providers affected by the project should be notified well in advance of construction of the project in order to minimize any transit service disruptions.
- All traffic control plans (TCP) shall follow the California MUTCD.
- Proposed built form may jeopardize existing and potential scenic highway designation. Evaluation of these impacts can not be conclusively determined without post construction review by the Caltrans Scenic Highway Departmental Technical Advisory Committee (DTAC) and approval by the State Legislature of the DTAC recommendations. Contact the Statewide Scenic Highway Coordinator, Senior Landscape Architect Dennis Cadd (916) 654-5370 for further information regarding certification or decertification of Eligible and Officially Designated Routes.
- The Draft EIR/EIS (D.3-44) states: "California Public Utilities Code Section 320 requires that all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway be undergrounded where feasible. SDG&E will bury all new or relocated utilities where feasible to avoid possible revocation of SR-78 as an Officially Designated Scenic Highway within the ABDS." Prior to PUC approval of this application, the applicant should provide the public a detailed feasibility analysis for undergrounding these facilities. The study should discuss any technical limitations and quantify the economic constraints.

- A Hazardous waste investigation for work done with Caltrans right-of-way may be required as part of Caltrans Encroachment Permit process.
- The appropriate Biological and Cultural resource studies will need to be evaluated as part of Caltrans Encroachment Permit process in not properly identified in the Sunrise Powerlink EIR.
- Caltrans Environmental requests that if any towers are to be constructed within Caltrans' ROW that the locations are to be delineated on a map in the EIR/EIS for evaluation of potential biological impacts within Caltrans' ROW.
- Should the U.S. Fish and Wildlife Service (USFWS) identify any critical habitat for federally listed species potentially affected by this project, then the critical habitat should be mentioned in the EIR/EIS.
- For the underground installations, methods of installation and maps of the installation locations should be included in the EIR/EIS. Trenching may result in impacts to jurisdictional waters of the United States, including wetlands, which may occur in the project area.
- The main biological concerns within Caltrans' ROW include adverse effects on federal and state listed species; riparian, chaparral, coastal sage scrub, desert scrub, and vernal pool habitat; and federally protected wetlands.
- Any impacts to wetland or riparian habitat from this project within Caltrans' ROW will require a Section 1602 Lake and Streambed Alteration Agreement from the California Department of Fish and Game (CDFG) and a Section 404 Nationwide or Individual Permit from the U.S. Army Corps of Engineers. Any impacts to federally listed species or critical habitat within Caltrans' ROW will require coordination with USFWS. Any impacts to state listed species within Caltrans' ROW will require coordination with CDFG.

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by the Department. Current policy allows Highway Improvement Projects costing \$1 million or less to follow the Caltrans Encroachment Permit process. Highway Improvement Projects costing greater than \$1 million but less than \$3 million would be allowed to follow a streamlined project development process similar to the Caltrans Encroachment Permit process. In order to determine the appropriate permit processing of projects funded by others, it is recommended the concept and project approval for work to be done on the State Highway System be evaluated through the completion of a Permit Engineering Evaluation Report (PEER). A PEER should always be prepared, regardless of the cost of improvements, when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER and necessary application and supporting documentation an encroachment permit can be issued.

Highway Improvement Projects greater than \$3 million, or considered complex projects, would be required to adhere to the full Project Development Process (e.g. Project Initiation Documents,

Project Study Reports and Cooperative Agreements). A Caltrans District responsible unit will be notified and a project manager will be assigned to coordinate the project approval.

In order to expedite the process for projects sponsored by a local agency or private developer, it is recommended a PEER be prepared and included in the Lead Agency's CEQA document. This will help expedite the Caltrans Encroachment Permit Review process. The PEER document forms and procedures can be found in the Caltrans Project Development Procedures Manual (PDPM).

<http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm>

[http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_\(TR-0112\).pdf](http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_(TR-0112).pdf)

Furthermore, the applicant's environmental documentation must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to State Highway R/W. Environmental documentation should include studies or letters from qualified specialists or personnel which address the potential, or lack of potential, for impacts to the following resources in state right-of-way:

- Biological resources
- Archaeological and historic resources
- Visual quality
- Hazardous waste
- Water quality & stormwater
- Pre-historic resources
- Air quality
- Noise levels

Copies of all project-related environmental documentation and studies which address the above-cited resources should be included with the project proponent's encroachment permit application to Caltrans for work within State R/W. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Encroachment permit submittals that are incomplete can result in significant delays in permit approval. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.

When a property owner proposes to dedicate property to a local agency for Caltrans use in conjunction with a permit project, Caltrans will not issue the encroachment permit until the dedication is made and the property has been conveyed to the Department.

Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. The Department's Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

The California Environmental Quality Act (CEQA) requires, under Public Resources Code (PRC) Section 21081.6, the adoption of reporting or monitoring programs when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after project approval to ensure implementation of the project in accordance with the mitigation adopted during the CEQA review process. According to PRC Section 21081.6, when a project has impacts that are of statewide, regional, or area-wide significance, a reporting or monitoring program shall be submitted to the Department of Transportation (Caltrans). Attached are Caltrans guidelines for the submittal of reporting or monitoring programs. Please submit the attached information to the Caltrans Inter-Governmental Review/Development Review contact following project approval.

If you have any questions on the comments Caltrans has provided, please contact Trent Clark of the Development Review Branch at (619) 688-3140.

Sincerely,



JACOB M. ARMSTRONG, Chief
Development Review Branch

To: CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Date: 4/11/2008

From: Jacob Armstrong
Senior Transportation Planner
California Department of Transportation - District 11
4050 Taylor Street MS-240
San Diego, CA 92110-5406

Subject: Additional Comments on Sunrise Powerlink Draft EIR/S

Caltrans recommends that potential impacts to community character and to local and regional economic activities (including effects to tourism), which could occur as the result of project-related activities within state right of way, be addressed within the Final EIR/S for the Sunrise Powerlink project. If Caltrans determines that there is a potential for such impacts to occur as the result of project-related work, and this potential has not been addressed in the FEIR/S, Caltrans may request additional studies or documentation to be provided at the time of the Sunrise Powerlink proponent's encroachment permit application to work within state right of way.