

California Department of Transportation

OFFICE OF THE DISTRICT 3 DIRECTOR
703 B STREET | MARYSVILLE, CA 95901-5556
www.dot.ca.gov



January 30, 2026

GTS # 03-COL-2026-00078
SCH # 2026010040

Jesse Cain, City Manager
City of Colusa
425 Webster Street
Colusa, CA 95932

Wastewater Treatment Plant Annexation - Colusa Triple Crown Development

Dear Jesse Cain,

The California Department of Transportation (Caltrans) has been included in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which include addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The Wastewater Treatment Plant Annexation – Colusa Triple Crown Development (Project) proposes an annexation of both city-owned and private property that abut the City of Colusa's Wastewater Treatment Plant (WWTP) and extend to the northeast to City limits and a property exchange between the City and Colusa Crown Cannabis (CTC). In exchange for 83.66 vacant acres on East Clay Street from CTC, the City would convey approximately 88.97 acres of agricultural land east of the WWTP to CTC, which will be used to construct a cannabis operation facility. The City is considering future development of the 83.66 acres on East Clay Street as a regional sports venue with organized play fields and supporting improvements and facilities, but these concepts are not included in this Project and would be subject to future environmental review under CEQA. The Project also includes a General Plan Amendment and Rezone to the properties within the annexation boundaries. Based on the Mitigated Negative Declaration provided, we provide the following comments.

Highway Operations

The analysis of the Traffic Impact Study (TIS) will need to be updated. The volumes used in the Highway Capacity Manual analysis do not match the volumes in the report. Please provide:

- The electronic HCM files for review.
- A queuing table in the report for the intersections studied.
- A signal warrant analysis for the intersections studied.
- The type and size of delivery trucks entering/existing the facility.
- Any work done on the State right of way (ROW) will require an encroachment permit.

Traffic Safety

Please provide a TIS and Intersection Safety and Operational Assessment Process (ISOAP) analysis for the intersection of Will S Green Avenue/State Route 20 (SR 20).

- Please refer to this link for more information about the ISOAP process:
<https://dot.ca.gov/programs/traffic-operations/isoap>

Encroachment Permit

Any project or work, including access modification and drainage work, that takes place along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901
D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Jesse Cain, City Manager
January 30, 2026
Page 3

If you have any question regarding these comments or require additional information, please contact Angelina Healy, Local Development Review Coordinator, by phone (530) 790-8138 or via email at D3.Local.Development@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "David J. Smith". The signature is written in a cursive, flowing style.

David Smith, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

Caltrans District 3 LDR Response - Wastewater Treatment Plant Annexation - 01.30.2026

Final Audit Report

2026-01-30

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"Caltrans District 3 LDR Response - Wastewater Treatment Plant Annexation - 01.30.2026" History

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California Department of Transportation

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February 25, 2026

GTS # 03-COL-2026-00078
SCH # 2026010040

Jake Morley, City Planner
City of Colusa
425 Webster Street
Colusa, CA 95932

Wastewater Treatment Plant Annexation - Colusa Triple Crown Development

Dear Jake Morley,

The California Department of Transportation (Caltrans) has been included in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which include addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The Wastewater Treatment Plant Annexation – Colusa Triple Crown Development (Project) proposes an annexation of both city-owned and private property that abut the City of Colusa's Wastewater Treatment Plant (WWTP) and extend to the northeast to City limits and a property exchange between the City and Colusa Crown Cannabis (CTC). In exchange for 83.66 vacant acres on East Clay Street from CTC, the City would convey approximately 88.97 acres of agricultural land east of the WWTP to CTC, which will be used to construct a cannabis operation facility. The City is considering future development of the 83.66 acres on East Clay Street as a regional sports venue with organized play fields and supporting improvements and facilities, but these concepts are not included in this Project and would be subject to future environmental review under CEQA. The Project also includes a General Plan Amendment and Rezone to the properties within the annexation boundaries. Based on the associated appendixes provided for the previously reviewed Mitigated Negative Declaration, we provide the following comments.

Highway Operations

The Caltrans letter dated January 30, 2026, has the following conditions that still stand.

