

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



April 29, 2026

11-IMP-86

PM 21.623

270 US HWY 86, LLC Cannabis Storefront facility
Negative Declaration (NEG)/SCH#2026040086

Ms. Rocio Yee
Planner II
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

Dear Ms. Yee:

Thank you for including the California Department of Transportation (Caltrans) in the development review process for the NEG (SCH#2026040086) for the 270 US HWY 86, LLC Cannabis Storefront facility Project located near State Route 86 (SR-86). The mission of Caltrans is to improve lives and communities through transportation. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Planning

Caltrans previously reviewed the October 14, 2025, Request for Review and Comments packet (CUP#25-0008/IS#25-0019) and the applicant's responses (dated February 2, 2026) to our general email comments Caltrans provided on October 30, 2025, regarding CUP25-0008. On January 27, 2026, Caltrans provided a formal comment letter on the October 14, 2025, Request for Review and Comments packet (CUP#25-0008/IS#25-0019). Then on February 12, 2026, Caltrans emailed the County of Imperial (County) letting them know that the applicant is missing the Responses to Comments for the recent Caltrans comment letter, dated January 26, 2026, again providing the formal Caltrans letter from January 26, for reference to the County.

Please be aware that Caltrans' comments have not yet been addressed. Please see attached the Caltrans comment letter dated January 26, 2026, for reference.

Traffic Safety & Operations and Design

It was stated in the Imperial County Fire Department's letter from October 27, 2025, that a Secondary access will be required for the project.

This section of SR-86 needs to follow the access control. It is part of the expressway system. Per the Caltrans Project Development Procedures Manual (PDPM) Chapter 17 Section 2 Article 3 any planned Emergency Access is not allowed.

Chapter 17 – Encroachments and Utilities
Section 2 – Encroachments

Emergency Access from Freeways and Expressways

Caltrans prohibits planned emergency access from adjacent right of way; an encroachment policy exception will not be considered. This policy preserves and protects the access control inherent to the freeway and expressway system. Emergency access must be planned for and provided by local streets or conventional highways outside the access control limits of freeways and expressways.

In responding to emergencies, fire districts, law enforcement agencies, or other emergency functions may cut or otherwise breach access control fences to quickly respond to an emergency. In such cases, they must secure an encroachment permit to replace fencing and restore the State right of way to pre-emergency conditions at their own expense.

The "Exhibit B Site Plan" on page 13 of 39 only shows one driveway proposed. There should be no left turn into or out of the proposed development. It needs to be right in and right out only.

The direction of the vehicles do not meet Caltrans Standards. Per Caltrans HDM Chapter 400: "To accommodate turn movements (e.g., at intersections, driveways, alleys, etc.), the travel way width and intersection design should be such that tracking width and swept width lines for the design vehicle do not cross into any portion of the lane for opposing traffic." The directional lines on the site plan show that vehicles would be crossing the lanes for opposing traffic. The site plan shows the entrance direction arrow in the lane opposite of what is standard. Please see exhibit of site plan on next page. Please correct.



Page 28 of page 39 of the main document of the Negative Declaration identifies "Roadway width will be determined upon further review of the site plan." Please confirm if this is the proposed roadway on the property or referencing to SR-86. Caltrans will have to review any proposed changes to the width of SR-86, which may nor may not be approved.

Traffic Engineering and Analysis

Any objects considered as discretionary fixed objects shall not be placed within 52 feet of the edge of traveled way (ETW).

Utilities

Please clarify if utility and water/sewer connections will be connected to Imperial County and Imperial Irrigation District (IID) Utilities. Please show these connections on the site plans.

Environmental

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 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 wall, highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's Final Environmental Document.

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' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within Caltrans' R/W prior to construction.

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

Ms. Rocio Yee, Planner II
April 29, 2026
Page 5

need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to 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.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

Attachment:

IMP_86_Commercial Cannabis Storefront Caltrans Comment Letter dated January 26, 2026

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
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January 26, 2026

11-IMP-86

PM 21.623

Commercial Cannabis Storefront
CUP#25-0008/Initial Study#25-0019

Ms. Rocio Yee
Planner II
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

Dear Ms. Yee:

Thank you for including the California Department of Transportation (Caltrans) in the development review process for the Conditional Use Permit (CUP#25-0008)/Initial Study (IS#25-0019) for the Commercial Cannabis Storefront Project located near State Route 86 (SR-86). The mission of Caltrans is to improve lives and communities through transportation. 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.

