

California Department of Transportation

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March 9, 2023

11-IMP-78
PM 41.067

Glamis Specific Plan DEIR
SCH# 2020100348

Mr. David Black, Planner IV
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243

Dear Mr. Black:

Thank you for including the California Department of Transportation (Caltrans) in the review for the Draft Environmental Impact Report (DEIR) of the Glamis Specific Plan (SCH# 2020100348) located near State Route 78 (SR-78) in Imperial County. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the County of Imperial in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and connections

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

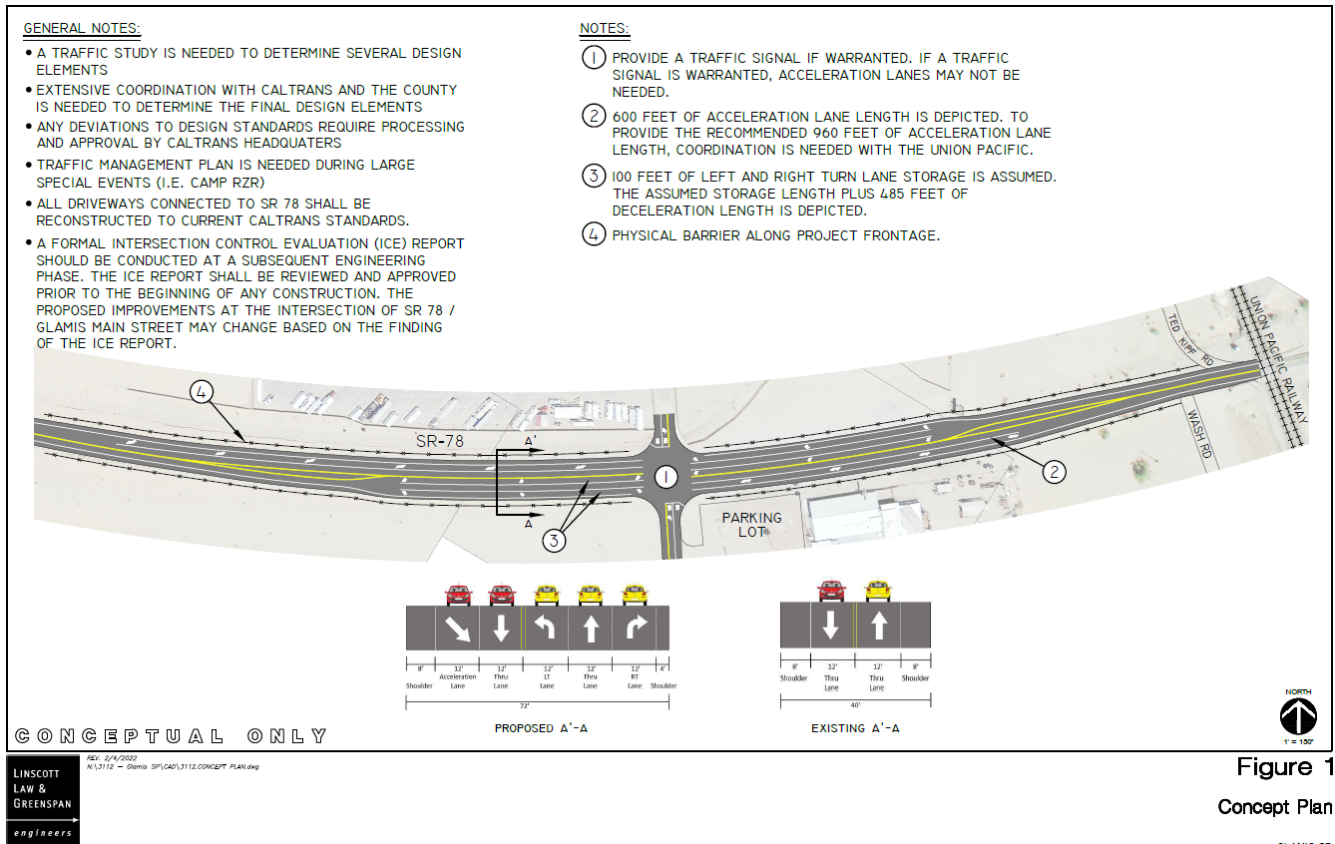
Environmental

Caltrans appreciates the opportunity to comment on the Draft EIR – Glamis Specific Plan. The analysis of potential future projects presented may impact on Caltrans Right-of-Way (R/W) in the future.

Should future projects based upon the changes enacted from this EIR document have elements and/or mitigation measures that change or effect Caltrans R/W, Caltrans would be a Responsible Agency under the California Environmental Quality Act (CEQA) and would use your environmental assessment in your environmental documentation for Caltrans subsequent environmental compliance. These projects may be applicable for the Caltrans encroachment permit process, which would naturally evolve from our continued coordination.

Traffic Engineering and Analysis

- The Glamis Specific Plan dated October 2022 Report: Replace Exhibit II-2 Conceptual Intersection Plan with the latest exhibit from the Transportation Impact Analysis (TIA) dated February 7, 2022; Appendix F inside the TIA, Figure 1, Concept Plan dated Rev 2/4/2022. (See below clipped photo).
- DEIR Volume 1 dated January 2023, Figure 4-4 Conceptual Intersection Plan under Section 4.2 Specific Plan Components: Replace Figure 4-4 with the latest exhibit mentioned in item #1 above.
- Appendix A-2 Environmental Initial Study: Section XVII. Transportation/Traffic, Item #b, Less Than Significant; A TIA has been prepared, update information to reflect the findings from the TIA Section 13 Conclusion & Recommendation. Indicate that an Intersection Control Evaluation report will be conducted at a subsequent Engineering phase.



Hydraulics

- Based on the provided information, Caltrans does not see evidence to support a less than significant conclusion for Impact 5.9-3c. Therefore, Caltrans cannot determine whether the changes proposed by the Glamis Specific Plan have adverse impacts to SR-78 or associated drainage facilities.
- The document does not address any potential impacts to the Federal Emergency Management Agency (FEMA) regulated floodplains. The proposed project features may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to SR-78 and associated facilities. Caltrans requests that the Developer(s) and the County of Imperial, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department regarding floodplain administration and allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that the Caltrans' facilities are not adversely impacted by any change in the water surface elevation resulting from this project.

- Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to Caltrans when the County of Imperial approves the permit to alter the floodplain and/or when the Developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).
- Caltrans supports future increases in flowrates and volumes of flows to the Caltrans R/W due to the Glamis Specific Plan changes be mitigated through retention basins.

Design

SR-78 is on the California Freeway and Expressway System and is access controlled. Any new proposed access points within SR-78 R/W will require an Encroachment Policy Exception per Caltrans' Project Development Procedures Manual (PDPM) Chapter 17.

Any gateway monuments must comply with the PDPM Chapter 29 and are considered discretionary fixed objects and must comply with Caltrans' Highway Design Manual (HDM) Topic 309.

When designing the drainage (or anything else that requires grading) keep in mind PDPM Chapter 17, Section 2 Article 2 Earthwork: Grading, placement, or removal of material by others in the State R/W is prohibited. An encroachment policy exception may be approved to perform earthwork within the State R/W if the State benefits from one or more of the following:

- Improved sight distance
- Increased clear recovery zone
- Improved drainage
- Reduced maintenance

Also, please refer to the Caltrans' PDPM for grading that encroaches into the State R/W (per PDPM Chapter 17, Section 2, article 2) regarding Encroachments Prohibited by State Constitution:

Private use of the [state] highway R/W without compensation is considered a gift of public funds and is prohibited by the California Constitution, Article XVI, Section 6. Caltrans has no authority to allow the use of highway R/W by a private party without compensation or benefits. Also, Caltrans has no authority to allow use of highway R/W that would be a betterment to adjacent parcels or entity or for a proposed development to be viable without equal or comparable benefit or compensation. This policy applies to all freeways, expressways, conventional highways, rest stops, vista points, maintenance facilities, and park and ride lots.

Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17. If utility lines do not comply with Chapter 17, an approved Utility Policy Exception or Encroachment Policy Exception will be required (see also our comments on the attachment).

If an access opening on SR-78 is being requested, Caltrans' Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. Caltrans' Design will need to review and comment on the roadway access opening per the HDM, PDPM Chapter 17, and any changes to access control will require an approved Encroachment Policy Exception (see also our comments on the attachment).

If cellular telecommunications towers or facilities are proposed in State R/W, Caltrans processes will need to be followed.

Please see the following chapters in the Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada.pdf>.
- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-all.pdf>.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

Attachment

TABLE 2-1. SUMMARY OF PUBLIC SCOPING COMMENTS

Comment Summary	Where Comment Is Addressed
<ul style="list-style-type: none"> Page 4-27 – Section 4.4 Project Phasing - "... the earliest construction beginning in late 2021. No uses would be opened prior to 2022 (opening year). The build-out year would be 2051 /2071." What are the phases of the project to be constructed between 2021 and 2051? 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 1. The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 2. In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 3. The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 4. Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 5. If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 6. New access points along the right of way may need to be evaluated based on access controlled guidance. 	Chapter 4.0, Project Description
<ul style="list-style-type: none"> 7. If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the HDM. 	Chapter 4.0, Project Description <div style="border: 1px solid blue; padding: 5px; width: fit-content;"> Access control is handled in the PDPM. Any changes in access control will need to be approved in an Encroachment Policy Exception. </div>
<ul style="list-style-type: none"> Provide a letter from the Floodplain Administrator stating that this project has no rise or a letter showing coordination with the Floodplain Administrator. 	Section 5.9, Hydrology and Water Quality
<ul style="list-style-type: none"> Per the draft IS/EA, Page 19, Figure 9 is insufficient: 	Updated figures are provided in Chapter 4.0, Project Description