The analysis of the Traffic Impact Study (TIS) will need to be updated. The volumes used in the Highway Capacity Software (HCS) analysis do not match the volumes in the report. Please provide:

- The electronic HCS files for review.
- A queuing table in the report for the intersections studied.
- A signal warrant analysis for the intersections studied.
- The type and size of delivery trucks entering/existing the facility.

Please also note:

- Any work done on the State right of way (ROW) will require an encroachment permit.
- An ISOAP will be required if there are any changes in geometry or intersection control on State Route 20 (SR 20).
 - Please refer to this link for more information about the ISOAP process:
<https://dot.ca.gov/programs/traffic-operations/isoap>

Encroachment Permit

Any project or work, including access modification and drainage work, that takes place along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901
D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Jake Morley, City Planner
February 25, 2026
Page 3

If you have any question regarding these comments or require additional information, please contact Angelina Healy, Local Development Review Coordinator, by phone (530) 790-8138 or via email at D3.Local.Development@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "David J. Smith". The signature is written in a cursive, flowing style.

David Smith, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3






Caltrans District 3 LDR Response - Wastewater Treatment Plant Annexation - 02.25.2026

Final Audit Report

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March 3, 2026

Jake Morley
City of Colusa
425 Webster Street
Colusa, CA 95932

Response to Caltrans Comments on the Traffic Impact Study for Wastewater Treatment Plant Annexation

Dear Mr. Morley,

This letter provides responses to Caltrans comments on the *Traffic Impact Study for Wastewater Treatment Plant Annexation* (GCW, April 28, 2025) provided on February 25, 2026.

Comment 1: The volumes used in the Highway Capacity Software (HCS) analysis do not match the volumes in the report.

Response 1: The volumes shown in Figure 5 (Baseline Conditions) and Figure 6 (Project Trips) of the traffic study contain misprints. The volumes in the analysis (shown in the level of service calculations sheets in the appendices) are correct. The analysis results are based on the correct volumes and the overall conclusions of the analysis are correct.

Comment 2: Please provide the electronic HCS files for review.

Response 2: The analysis was performed using Synchro software. The Synchro files can be provided for review.

Comment 3: Please provide a queuing table in the report for the intersections studied.

Response 3: Queuing analysis has been performed for the intersections on the State highway (SR 20) for the Future Year and Future Year Plus Project conditions (the highest level of traffic/worst case scenario). The queuing analysis results are shown in Table 1.

Table 1: Queuing Analysis – Future Year Conditions

Intersection	Movement	Storage ¹	Morning				Afternoon			
			Future Year		Future Year Plus Project		Future Year		Future Year Plus Project	
			Avg. (ft)	95 th %ile (ft)	Avg. (ft)	95 th %ile (ft)	Avg. (ft)	95 th %ile (ft)	Avg. (ft)	95 th %ile (ft)
SR 20/Will S Green Ave	NB Approach	490	25	35	25	35	35	90	160	430
	WB Left	280	25	25	30	70	25	60	50	120
SR 20 (10 th St)/Sioc St	WB Approach	340	50	85	60	100	65	115	80	155
	SB Left/Through	280	25	25	25	25	25	60	25	70
SR 20 (Bridge St)/Sioc St	NB Left	175	40	70	60	110	85	155	95	175
	NB Through	320	45	95	50	130	150	280	150	290
	NB Right	175	25	30	25	30	25	85	25	95
	SB Left	95	25	40	25	45	30	85	30	85
	SB Through/Right	250	40	90	45	95	165	295	165	295
	EB Left/Through	325	25	55	25	55	30	80	55	135
	EB Right	75	30	65	30	70	60	105	75	120
	WB Left/Through	125	25	55	25	60	65	125	65	125
	WB Right	125	25	30	25	35	30	75	30	75

Notes: 1. Storage = pocket length or distance to nearest upstream intersection.
 2. Queue lengths are rounded to the nearest 5 feet. Any queues less than 25 feet are rounded up to 25 feet.
Bold text indicates queues that exceed storage.
 Source: GCW, 2026

As shown in the table, the Future Year and Future Year Plus Project queues are not expected to extend beyond the existing storage, except for the southbound through/right-turn lane and eastbound right-turn lane of the SR 20 (Bridge Street)/Sioc Street intersection. The Future Year queues for these movements are expected to exceed existing storage lengths with or without project traffic. The queues are not a result of the proposed project and the project’s incremental contribution is not cumulatively considerable. The southbound through/right-turn queue would not increase with project traffic, and the eastbound right-turn queue would increase by less than 1 vehicle length which can be considered negligible.

