

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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May 5, 2025

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GTS #: 04-SF-2022-00403
GTS ID: 25248
Co/Rt/Pm: Various

Julie Moore & Monica Huggins, Senior Planners
City and County of San Francisco
49 S Van Ness Ave
San Francisco, CA 94103

Re: Pacific Gas and Electric Company (PG&E) Power Asset Acquisition Project – Draft Environmental Impact Report (DEIR)

Dear Julie Moore & Monica Huggins:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the PG&E Power Asset Acquisition Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the March 2025 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project involves the City and County of San Francisco (the City) purchasing PG&E owned electrical transmission and distribution assets in San Francisco and San Mateo County that are needed to provide electricity service to customers within the city. The City will own, operate, and maintain the electricity grid in San Francisco after the acquisition. The proposed project could require encroachment permit from Caltrans.

Hydrology

Due to the extensive work proposed and the general description of the proposed work in and around State Routes 1, 82 and 101, the following comments are general.

- All proposed developments will need to adhere to the C3 requirements of the Municipal Regional Permit (MRP) to ensure post-project surface flows, due to rainfall, to/from State routes will match or be less than pre-project surface flows.

- All proposed developments will need to ensure there are no changes in existing drainage patterns to/from State routes or facilities.
- Any existing drainage easements, maintenance agreements or other access agreements with PG&E which will or could affect Caltrans or the City's ability to access and maintain drainage or other State-owned facilities will need to be reviewed by legal professionals and Right-of-Way (ROW) staff to ensure State facilities can be properly maintained.
- All proposed development plans will need to show how surface flows are intercepted, stored and conveyed to State facilities and demonstrate that all drainage flows to State facilities are adequately contained within City or State drainage systems. A drainage report for each proposed development is suggested. Any floodplain impacts must be documented and mitigated.

Encroachment Permit

Please review Chapter 17 of the Caltrans Project Development Procedures Manual ([link](#)) and Ch. 600 of the Caltrans Encroachment Permit manual ([link](#)) to be aware of the Caltrans policy on utilities and encroachments, and property rights that PG&E may have within Caltrans' ROW in the various locations where the City will be acquiring physical infrastructure and relocating or upgrading that infrastructure.

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects

requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Cultural Resources

Should construction activities within Caltrans' ROW take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

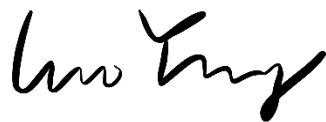
Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Marley Mathews, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Julie Moore & Monica Huggins, Senior Planners
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Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" being more prominent and the last name "Yunsheng" following in a similar style.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse