

## California Department of Transportation

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April 15, 2026

11-IMP- SR-78,  
SR-86, SR-111, SR-115  
Lithium Valley Specific Plan DEIR  
SCH #2023120104

Mr. Jim Minnick  
Planning Division Manager  
Imperial County Planning Division  
801 Main Street  
El Centro, CA 92243

Dear Mr. Minnick:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Imperial County Draft Environmental Impact Report- Lithium Valley Specific Plan, located near State Routes 78, 86, 111, and 115 (SR-78, SR-86, SR-111, SR-115). Caltrans's mission is to improve lives and communities through transportation. To this end, Caltrans reviews land use projects and plans to ensure they align with our mission and State transportation planning and policy priorities. For Lithium Valley to succeed, state and local plans must coordinate to ensure a seamless Transportation System. Local roads must connect to the System to ensure mobility of resources to, from, and around Imperial County.

Imperial County, California, is an underserved rural community with limited transportation infrastructure near the project area—in and around Mundo, Niland, Estelle, and Calipatria. According to the Program Environmental Impact Report (PEIR) and the Vehicle Miles Travel (VMT) analysis, the Lithium Valley Specific Plan (LVSP) will significantly increase growth in the Imperial Valley community, including daily traffic, movement of goods and services, and impacts on the surrounding environment. Caltrans recommends that the project applicant explore opportunities to mitigate those impacts.

Caltrans and Imperial County must collaborate to build a safe, functional, interconnected, multi-modal transportation network. This will ultimately improve transportation accessibility and the quality of life for the people in the communities we serve.

Caltrans has the following comments to guide our subsequent coordination and reviews:

## **Safety**

Safety is one of Caltrans' strategic goals. Caltrans aims for 2050 to be the first year with no deaths or serious injuries on California's roads. We seek more equitable outcomes for the diverse users of the transportation network. To reach these ambitious goals, we will collaborate meaningfully with our partners. We encourage the adoption of new technologies, innovations, and best practices that will improve transportation safety. These goals are ambitious and urgent, requiring a deliberate departure from the status quo as we embed safety into all aspects of our work.

## **Traffic Analysis**

Please see comments on the Local Mobility Analysis Appendix C document of the Lithium Valley Specific Plan Draft Environmental Impact Report:

- Future projects along State Right of Way (R/W) need to confirm compliance with Caltrans Access Control.
- Future individual sites/developments will need to provide a Vehicle Miles Travel (VMT) analysis and mitigate VMT impacts accordingly.
- All proposed improvements on Caltrans' facilities will need Caltrans review and approval.
- Future traffic studies should be conducted when specific project or trip thresholds are reached. These studies should reevaluate roadway impacts, safety, and required mitigation measures.
- This applies to adding any lanes to Caltrans' Facilities.

The Executive Summary, Section 1.6, Significant and Unavoidable, Page 96, of the December 2025 Draft Lithium Valley Specific Plan (PEIR) states the following:

*As discussed in this PEIR, implementation of the project would result in significant and unavoidable impacts to aesthetics, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, noise, population and housing, tribal cultural resources, and transportation.*

California Environmental Quality Act (CEQA) guidelines provide conditions for public agencies to disclose information to reviewing agencies, and specifically to State agencies when a proposed project is of statewide or regional significance and to explore project mitigation measures.

The PEIR document, appendix J-1 Vehicle Miles Travel (VMT) Analysis December 2025, Section 6.0 Conclusion, states the following:

*As shown in Table 3, Phases 1, 2,3, the Reduced Density Alternative, and the Increased Density Alternative of the Project would result in a potentially significant VMT impact because the work VMT per employee would exceed the County's baseline VMT. The Project would implement LVSP policies and mitigation measures to ensure that VMT reduction is achieved to the extent feasible. Because some of these VMT reducing measures are non-quantifiable or*