Comment 4: Please provide the type and size of delivery trucks entering/existing the facility.

Response 4: The delivery trucks entering/existing the facility are standard trucks that are common on state highways. It is not anticipated that any unique or non-standard trucks will be entering/exiting the facility.

Comment 5: Any work done on the State right of way (ROW) will require an encroachment permit.

Response 5: The project is not proposing or recommending any changes to the State highway system or ROW.

Comment 6: An ISOAP will be required if there are any changes in geometry or intersection controls on State Route 20.

Response 6: The project is not proposing or recommending any changes to the geometry or intersection controls on State Route 20.

Sincerely,
GCW, INC.



Loren Chilson, PE
Principal

California Department of Transportation

OFFICE OF THE DISTRICT 3 DIRECTOR
703 B STREET | MARYSVILLE, CA 95901-5556
www.dot.ca.gov



March 20, 2026

GTS # 03-COL-2026-00083
SCH # 2026010040

Jake Morley, City Planner
City of Colusa
425 Webster Street
Colusa, CA 95932

Wastewater Treatment Plant Annexation - Colusa Triple Crown Development

Dear Jake Morley,

The California Department of Transportation (Caltrans) has been included in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which include addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

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Highway Operations

Please update the traffic volume figures in the report to match the numbers in the analysis.

Please provide a full signal warrant study for the intersections of SR20/Will S. Green and SR20(10th St)/Sioc Street.

This project will increase traffic at the intersection of SR20 and Will S. Green. Please lengthen the westbound left turn lane to meet Caltrans Standards for 50MPH.

Collect fare share fees at the intersections of SR20/Will S. Green and SR20(10th St)/Sioc Street.

Any work done on the State right of way (ROW) will require an encroachment permit.

Encroachment Permit

Any project or work, including access modification and drainage work, that takes place along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901
D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Jake Morley, City Planner
March 20, 2026
Page 3

If you have any question regarding these comments or require additional information, please contact Angelina Healy, Local Development Review Coordinator, by phone (530) 790-8138 or via email at D3.Local.Development@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "David J. Smith". The signature is written in a cursive style with a large, stylized initial "D".

David Smith, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

Caltrans District 3 LDR Response - Wastewater Treatment Plant Annexation - 03.20.2026

Final Audit Report

2026-03-20

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April 13, 2026

Jake Morley
City of Colusa
425 Webster Street
Colusa, CA 95932

Response to Caltrans Comments Dated March 20, 2026 on the Traffic Impact Study for Wastewater Treatment Plant Annexation

Dear Mr. Morley,

This letter provides responses to Caltrans comments dated March 20, 2026 on the *Traffic Impact Study for Wastewater Treatment Plant Annexation* (GCW, April 28, 2025).

Comment 1: Please update traffic volume figures in the report to match the numbers in the analysis.

Response 1: The volumes on Figure 5 (Baseline Conditions) and Figure 6 (Project Trips) have been updated to match the analysis and are provided in Attachment A of this letter. The analysis results provided in the Traffic Impact Study are based on the correct volumes and the overall conclusions of the analysis are correct.

Comment 2: Please provide a full signal warrant study for the intersections of SR 20/Will S. Green and SR 20 (10th Street)/Sioc Street.

Response 2: The Traffic Impact Study does not recommend traffic signals at the SR 20/Will S. Green Avenue or SR 20 (10th Street)/Sioc Street intersections.

The SR 20/Will S. Green Avenue intersection is expected to operate at LOS D or better (within policy level of service thresholds) under all scenarios with side street stop control. A traffic signal is not needed for operations purposes. Additionally, a preliminary investigation of signal warrant criteria shows that a signal is clearly not warranted based on the traffic volumes analyzed in this study.

A preliminary investigation of signal warrant criteria shows that a signal is clearly not warranted at the SR 20 (10th Street)/Sioc Street intersection based on Baseline Plus Project traffic volumes and likely not warranted based on Future Year Plus Project traffic volumes. The difference between the Baseline Plus Project and Future Year Plus Project traffic volumes is background traffic growth unrelated to the project. If signal warrant criteria is met in the Future Year, it would not be a result of the project volumes. Any potential future signalization needs would be due to background traffic growth and not the responsibility

of the project to implement. Further analysis is not justified since the project would not cause a need for signals.

