

## PUBLIC UTILITIES COMMISSION

320 W. 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013

**(Electronically Transmitted – No hard copy will follow)**

May 27, 2021

Governor's Office of Planning &amp; Research

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Kristen Uchitel  
Project Manager  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101

**STATE CLEARINGHOUSE****SUBJECT: SCH#2021040512; San Diego Association of Governments, Central Mobility Hub Project, Notice of Preparation**

Dear Ms. Uchitel,

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) and rail transit projects in California. All rail fixed guideway systems are subject to the Commission's Safety Oversight Program requirements. Safety Certification Plan approval is required for rail transit project to be placed in revenue service. The California Public Utilities Code requires Commission approval for construction or alteration of crossings and grants the Commission exclusive power on design, alteration, and/or closure of crossings in California. The Commission's Rail Transit Safety Branch (RTSB) will review rail transit projects matters and the Rail Crossings and Engineering Branch (RCEB) will review crossing matters. The Commission has received a copy of the Notice of Preparation (NOP) from the San Diego Association of Government (SANDAG), who is the lead agency for the proposed Central Mobility Hub (CMH).

According to the NOP, SANDAG proposes to construct the CMH project for connecting the San Diego International Airport (SDIA) to a newly constructed CMH at the existing Naval Base Point Loma Old Town Campus (OTC) site. The objective of the CMH project is to create a transportation system that will improve connectivity to SDIA while providing a cleaner, safer and environmentally friendly multi-modal solution and reducing congestion to the airport area at the same time.

SANDAG proposes to advance a Proposed Project and two alternatives for consideration as part of California Environmental Quality Act (CEQA) Scoping. The Proposed Project is CMH at OTC with Direct Transit Connection to SDIA. In summary, Proposed Project would consist of the following components:

- Multimodal CMH at the OTC site
- Relocation of transit services from Old Town Transit Center (OTTC) to the CMH on the OTC site
- A high-frequency transit connection via dedicated right-of way between CMH and SDIA
- Up to four high-frequency transit stations
- Modifications to Interstate-5
- Pedestrian, bicycle, and other active transportation improvements

- Roadway modifications
- Supporting infrastructure for the transit connection, including traction power and a maintenance facility

The CMH would be served by San Diego Trolley light rail, Amtrak intercity rail, COASTER commuter rail, and buses. The draft EIR will include a comparison of the following alternatives to the Proposed Project: Alternative One, CMH at Intermodal Transit Center (ITC) Site with direct transit connection to SDIA, but with some differences from the proposed project, and Alternative Two, an extension of San Diego Trolley to SDIA.

The CMH transit station and the dedicated right-of-way, high-frequency transit connection between CMH and SDIA described in the NOP will be subject to a number of rules and regulations involving the Commission. These may include but not limited to:

- California Public Utilities Code, Sections 1201 et al, which requires Commission authority to construct rail crossings.
- California Public Utilities Code, Sections 2111, 2112, 99152; rail transit safety.
- Commission's Rules of Practice and Procedure, which details the Formal Application process for construction or modification of a public crossing.

The design criteria of the proposed project must comply with Commission General Orders (GOs), such as:

- GO 26-D, Clearances on railroads and street railroads as to side and overhead structures, parallel tracks and crossings.
- GO 72-B, Construction and maintenance of crossings – standard types of pavement construction at railroad grade crossings.
- GO 75-D, Warning devices for at-grade railroad crossings.
- GO 88, Rules for altering public highway-rail crossings.
- GO 95, Overhead electric line construction.
- GO 118-A, Construction, reconstruction and maintenance of walkways and control, of vegetation adjacent to railroad tracks.
- GO 128, Construction or Underground and Electrical Supply and Communication.
- GO 143-B, Design, Construction and Operation Safety Rules and Regulations Governing Light-Rail Transit.
- GO 164-E, Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.

The project must ensure compliance with federal regulations including:

- 49 CFR 674, State Safety Oversight

The following link provides resources on the Commission's rules and regulations regarding rail safety:

<https://www.cpuc.ca.gov/rail/>

The proposed project would disrupt the heavily used roadway network surrounding the SDIA, which includes several at-grade railroad crossings. The potential impact should be identified, discussed, and evaluated for necessary safety improvements and mitigations at each proposed construction stage. This includes considering traffic circulation and queuing, level of service, emergency service response, and compliance with the America Disabilities Act.

The following at-grade crossings should be studied for potential impacts:

Taylor Street – DOT # 026852D  
Washington Street – DOT # 026857M  
Sassafras Street – DOT # 026859B  
Palm Street – DOT # 026861C

The Commission appreciates the opportunity to provide comments on the project described in the NOP. Please feel free to contact me at (916) 928-6858 or [daren.gilbert@cpuc.ca.gov](mailto:daren.gilbert@cpuc.ca.gov) or contact our lead staff on this project: Joey Bigornia at (619) 417-0815 or [joey.bigornia@cpuc.ca.gov](mailto:joey.bigornia@cpuc.ca.gov) for transit safety matters and Howard Huie at (415) 308-0533 or [howard.huie@cpuc.ca.gov](mailto:howard.huie@cpuc.ca.gov) for crossing matters.

Sincerely,



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