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*cannot be modeled, depend upon planning efforts from multiple regulatory agencies and it is not possible to guarantee the implementation of measures prior to occupancy or even with completion of Phase 1, the Project's VMT impacts would be significant. Therefore, impacts to CEQA Guidelines section 15064.3, subdivision (b) would be considered significant and unavoidable.*

Caltrans is currently working on a Project Initiation Document (PID) for the Lithium Valley Connectivity Project. This document focuses on improving transportation access and system performance across key State Routes in Imperial County in response to the rapid development of the Lithium Valley extraction complex and associated clean-energy industries near the Salton Sea. It is important to note that the PID document only focuses on Lithium Valley's project, phase 1. The Lithium Valley Specific Plan should explore funding opportunities to assist in the development of Caltrans' PID document.

The PEIR document, VMT, page 11, 3.1 Screening states the following:

*The Project is estimated to generate 47,055 daily trips in Phase 1, 80,243 daily trips in Phase 2, and 92,933 daily trips in Phase 3, and therefore, would not be considered a Small Project.*

The proposed Lithium Valley project will place new and increasing demands on the surrounding State Highway System (SHS), particularly along SR-111, SR-115, SR-86, and SR-78, which serve as the primary regional connectors between communities, employment centers, border crossings, and industrial sites in the Imperial County area. In order to address future demand trips, please consider and explore improvements to SR-78, SR-86, SR-111, and SR-115 intersections surrounding communities as suggested in this comment letter.

The PEIR needs to include additional analyses for the existing plus project condition and horizon year, with project conditions for phases 1, 2, and 3. The current conditions for SR-111 in Niland, Estelle, and Calipatria communities are one lane in each direction.

Assembly Bill (AB 98) requires a county or city to update its circulation element, as prescribed, including identifying and establishing specific travel routes for the transport of goods, materials, or freight for storage, transfer, or redistribution to safely accommodate additional truck traffic and avoid residential areas and concentrations of sensitive receptors [Chapter 931 (2)]. The bill requires a county or city to make truck routes publicly available and to share maps of those routes with warehouse operators, fleet operators, and truck drivers [Chapter 931 (2)]. Please identify regional truck routes impacted by AB 98 truck routing requirements.

Individual projects coming from the specific plan and proposing improvements in State (R/W) may need a safety review that follows the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf>.

Intersection Safety and Operational Assessment Process (ISOAP) applies to new intersections or the major modification of existing intersections and local street interchanges (including State conventional highways and expressways) on the State Highway System, including but not limited to the following:

- Connecting a new public road, private road, or high-volume (average daily traffic volumes of 1,000 or greater) driveway to a state highway or a new interchange to a freeway.
- Changing the type of traffic control, such as from stop-control to signal control or from a two-way stop to all-way stop.
- Installing a pedestrian hybrid beacon at an intersection.
- Making major physical changes to intersection approaches, including at ramp terminals, such as adding a leg to an intersection or widening to provide an additional through or turn lane.

For additional information, please reference the ISOAP Guide: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/isoap/20240910-isoap-process-info-guide--a11y.pdf>

### **Modeling and Forecasting**

In Appendix J-1, VMT Memo (Page 8), the following is quoted:

*The VMT analysis for LVSP was conducted by Iteris using the current version of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Travel Demand Forecasting Model (herein referred as SCAG model). The current SCAG model is consistent with the 2024-2050 RTP/SCS, also known as Connect SoCal 2024. The SCAG model runs on the TransCAD software platform and is an Activity-Based Model (ABM).*

Over the past decade, Caltrans District 11 has used the Imperial County Transportation Model (ICTM) for modeling purposes, including VMT studies. The ICTM is an enhanced subregional transportation model tailored to Imperial County. Historically, the SCAG model has not been the preferred modeling tool for projects in Imperial County.

In the Appendix B Transportation Studies of Appendix J-2, Transportation Report, please clarify where is the intersection operations analysis of future conditions. In Traffic Studies, intersection operational analysis typically evaluates both existing and future conditions. This is because transportation projects often aim to address not only current issues but also anticipated increases in traffic volume due to population growth, land-use changes, and economic development.