4.2.8 Grading Plan

The purpose of the conceptual grading plan (Figure 4-8) promotes contours similar to existing conditions of the project site; however, it increases the area protected from flooding and provides for more flexibility in creating fluent layouts for each of the conceptual Planning Area needs.

The use of the existing and modified earthen channels and berms for the project assist in providing an environment similar and consistent with the surrounding drainage patterns and practices. The manner of capture, conveyance and release of the drainage flows around and/or through the Planning Areas also assists in preserving the historical pattern of natural drainage courses. Finally, the conceptual grading and drainage plan, helps the proposed Specific Plan to meet the site drainage requirements and County guidelines.

4.2.8.1 *Conceptual Grading Plan Standards*



- Precise grading plans will be prepared for each phase of development of the proposed Specific Plan. Precise grading plan(s) will comply with the basic development standards and criteria described herein.
- All grading activities shall conform to County standards, shall be in substantial conformance with the Conceptual Grading Plan and shall implement any grading related mitigation measures.
- Prior to development within any Planning Area, an overall Conceptual Grading Plan for the site and the individual development area shall be submitted for County Planning Department approval. The overall Conceptual Grading Plan shall be used as a guideline for subsequent detailed grading plans for individual stages of development within that Planning Area. Such plans shall include techniques employed to prevent erosion and sedimentation as well as eliminate source pollutants during and after the grading process; approximate time frames for grading activity; identification of areas which may be graded during high probability rain months; and preliminary pad elevations. Grading work shall be balanced onsite wherever possible.
- A grading permit shall be obtained from the County prior to the start of grading activities.
- If any historic or prehistoric resources are discovered during grading, a qualified archaeologist shall be consulted to ascertain their significance, as specified in the project environmental document.
- The proposed Specific Plan will comply with all National Pollutant Discharge Elimination System permit requirements prior to commencing grading activities.

Design

- The Project Development Procedures Manual (PDPM) Chapter 29 must be consulted regarding the requirements for Gateway Monuments.
- In addition, above ground gateway monuments are considered fixed objects and must comply with the Highway Design Manual (HDM) standard for Index 309.1(2)(b) Clear Recovery Zone for Discretionary Fixed Objects and/or HDM Index 309.1(3) Minimum Horizontal Clearances.
- The HDM should be consulted for the design of any proposed grade-separated structures and at-grade intersections.
- Proposed utility lines (new or relocated) within the R/W should comply with the policies in the PDPM Chapter 17. **If utility lines do not comply with Chapter 17, an approved Utility Policy Exception or Encroachment Policy Exception will be required.**
- If a frontage road along SR-78 is to be included, consult the HDM for design standards, including barrier separation.
- New access points along the right of way may need to be evaluated based on access-controlled guidance.
- If an access opening on SR-78 is being requested, Caltrans Design will need to evaluate the geometric proposal once the specific roadway access plans has been submitted. The Caltrans Design Branch will need to review and comment on the roadway access opening per the ~~HDM~~ **PDPM Chapter 17, and any changes to access control will require an approved Encroachment Policy Exception.**
- US Bicycle Route System (USBRS) designates SR-78 as part of the “Southern Tier Route” in this area. Cyclists are present and use this road for regional and cross-country trips.
- As the Glamis Specific Plan develops and is implemented, consider how cyclists and off-highway vehicles may interact. Namely when off-highway vehicles take the shoulder of SR-78, where cyclists may be present.
- The document mentions “Urban hardscape (i.e., paved roads, curb and gutter, etc.) will be built in tandem with all proposed permanent structures.” Please specify the locations of sidewalks and bike lanes, and other complete streets elements.

5.14.1 Environmental Setting

Access

The GSPA is regionally accessible via State Route 78 (SR-78) and serves as the primary transportation route for cars and trucks. Wash Road, a County-maintained dirt road, serves as access to BLM land and extends southeasterly from SR 78 for approximately 18.4 miles to County Highway S34 (Ogilby Road), a County maintained and paved two-lane highway. Circulation flow will be provided via the proposed “Glamis Mainstreet”, which will interconnect by crossing SR-78. A secondary and emergency only access point to/from the GSPA to SR-78 will be provided on the west side of the GSPA, immediately south of SR-78.