We look forward to working with the Imperial County (County) 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 Analysis

- Please see and address the Caltrans redline comments on the proposed Site Plan (Sheet A102) from the CUP packet (See attachment titled, TEA Review Comments on Site Plan A102.pdf., for further details).
- If a Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) and/or Local Mobility Analysis is completed, please provide a copy for this project.
- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

Planning

On all plans, indicate Caltrans' Right-of-Way (R/W) lines. It's important to clearly delineate Caltrans' R/W limits by calling them out on your plans so we can identify any impacts to Caltrans' State facilities. You can access Caltrans' R/W lines/maps by following the link to the Caltrans public website below.

<https://experience.arcgis.com/experience/04ae3745190047c5adf8f33714af9e3a>

Design

- The driveway connecting to SR-86 should meet Caltrans' current standards and Caltrans' Highway Design Manual (HDM) Section 205.3-Urban Driveways.
- Please show sight distance calculations for both sides of highway as there is a bridge barrier on the right side of the driveway and berm (approximately 1:1 slope) on the left side of the driveway.
- The proposed driveway must be paved.
- Please provide the driveway pavement structural section for review.
- A Truck turning template will be required for the largest vehicle entering and exiting the project site.
- Please refer to standard plan A87A for the curb and driveway for the accessibility design standards.
- Driveway corner radii should be minimized to encourage low speed turns by motorized vehicles and bicycles for pedestrian safety.

Hydrology and Drainage Studies

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.

- Provide a pre- and post-development hydraulics and hydrology study.
- Show drainage configurations and patterns.
- Provide drainage plans and details. How will stormwater be collected from the property?
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- The proposed project features may significantly alter the FEMA defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to the Caltrans State facilities along SR-86. Caltrans requests that the County of Imperial, acting as the Local FEMA Administrator, include Caltrans in reviews of all submittals to the Development Services Department 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 project.
- Per 44 CFR §65.12, Caltrans requests that a formal notification be sent to Caltrans when the County of Imperial approves the permit to alter the floodplain and/or when the developer applies for the Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR).
- On all plans, show Caltrans' R/W.
- 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 Program

The segment of SR-86 adjacent to the project area has been identified as a District 11 Caltrans Active Transportation Plan tier 1 need for bicycle and pedestrian infrastructure. Accordingly, please work with Caltrans District 11 including the Complete Streets Program to explore options for comfortable, convenient, and connected bicycle and pedestrian facilities along this segment of SR-86. At this time, Caltrans recommends that the applicant provide the proposed 10-foot sidewalk along SR-86 as identified in Site Plan (Sheet 5 of 12) submitted with the Conditional Use Permit dated October 14, 2025. Caltrans would like to ensure complete streets connectivity for this project and future developments. The proposed sidewalk improvement of this project supports the complete streets connectivity.

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, 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.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

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 intersections at SR-86 between Brandt Road and New River, 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-86) 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-86.

Environmental

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 Environmental Document 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 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 fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

Right-of-Way

The project's assessor's map and site plan depict Caltrans' R/W differently than the official Caltrans Right of Way Maps (See attachments, LO-73573 and LO-73574). This discrepancy will need to be resolved. Please depict Caltrans' R/W lines correctly on all plans.

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 visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

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need to have documents submitted for Quality Management Assessment Process (QMAP) process via email to 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.

