

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
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[www.dot.ca.gov](http://www.dot.ca.gov)



June 25, 2025

11-SD-78  
PM 42.882

Waste Discharge Requirements for Demler Brothers LLC,  
Pine Hill Egg Ranch and Pullet Farm  
NEG/SCH# 2025060041

Ms. Mahsa Izadmehr  
Water Resource Control Engineer  
California Regional Water Quality Control Board, San Diego Region 9 (RWQCB)  
2375 Northside Dr  
San Diego, CA 92108

Dear Ms. Izadmehr:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Negative Declaration for the Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm Project located near State Route 78 (SR-78). 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 has the following comments:

The following comments were previously submitted to the applicant in a Caltrans comment letter on February 24, 2022, but were not addressed by the applicant. Please see the unaddressed comments from the February 24, 2022, Caltrans comment letter below.

## **Traffic Engineering and Analysis**

- Caltrans requests that the County of San Diego or the RWQCB condition the applicant to pave the gravel area of the main driveway (Existing Egg Ranch Access: Primary) at the truck path to reduce the amount of gravel entering Caltrans Right-of-Way (R/W) from semi-trucks (see attachment, Caltrans Letter\_Demler Manure Processing Facility Major Use Permit\_MND\_SCH#2022010469\_02242022).
- The applicant will need to construct the existing driveway to current Caltrans standards.

## **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: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the intersection along SR-78 within the project area, 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.

Ms. Mahsa Izadmehr, Water Resource Control Engineer

June 25, 2025

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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

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to [D11.QMAP.Permits@dot.ca.gov](mailto:D11.QMAP.Permits@dot.ca.gov). 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](mailto:charlie.lecourtois@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review

Attachment - Caltrans Letter\_Demler Manure Processing Facility Major Use  
Permit\_MND\_SCH#2022010469\_02242022

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
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February 24, 2022

11-SD-78

PM 42.882

Demler Manure Processing Facility Major Use Permit

MND/SCH#2022010469

Ms. Angelica Truong  
Land Use Environmental Planner III  
County of San Diego, Planning & Development Services  
5510 Overland Ave, Suite 310  
San Diego, CA 92123

Dear Ms. Truong:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Demler Manure Processing Facility Major Use Permit Project located near State Route 78 (SR-78). 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 San Diego 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 requests that the County condition the applicant to pave the gravel area of the main driveway (Existing Egg Ranch Access: Primary) at the truck path to reduce the amount of gravel entering Caltrans Right-of-Way (R/W) from semi-trucks.

### **Hydrology and Drainage Studies**

- Please provide off site hydrology and hydraulics studies, proposed drainage and proposed grading plans for Caltrans to review.
  - Provide drainage plans and details. Provide existing and proposed drainage facilities.
  - Provide existing and proposed 2-foot contour grading with legible callouts.
  - Include detention basin details of inlets/outlet and proposed basin grading, include in detention basin calculations:
    - Plan schematic
    - Elevation vs storage tables
    - Elevation vs area tables
    - Elevation vs outlet flow (stage - outflow)
    - Inflow vs outflow
    - Elevation vs time (stage - time)
    - Volume vs time (storage - time)
- Provide a Drainage Study showing 100-year storm event calculations and 25- year storm event calculations.
- Provide on-site hydrology and hydraulic studies per the Highway Design Manual (HDM) methodologies and per Caltrans policies and procedures.
  - Provide all available Caltrans drainage facility as-built and R/W Maps.
  - Provide survey data of onsite system that the development will be draining to.
- On all plans, show Caltrans' R/W and SR-78 centerline.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

## **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

## **Land Use and Smart Growth**

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 local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

## **Traffic Control Plan/Hauling**

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, including the intersections along SR-78 within the project area, 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.

## **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.

## **Environmental**

### Air Quality

The Air Quality Assessment Report dated 10/13/2021 and the Greenhouse Gas Screening Letter dated 10/13/2021 of the MND have satisfied the requirements to evaluate and address air quality impacts from the proposed project.

### Hazardous Waste

The Hazards and Hazardous Material section of the IS has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed project.

A hazardous waste concern for this project is aerielly deposited lead (ADL). Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is usually found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the surface. The Department of Toxic Substances Control (DTSC) sets regulatory thresholds for lead in soil, based on risk assessment work performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). It is the Permittee's responsibility to comply with the DTSC ADL requirements for roadway soil management.

### Noise

The Noise Assessment Report dated 10/16/2021 of the MND has satisfied the requirements to evaluate and address noise impacts from the proposed development.

It should be recognized that definition and evaluation of geologic and environmental conditions are a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with incomplete knowledge of the subsurface conditions present due to the limitations of data from field studies. Although risk can never be eliminated, more detailed and extensive studies yield more information, which may help understand and manage the level of risk.

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. 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 EIR 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, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, 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 including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

## **Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

## **Mitigation**

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

## **Right-of-Way**

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.

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.

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](mailto: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.

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

It is also understood by our agency that no new utility crossings on State facilities will occur as a result of this project. However, 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 within the Caltrans' R/W, and any corresponding technical studies.

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>.

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](mailto:Charlie.Lecourtois@dot.ca.gov).

Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development Review