

## Memorandum

**To:** DEPUTY DIRECTORS  
DISTRICT DIRECTORS  
DIVISION CHIEFS

**Date:** Jan 15, 2026

**From:** Eric Souza  
Chief  
Division of Design



**Subject: ACCOMMODATION OF TELECOMMUNICATIONS AND WIRED  
BROADBAND FACILITIES WITHIN ACCESS-CONTROLLED STATE HIGHWAY  
RIGHT OF WAY**

This memorandum establishes the revised accommodation policy for telecommunications and wired broadband facility installations within the access-controlled State highway right-of-way. This memorandum supersedes the existing policy on accommodating telecommunication and wired broadband on an access-controlled highway in the Project Development Procedures Manual (PDPM) Chapter 17, Section 2, Article 2 and the memorandum on *Accommodation of Wired Broadband Facilities within Access-controlled State Highway Right-of-Way* dated June 25, 2025.

In 2017, Deputy Directive-116 established the policy to accommodate wired broadband facility encroachments within State highway right-of-way when there is a benefit to the public.

In July 2021, the California Legislature passed Senate Bill 156 directing the California Department of Transportation (Caltrans) to assist in the deployment of the State-owned Broadband Middle Mile Network within the State highway right-of-way in cooperation with the California Department of Technology (CDT) and the California Public Utilities Commission. The Broadband Middle Mile Network will be the open-access middle-mile broadband infrastructure to enable last-mile connectivity throughout California, providing equitable access to high-speed broadband service to unserved and underserved communities.

In March 2022, in anticipation of the increased installations of wired broadband facilities within State highway right-of-way, Caltrans established a new wired broadband accommodation policy after a review of existing policies, procedures, and best practices was completed. It implemented the recommendations resulting from that review and incorporated input from other divisions and the Federal Highway Administration (FHWA). The goal of the revised policy is to better accommodate wired broadband facilities to promote a more connected California, while preserving the safety and operations of the State Highway System.

As the California Department of Technology's strategy for installation of the Middle-mile Broadband Network shifted from standalone builds to partnerships with third party installers and providers, Caltrans determined that wired broadband should be treated as a telecommunications utility since many of the middle-mile partners are telecommunication utilities. Upon further review by FHWA, additional guidance was required for installation on the Interstate System.

Effective immediately, Attachment A is the new accommodation policy for telecommunication and wired broadband facilities for freeway and expressway facilities as defined under the Streets and Highway Code Division 1, Chapter 2, Article 2.

For conventional highways, telecommunication and wired broadband facilities are accommodated based on the existing guidelines in the Encroachment Permits Manual. As-builts of the constructed facilities and markings are required.

The Attachment A is effective until it is superseded by the appropriate guidance update or by a new policy memo. For any questions, please contact Jin Zhen, Chief (Acting), Office of Project Support, at [jin.zhen@dot.ca.gov](mailto:jin.zhen@dot.ca.gov).

#### Attachment

Attachment A – TELECOMMUNICATION AND WIRED BROADBAND  
FACILITY ACCOMMODATION IN ACCESS-CONTROLLED STATE  
HIGHWAY RIGHT-OF-WAY

c: Design Management Board

Traffic Operations Executive Board

Pyo Hong, Deputy Division Chief (Acting), Division of Design

Brian Alconcel, Deputy Division Chief (Acting), Traffic Operations

Devinder Sandhu, Chief, Office of Encroachment & Outdoor Advertising  
Permits

Jin Zhen, Chief (Acting), Office of Project Support, Division of Design

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Tigi M. Thomas, Deputy Division Chief, State Pavement Engineer, Division of  
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Steve Pyburn, Design Program Manager, FHWA CA Division

Michael Caliendo, ROW Program Manager, FHWA CA Division

Antonio Johnson, Director of Planning, Environmental, & Right-of-way, FHWA  
CA Division

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These criteria for accommodating telecommunication and wired broadband facilities within access-controlled highway right-of-way (Interstates and access-controlled freeways and expressways) replace the criteria in the Project Development Procedures Manual (PDPM) Chapter 17, Section 2, Article 2.

For exceptions to the encroachment policies listed below for telecommunication and wired broadband facility installations on the Interstate System, Federal Highway Administration (FHWA) approval is required. Refer to PDPM Chapter 17, Section 2, Article 4, Federal Highway Administration Approvals for projects on the Interstate System. Refer to PDPM Chapter 17, Section 3, Article 4, Clearance and Offset Requirements for additional installation requirements. Exceptions to the criteria below will be considered on a case-by-case basis in accordance with Section 4, Exception Requests. For installations not on the Interstate system, approval of policy exceptions will be provided by Headquarters Division of Design, Office of Project Support, or the delegated district approval authority.