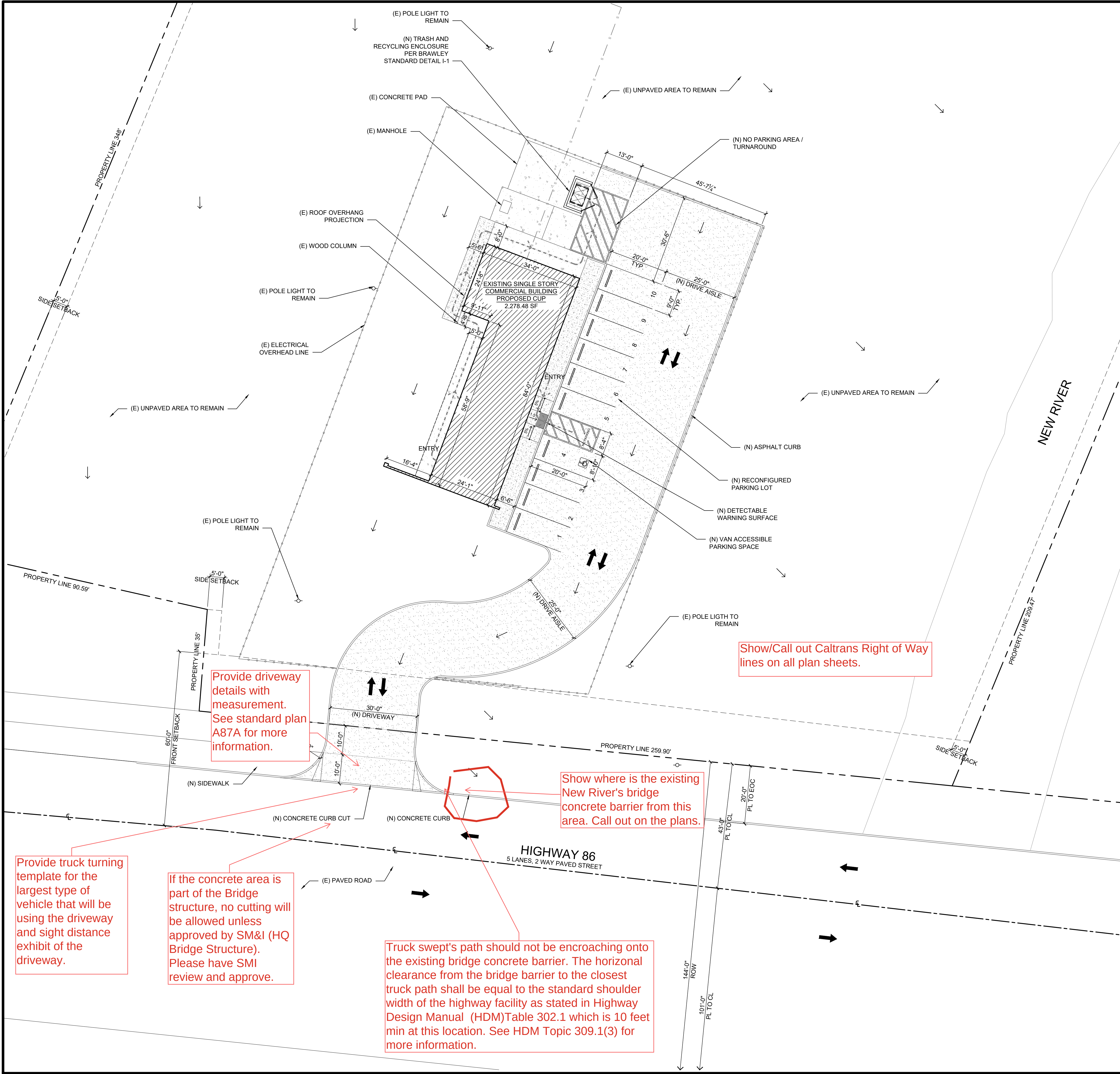
Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

Attachment(s):

1. TEA Review Comments on Site Plan A102.pdf
2. LO-73573.jpg
3. LO-73574.jpg



SITE PLAN LEGEND

- PROPERTY LINE
- OUTLINE OF SCOPE OF WORK
- EXISTING CONCRETE AREA
- PROPOSED ASPHALT AREA
- PROPOSED HARDSCAPE AREA
- PROPOSED FENCE
- PROPOSED VEHICULAR CIRCULATION
- SITE DRAINAGE PATTERN
- ACCESSIBLE PATH

SITE PLAN NOTES

- A. The site plan is for informational and general site reference only.
- B. The existing water and sewer services will remain.