In the DRAFT Lithium Valley Specific Plan Program Environmental Impact Report (as referenced on Page 151 and 156) and Appendix C, AQ-GHG-HRA Technical Report, Section 4.3 Air Quality (as referenced on Page 46, 52, and 62):

The California Emissions Estimator Model (CalEEMod), Version 2022.1.1.29, was used to estimate emissions from the construction and operation of the project (CAPCOA 2022). The California Air Resources Board (CARB) is a state agency responsible for creating and enforcing stringent air pollution and emissions regulations. EMFAC was created by CARB.

CalEEMod should not be used on its own to model on-road mobile air pollution. It has a limited, screening-level role only, not appropriate for detailed on-road exposure, hotspot analysis, or cumulative corridor impacts. Furthermore, it is not a substitute for regional or roadway-scale mobile-source modeling.

For DEIR/EIR analyses involving roadway traffic emissions and impacts, the standard practice is to use EMFAC to generate on-road emission factors (by speed, vehicle class, calendar year). EMFAC is CARB's stand-alone, official on-road emissions model.

CalEEMod may be included in parallel to estimate project-related emissions, but not as the primary tool for on-road air quality impacts. Using CalEEMod alone for roadway impacts is often flagged as insufficient. When a project that adds significant traffic, EMFAC emission analysis is required.

## **Design**

Please be advised of the following Caltrans' active transportation improvement project, located near the project area. Caltrans is currently in the Project Approval and Environmental Document (PA&ED) Phase, for a proposed project to make improvements at the intersection of SR-111 / SR-115, including the replacement of high-visibility crosswalks and the repair of existing sidewalks. The same project proposes repairing existing sidewalks and constructing new sidewalks at certain segments of SR-111 (primarily in the SB direction) from SR-115 to south of Young Avenue (within the study area of the Lithium Valley Project). The EA 11-43154 project also proposes the construction of new ADA curb ramps (and the upgrade of existing ADA curb ramps) at specific locations within the same segment mentioned above.

## 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, SR-86, SR-111, and SR-115.

## System Planning

- For Policy CT-16 and CT-20 (page 271), please coordinate with Caltrans Planning for any assistance needed within the SR-111 corridor.
- Policy CT 21, as transit facilities and transportation hubs are developed to better serve the workforce and surrounding communities, please coordinate with Imperial Valley Transit (IVT) to address existing bus stops, such as the Route #2 stop, at SR-111 and Main Street in Niland. This stop currently lacks signage and shelter from the elements.
- Under Chapter 8 – References, the Caltrans 2020b Transportation Impact Study Guide (page 989 of the PDF) currently has a broken link. Please consider using the following updated link instead: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.
- For Appendix J-1 VMT Memo, Table 5 – VMT Reduction Measures, please consider including the following as part of the mitigation measures:
  - EV Charging Infrastructure (T-14, up to 11.9%, greenhouse gas [GHG] reduction)
  - Subsidized transit fares (T-29, up to 1.2% GHG reduction)
- Both mitigation measures are from the [Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity](#).

Please include Caltrans State Routes and R/W lines on all figures and maps.

Please clearly outline how the Lithium Valley Specific Plan recommended transportation improvements will be implemented, funded, and scheduled.

Please work with Caltrans Planning for any proposed transit improvements, such as the proposed dedicated bus lane on SR-111, as mentioned in the 5.5 Transit Section of the LVSP document.

Please consider coordinating with the Imperial Valley Transit Agency to discuss transit bus shelter planning for extreme weather.

Route 2 of the Imperial Valley Transit is cited in the LVSP. Please consider including Routes 22 and 5, which have connections to the project area and are near Niland and Calipatria.

## Freight

Freight analysis for interregional trips to San Diego and Riverside Counties, interstate trips to Arizona, and international trips to the Mexico border should be analyzed due to the potential for goods movement.