Comment 3: This project will increase traffic at the intersection of SR 20 and Will S. Green. Please lengthen the westbound left turn lane to meet Caltrans standards for 50 mph.

Response 3: As shown in Table 1, the westbound left-turn queues under Future Year Plus Project conditions (worst case scenario) are not expected to occupy even half of the existing pocket length. The westbound left-turn movement is also expected to operate at LOS A under Future Year Plus Project conditions. It is not the responsibility of the project to improve existing conditions when the project does not create impacts and mitigations are not justified.

Table 1: Queuing Analysis – Future Year Plus Project Conditions

Intersection	Movement	Storage ¹	Queue Lengths			
			Morning		Afternoon	
			Avg. (ft)	95 th %ile (ft)	Avg. (ft)	95 th %ile (ft)
SR 20/Will S. Green Ave	NB Approach	490	25	35	160	430
	WB Left	280	30	70	50	120

Notes: 1. Storage = pocket length or distance to nearest upstream intersection.
 2. Queue lengths are rounded to the nearest 5 feet. Any queues less than 25 feet are rounded up to 25 feet.
 Source: GCW, 2026

Comment 4: Collect fare share fees at the intersections of SR 20/Will S. Green and SR 20 (10th Street)/Sioc Street.

Response 4: Improvements/mitigations are not recommended or justified at the SR 20/Will S. Green and SR 20 (10th Street)/Sioc Street intersections, therefore fare share fees are not applicable to these locations.

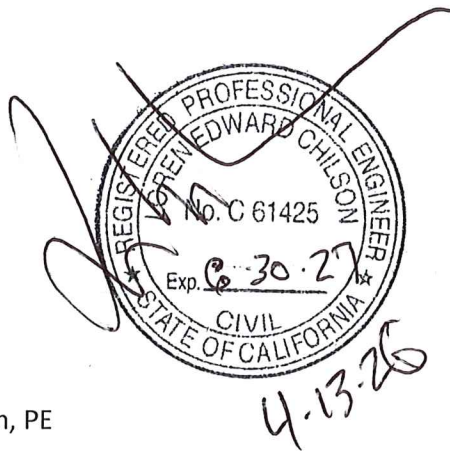
Comment 5: Any work done on the State right of way (ROW) will require an encroachment permit.

Response 5: The project is not proposing or recommending any changes to the State highway system or ROW, nor seeking any permit from Caltrans.

Comment 6: Any project or work, including access modification and drainage work, that takes place along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices.

Response 6: The project is not proposing or recommending any changes that require an encroachment permit issued by Caltrans.