TECHNE

DESIGN | DEVELOPMENT

2934 Lincoln Ave., San Diego, CA 92104
techn-us.com sustainablearchitect.org
619-940-5814 313-595-5814

CONSULTANTS



BRAWLEY CUP
270 US Highway 86,
Brawley, CA 92227

APPLICANT

270 US HWY 86 LLC
270 US Highway 86,
Brawley, CA 92227

Show/Call out Caltrans Right of Way lines on all plan sheets.

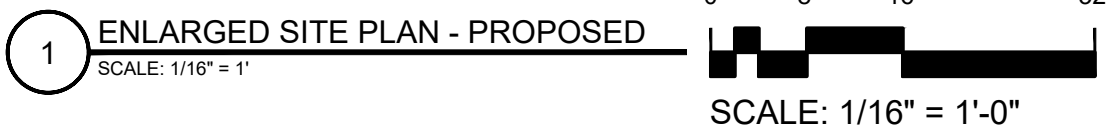
Provide driveway details with measurement. See standard plan A87A for more information.

Show where is the existing New River's bridge concrete barrier from this area. Call out on the plans.

Provide truck turning template for the largest type of vehicle that will be using the driveway and sight distance exhibit of the driveway.

If the concrete area is part of the Bridge structure, no cutting will be allowed unless approved by SM&I (HQ Bridge Structure). Please have SMI review and approve.

Truck swept's path should not be encroaching onto the existing bridge concrete barrier. The horizontal clearance from the bridge barrier to the closest truck path shall be equal to the standard shoulder width of the highway facility as stated in Highway Design Manual (HDM) Table 302.1 which is 10 feet min at this location. See HDM Topic 309.1(3) for more information.



01	05.19.25	1st CUP Submittal
02	06.24.25	1st CUP Resubmittal - Pre-Screen
03	10.09.25	1st CUP Resubmittal - Pre-Screen

MARK	DATE	DESCRIPTION
PROJECT NO:	2512	
CAD DWG FILE:	G001	
DRAWN BY:	A.S., S.V., D.C., J.A., M.D., L.G.	
CHK'D BY:	A.S.	

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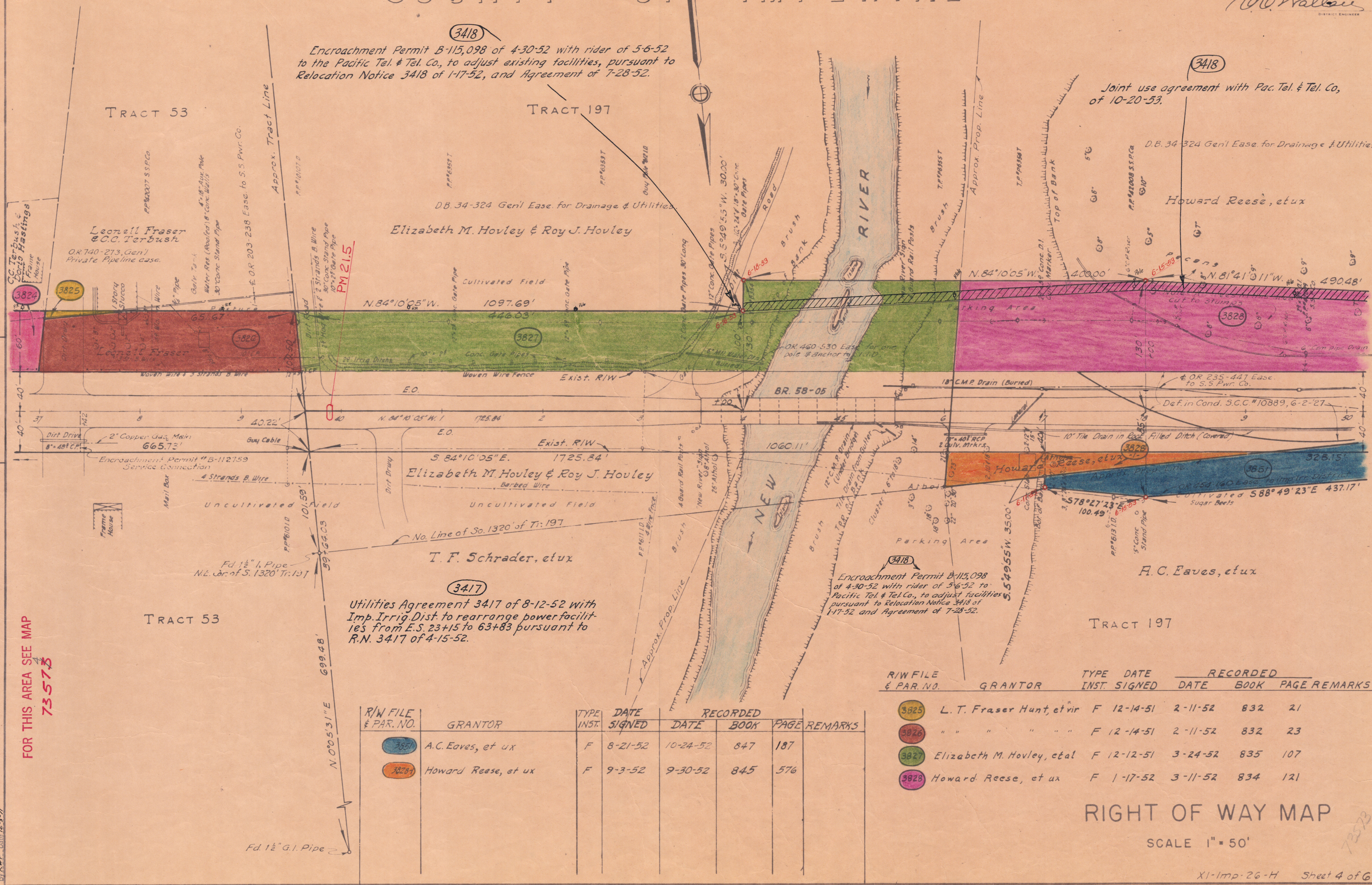
ENLARGED SITE PLAN - PROPOSED