- **Bridges on SR-111**

Please provide further analysis regarding the potential impacts to the bridges on SR-111 between the Brawley Bypass and the community of Niland. This should include any structural or traffic-related concerns.

- **Truck Traffic on Gentry Road (Proposed Truck Route)**

Please consider addressing the Environmental, Structural, Air Quality, and Community impacts of truck traffic traveling to/from Gentry Road (proposed truck route) to the SR-78/N Center.

Street Intersection (Forrester Road) and SR-78. Please include traffic management strategies for this proposed route.

- **Page 51, Figure 3-4, Roadway Classification for SR-111 (Eddings Rd to Sinclair Rd)**

The proposed reclassification of SR-111 between Eddings Rd and Sinclair Rd to a 4-lane State highway requires coordination with Caltrans, the Imperial County Transportation Commission (ICTC), and the Southern California Association of Governments (SCAG). This should be considered within the overall plan's approach.

- **Rail Spurs or Rail Transload Facility Impacts**

Any proposed rail spurs (e.g., at SR-111/Pound Rd or SR-111/Sinclair Rd) or rail transload facilities (e.g., at SR-111/Sinclair) that may impact the State's R/W should be coordinated with Caltrans and undergo the appropriate review process.

- **Coordinating Commercial Nodes, Public Transportation Hubs, and Rail Yards**

Commercial nodes, public transportation hubs, intermodal rail yards, and any other transit services identified in the plan must be coordinated with Caltrans to ensure integration with existing transportation networks and infrastructure.

- **Truck Route Management and Traffic Efficiency (Section 5.1.2 A)**

Please coordinate with Caltrans regarding any truck route management strategies and traffic efficiency measures outlined in Section 5.1.2 A of the plan. Coordination is essential to ensure these strategies align with broader regional and State transportation goals.

- **Impact Strategies for State Highway Systems Outside of the Plan Area**

The plan should include strategies to address potential impacts on the SHS, outside the LVSP area, ensuring surrounding infrastructure is properly considered.

- **Section 4.17 Transportation, Truck Routes and Port of Entry, page 734**  
The PEIR states the following: *"The third crossing near the Arizona border, the Andrade POE, accommodates pedestrian traffic only."* Please update the statement to say: *"The third crossing near the Arizona border, the Andrade POE, accommodates pedestrian and passenger vehicle traffic only."*
- **Page 735 of PEIR, Truck Routes and Port of Entry,**  
For the discussion of the National Highway Freight Network (NHFN), SR-111, and the California Truck Network, please be aware that the [National Highway Freight Network - FHWA Freight Management and Operations](#)) and the [CA Truck Network | Caltrans](#) are two different designations.

### **Engineering**

Please be advised that the Rail Crossings at SR-111 at Pound Road and Sinclair Road will require new intersections and/or grade separations.

Please consider the need for improvements along SR-111 at Edkins, Lindsay, Sinclair, Pound, English, and Davis Road intersections.

The conversion of sections of SR-111 from Calipatria north to Sinclair Road to a four-lane facility. Please consider the following:

- A more robust structural section for heavy truck traffic.
- Full 8-10-foot-wide shoulders for emergency services, breakdowns, and drainage.

Dedicated transit lanes along SR-111, along with Commercial Nodes, Intermodal Rail Yard, and Public Transit HUB. Please consider all this movement when it comes time to design the intersections.

Intelligent Transportation System (ITS) improvements along SR-111 will need to be connected back to Caltrans's Transportation Management Center (TMC).

Please be advised that major utility improvements, including sewer, water, fiber optic, etc., would need to be encased across Caltrans' R/W.

No impacts on State facilities will be allowed due to the proposed floodplain improvements to the New River and Alamo River as described on page 124 of the Draft Lithium Valley Specific Plan Program, Floodplain Management, Stormwater, and Drainage Section, Figure 3-6.

