

## California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING  
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November 27, 2024

Ms. Margaret S. Roberts  
City Manager  
City of Plymouth  
P.O. Box 429  
Plymouth, CA 95669

**AMA-49 Countywide 6th  
Cycle Housing Element - City  
of Plymouth (Plymouth  
Annex) Initial Study (IS)/  
Negative Declaration (ND)  
SCH: 2024110040**

Dear Ms. Roberts,

The State of California requires all cities and counties to update their housing element every eight (8) years. The cities of Amador County participated in a countywide housing element for the 6th cycle housing element period (2021-2029). The City of Plymouth is included within the Housing Element, and a specific Annex within the Housing Element is specific to the City. As part of the Housing Element, the City has prepared a Draft Initial Study/Negative Declaration to review potential impacts related to the City's Annex within the Housing Element.

The proposed project is a Countywide 6th Cycle Housing Element.

Based on the Initial Study (IS), the Plymouth Planning Department has determined that the Housing Element will not have a significant adverse effect on the environment.

At this time, Caltrans has the following comments:

### **Environmental**

If any construction-related activities will encroach into Caltrans Right-of-Way (ROW) as a result of the project, the project proponent must apply for an Encroachment Permit with the Caltrans District 10 Encroachment Permit Office. All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will analyze potential impacts on any cultural sites, historic properties, biological resources, hazardous waste/materials, scenic highways, and/or other environmental resources within Caltrans ROW at the project site(s).

### **Traffic Operations**

The projects within the city of Plymouth's 2021-2029 Countywide 6th Cycle Housing Element area may cause a significant impact to State Routes, specifically State Route (SR) 49. As the Plan projects within the influence area of the State Highway System (SHS) move forward, a Transportation Impact Study (TIS) for each development will be required. Projects cannot be approved as a categorical exemption if an impact is determined. A TIS is necessary to determine a proposed project's near-term and long-term implications for existing and proposed conditions and to suggest appropriate mitigation measures. Caltrans recommends that the study be prepared in accordance with the Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG) May 20, 2020, and Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA December 2018.

Caltrans recommends that the Lead Agency (City of Plymouth) encourage the developer to submit a scope of work for conducting the TIS before circulating the local development application for comment to expedite Caltrans' review. Before beginning the TIS, Caltrans is available to discuss assumptions, data requirements, study scenarios, and analysis methodologies. This will help ensure that a quality TIS is prepared.

Each proposed project may not significantly impact state facilities when considered by itself; however, when combined with the cumulative impacts of other existing and proposed developments, the resulting traffic will negatively impact the state and local roadways. Therefore, Caltrans recommends the establishment of a local countywide traffic impact fee. Proposed mitigation should include highway improvements, modal alternates, and any proposed funding mechanisms.

Any work within the State ROW will require an encroachment permit.

### **Encroachment Permits**

If any future project activities encroach into Caltrans 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. These studies will include an analysis of potential impacts to any cultural sites, biological resources, hazardous waste locations, and/or other resources within Caltrans ROW at the project site(s). For more information, please visit the Caltrans Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>

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If you have any questions or would like to discuss these comments, please contact Paul Bauldry at (209) 670-9488 (email: [paul.bauldry@dot.ca.gov](mailto:paul.bauldry@dot.ca.gov)) or me at (209) 986-9830 (email: [anupam.mishra@dot.ca.gov](mailto:anupam.mishra@dot.ca.gov)).

Sincerely,

*Anupam Mishra*

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

Cc: State Clearinghouse