A102

T.13 S., R.14 E., S.3. B. & M.
COUNTY OF IMPERIAL

FOR PREVIOUS R/W INFORMATION
SEE MAP NO. I-065
I-080, I-081

86 PM 215
C. Wallace
DISTRICT ENGINEER



FOR THIS AREA SEE MAP
73573

FOR THIS AREA SEE MAP - 73573

R/W FILE & PAR. NO.	GRANTOR	TYPE INST.	DATE SIGNED	DATE	RECORDED BOOK	PAGE	REMARKS
3825	A.C. Eaves, et ux	F	8-21-52	10-24-52	847	187	
3826	Howard Reese, et ux	F	9-3-52	9-30-52	845	576	

R/W FILE & PAR. NO.	GRANTOR	TYPE INST.	DATE SIGNED	DATE	RECORDED BOOK	PAGE	REMARKS
3825	L. T. Fraser Hunt, et vir	F	12-14-51	2-11-52	832	21	
3826	" " " " "	F	12-14-51	2-11-52	832	23	
3827	Elizabeth M. Hovley, et al	F	12-12-51	3-24-52	835	107	
3828	Howard Reese, et ux	F	1-17-52	3-11-52	834	121	

RIGHT OF WAY MAP

SCALE 1" = 50'

XI-Imp-26-H Sheet 4 of 6

LO-73573 73573

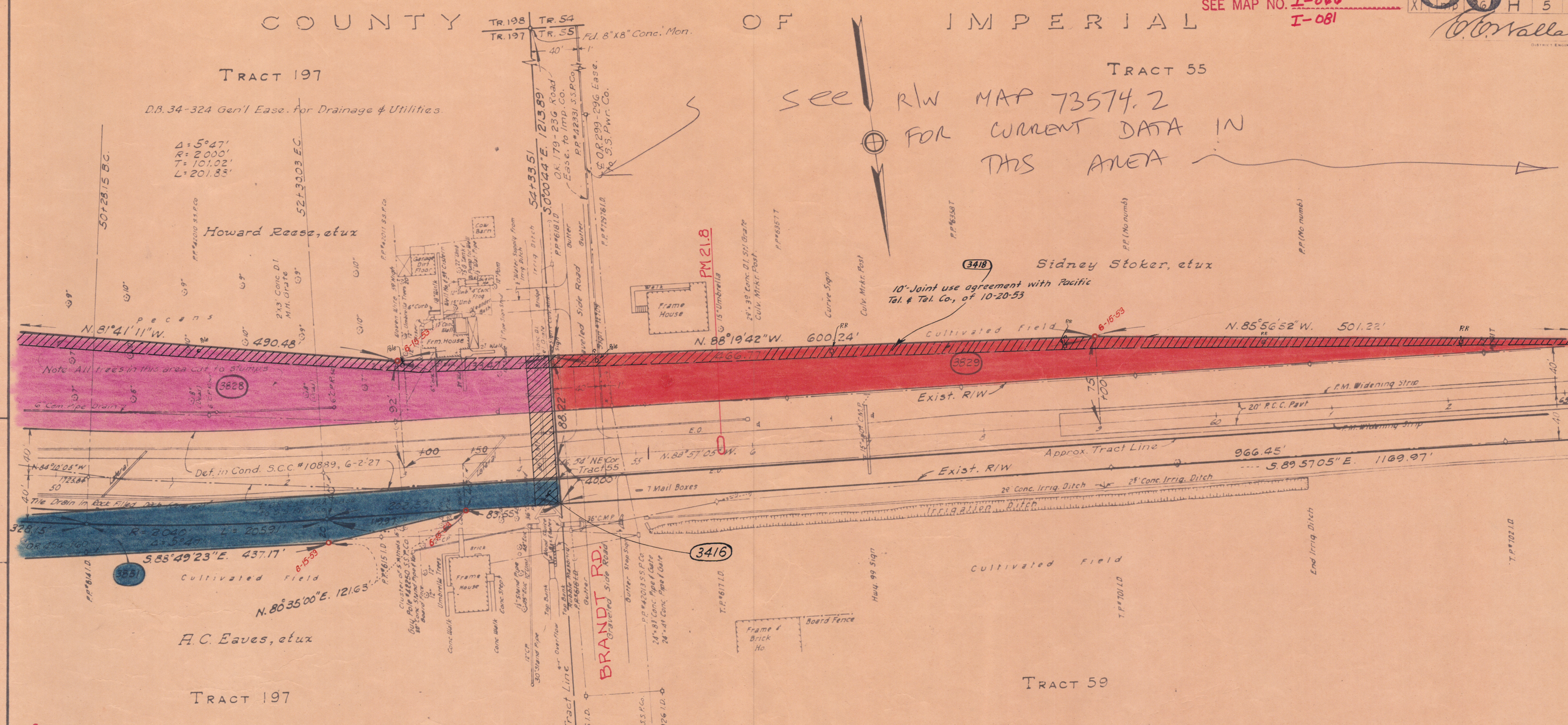
Excess Reviewed
