

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



September 19, 2023

11-IMP-86
PM 13.923

Green Valley Logistics Center
MND/SCH#2023080536

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 environmental review process for the Mitigated Negative Declaration (MND) (SCH# 2023080536) for the Green Valley Logistics Center Project located near State Route 86 (SR-86). 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.

We look forward to working with the County of Imperial (County) 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 Engineering and Analysis

- Caltrans District 11 standard practice is to follow the Transportation Research Board (TRB) "Access Management Manual" on reducing the access points onto the Caltrans Highway SR-86 to improve livability and reduce the conflict points to all users. The two proposed driveways with one as right-in and one as right-out will introduce additional conflict points and safety concerns for vehicle entering and exiting the development.
- SR-86 at this location is access controlled. Any modification to existing access opening will need to be discussed with Caltrans ROW Engineering, Traffic Operations, and Design divisions.
- The project proposed a high number of large trucks entering and exiting the development. Since this is a high-speed highway, acceleration and deceleration lane may be necessary for ingress and egress to and from the proposed development.

Design

- Provide confirmation that the removal of the existing cemetery access would be allowed. The Site map shows the cemetery as a veteran's memorial therefore it implies that this is a federal/public cemetery, and the removal of the access might not be an option.
- Per Caltrans Highway Design Manual (HDM) Section 205.1 'Road Connections and Driveways,' "Access openings should not be spaced closer than one-half mile to an adjacent public road or to another private access opening that is wider than 30 feet." The existing cemetery driveway is too close to both proposed new driveways. However, even if the cemetery's driveway is removed, the two proposed driveways would be too close to meet this requirement.
- Per Caltrans HDM Section 205.3 'Urban Driveways,' "commercial driveways when used for a one-way traffic, the maximum width should be 25'. If the driveway serves a large parcel, where large volumes of vehicles or large vehicles are expected, the entrance maximum width should be 40' and the exit maximum width should be 35.' Both proposed driveways are shown as 48' wide.
- Per Caltrans' Right of Way Maps, the requested southern access along SR-86 (right/in) is authorized but not the northern access (right/out). Allowing two separate access points along SR-86 increases potential conflict points and possible

collisions. The State understands that truck circulation within the development, as proposed, is optimal for the development, however, it requires two access points along SR-86. The State recommends to re-design truck circulation within the development so that only one access would be needed.

- Per Caltrans' Right of Way Maps, it is understood that there is allowed access at the southern end of the property (where the secondary/Emergency access point is shown). Has it been considered to move the right/in and right/out access to the Dahlia Lateral Eight instead of the south of the cemetery?
- The proposed right/out access shows an acceleration lane of about 900,' if the location of the access is approved, the design would have to follow HDM's Section 405.1 (4) 'Acceleration Lanes for Turning Moves onto State Highways.'
- The proposed right/in access shows a deceleration lane. The State has safety concerns due to the quantity of proposed trucks entering the proposed development. Due to the high speed of the highway and if the location of the access is approved, a right-turn lane with a possible deceleration lane will be required following the Caltrans Section 405.3 'Right-turn Channelization.' A traffic study analyzing the amount of truck entering the development would be needed to calculate the needed storage length of the right-turn lane.
- If a driveway is approved, follow the Caltrans Encroachment Permit Manual's Appendix J "Road Connections and Driveways."

Hydrology and Drainage Studies

- Provide Site Development Improvement Plans and include:
 - Grading Plans with 0.2-foot contour intervals.
 - Drainage Infrastructures Plans (existing and proposed).
 - Complete Hydrology and Hydraulics Report.
 - Show Caltrans' Right-of-Way (R/W) line limits and the Department's SR-86 centerline.
- Provide Improvement Plans for the driveway access points with respect to SR-86 and include:
 - Existing and Proposed Grading Plans with 0.1-foot contour intervals.
 - Existing and Proposed Drainage Features.
 - Department's R/W line limits and centerline stations.

- Existing and Proposed Roadway Features.
- SR-86 onsite Hydrology and Hydraulics Studies in accordance with Caltrans HDM for the existing and proposed conditions.
- SR-86 offsite existing and proposed Hydrology and Hydraulics, if necessary.

System Planning

- Currently, there are no planned Caltrans projects or improvements for the segment of SR 86 containing the project location. The segment of SR-86 was to be relinquished to the County. However, relinquishment negotiations remain ongoing and undecided.
- It is advised that the applicant coordinate with the County and the Imperial County Transportation Commission in the development of the Condition of Approval for project access and truck routes. Current routes specified in Section 7 utilize nearby S31 Dogwood Rd. Long-term plans for this facility include upgrades to 6 lanes for north-south transit between the Cities of El Centro and Brawley (please see the 2008 County Circulation and Scenic Highways Element). This may conflict with traffic from medium and heavy-duty trucks and agricultural equipment.

Right-of-Way Utilities

- Tomcat Development LLC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of SR-86 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.
- 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 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 California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies. For the proposed 1.3-mile extension of the SoCal compressed natural gas (CNG) line,

depending on the alignment of the CNG line relative to Caltrans R/W, a longitudinal encroachment permit may be required.

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>.

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 or concerns, please contact Charlie Lecourtois, LDR Coordinator, at (619) 985-4766 or by e-mail sent to charlie.lecourtois@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review