On page 100, Figure 5-5 Cross-Section, of the draft Lithium Valley Specific Plan, the dike is called out next to the curb. Caltrans recommends either a dike or a curb. The minimum shoulder width for a two-lane State highway is 8 feet. The standard outside shoulder width for a four-lane State highway is 10 feet.

Also, the concrete barrier and center median are shown in the same cross-section. Please show a separate cross-section showing the concrete barrier as needed.

According to Table 302.1 of the Highway Design Manual (HDM), inside shoulders must be 5 feet wide.

In addition, when on-street parking is allowed, the preferred shoulder width is 10 feet.

On page 128, Figure 6-4, Drainage Infra Opportunities, of the draft specific plan, the legend for drain extensions to improve flow to the sea does not match what is shown on the map. Please clarify.

### **Hydraulics**

Please provide the Regional Master Drainage Plan. Due to the region's rural nature, the existing storm drain infrastructure is not suitable for urbanization and relies on the Imperial Irrigation District (IID) water delivery system as the de facto storm drain. An underground storm-drain infrastructure network, separate from and independent of the water delivery system, facilitates successful development and urbanization. Please be advised that Caltrans's future infrastructure will be dependent upon the region's future underground storm drain infrastructure.

While the main goal of the Specific Plan is to identify regulatory frameworks and guidance documents for necessary infrastructure, rail infrastructure is not specifically addressed. This suggests that most freight transportation will be handled by Caltrans infrastructure. From a drainage perspective, an increase in truck traffic requires wider shoulders, concrete shoulders instead of asphalt, and more complex drainage systems. This leads to higher costs for facility construction, maintenance, and rehabilitation. Additionally, wider shoulders reduce the space available for complete street features. Installing new at-grade crossings for railroad facilities is not recommended.

Section 6.3.1 in the Draft Specific Plan identifies IID as the "*government entity with varying responsibilities as it relates to ownership, operation, and maintenance of the drains and canals*". However, it is Caltrans's understanding that the IID position is that these drains and canals should not operate in storm-drain capacity and are specifically designed as utilities. Please clarify why the existing drains and canals under the jurisdiction of IID represented in the Stormwater and Drainage portion of this report.

The proposed project features will significantly alter the Federal Emergency Management Agency (FEMA)- defined Floodplain and associated water surface elevations throughout the project area and may adversely affect the Imperial Routes 111 and 78 facilities. Any alterations of the existing FEMA floodplains should not impact Caltrans' facilities, nor should they be redefined on Caltrans's R/W. Caltrans requests that Imperial County, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Local Administrator regarding floodplain administration and allow for Caltrans to comment prior to the Conditional Letter of Map Revision (CLOMR) application or the Permit issue, to assure that

Caltrans' assets are not adversely impacted by any change in the water surface elevation resulting from this specific plan or subsequent development projects.

Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to Caltrans when Imperial County approves the permit to alter the floodplain or when a developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).

There is no discussion of the U.S. Army Corps of Engineers' role in Public Works Projects, nor of the necessity for any Public Works Projects.

Discussions about the need for levees or floodwalls to meet floodplain recommendations should be included in the Lithium Valley Specific Plan document.

Future improvements cannot affect water surface elevations at Caltrans bridges or raise the risk of scour.

Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modifications to existing Caltrans drainage and/or increased runoff to State facilities will not be allowed.

For future individual project-related improvements in State R/W:

- Please provide hydraulic studies, drainage, and grading plans to Caltrans for review.
- Please provide a pre- and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details. Please include detention basin details of inlets/outlets.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- For all plans, please show Caltrans' R/W.