By S.W.F. Date 12-3-71

XI-Imp-26-H 5.4

T.13 S., R.14 E., S.B.B. & M.
COUNTY OF IMPERIAL

FOR PREVIOUS R/W INFORMATION
SEE MAP NO. **I-066**
I-081

86 **Im 218**
C. Wallace
CITY ENGINEER



FOR THIS AREA SEE MAP
73574

3417
Utilities Agreement 3417 of 8-12-52 With
Imp. Irrig. Dist. to rearrange power facilit-
ies from E.S. 23+15 to 63+83 pursuant to R.N.
3417 of 4-15-52.

R/W FILE & PAR. NO.	GRANTOR	TYPE INST.	DATE SIGNED	RECORDED			REMARKS
				DATE	BOOK	PAGE	
3828	Howard Reese, et ux	F	1-17-52	3-11-52	834	121	
3829	Sidney Stoker, et ux	F	12-14-51	2-4-52	831	349	
3831	A.C. Eaves, et ux	F	8-21-52	10-24-52	847	187	
3416	Imperial Irrig. Dist.	Jt. Use Agmt.	1-29-52	Not Recorded			

RIGHT OF WAY MAP

SCALE 1" = 50'

Excess Reviewed
By **FWF** Date **12-3-71**

XI-1mp-26-H 5.4

XI-1mp-26-H Sheet 5 of 6
LO-73575 **73574**

FOR THIS AREA SEE MAP - 73574