

California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR
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July 31, 2024

10-MER-59-PM 020.904
Highway 59 Landfill Composting Facility
Supplemental EIR
SCH# 2014061081

Patrick Womble
Environmental Resource Manager
Merced County Regional Waste Management Authority
7040 North Highway 59
Merced, CA 95348

Dear Mr. Womble:

Thank you for the opportunity to review the proposed Landfill Composting Facility. The project is immediately east of State Route 59 at 7040 North Highway 59. The project expands the already-approved Valley Fill Project with a compost facility designed to accept up to 50,000 tons per year of green waste and food waste and capable of storing up to 100,000 cubic yards on-site of organic material. The Department has the following comments:

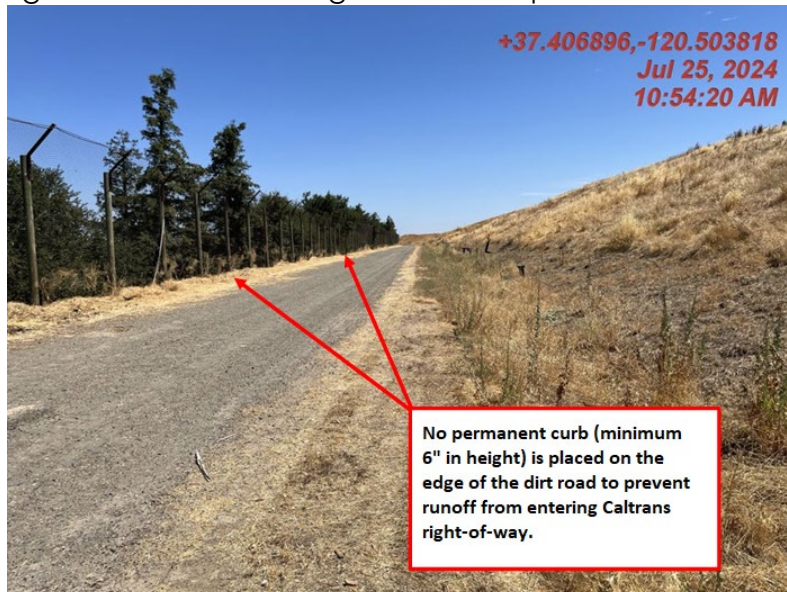
1. Caltrans agrees that the development of the proposed composting facility would not increase the number of vehicle trips to and from the landfill and would not cause the traffic volumes identified and evaluated in the 2016 Valley Fill Project EIR to be exceeded since the compostable materials would be removed and separated at the point of origin from the municipal solid waste (MSW) stream, which is already occurring.
2. According to Table 3.7-1 (Projected Peak Daily Tonnage and Traffic Volumes Evaluated in Valley Fill Project EIR) of the SDEIR, the projected maximum traffic volumes evaluated in the Valley Fill Project increased from 554 vehicles/day in 2015-2020 period to 800 vehicles/day in 2035 to closure period. Valley Fill Project will significantly increase the number of vehicle trips to and from the landfill at the SR 59/Landfill Access intersection. Potential safety conflicts (rear-end collisions) may occur due to landfill traffic slowing down before making a right turn from Northbound SR 59 or a left turn from Southbound SR 59 onto the landfill driveway.
 - a. In addition to Vehicle Miles Traveled (VMT analysis), the Transportation/Traffic Section of the SDEIR to the Highway 59 Valley Fill Project EIR needs to include the safety analysis (i.e., collision analysis/accident history from 2015 to the most recent available data) to determine if the landfill traffic has had any potential safety impacts at SR 59/landfill driveway and provide appropriate mitigations to those safety impacts if there are. Please submit this to Caltrans for review and comment prior to project approval.

3. On July 25, 2024, Caltrans performed a site visit to this area after receiving complaints of flooding from the Merced County Board of Supervisors. During the inspection, Caltrans found several locations on the north side of the landfill that show potential for runoff from the landfill into the Caltrans right-of-way (ROW). Please see photo below showing excessive scouring on top of the culvert just below the hillside that is running parallel to the SR-59 inside the land fill. The runoff is so large that the landfill had to drop heavy cement blocks on top of the outlet to reduce the velocity and minimize the scouring at this location. The washout and scouring are strong evidence that additional runoff is coming to the Caltrans ROW.

a. Photo below shows conditions as of 7/25/2024. Riprap (several large cement blocks) have been placed to dissipate energy and reduce velocity of runoff.



b. Photo inside landfill at the northern part of the property next to Caltrans ROW. This dirt road is approximately 30 feet higher than SR-59. Top of the hillside to the right is about 80 feet higher than the perimeter dirt road.



4. The supporting documents below previously requested in our November 29, 2023 letter have not been received. The comments below are still applicable. Additional review will be required once the project development plans, including but not limited to, Drainage and Grading Plans and drainage calculations are submitted.
 - a. The proposed expansion on the above-mentioned parcels has indicated an increase in the imperious (paved) and pervious (unpaved) stormwater runoff area. If historical undeveloped topography shows drainage from this site flowed into the State right-of-way (R/W), it may continue to do so with the conditions that peak flows may not be increased from the pre-construction quantity Any increase in runoff generated by the proposed development should be stored/mitigated onsite.
 - b. There are six (6) existing State cross culverts within the proposed landfill expansion vicinity (See attachment). Caltrans would not allow additional runoff draining into the State R/W nor significantly impacting these existing drainage facilities or flow patterns.
 - c. Caltrans would like to review the pre and post construction stormwater runoff calculations for two (2) 10-year/24-hour storm event and Drainage and Grading Plans showing the flow patterns. The applicant needs to ensure that the existing State drainage facilities will not be significantly impacted by the project. Additional review will be required once the project development plans, including but not limited to, Drainage and Grading Plans and drainage calculations are submitted.


5. If there are any physical construction activities that will encroach into Caltrans Right of Way (ROW), the project proponent must apply for an Encroachment Permit with the Caltrans District 10 Encroachment Permit Office. All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will include an analysis of potential impacts to any cultural sites, historic properties, biological resources, hazardous waste locations, scenic highways, and/or other environmental resources within Caltrans Right of Way, at the project site(s).
 - a. Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents for approval of encroachment in the Caltrans ROW.
 - b. There is potential for suitable nesting habitat to exist within the project area. Please note, the nesting season that Caltrans considers is different from that outlined in the Supplemental Environmental Impact Report. If work will occur within Caltrans ROW between February 1 and September 30 of any year, a pre-construction bird survey must be conducted by a qualified biologist prior to the start of any construction related activities in Caltrans ROW. If an active nest is observed, a protective buffer must be established around the nest per CDFW guidelines. No work is allowed within the protective buffer limits until the young have fledged and until authorized by the Caltrans District 10 Environmental Office. Results of the pre-construction bird survey(s) must be provided to the Caltrans District 10 Environmental Office prior to the start of construction.

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- c. If there are impacts to protected water resources within Caltrans ROW, Caltrans will need to see the correspondence with the permitting authorities (California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers, Regional Water Quality Control Board) and/or be provided copies of any required permits prior to the start of any construction in Caltrans ROW. If there are any potential impacts/effects to special status species, critical habitat, or Essential Fish Habitat within Caltrans ROW, evidence of permitting/consultation with CDFW, U.S. Fish & Wildlife Service, and/or National Marine Fisheries Service must be provided with the Encroachment Permit application.

If you have any questions, please contact me at (209) 483-2582 or Nicholas Fung at (209) 986-1552.

Sincerely,



FOR

Tom Dumas
Chief, Office of Metropolitan Planning

Culvert Inspection Program