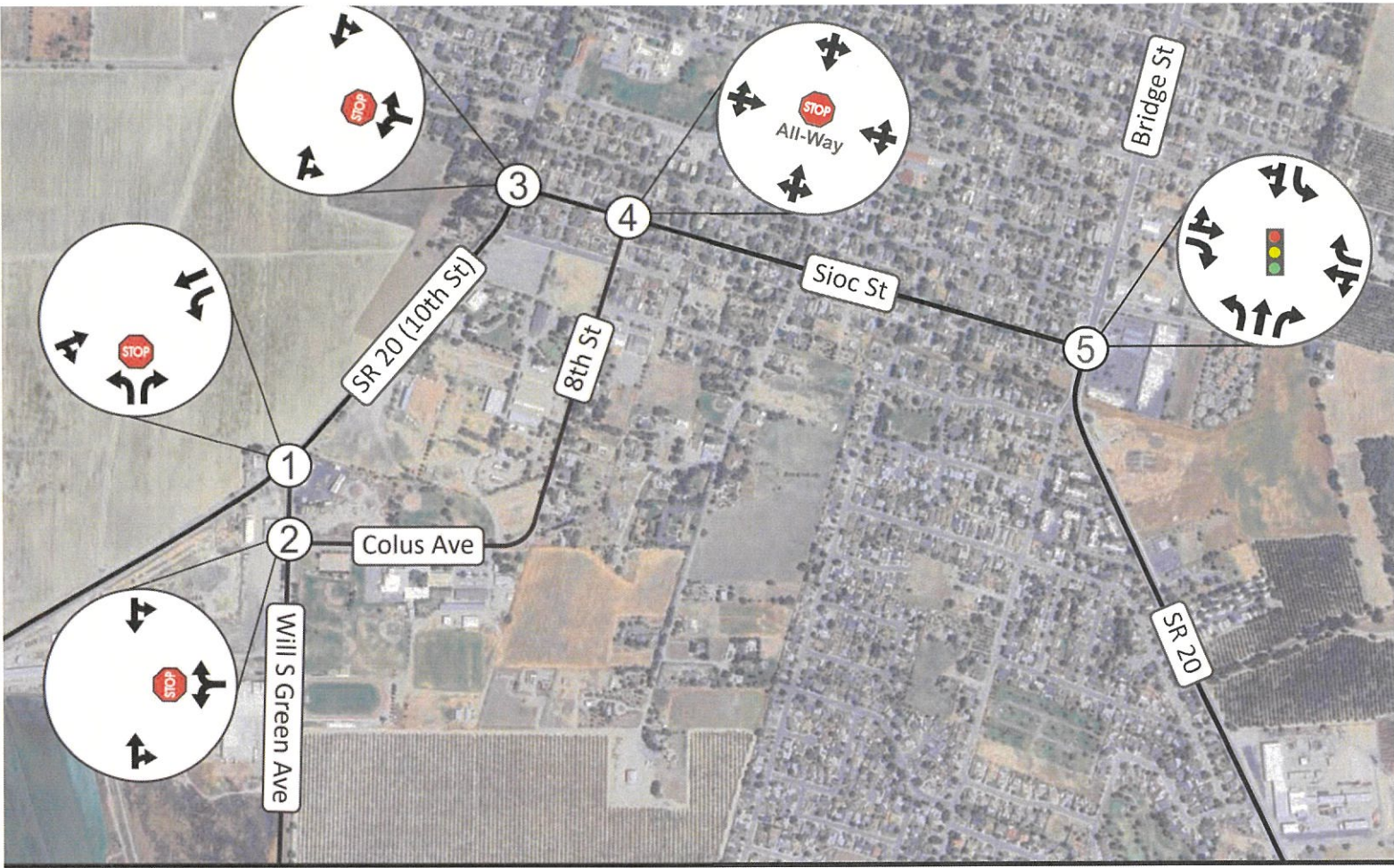
Sincerely,
GCW, INC.



Loren Chilson, PE
Principal

Attachment A:

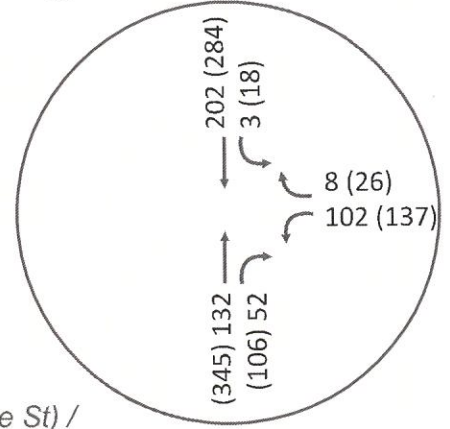
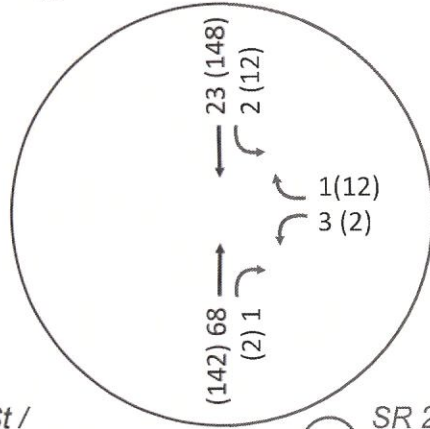
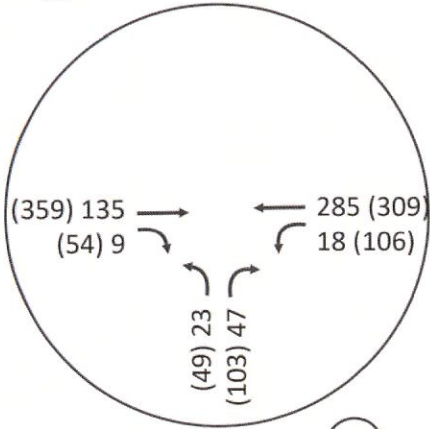
- Figure 5 – Baseline Traffic Volumes, Lane Configurations, and Controls
- Figure 6 – Project Trip Distribution and Assignment



