

California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING
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October 9, 2025

Mr. Santa Croce
Senior Waste Management Engineer
California Department of Resources Recycling and
Recovery
1001 I Street
Sacramento, CA 95814

**TUO-49-CalRecycle Rotelli
Burn Dump Remediation
Initial Study
SCH 2025090436**

Mr. Santa Croce,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Rotelli Burn Dump Remediation Project Initial Study.

The proposed project site is located near Mill Villa Court adjacent to State Route 49 (SR-49), southwest of the City of Sonora (City) in unincorporated Tuolumne County. The Project Area is defined as the areas that would be disturbed by remediation activities or used for access. The Project Area is located predominately within 2 parcels owned by different entities, Assessor's Parcel Numbers (APNs) 056-020-004 (Rotelli), and 056-020-027 (Smith), with a small part of the drainage crossing through the lower corner of APN 059-010-034 (Bureau of Land Management). Remediation access would further cross portions of APN 056-020-029 (Hattler) and Caltrans right of way (ROW) on the west side of SR 49.

Caltrans has the following comments:

Caltrans suggests that the California Department of Resources Recycling & Recovery (CalRecycle) continue to coordinate with Caltrans in identifying and addressing potential pedestrian safety and cumulative transportation impacts from this project and other developments near this location. This will assist Caltrans in ensuring that pedestrian, traffic safety, and quality standards are maintained for the traveling public on existing and future state transportation facilities in Tuolumne County.

Hydrology

The proposed development indicates a significant increase in impervious surface area, which will result in higher stormwater runoff. Any increase in runoff generated by the development must be managed onsite through appropriate storage or mitigation measures. Per Caltrans regulations, additional runoff shall not be discharged into the State ROW or cause significant disruption to existing drainage patterns.

Environmental

If there are any construction related activities that will encroach into Caltrans 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, including the final Initial Study (IS) with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies may include an analysis of potential impacts to 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).

Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents for approval of encroachment in the Caltrans ROW. If any previously unknown cultural resources are discovered during construction in Caltrans ROW, all work must stop within a 100-foot radius of the discovery. The Caltrans D10 Environmental Office must be notified immediately. The Caltrans Professionally Qualified Staff (PQS) will investigate the discovery. No work shall resume within the 100-foot radius until authorized by the Caltrans PQS.

There are mature trees within and/or near Caltrans ROW that could provide suitable nesting habitat. Mitigation Measure BIO-4 in the Initial Study describes the nesting season as February 1–September 1; however, Caltrans considers the nesting season to be between February 1–September 30. If work will occur between February 1 and September 30 of any year, a pre-construction bird survey must be conducted by a qualified biologist prior to the start of any construction related activities in Caltrans ROW. If an active nest is observed, a protective buffer must be established around the nest per CDFW guidelines. No work is allowed within the protective buffer limits until the young have fledged and until authorized by the Caltrans District 10 Environmental Office. Results of the pre-construction bird survey(s) must be provided to the Caltrans District 10 Environmental Office prior to the start of construction. If there are impacts to water resources within Caltrans ROW, Caltrans will need to review the correspondence with the permitting authorities (California Department of Fish and Wildlife [CDFW], United States Army Corps of Engineers, Regional Water Quality Control Board) and/or be provided copies of any required permits prior to the start of any construction in Caltrans ROW. If there are impacts to any special status species, critical habitat, or Essential Fish Habitat that exist within Caltrans ROW, evidence of consultation with CDFW, U.S. Fish & Wildlife Service, and/or National Marine Fisheries Service shall be provided to Caltrans with the Encroachment Permit application.

The results or any pre-construction surveys performed in Caltrans ROW must be provided to Caltrans for review prior to the start of any construction related activities. Unpaved areas adjacent to the State Highway System may contain Aerially Deposited Lead (ADL)

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from past tail pipe emissions. Best Management Practices should be implemented when working in these areas. Any excess soil generated during the course of work in Caltrans ROW shall be redistributed on-site. If soil cannot be appropriately redistributed, then it must be tested and classified prior to transport out of Caltrans ROW for disposal. The Caltrans District 10 Environmental Office must be notified before any soil exceeding regulatory threshold is exported out of Caltrans ROW. The project must adhere to all local tree ordinances.

If you have any questions or concerns, please contact Dariana Villamil (209) 986-5762 (email: dariana.villamil@dot.ca.gov) or me at (209) 639 -8832 (email: Gregoria.ponce@dot.ca.gov).

Sincerely,

Gregoria Ponce'

Gregoria Ponce', Chief
Office of Rural Planning

cc: State Clearinghouse