## **Complete Streets**

Caltrans' Complete Streets consultation shall be requested for the following:

- As individual development projects located in the LVSP are submitted for review, complete streets elements will be considered, and input will be provided by the Caltrans District 11 Complete Streets Branch.
- The two (2) current proposed locations of the Concept Public Transportation Hubs are adjacent to SR-111 (referenced on page 35-36 of the Draft Specific Plan). As this concept becomes a viable project, close consultation with Caltrans will be required to further determine access to the Hub and impacts to SR-111. These comments will also apply to the Transit Network Map on page 112 of the Draft Specific Plan.

- Also, the project should always seek transit consultation from the Imperial County Transportation Commission as they are the administrators and operators of the transit network in Imperial County.
- The Conceptual Pedestrian Pathway proposed currently does not have a direct connection to SR-111, if that changes and connections to the State system are proposed Caltrans review will be required.
- The two (2) proposed Intermodal Rail Hub locations (referenced on page 36 of the Draft Specific Plan) present a need to cross SR-111 and potentially impact the complete streets connectivity of SR-111 where new rail crossings may be developed. In addition, page 108 of the Draft Specific Plan states, "*Phase 2 Private Rail lines may be constructed to provide immediate rail connections to industry users...proximity to the existing rail line will ensure efficient freight...*" considering the existing rail line is located east of SR-111, Caltrans will need to further analyze operational impacts to SR-111 as it relates to additions/modifications to rail operations in the project area.

Figure 5-8 Bicycle Network Map and Figure 5-7 Bridges of the LVSP document, show a proposed four-lane segment on SR-111. To address potential bottlenecks, the traffic analysis needs to include the four-lane segment at SR-111 north of Calipatria.

### **Mitigation**

Caltrans endeavors to ensure that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to CEQA and National Environmental Policy Act (NEPA) standards.

Since the Lithium Valley Specific Plan project is considered significant, feasible mitigation measures to State facilities should be identified in the DEIR. Impacts that are significant and unavoidable need to have an alternative mitigation identified in the DEIR.

Caltrans recommends that regional mitigations should be explored for this project. Opportunities for transportation mitigation locations include the following:

- SR-111 and Sinclair Road
- SR-111 and SR-115 Intersection
- SR-111 General Improvements

Caltrans is currently working on a draft PID for the Lithium Valley Connectivity Project 2026. This PID document should be consulted and referenced to consider and identify mitigation ideas for the Lithium Valley Specific Plan, phase 1.

The following improvements could be considered as mitigation for the Lithium Valley Specific Plan:

- Passing Lanes on SR 111 between Calipatria and Niland
- Improvements to the SR 111/SR 115 intersection

- Widen paved shoulders on SR 111 between Calipatria and Niland

Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports should be coordinated with Caltrans to identify and implement 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 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.

### **Environmental**

As future projects are identified, please provide the reference to the Imperial County Environmental Impact Report Lithium Valley Specific Plan, with the project-specific scope/elements and/or mitigation measures affecting Caltrans R/W.

Caltrans Environmental Division, for encroachment permit approval, requires the conclusions from environmental technical studies. This project should specifically identify and assess potential impacts caused by the project or by mitigation efforts within Caltrans R/W, including impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps), and appurtenant features (lighting/signs).

The following is a list of impacts that are typical to Caltrans' facilities, and we recommend that they be addressed, if appropriate, in environmental and supporting documents for this project:

- Noise
- Air Quality
- VMT
- Hazardous Materials
- Community Impacts
- Visual/Aesthetic Impacts (including any removal of vegetation or trees)
- Biological Resources
- Cultural Resources
- Tribal Resources
- Water Quality
- Agricultural/Farmland Impacts
- Traffic/Circulation

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

Each subsequent development will have to have its own environmental assessment for improvements in Caltrans's R/W.

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 Caltrans' R/W before construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits—specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

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.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Branch Chief, by phone (619) 985-1587 or by e-mail at [Kimberly.Dodson@dot.ca.gov](mailto:Kimberly.Dodson@dot.ca.gov).

Sincerely,

*Jose I. Marquez*

Jose I. Marquez, AICP  
Deputy District Director  
Planning and Local Assistance