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Mr. Mike Monasmith
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5112

Dear Mr. Monasmith:

The California Department of Transportation (Caltrans) has reviewed the Preliminary Staff Assessment (PSA) for the proposed Carlsbad Energy Center Project (CECP) located adjacent to Interstate 5 (I-5) in the City of Carlsbad. We appreciate the time that the California Energy Commission has extended to Caltrans for our review. From a Caltrans perspective we believe that although there are many constraints in this corridor, the needs of both facilities can be accommodated by working in partnership. In addition to our comments below, please refer to our previous letter dated November 17, 2008.

1. The formal environmental process for the I-5 North Coast Corridor (I-5 NCC) project was initiated in 2004 in partnership with the Federal Highway Administration (FHWA) and funded by the San Diego Association of Governments (SANDAG). The I-5 NCC has been a key component of the Regional Transportation Plan since the mid 1990s and is also included in the Region's Transnet program, a local ½ cent sales tax for transportation projects, approved by voters in 2005.

2. Interstate 5 is an Interstate facility that serves not only local and regional traffic, but interregional, goods movement, and national defense related traffic. As such, various regional, state and national stakeholders have identified the widening of the I-5 NCC as a high priority. The I-5 NCC project is a high priority project under Presidential Executive Order (E.O.) 13274 *"Environmental Stewardship and Transportation Infrastructure Project Reviews"* to "enhance environmental stewardship and streamline the environmental review and development of transportation infrastructure projects." It is the only project in California on the list of eight nationwide projects selected by the U.S. Department of Transportation (USDOT). Additionally I-5 is one of only three corridors in California that are designated as a national "Corridor of the Future" by the USDOT.

3. Given the nature and location of natural resources and adjacent existing and planned land uses in this corridor, our flexibility to construct the I-5 NCC is very limited. As such, it is critical that the proposed CECP does not preclude, interfere with, or unduly restrict existing or the planned future expansion of I-5 and the double-tracking of the Los Angeles to San Diego (LOSSAN) Rail Corridor. To ensure this we would request that the applicant demonstrate how these facilities are accommodated in the future condition such that they are compatible public uses in terms of design, use, impacts, cost and constructability using reasonable construction methods.

4. It should be noted that concerns raised regarding the potential for errant vehicles impacting the plant are typically addressed through placement of a barrier at the edge of the I-5 traveled way.

5. All four alternatives being formally studied in the I-5 NCC draft environmental document require the removal of the existing earth berm, associated landscape and acquisition of plant property. Caltrans agrees with the concern stated in the document regarding the potential for significant adverse cumulative visual impacts, if the two projects go forward without coordination on this issue. Furthermore, the adjacent land uses and natural resources significantly limit our ability to fully mitigate visual impacts associated with the highway expansion in this area. Consequently, we would recommend a visual analysis be completed assuming both projects are constructed. Caltrans would be an advocate to work in partnership with the applicant to explore possibilities as part of the energy plant project to address cumulative visual impacts of the two projects.

6. We would continue to advocate that the ultimate location of the Coastal Rail Trail be identified to the mutual satisfaction of all the parties. It our understanding that other alternatives have been identified and it will no longer be adjacent to I-5.

7. As the CECG is adjacent to the LOSSAN corridor, we would recommend that the project be coordinated with SANDAG, the agency responsible for planning and developing the LOSSAN double-tracking project

Caltrans appreciates the opportunity to comment on this project. If you have any questions, please contact Arturo Jacobo at (619) 688-6816.

Sincerely,

Allan Kosup

Allan Kosup,
I-5 Corridor Director

c: Joe Garuba, City of Carlsbad,
Rob Rundle, Sandag