

**DEPARTMENT OF TRANSPORTATION**

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6/10/2020  
Governor's Office of Planning & Research



*Making Conservation  
a California Way of Life.*

**Jun 11 2020**

**STATE CLEARINGHOUSE**

June 11, 2020

11-IMP-98  
PM 46.00

East Highline Reservoir and Intake Channel Project  
DEIR/EA/ SCH #2019011070

Ms. Justina Gamboa-Arce  
Water Resources Planner  
Imperial Irrigation District  
333 E. Barioni Boulevard  
Imperial, CA 92251

Dear Ms. Gamboa-Arce:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review for the Draft Environmental Impact Report (DEIR)/Environmental Assessment (EA) (SCH #2019011070) of the East Highline Reservoir and Intake Channel project located near State Route 98 (SR- 98), east of Calexico in Imperial County. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans is a Responsible Agency under the California Environmental Quality Act (CEQA), for the discretionary authority regarding the portion of the project that is in Caltrans' Right of Way (R/W). Please indicate Caltrans status as a Responsible Agency for the Final EIR. We appreciate that you have already started coordination efforts to ensure that Caltrans can adopt the alternatives under study and/or mitigation measures for effecting Caltrans' R/W. We appreciate continuing to meet with you to discuss the elements of the DEIR that Caltrans will use for our subsequent environmental compliance and encroachment permit process.

An encroachment permit is required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project,

corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, provide the CEQA determination documents or exemptions. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the Final EIR.

Caltrans has the following comments:

### **Traffic Engineering Analysis**

1. Environmental Assessment (EA) Chapter 3 - Affected Environment and Environmental Consequences: There was no information or analyses provided regarding project related impacts, consequences, and proposed mitigations to the "Transportation and Traffic" section of this environmental document for SR-98. Also lacking was detailed information regarding the type of construction methods that will be used. There was no reference to the number of construction trips that will be generated during construction affecting SR-98.
2. Caltrans District 11 will be required to enter into a Cooperative Agreement with Imperial Irrigation District (IID) for the submitted project. The project impacts and complexity within the State Highway R/W triggers the need to review this project as a Streamlined Oversight Project.
3. The proposed water crossings with openings of 20 feet wide at SR-98 are defined as bridge structures which will require the review of this proposed project by the Caltrans Structure Maintenance and Investigations Branch. Refer to Caltrans Highway Design Manual, Topic 62.2 Highway Structures, Sections (2)-Bridges and (3)-Culverts for more information.
4. Before the issuance of an encroachment permit, it has been determined that

this proposed project will be a Streamlined Oversight Project that will require a thorough review by Caltrans Functional Support units from various functions.

5. Please provide with the following documents:

- Approved or in review environmental document
- 60% of plans and the most updated version of special provisions (of all work within Caltrans R/W and of the SR-98 detour)
- Project estimate of cost inside Caltrans R/W
- Most updated design/construction schedule
- Hydrology Study
- Geotechnical Report
- Storm Water Data Report
- Quality Management Plan (to include a Source Inspection Quality Managed Plan)
- Cooperative Agreement specifying duty responsibilities of IID and Caltrans
- Right of Way Certification (showing temporary easements for SR-98 detour)
- Lane Closure Chart Request
- Traffic Management Plan
- Maintenance Agreement for the detour along SR-98

Prior to issuance of a permit, permit forms TR-0100 and TR-0402 will need to be completed as well as proof of performance bond or liability insurance will need to be submitted to the Caltrans Encroachment Permit office.

### **Hydraulics Analysis**

1. The box culverts should be treated as a utility and not a drainage/stormwater facility.
2. Page 3-10 (Section 3.3.5 Operation – DEIR): “Maintenance would be undertaken by IID in accordance with the existing practices for inspections and repair.” IID is required to enter into a Memorandum of Understanding/Utility Agreement that assigns Major Maintenance to IID.
3. Based on the statement “The actual channel would have a bottom of approximately 20 feet with a total open channel width of approximately 70 feet (concrete edge to concrete edge) and a depth of 10 to 15 feet from the top of the embankments” on Page 3-5 (DEIR) the proposed 4 Gated Box

Culvert structure within Caltrans R/W would be at least 20 feet wide, which would classify this proposed feature as a bridge. We will need to circulate through Caltrans' Structures Branch for review.

