

California Department of Transportation

DISTRICT 11
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www.dot.ca.gov



May 4, 2026

11-IMP-78

PM 29.00

NorthStar 2 Solar and Battery Storage Project
MND/SCH# 2026040229

Mr. Luis Bejarano
Planner II
Imperial County Planning and 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 Mitigated Negative Declaration (MND) for the NorthStar 2 Solar and Battery Storage Project located adjacent to State Route 78 (SR-78), Ben Hulse Highway near Brawley 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.

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:

Traffic Engineering and Analysis

- Section XVII, Transportation Impact Analysis, mentions that there will be truck trips associated with the project. Please provide information on the number of truck trips and regular vehicle trips during and after construction. If there are impacts during and after construction, propose appropriate mitigation measures.
- If a Vehicle Miles of Travel (VMT) is not required, please provide the formal justification that was submitted to the lead agency.
- If the proposed project ingress and egress are from SR-78, provide preliminary drawings for the proposed driveway connection to SR-78. The driveway design shall comply with the latest Caltrans standards during the design phase.
- A sight-distance analysis may be required for driveway installations on the State Highway System. Refer to the Encroachment Permit Manual, Appendix J "Road Connections and Driveways"/ "Design Guidelines for Typical Rural Driveways in State Right of Way" for additional information. The Appendix J may be downloaded at the below link:
 - [Encroachment Permits Manual | Caltrans](#)
 - [appendix-j-ada-a11y.pdf](#)
- For the Northstar 2 Solar and Battery Storage project please reference the Caltrans "Local Development Review (LDR) Safety Review Practitioner's Guidance" <https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf> to determine if the project meets both of the screening criteria. If both screening criteria are not met, then a safety review will be needed.

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. Include detention basin details of inlets/outlet.

- 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.

Design

There is a planned Fiber Optic installation passing through the project site footprint. The fiber optic installation runs on SR-78 from PM R9.2 to PM 80.8. Future coordination is recommended for any planned improvements to the SR-78 corridor.

Utilities

There is a long-distance AT&T line underground. It appears to be on north side closer to Imperial Irrigation District (IID) aqueduct. Page 481 for example notes the electric line will head west through the Bureau of Land Management (BLM) lands and ties into existing structure. Please clarify if this is the existing IID structure to west of IID aqueduct.

Traffic Management Plan/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>

A Traffic Management Plan for construction trips is to be submitted to Caltrans District 11, 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-78) 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, the Department of Transportation (Caltrans) is not responsible

for existing or future traffic noise impacts associated with the existing configuration of SR-78.

Glare

The proximity of the project site to SR-78 raises some concerns regarding potential glare that could pose a potential risk to motorists traveling on SR-78. The project's potential glare characteristics should be considered as part of the County's Permit approval. Caltrans would want to ensure that all lighting, including reflected sunlight and reflected night lighting, within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on SR-78.

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 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 (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in the analysis for any work identified in Caltrans R/W and any additional mitigation measures identified for the 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.

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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. 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