Definitions:

- Maintenance access point (MAP): location where installation or maintenance activities can be performed.
- Pull box and pull vault: box or vault used to install fiber optic cable.
- Splice vault: a MAP vault that allows for the splicing of the fiber optic cable segments based on maximum spool length and/or serves as a location where local service providers can make distribution connections or service line connections.
- Fiber trunk line splice vault: a vault used exclusively for splicing of the fiber optic cable segments based on the maximum spool length. Distribution connections and service line connections are not allowed at fiber trunk line splice vaults.
- Distribution connection: point on the fiber trunk line where a local service provider can connect to the trunk line to provide last-mile service. Distribution connections can only be made at splice vaults.
- Service line: portions of a utility that connect a customer, usually at the meter location, to the utility distribution points or supply system.
- Buried boxes: pull box, pull vault or fiber trunk line splice vault that are buried at least 6 inches underground.

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For Installation on all access-controlled right-of-way:

1. Longitudinal installations within access-controlled highway right-of-way must be underground.<sup>1</sup>
2. Longitudinal installations must be installed according to the following criteria in descending order of preference (See Figure 1):
  - a. Further than 3 feet from the edge of pavement<sup>2</sup> or behind and further than 4 feet from the face of the guardrail<sup>3</sup>, in accordance with the following:
    - The preferred placement location is within 10 feet from the right-of-way line.
    - If placement is located more than 10 feet from the right-of-way line, justification reason(s) for installing further than 10 feet from the right-of-way line must be explained in the project report or permit application submittal.
  - b. Within the pavement area, within 3 feet of the edge of pavement, or behind and within 4 feet of the face of guardrail is prohibited. On roadways with limited right-of-way or other physical and environmental constraints, an encroachment policy exception may be considered. Any installation in the pavement will require concurrence from the district materials engineer or district maintenance engineer. Installation in the traveled lane of constructed freeways and expressways, except for expressways with paved shoulders less than 4 feet, is prohibited under any circumstance.
3. Longitudinal installations are prohibited in the highway median. Exceptions for placing MAPs in the median are rarely granted and highly discouraged.
4. Longitudinal underground installations require cable markers and tracer wire. Uniform color-coded utility mark-outs, such as colored backfill or warning tape, are also required if installed by open trench.
5. Buried pull boxes and trunk line splice vaults:
  - a. Consider burying boxes and vaults under 6-12 inches of dirt to deter and prevent cable theft.
  - b. Buried pull boxes, buried pull vaults, and buried fiber trunk line splice vaults are not considered MAPs and direct distribution connections cannot be made from these boxes in the future.
  - c. Buried boxes and vaults do not require a maintenance vehicle pullout.
  - d. Buried boxes must have surface markers for highway maintenance activities.
  - e. Buried boxes and vaults must be rated for highway traffic in locations that are subjected to occasional vehicular traffic.

<sup>1</sup> Unless installed on bridges.

<sup>2</sup> Per Highway Design Manual Index 672.3, the preferred hinge width for pavement structural stability is 3 feet.

<sup>3</sup> Per Traffic Safety Systems Manual, 4 feet is the minimum distance to the hinge point to support a standard post.

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6. Locate MAPs to optimize safety for workers and the travelling public by prioritizing use of these locations:
  - a. Locations where there is adequate Stopping Sight Distance (as defined in Section 201 of the Highway Design Manual) for maintenance vehicles entering and exiting vehicle pull-out areas.
  - b. Locations where passing traffic is traveling at low speeds, such as, along local streets (with or without a locked gate) or near on-ramp terminals at the local street.
  - c. Locations where maintenance vehicles and workers are protected by highway features such as existing guardrails or barriers.
  - d. Locations where maintenance vehicles can pull completely off the roadway and shoulder and allow maintenance personnel to access the MAP and maintenance vehicle without having to walk along the travel lanes or the shoulder.
  - e. Locations where there is existing lighting so drivers can see maintenance vehicles entering, exiting, and parked at pull-out areas.
  - f. Do not place MAPs in areas along ramps and freeway mainline where drivers must merge onto or diverge from through traffic including gore areas, or at driver decision points such as approaching interchanges.
  - g. Underground MAPs that are subjected to occasional vehicular traffic must be rated for highway traffic to address highway maintenance and motorist safety.
7. For installations within the Interstate System right-of-way:
  - a. Exceptions from these requirements must be approved by FHWA.
  - b. Distribution and service line connections are prohibited under any circumstance where access to splice vault is required from the freeway mainline.
  - c. Splice vaults for distribution connections are prohibited to access on ramps but may be considered near local street intersections with an approved exception.
  - d. MAPs are allowed if installed on local streets at interchanges and grade-separated crossings or frontage roads where access will not adversely affect the highway safety or operations.
  - e. Buried boxes and MAPs are prohibited within the pavement unless an exception is approved by FHWA.
  - f. In areas where grade-separated crossings and interchanges are many miles apart, access to a MAP may be considered via a new or existing locked gate with approval by FHWA.
  - g. A maintenance vehicle pullout must be installed at splice vaults, unless maintenance can be performed using existing pullouts.