- On Page 3-6 the channel is described as 75 feet wide, which width is correct?
  - Please submit a cross-section showing channel base, top width dimensions, side slopes and depth.
4. Will the box culvert structure always be functioning under pressure?
  5. Please provide the Operation and Maintenance Plan for the box culvert structures. The Operation and Maintenance Plan should also be provided with the Permit application.
  6. Please provide structure and grading plans.
  7. Please provide cross-sections along the centerline of each of the proposed box culvert structures. Be sure to include roadway elevations as well.
  8. Based on the equipment shown on Table 3-2 (DEIR) you appear to be constructing the box culvert through trenching method. This will require extensive coordination and approvals with Caltrans' Traffic Operations Branches to establish appropriate traffic handling and stage construction detour plans.
  9. The Figures and Enclosures should show Caltrans' R/W and Caltrans' alignment and Station/Offset callouts. Please coordinate with Caltrans' R/W Department.
  10. Driveways shall be constructed in a manner that will perpetuate existing drainage patterns.

### **Environmental Analysis**

The subsequent documentation must address the impacts from the alternatives and any additional mitigation that effect Caltrans' R/W that include:

#### **Biological Resources**

This Draft EIR/EA assess both the potential sensitive species and habitats that includes burrowing owls, flat-tail horned lizard, and avoidance/minimization and mitigation measures. Please consider separating assessment for Caltrans R/W from the assessment of the project overall.

### Cultural Resources

Both the All-American Canal and East Highline Canal are “eligible” properties for the National Register of Historic Places. Please provide more detail when describing both canals for the conclusions of no effect for the Built Environment (the canals) impacts (Impacts and Environmental Consequences sections). This would include describing the criteria that make the canals “eligible,” the canals character defining features and/or contributing elements, and how the integrity of the canals will (or will not) maintain its historic integrity, post-project. Please include if there are any impacts (direct or indirect) to those canals. In addition, please provide during the Encroachment Permit Process the final cultural reports as they pertain to any eligible resources within Caltrans R/W.

### Air Quality

Please notify Caltrans if there is a change to the proposed mitigation measure outlined in *Chapter 4.2 Air Quality (DEIR)*.

### Hazardous Waste

Please notify us if there is a change to the proposed mitigation measure outlined in *Chapter 4.5 Hazards and Hazardous Materials (DEIR)*. Please provide with identification of Caltrans R/W the hazardous materials contingency plan to be followed during demolition, excavation, and construction activities, and provide for a spill prevention, control and countermeasures (SPCC) plan to be implemented during construction, and if applicable, during site operations. Implementation of these measures would reduce impacts from hazards and hazardous materials to less than significant.

Since the project will generate soil that cannot be reused in the immediate area from which it was generated, the project is categorized as an “Excess Soil” project. IID, as the Permittee, is responsible for proper identification (including sampling and analysis) and management of the excess soil that are removed and/or excavated from the work site. It is the Permittee’s responsibility to comply with the Department of Toxic Substances Control (DTSC) Aerially Deposited Lead ADL requirements for roadway soil management. “Hazardous Materials and Hazardous Waste Management Special Provisions” (TR-0408) must be included in the Encroachment Permit Application (see Appendix K of Caltrans Encroachment Permit Manual). Please provide for Caltrans R/W a lead compliance plan (LCP), prepared by a Certified Industrial Hygienist (CIH) that will be implemented for all workers handling the soil.

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## **Design**

This project will need an Encroachment Policy Exception since it can be considered a utility crossing with proposed grading work and a potential to maintain elements of the proposed intake channel within State R/W.

A Design Standard Decision Document might also be needed if there are any above ground features within 52 feet from the edge of the traveled way, but this may need to be assessed when there are design plans available.

The detour of SR-98 will need District Traffic Manager approval. It is not clear if the detour will construct a temporary alignment with minimal delay to traffic or closing a portion of SR-98 and re-routing traffic which could be a significant delay since the detour options are limited at this rural location.

There are no existing culverts at the described location. The concern is Hydraulics and Maintenance of the culverts after installation. New facilities within the State R/W that will require Caltrans Maintenance which needs to be reviewed by the Caltrans Maintenance Region Manager.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions about this letter or Responsible Agency coordination, please contact Mark McCumsey at (619) 688-6802 or by email at [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief  
Local Development and Intergovernmental Review Branch