① SR 20 / Will S Green Ave

② Will S Green Ave / Colus Ave

③ SR 20 (10th St) / Sioc St



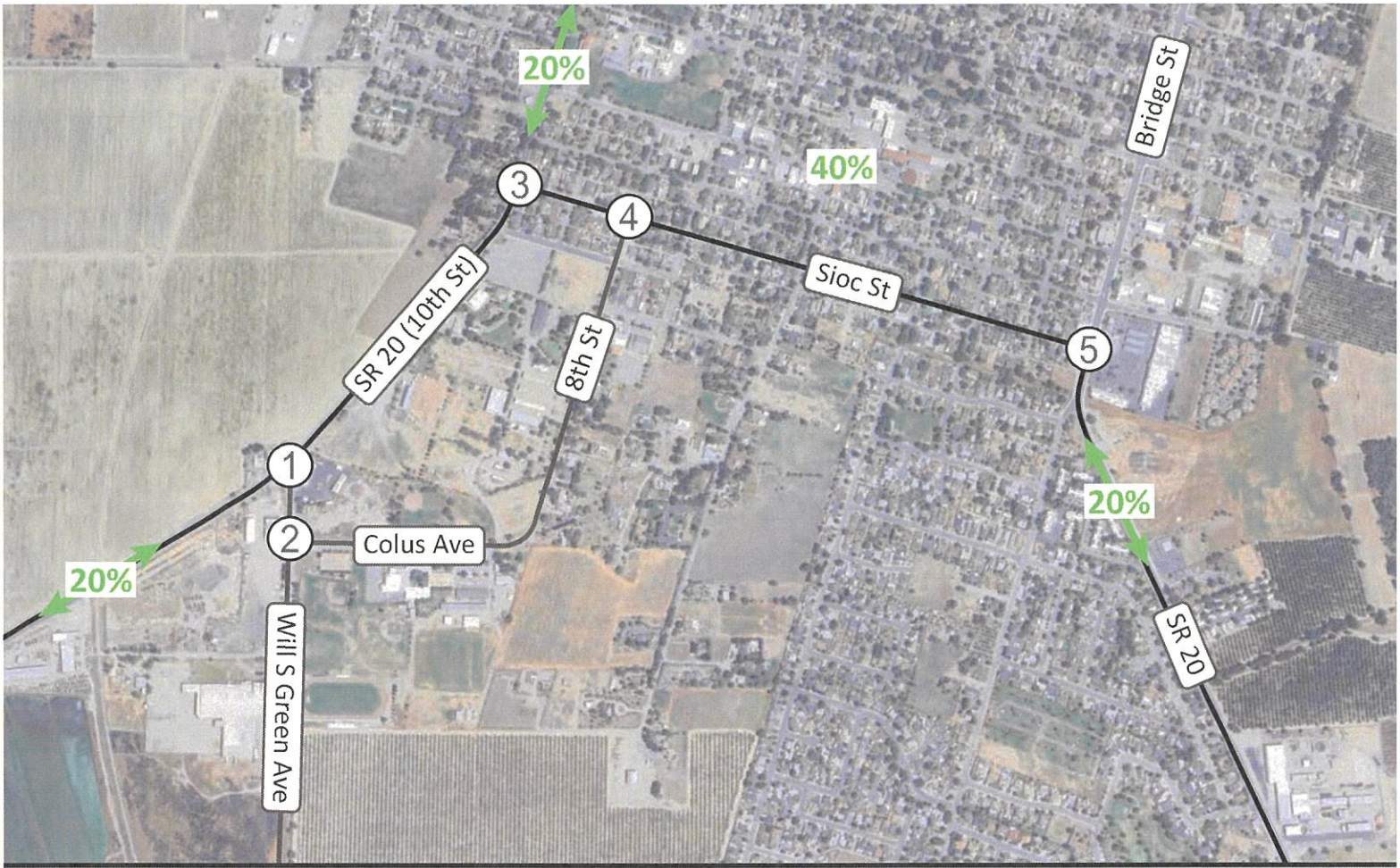
④ Sioc St / 8th St

⑤ SR 20 (Bridge St) / Sioc St

AM Peak Hour Volume (PM Peak Hour Volume)
 # - Study Intersection

Figure
 Wastewater Treatment Plant Annexal
 Traffic Impact St

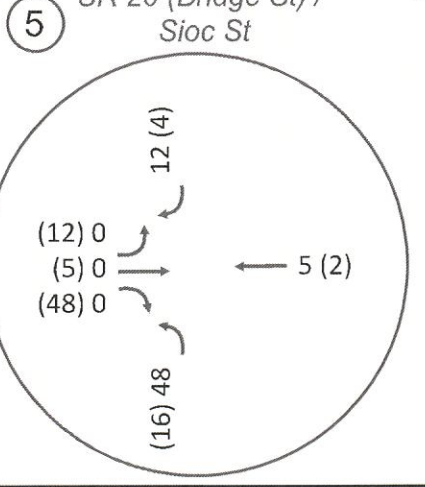
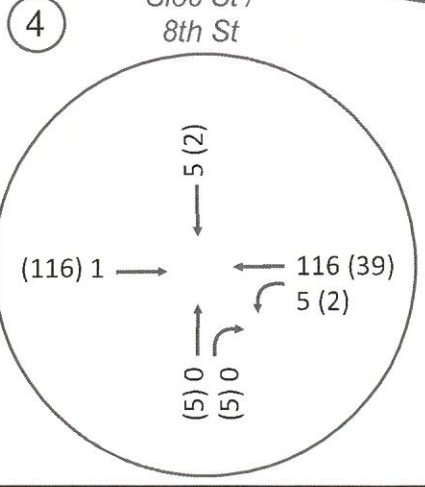
