

California Department of Transportation

DISTRICT 12
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March 16, 2026

Ryan Bensley
Orange County Waste & Recycling
601 N Ross Street
Santa Ana, CA 92701

File: LDR/CEQA
SCH: 1999041035
LDR LOG #2024-02597
I-5, SR-74

Dear Mr. Bensley,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Supplemental Environmental Impact Report (EIR) for the Increase in Maximum Daily Operations Prima Deshecha Landfill Project. The Proposed Project would increase the permitted daily maximum tonnage of waste received at Prima Deshecha Landfill (Landfill) from 4,000 tons per day (TPD) to 8,000 TPD. Waste would continue to be disposed of in existing areas of the Landfill that are designated for disposal. The Proposed Project would also allow for up to 36 operational emergency days during which the 8,000 TPD limit could be exceeded by up to 2,000 TPD (i.e., a maximum of 10,000 TPD). This increase in daily tonnage is anticipated to take place gradually. The Proposed Project would not change the nature or location of approved activities within the Landfill, including the limits of refuse, nor would it alter the footprint, property limits, or configuration of the Landfill. No new construction is proposed.

The mission of Caltrans is Improving lives and communities through transportation. Caltrans is a commenting agency on this project and has the following comments:

1. Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with state and local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.
2. Caltrans freight policy focuses on creating a sustainable, efficient, and resilient goods movement system, guided by the California Freight Mobility Plan (CFMP) and Executive Order B-32-15. Key priorities include decarbonizing the supply

chain, improving infrastructure efficiency, enhancing safety, and ensuring environmental equity.

3. Evaluate whether current on-site truck parking, staging, and driver amenities (restrooms, lighting, food, water) are adequate for the projected increase in truck and driver activity. If not, please commit to expanding these facilities as needed to support safe and efficient freight operations Truck Parking, Staging, and Driver Amenities
4. The SEIR should evaluate and, if necessary, expand on-site truck parking and driver amenities to accommodate increased truck traffic, in line with Caltrans' expectations for safe and comfortable facilities. This will help prevent unauthorized or unsafe parking in surrounding neighborhoods.
5. Please address potential conflicts between trucks and non-motorized users (pedestrians, cyclists) on Avenida La Pata and at site entrances. Caltrans recommends a commitment to monitor and mitigate any emerging safety issues for vulnerable users, especially during peak truck arrival/departure times.
6. Caltrans recommends ongoing engagement with local communities, including those identified as disadvantaged or sensitive, to monitor and address any emerging concerns related to noise, air quality, and traffic safety. Reference CalEnviroScreen and AB 617 community emission reduction strategies to ensure equity and environmental justice are addressed for nearby disadvantaged communities.
7. The SEIR identifies significant and unavoidable air quality and GHG impacts. Please strengthen the discussion of mitigation by evaluating additional measures such as incentives or requirements for zero- or near-zero emission vehicles, electrification of on-site equipment, and expanded landfill gas-to-energy conversion, consistent with Executive Order N-79-20 and state GHG reduction goals.
8. Please provide the queue analysis for the following locations as stated in Caltrans comment letter dated August 4, 2024:
 - o I-5 SB offramp, and I-5 NB onramp- The queue analysis shall include full heavy vehicle adjustments during peak hour with maximum landfill dispatch conditions. Also, the analysis should include mitigation measures in the event of any potential significant impacts.
 - o La Pata Avenue NB left-turn lane to WB Ortega Highway (SR-74) / La Pata Intersection. Requires a left turn pocket evaluation and queue storage

determination and consider operational measures to avoid concentrated truck arrivals during school peak periods.

- Please provide U-turn traffic volumes at NB/SB Antonio/La Pata Ave and impact analysis for the proposed restricted U-turn.
9. Please provide explanation as to why proposed traffic mitigation measures, such as traffic signal synchronization and additional pocket turn lane, which were included in the previous document have been removed from this SEIR. Please provide the replacement mitigation methods proposed.
10. Please consider installing the following at signalized intersections within the project limits:
- VDS (Video Detection System)
 - PTZ (Pan, tilt and zoom) cameras
 - yellow backplate
 - APS (Accessible Pedestrian Signal)
- Additionally, utilize the Synchro program to synchronize all signals within the project limits.
11. The SEIR should include a discussion on High Concentration Collision Locations. Please coordinate with Traffic Safety Branch at Caltrans District 12 Office.
12. Any work performed within Caltrans right-of-way (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. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. If coordination is not required, please submit an encroachment permit application package (EPAP) through the Caltrans Encroachment Permit System (CEPS - <https://ceps.dot.ca.gov/>). EPAP should include application, PE signed and stamped site-specific traffic control plan, insurance, letter of authorizations as needed, and any other relevant documents. EPAP should be submitted as early as possible to avoid any delays.
13. Project plans and traffic control plans must be stamped and signed by a licensed engineer. For all plans, including traffic control plans, Caltrans R/W lines should be clearly labeled, which include existing and proposed (if there are any changes to Caltrans R/W), the north arrow, the edge of pavement, and edge of the sidewalk, if applicable. When submitting the application, please include final Environmental Clearance Documentation, relevant design details

including design exception approvals and construction and drainage plans, traffic control plans, traffic management plan and traffic impact study if proposed traffic delay of 30 minutes above normal recurring traffic delay is anticipated, any Caltrans R/W certifications if needed, maintenance agreement as needed, shoring plans for any excavation 5-feet or more, ADA certification, and any letter of authorizations.

Please continue to coordinate with Caltrans for any future developments that could potentially impact the State transportation facilities. If you have any questions, please do not hesitate to contact Maryam Molavi at Maryam.Molavi@dot.ca.gov.

Sincerely,



Scott Shelley (Mar 16, 2026 15:07:45 PDT)

Scott Shelley
Branch Chief – Local Development Review/Climate Change/Transit Grants
District 12