

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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Justin Chapel, Superintendent – Water Division
City of Redwood City, Public Works
1017 Middlefield Road
Redwood City, CA 94063

Re: Recycled Water Master Plan Phase 2 Project – Draft Environmental Impact Report (DEIR)

Dear Justin Chapel:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Recycled Water Master Plan (RWMP) Phase 2 Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the August 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project.

Project Understanding

The proposed project would develop a planning framework for Redwood City to expand and improve its existing recycled water system. The purpose of the project is to develop a planning document within which the City identifies a cost-effective, phased approach to expansion and priority areas of improvement to the system. The proposed project would extend the City's existing Recycled Water pipeline system to a new service area as well as construct back up water storage tanks and pumps. Work for the proposed pipeline expansion is within the vicinity of US 101, State Route (SR) 84, and SR 82.

Hazards and Hazardous Materials

The DEIR for the City's RWMP Phase 2 Project states that construction activities, including the installation of new recycled water pipelines and related infrastructure, will take place primarily within existing public right-of-way (R/W). Some of these

alignments may cross or be adjacent to the State R/W. The DEIR recognizes the potential for encountering unknown contaminated soil or groundwater during ground-disturbing activities, especially in urbanized areas with a history of commercial or industrial use. The DEIR includes a mitigation measure (HAZ-1) that requires immediate work stoppage and evaluation by a qualified environmental professional if evidence of contamination is found, with subsequent management and regulatory notification as appropriate.

At this planning stage, the DEIR does not provide detailed, site-specific hazardous waste investigations for all pipeline segments. Instead, it commits to further evaluation and management of hazardous materials concerns as the project design advances and as specific alignments and construction methods are finalized. Since some pipeline crossings may occur within or adjacent to the State R/W, Caltrans expects that additional hazardous waste studies, such as a Preliminary Site Investigation (PSI) and an Initial Site Assessment (ISA), may be required during the encroachment permit phase. These studies will be necessary to identify, characterize, and manage any hazardous materials that may be present within the State R/W, and to ensure compliance with Caltrans hazardous waste protocols and regulatory requirements.

Caltrans requests that the City coordinate closely with Caltrans during the permit application process to ensure that all hazardous waste concerns are adequately addressed prior to construction within the State R/W. All required hazardous waste investigations, management plans, and regulatory notifications should be completed and submitted as part of the encroachment permit application, consistent with Caltrans standard procedures.

Water Quality

Please specify how much of the New Impervious Area is within Caltrans' R/W. If the New Impervious Surface (NIS) within Caltrans' R/W is greater than 10,000 square feet, Treatment Best Management Practices (TBMP) will be required to the area of NIS.

For the temporary dewatering of groundwater from excavations, please specify if an Active Treatment System (ATS) or any other measures will be needed.

Please note that a Storm Water Data Report (SWDR) including TBMP's location and design should be provided in the Project Approval and Environmental Document (PA&ED) and Plans, Specifications, and Estimate (PS&E) phases. A Water Pollution Control Plan for any potential impacts within Caltrans' R/W should also be provided in the PS&E phase.

Air Quality

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.2, pdf page 119): Please consider using Tier 4 interim or Tier 4 final engines for off-road diesel-

fueled vehicles since Redwood city is consistently nominated in the Community Air Protection Program (CAPP).

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.2, pdf page 120 & 121) and Appendix B: Please revise the discussion of construction-related emissions to clarify that the Air District uses a Best Management Practices (BMP)-based approach for construction-related fugitive dust emissions rather than a numerical emissions threshold. The 2022 CEQA Guidelines state that implementation of all Basic BMPs in Table 5-2 is the basis for considering construction-related fugitive dust impacts less than significant. Please also revise the corresponding discussion in Appendix B.

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.2, pdf page 122): Please note that diesel generators above 50 horsepower (HP) require Bay Area Air Quality Management District (BAAQMD) permit.

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.2, pdf page 124): Please clarify the basis for the "Less Than Significant with Mitigation Incorporated" conclusion, as the emissions table indicates that neither construction nor operational emissions exceed the applicable thresholds. If AIR-1 is included solely to minimize construction emissions consistent with Air District recommendations, please clarify whether the impact should be characterized as "Less Than Significant" rather than "Less Than Significant with Mitigation Incorporated."

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.3, pdf page 124): Please clarify how AIR-1, which addresses fugitive dust, would also reduce construction-related diesel particulate matter (DPM) and associated health risks.

DEIR Section 4.3.3 Air Quality Impacts and Mitigation Measures (Threshold 4.3.3, pdf page 125): Please clarify the applicability of AIR-1 to this impact of "Less than Significant with Mitigation Incorporated."

DEIR Section 4.2.2.2 State Regulations (pdf page 129): Please correct page placement.

Greenhouse Gas Emissions

DEIR Section 4.8.3 Greenhouse Gas Emissions Impacts and Mitigation Measures (Threshold 4.8.1, pdf page 231): Please clarify whether AIR-1 is an applicable measure for reducing construction-related greenhouse gas (GHG) emissions. Dust control measures are not the general GHG control measures.

DEIR Section 4.8.3 Greenhouse Gas Emissions Impacts and Mitigation Measures (Threshold 4.8.1, pdf page 234): While the City's Climate Action Plan (CAP) consistency analysis supports the "Less Than Significant" conclusion, please briefly discuss the operational GHG emissions presented in the table and their relevance to the analysis.

Noise

DEIR Section 4.13.1 Noise Setting (pdf page 319): Fire stations, school playgrounds, and public parks are not forms of commercial and retail activities. Please review the examples listed for consistency with the included categories.

DEIR Section 4.13.2 Noise Regulatory Setting (pdf page 323): Please revise the units for the vibration annoyance criteria. Table 20 in the Transportation and Construction Vibration Guidance Manual, 2020 ([link](#)) identifies the annoyance criteria in terms of maximum PPV (in/sec), not RMS (in/sec).

DEIR Section 4.13.3 Noise Impacts and Mitigation Measures (pdf page 329): Please revise the units for the vibration annoyance criteria to use maximum PPV (in/sec), not RMS (in/sec).

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Equitable Access

Any Caltrans facilities impacted by the project must meet Americans with Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway Rights-of-Way (ROW) requires a Caltrans-issued encroachment permit. The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package.

Project plans within the State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.). Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)).

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality

Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, maintenance agreements, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). In the event of installation, after project completion, please provide as-built plans for installed recycled water facilities to the Office of Permits for Caltrans records.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse