

## California Department of Transportation

OFFICE OF THE DISTRICT 10 RURAL PLANNING  
P.O. BOX 2048 | STOCKTON, CA 95201  
(209) 948-7325 | FAX (209) 948-7164 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



May 5, 2026

Amy Augustine  
Tuolumne County Community Development  
Department  
48 Yaney Avenue  
Sonora, CA 95370

**TUO- 120**  
**Groveland StorQuest**  
**Initial Study**  
**SCH 2026030505**  
**CUP 22-001**

Dear Ms. Augustine,

The California Department of Transportation (Caltrans) recognizes the opportunity to review and provide information on the Groveland StorQuest Initial Study/Mitigation Negative Declaration. The proposed project has been redesigned and proposes a self-storage facility consisting of seven storage buildings (62,000 square feet) and storage leasing office and drive-thru coffee shop with outdoor seating (1,500 square feet), a fenced dog park, additional landscaping, and a monument sign on the road frontage of Deer Flat Road.

The proposed project is located west of the intersection of State Route (SR) 120 and Deer Flat Road, in the community of Groveland.

### **Caltrans, at this time has the following comments:**

#### **Traffic Operations**

Please provide mitigations for corner sight distance at the intersection of Deer Flat Rd/SR 120. Per the new version of the Highway Design Manual (HDM) Table 405.1A, please refer to the Single Unit Truck Time Gap for the calculation which is 9.5 for left turn and 8.5 right turn for the corner sight distance. This would change the required sight distance values in Table 8 on page 12 of the Traffic Impact Study. Also, on Page 12 of TIS, it recommends widening northwest corner of intersection to accommodate the eastbound (EB) left and the southbound (SB) right truck turns. It recommends constructing 280' westbound acceleration lane along SR 120 with 165' taper. The taper for 35 miles per hour (mph) should be 245' not 165'. Please refer to HDM Figure 405.2A.

The following truck turning templates in Attachment G need mitigation:

- a. Exhibit B Deer Flat Road/SR 120 EB left, and SB right turns show the EB left movement encroaches onto the gravel shoulder at the northwest (NW) corner of

the intersection. The SB right movement also encroaches onto the gravel shoulder at the northeast (NE) corner.

- b. Exhibit C shows the SB left turn encroaches to the gravel at the edge of shoulder along SR 120.
- c. Exhibit E shows no improvement for this movement and shows the truck going over the SB limit line. It also still shows trucks using the gravel along SR 120 and along Deer Flat Rd.
- d. All truck turning paths should be at least 2 feet off the edge of pavement.

An Encroachment permit will be needed for any work within the State right of way (ROW).

### **Advance Planning**

Ensure that state highway ROW is not impacted or compromised due to proposed development. Existing boundaries should be reviewed to ensure accuracy of existing ROW. Any potential conflicts or impacts due to proposed development adjacent to SR 120 will require review and possible permits from the district 10 Right of Way Office.

### **System Planning**

It is recommended to evaluate the truck access in the context of constraints along SR 120, particularly the New Priest Grade segment leading to Groveland. Due to geometric limitations and the lack of continuous STAA-designated access, the corridor does not reliably accommodate STAA design vehicles. Any analysis to be completed should be based on California Legal truck configurations as the appropriate design vehicle for this region, unless documentation is provided demonstrates that larger STAA vehicles are both legally permitted and operationally feasible along the corridor. While California Legal truck can access the corridor, operations remain constrained by roadway geometry and the route primarily functions for smaller, more maneuverable truck configurations. The project should ensure that on-site circulation and access improvements are designed to accommodate the selected design vehicle without adverse impacts to Deer Flat Road and SR-120. This includes potential queuing or vehicle encroachment near the state highway intersection.

The Initial Study proposes modifying the site frontage, including slope cut back to improve corner sight distance and the addition of a westbound acceleration lane for SB left-turn movements. These improvements should be evaluated for consistency with Caltrans' traffic operations, safety, and applicable highway design standards, including the potential of a new conflict points or affect mainline operations on SR 120.

The Initial Study should also demonstrate that the proposed improvements will safely accommodate the appropriate design vehicle (California Legal trucks), consistent with the geometric constraints of the SR 120 corridor. Considerations should include whether queuing, turning delays or vehicle encroachment at the Deer Flat Road intersection could extend toward SR 120 and impact through traffic operations. Any

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roadway geometric modifications within or adjacent to the State ROW will require coordination with Caltrans and may be subject to further review to ensure the long-term operational integrity and safety of the state highway system.

While the projected increase in peak-hour queuing at the intersection of Deer Flat Road and SR 120 is modest (approximately 0 to 4 vehicles in the AM peak and 2 vehicles in the PM peak), even small increases in delay and queuing can have meaningful effects in rural corridor conditions. SR 120 serves as a key regional and recreational access route to Yosemite National Park, where traffic demand is highly seasonal and flow conditions are susceptible to localized disruptions. Even with minor increases in queuing, it can contribute to vehicle bunching and intermittent traffic flow, which may affect downstream operations, travel time reliability and driver perceived delay. In this case, it is recommended to evaluate whether the incremental increase in queuing could lead to a cumulative operational impact under peak recreational travel conditions and assess whether mitigation is warranted to maintain corridor performance, intersection efficiency and overall, system sustainability.

### **Environmental**

If any construction related activities will encroach into Caltrans ROW, the project proponent must apply for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will include an analysis of potential impacts to any cultural resources, cultural sites, historic properties, biological resources, hazardous waste locations, scenic highways, and/or other environmental resources within Caltrans ROW, at the project site(s).

If you have any questions or would like to discuss these comments, please contact Yolanda Tello Jackson at (209) 986-9828 or at [yolanda.tello-jackson@dot.ca.gov](mailto:yolanda.tello-jackson@dot.ca.gov) or me at (209) 639-8832 (email: [gregoria.ponce@dot.ca.gov](mailto:gregoria.ponce@dot.ca.gov) )

Sincerely,

*Gregoria Ponce'*

Gregoria Ponce', Chief  
Office of Rural Planning

c: State Clearinghouse  
Roger Root, Interim Director

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bc: Traffic Operations, Sonia Arrellano  
Advance Planning, Charles Carroll  
System Planning, Hedy Mack-Chiu  
Environmental, Elizabeth Hummel