

California Department of Transportation

DISTRICT 11
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October 15, 2024

11-IMP-78
PM 17.543
Brian Welsh Imperial RV Storage
CUP23-0019/IS23-0024
MND/ SCH #2024051372

Mr. Derek Newland
Planner III
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243

Dear Mr. Newland:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review for the Mitigated Negative Declaration (MND) on the proposed Brian Welsh Imperial RV Storage project 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 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 Analysis

- Plans are not clear due to the file lower resolution. Please provide a higher resolution plan set for review.
- Clearly show all proposed driveways to be connected to SR-78 on the plans.
- All new driveway/roadway connections shall comply with the latest Caltrans Highway Design standards. Driveways shall be paved according to Caltrans latest standard plans and specifications. See Highway Design Manual (HDM) Topic 205.4 for additional information.
- Sight distance exhibits will be required to submit for review for driveways and minor street connections inside Caltrans' Right-of-Way (R/W). Provide sight distance exhibits for the driveway connection for review. See HDM Topic 201 and Topic 405 for additional information on the requirements of stopping, decision, and corner sight distance.
- Per the HDM, the minimum clear recovery zone for conventional highway is 20 feet. Provide a minimum of 20 feet from the edge of the proposed driveway to the edge of the dirt culvert with 10:1 or flatter slope, on both east and west sides of the driveway. See HDM Topic 309.1 Horizontal Clearances for Highways for additional information.
- Provide a Vehicle Miles Traveled (VMT) analysis. If the project does not require to prepare a detailed VTM analysis, provide formal justifications of exemption submitted to the lead agency.

Hydraulics

- Any work within Caltrans' R/W requires an encroachment permit from Caltrans.
- Please clarify if the storm water within the proposed site is being retained within the site or being detained to another location.
- The development should not have any adverse impact on Caltrans' R/W.
- Provide any as-builts of the area.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

Grading and Drainage Plans

- Please provide Grading plans.
- Include existing condition with 0.2 feet labeled contours.
- Provide proposed grading plans with 0.2 feet labeled contours.

- Provide drainage plans for any proposed drainage facilities.
- Include drainage layouts, drainage profile and drainage details on plans.
- Provide centerline for SR-78 with labeled stations.
- Provide R/W lines on all plan sheets with clearly labeled Caltrans and County R/W.
- Include any existing Caltrans facilities around the proposed project site.

Hydrology and Hydraulics Study

- Show calculation and methodologies on Hydrology and Hydraulics study.
- Provide 100-year storm calculation on Caltrans' offsite and 25-year storm calculations on Caltrans' onsite if applicable.
- If any proposed drainage will be constructed in Caltrans' R/W, the proposed drainage facility must comply with the HDM.
- Provide pre and post development Hydrology maps.
- Include 0.2' contours on both pre and post development hydrology maps.
- Provide R/W lines all plan sheets with clearly labeled Caltrans and County R/W
- Provide centerline for SR-78 with labeled stations.
- Delineate watersheds on both pre and post development hydrology maps.
- Show drainage path on pre and post development hydrology maps.

Design

Caltrans has the following proposed projects broadband project (EA 4B015, PID 1122000236) and a rumble strip project (EA 2N225, PID 1124000121) with project footprints containing Post Mile (PM) 17.543.

Environmental

Caltrans appreciates the opportunity to comment on this Initial Study draft Mitigated Negative Declaration (IS/MND). The analysis of potential future projects presented may impact on Caltrans' R/W in the future. Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final IS/MND. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the environmental document that Caltrans will use for our subsequent environmental compliance.

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 approved final environmental documents for this project that include the work in Caltrans' R/W, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, California Environmental Quality Act (CEQA)

determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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 Right-of-Way and any additional mitigation measures identified for the Final IS/MND. For example, the CEQA Cultural Section requires more details for AB52.

Impacts could occur to Burrowing Owl. Protocol level surveys following California Department of Fish and Wildlife's 2012 Staff Report on Burrowing Mitigation should be performed. Birds could nest in the R/W. Nesting bird surveys are required for work during the breeding season. A drainage feature within the R/W discharges into Alamo River.

Impacts to the feature may require permitting from resource agencies (Army Corps of Engineers, Water Board, Cal Dept. of Fish and Wildlife).

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-78.

Hauling/Traffic Control Plan

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 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-78) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

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. 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.

Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit.
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

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

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review