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Pullout areas should be located behind existing guardrails or barriers, or areas accessed through a locked gate.

- h. FHWA approval is required for new locked gates or new users for existing locked gates used for access.
- i. Installations in the median of Interstate system require FHWA approval and will only be considered in exceptional circumstances.
- j. Construction drawings for installations on the Interstate system shall clearly identify and label splice vaults, fiber trunk line splice vaults, buried boxes, pull boxes and pull vaults.

8. For non-Interstate access-controlled right-of-way, MAPs are allowed if installed on local streets at interchanges and grade-separated crossings, local streets at at-grade intersections on expressways, or frontage roads where access will not interfere with the safety and operations of the highway facility. If MAPs cannot be installed at these allowed locations, then alternate locations for MAPs must be evaluated according to the following criteria in descending order of preference:

- a. Per PDPM Chapter 17, Section 2, Article 3, installation of a locked gate on non-Interstate access-controlled highways may be approved through the project delivery or encroachment permit process.
- b. If a MAP must be accessed from the mainline on non-Interstate access-controlled highways, then the MAP must be installed no more than 10 feet from the right-of-way line provided there is an area where maintenance vehicle can be off the highway mainline and shoulder.
- c. If a splice vault can only be accessed from the mainline and ramps on non-Interstate access-controlled highways, then a maintenance vehicle pullout must be installed, unless maintenance can be performed using existing pullouts or existing maintenance access locations. Existing maintenance locations are areas behind existing guardrails or barriers, and areas accessed through existing access roads or locked gates.
- d. Splice vaults for distribution connections must be on local streets at interchanges and grade-separated crossings or at-grade intersections on expressways. Service line connections are prohibited under any circumstance from the mainline on a full access-controlled facility.
- e. If a MAP cannot meet the criteria a through d described above, an encroachment policy exception may be considered on a case-by-case basis.
- f. Construction drawings for installations shall clearly identify and label splice vaults, fiber trunk line splice vaults, buried boxes, pull boxes and pull vaults.

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9. Installations on bridges:
  - a. If longitudinal installations are installed on a bridge, pull vaults or fiber trunk line splice vaults are recommended to facilitate future bridge work. Vaults and boxes are allowed at both ends of the bridge and its locations should follow the above to optimize safety for workers and the travelling public.
  - b. For installation proposed on bridges, refer to Caltrans standard details for attachment of conduits to bridges available at [<https://dot.ca.gov/programs/engineering-services/manuals/bridge-standard-details>](https://dot.ca.gov/programs/engineering-services/manuals/bridge-standard-details). The link includes “*The User Guide to Bridge Standard Detail Sheets, Section 20 – 2*”, “*Communication Conduit Attached to Structures*.”
  - c. Refer to the Encroachment Permits Manual and Caltrans District staff for additional guidance on using the appropriate attachment details.
  - d. A non-standard attachment method will require review and approval by Caltrans’ structure unit.

Other requirements for all access-controlled right-of-way:

10. Installations are allowed to cross the highway. See the criteria for MAPs if needed for transverse crossing installations.
11. Large above-ground facilities such as repeater huts are prohibited under any circumstance. Smaller appurtenances may be considered on a case-by-case basis.
12. In areas with existing longitudinal above-ground facilities, joint use with the existing facilities may be considered with an encroachment policy exception.
13. Installation should be designed and installed such that lane closures, except shoulder closures, on the mainlines or ramps of access-controlled highways will not be needed for future operation and maintenance.
14. Per PDPM Chapter 17, Section 2, Article 2, no additional longitudinal electric service lines are allowed as part of a broadband installation. Electric supply lines must come from outside of the State right-of-way as a service lateral line perpendicular to the line.
15. As-builts of the installation and trenchless installation bore paths must be submitted to the district Utility Engineer Workgroup. Using a Caltrans-specified datum, as-built drawings must show the horizontal location and vertical profile of the conduits and MAPs as constructed in the field in Caltrans-accepted electronic CADD files.

