

## California Department of Transportation

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May 9, 2023



11-IMP-111  
PM 15.422

True North Organics Renewal Energy Facility  
MND/SCH#2023040047  
CUP # 21-0019

Ms. Diana Robinson  
Planner Division Manager  
County of Imperial Planning and Development Services  
801 Main Street  
El Centro, CA 92243

Dear Ms. Robinson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the True North Organics Renewable Energy Facility located on East Harris Road near State Route 111 (SR-111) 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 our 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:

### **Traffic Impact Study**

- Provide additional justification and trip generation sources to justify the employee trip rate of 2.1 ADT per worker.
- In the Transportation Impact Analysis, Figure 5-2, Project Traffic Volumes, is missing directional arrows for the trip movements.
- In the Transportation Impact Analysis, Figure 5-2, Project Traffic Volumes, shows 18 AM out trips going eastbound at SR-111 and Harris Road. However, Section 8.2 indicates that heavy trucks will be required to travel along Old Highway 111 to access SR-111 via Keystone Road. At SR-111 and Keystone Road there is only 1 AM out trip shown going eastbound at SR-111 and Keystone Road. Please explain or revise, it seems that there needs to be a figure and a Synchro analysis for the condition with the heavy truck route in place for Mitigation Measure TRANS-2.

### **Hydrology and Drainage Studies**

- The proposed facility is adjacent to Old Highway 111 that was relinquished by Caltrans to the County of Imperial on October 5, 2010, in accordance with Right-of-Way (R/W) Map No. 81338m. This work is outside the jurisdiction of Caltrans R/W and it will be the responsibility of the County of Imperial.
- If the plans have any changes or revisions that affects the Caltrans R/W, please resubmit for review.
- Caltrans generally does not allow development projects to impact hydraulics within Caltrans' R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

### **Traffic Control Plan/Hauling**

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for

oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the intersections at SR-111 and East Harris Road, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (SR-111) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

### **Noise**

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-111.

### **Environmental**

Caltrans appreciates the opportunity to comment on the True North Organics Renewable Energy Facility - Initial Study with proposed MND. The analysis presented does not impact on Caltrans' R/W. Should elements of the project and/or mitigation measures change to effect Caltrans' R/W, Caltrans would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please contact us as we would appreciate meeting with you to discuss the elements of the project that effect Caltrans R/W and the environmental documentation that Caltrans will use for our subsequent environmental compliance.

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 the analysis for any work identified in Caltrans R/W and any additional mitigation measures identified for the True North Organics Renewable Energy Facility.

### **Mitigation**

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California

Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (<https://dot.ca.gov/programs/traffic-operations/ice>).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

### **Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

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](mailto: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.

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work

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within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

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-a11y.pdf>.
- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf>
- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf>.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

*Hanwen Yi*, PE  
Acting for

MAURICE A. EATON  
Branch Chief  
Local Development Review