

California Department of Transportation

DISTRICT 11
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August 8, 2025

11-IMP-78
PM 3.467
Seville 5 Solar Project
MND/SCH#2025070239

Mr. David Black
Planner IV
Imperial County
Planning and Development Services
801 Main Street
El Centro, CA 92243

Dear Mr. Black:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) on the Seville 4 Solar Plant near State Route 78 (SR-78) in Imperial County. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. 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 Imperial 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.

Traffic Engineering and Analysis

- Please provide visual simulations for OP 11, since KOP 1 (which is OP 1) is located too far west to adequately represent the eastbound view.
- Exhibit A “Visual Assessment and Glare” – Section 6.1.6 “Glare Effects Recommendations”: Confirm the mitigation measures outlined in this section that will be implemented to prevent glare from the project affecting traffic in both directions on SR-78.”

Hydrology and Drainage Studies

- The proposed project features may significantly alter the Federal Emergency Management Agency (FEMA) defined Floodplain and associated water surface elevations through the project area and have potential adverse impacts to State Route 78 (SR-78) facilities. Caltrans requests that Imperial County, 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 CLOMR and Letter of Map Revision (LOMR).

Caltrans provided the following comments in January 2025, and they have not yet been addressed.

- Please provide a pre- and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Please provide drainage plans and details. Include detention basin details of inlets/outlet.
- Please provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' Right of Way (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.

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. Please indicate our status as a Responsible Agency for the Final Environmental Document. 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 that include the work in Caltrans' R/W, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the 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 Final Document.

Hauling

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: <http://www.dot.ca.gov/trafficops/permits/index.html>

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' 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.

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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

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 Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review