In addition to these requirements, all other applicable requirements within the PDPM Chapter 17, Highway Design Manual, and Encroachment Permits Manual still apply within access-controlled right-of-way.

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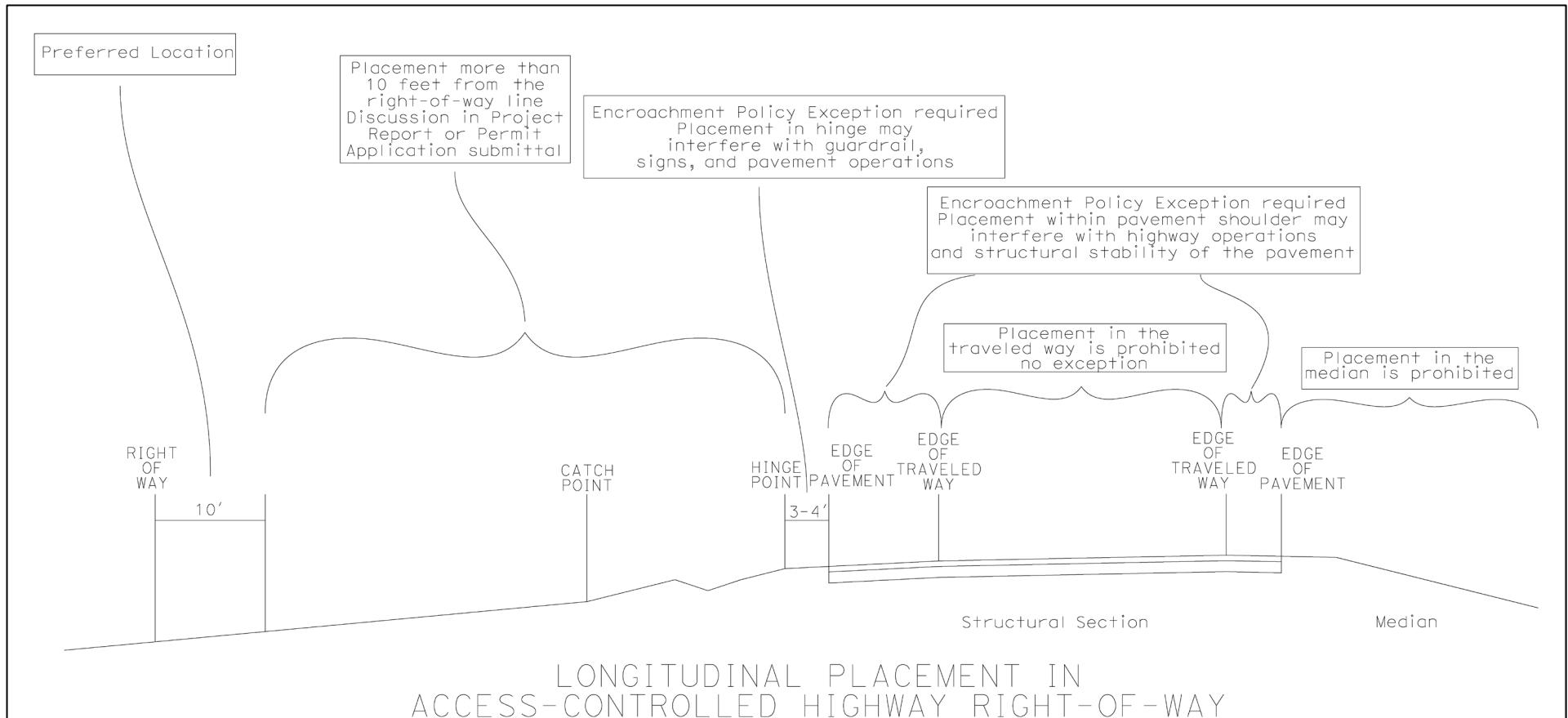


Figure 1 Longitudinal Placement in Access-Controlled Highway Right-of-Way