

California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING
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December 18, 2024

Terrance Rodgers
Golden State Finance Authority
1215 K Street, Suite 1650
Sacramento, CA 95814

**TUO - 120 - PM 8.175 Golden
State Natural Resources Forest
Resiliency Demonstration
Program - SCH 2022110466**

Dear Mr. Rodgers,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the multi-district Natural Resources Forest Resiliency Demonstration Project Draft Environmental Impact Report. The proposed project is a response to the growing rate of wildfires in California, which has been exacerbated by hazardous excess fuel loads in forests, and the need to promote economic activity within California's rural counties, which would improve the resiliency of forestlands by sustainably procuring and processing excess biomass into a pelletized fuel source for use in renewable energy generation overseas. The project components include the vegetation treatment activities; the transportation and storage of feedstock, and subsequent processing at two pellet production facilities located at Jamestown (Tuolumne County) and at Nubieber (Lassen County); and the transportation of the finished product to a storage and shipping facility at the Port of Stockton.

The project is located at 12001 La Grange Road, approximately nine miles southwest of the community of Jamestown, Tuolumne County, within Assessor Parcel Number (APN) 063-190-056.

Caltrans has the following comments:

Caltrans suggests Tuolumne County continue to coordinate and consult with Caltrans to identify and address potential cumulative transportation impacts from this project and other developments near this location. This will assist Caltrans in ensuring that traffic safety and quality standards are maintained for the traveling public on existing and future state transportation facilities.

Environmental

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 to the Caltrans District 10 Encroachment Permit Office. All California Environmental Quality Act (CEQA) documentation such as the Final Environmental Impact Report (EIR), 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 ROW, at the project site(s). 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.

If there are impacts to water resources within Caltrans ROW, Caltrans will need to see the correspondence with the permitting authorities (California Department of Fish and Wildlife [CDFW], United States 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 impacts to any special status species, critical habitat, or Essential Fish Habitat that exist within Caltrans ROW, evidence of consultation with CDFW, U.S. Fish & Wildlife Service, and/or National Marine Fisheries Service shall be provided to Caltrans with the Encroachment Permit application. The Draft EIR includes mitigation measure BIO-1 that says consultation will occur with the appropriate regulatory agencies but does not list the National Marine Fisheries Service (NMFS) as one of those agencies. The project is located within NMFS jurisdiction so BIO-1 should note NMFS as a federal agency that may need to be consulted with and potentially obtain a Biological Opinion from. Mitigation Measure BIO-10 states nesting bird surveys will be conducted if there is work between February and September – Please provide a specific date for each month considered here.

Caltrans considers the nesting season to be between February 1 and September 30 of any given year, so if work occurs in Caltrans ROW during that time at any of the project sites, 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. Mitigation Measure BIO-14 details pre-construction bat surveys. Mitigation Measure BIO-19 states that the project proponent considers the Swainson's Hawk Nesting season to be between March and August 31. Please note, that Caltrans considers the nesting season for this species to be February 1 – September 30, so if there is any work in Caltrans ROW between February 1 and

September 30, a pre-construction survey must be conducted as detailed above. If work will occur in Caltrans ROW at any of the project sites, the results of the pre-construction bat, bird, and plant surveys must be provided to the Caltrans District 10 Environmental Office prior to the start of construction related activities.

If any cultural materials or human remains are discovered during construction in Caltrans ROW, stop all work within a 100-foot radius of the discovery and notify the Caltrans District 10 Environmental Office immediately (in addition to the procedures detailed in MM-CUL-1 and MM-CUL-2). Do not move cultural materials or take them from the job site. Do not resume work within a 100-foot radius of the discovery area until authorized by the Caltrans Professionally Qualified Staff (PQS). If there are any ground disturbing activities in Caltrans ROW, the Encroachment Permit applicant must submit the Phase II Work Plan and a Lead Compliance Plan with the application. The Lead Compliance plan must be completed by a Certified Industrial Hygienist.

Traffic Operations

Truck Volumes are being converted into PCE (Passenger Car Equivalent), to include the truck factor in the analysis. Please use the actual volume (do not convert to PCE) and input the truck percentage in Synchro.

Please provide electronic Synchro/SimTraffic files for review.

Please provide the analysis for cumulative condition (20 years from the opening year of the project).

Please provide truck turning templates at Red Hill Road/Montezuma Road - SR-49 - SR-120.

Please provide the lateral clearance between the proposed truck tire off-tracking and the existing dike or edge of pavement. Truck body sweeps close to the signpost/electric power pole, provide the lateral clearance between the proposed truck tire off-tracking and the signpost or electric power poles at SR-120 - SR-108/La Grange Road - CR J59 and La Grange Road - CR J59/Yosemite Boulevard - SR-132.

Encroachment Permits

If any project activities encroach into Caltrans Right-of-Way (ROW), the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. For more information, please visit the Caltrans Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

Terrance Rodgers
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If you have any questions or concerns, please contact Shiferaw Jemberie (209) 986-9635 (email: Shiferaw.jemberie@dot.ca.gov) or me at (209) 948-7325 (email: Anupam.mishra@dot.ca.gov).

Sincerely,

Anupam Mishra

Anupam "Chris" Mishra, Chief
Office of Rural Planning
Planning, Local Assistance, and Environmental

cc: - Quincy Yaley, Community Development Department Director, Tuolumne County
- State Clearinghouse (SCH)