

## 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](http://www.dot.ca.gov)



October 21, 2025

11-IMP-115  
PM 9.97

Omega Harvested Metallurgical  
NEG/SCH#2025090816

Mr. Luis Bejarano  
Planner II  
Imperial County  
Planning & Development Services  
801 Main Street  
El Centro, CA 92243

Dear Mr. Bejarano:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Negative Declaration (NEG) for the Omega Harvested Metallurgical located near State Route 115 (SR-115). 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.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the 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.

Caltrans has the following comments:

### **Freight Planning**

#### Compliance with State and Federal Regulations

- **Hazardous Materials Transportation Laws:** Ensure all transportation adheres to the U.S. Department of Transportation (DOT) regulations, particularly the Hazardous Materials Regulations (HMR) under Title 49 CFR.
- **California State Regulations:** Comply with California Code of Regulations (CCR), Title 22 for hazardous waste transport and handling, and California Vehicle Code regarding hazardous material transport.
- **Hazardous Waste Manifest:** Maintain a proper Uniform Hazardous Waste Manifest for each shipment, documenting generator, transporter, and receiver details.

#### Coordination with State and Local Agencies

- Notify and coordinate with Caltrans and California Highway Patrol (CHP) regarding the routes and schedules for transporting hazardous materials on state highways.
- Coordinate with the County Environmental Health Department and local emergency responders to ensure readiness for potential incidents.

#### Transportation Route Planning

- **Preferred Routes:** Use state-designated hazardous materials routes to minimize risk and avoid heavily populated or environmentally sensitive areas.
- **Route Restrictions:** Confirm any restrictions on truck sizes, weights, or timing (e.g., avoiding peak traffic hours).
- **Emergency Access:** Ensure transportation routes allow for quick emergency response in case of an incident.

#### Vehicle and Driver Requirements

- Use vehicles specifically designed and certified for hazardous waste transport, including appropriate placards and containment measures. Drivers must have Hazardous Materials Endorsements (HME) on their Commercial Driver's Licenses (CDLs).
- Conduct regular vehicle inspections and maintenance per DOT regulations.

#### Safety and Risk Management

- **Battery Neutralization Confirmation:** Ensure all lithium batteries are fully discharged and neutralized before transport, as described by the applicant's process.
- Develop and implement spill prevention, control, and countermeasure (SPCC) plans.
- Establish emergency response procedures, including immediate notification protocols for spills, accidents, or exposures.
- Train all personnel involved in handling and transporting hazardous materials on safety protocols and emergency response.

#### Limitations on Quantity and Frequency

- Follow the applicant's schedule limits to reduce risk.
- Monitor and document daily weights and volumes transported (40,000 to 120,000 lbs.), ensuring compliance with any permit or regulatory thresholds.

#### Documentation and Recordkeeping

- Maintain detailed logs of all shipments, including weight, origin, destination, driver info, vehicle details, and manifests.
- Keep records accessible for inspections by regulatory agencies.
- Ensure chain-of-custody is clearly documented from the Los Angeles County facility or OEMs through delivery and export.

#### Community and Environmental Consideration

- Inform local communities about transportation schedules and safety measures.
- Implement noise and traffic mitigation plans to minimize local impact.
- Ensure that state facility infrastructure (roadways, bridges) can safely support the weight and volume of hazardous material transport vehicles.

### **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.

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 Environmental 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: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>

**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.

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](mailto: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 Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to [shannon.aston@dot.ca.gov](mailto:shannon.aston@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review