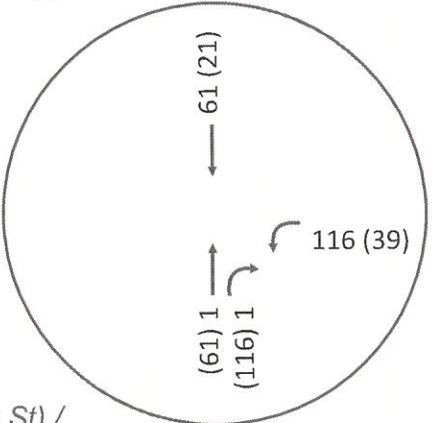
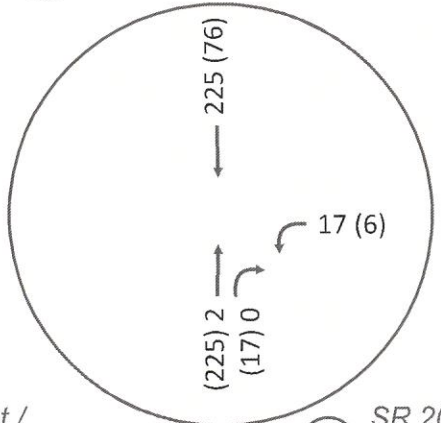
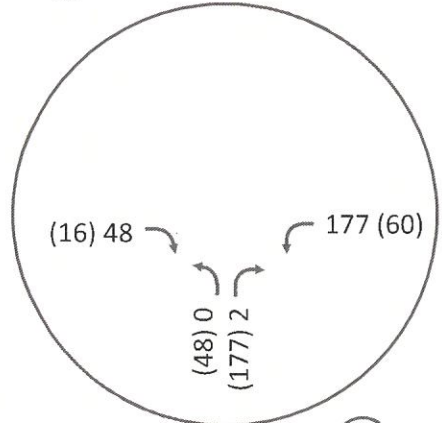




① SR 20 / Will S Green Ave

② Will S Green Ave / Colus Ave

③ SR 20 (10th St) / Sioc St



AM Peak Hour Volume (PM Peak Hour Volume)
 # - Study Intersection $\leftarrow XX\% \rightarrow$ - Trip Distribution

Figure
 Wastewater Treatment Plant Annexal
 Traffic Impact Study