California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8370
www.dot.ca.gov

June 26, 2026

GTS# 03-SAC-2026-02632
SCH#2026051027

Jerry Park, Environmental Management Specialist
Sacramento Municipal Utility District (SMUD)
Environmental Services Department
6201 S Street, MS B209
Sacramento, CA 95817

Twin Cities Solar and Battery Energy Storage System

Dear Jerry Park,

Thank you for including the California Department of Transportation (Caltrans) 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 includes 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 Twin Cities Solar and Battery Energy Storage System (BESS) Project (Project) proposes the construction and operation of a photovoltaic (PV) solar power and battery storage facility and interconnection facilities including a generation substation and interconnection tie-lines that would interconnect into the Rancho Seco Switchyard via a new 230 kilovolt (kV) interconnection line. The Project would provide new power production capacity of up to 275 megawatt (MW) and allow storage of 275 MW at the BESS facility, which would be delivered at the point of interconnection with the electrical grid managed by SMUD. The solar panels and associated infrastructure would be located on approximately 1,328 acres of land within the 1,697-acre project site. The Rancho Seco Switchyard would be modified to accept the new interconnection. The Project is located along State Route (SR) 104 in unincorporated southeastern Sacramento County, east of the community of Herald. The northern portion of the Project is bordered by Twin Cities Rd to the south and farmland and farm roads to the west, north, and east; the western portion of the project area is bordered by Clay East Road to the south, Twin Cities Road to the northwest, and the decommissioned Rancho Seco nuclear Generating Station to the east. Based on the

Notice of Preparation of an Environmental Impact Report (NOP EIR) provided, we provide the following comments.

Freeway Operations

The applicant has acknowledged that operational evaluation (existing and proposed peak hour volumes), Annual Average Daily Traffic (AADT) will be obtained for potentially impacted corridors, intersections, and potential access locations to be determined and ultimately permitted on SR 104 (Twin Cities Road). Caltrans emphasizes the need to avoid curved geometry for construction access, keeping within tangent highway sections, and avoiding use of existing and creation of new skewed or acute angle geometry that can affect safety and operations. It should be noted the Caltrans does not have current peak hour count data in the general area.

Forecasting & Modeling

The Project area is currently designated as "General Agricultural" land in the General Plan, even though the Project entails photovoltaic solar panels, battery equipment, and other utilities. Please amend the General Plan so that the Project is consistent with it and share the draft EIR when it is ready.

Right of Way Engineering

Planned improvements abut State conventional right of way (ROW). Plans will need to show and label Caltrans ROW, Centerline, and widths with bearings and distances.

Applicants, or their representatives, may also need to identify any possible vulnerable survey monuments in the development area that will need to be preserved and/or perpetuated, as required by PE Act 6731.2 and PLS Act 8771.

Right of Way Engineering advises the applicant to seek ROW Record and Monument Maps from the District 3 ROW Front Map Counter by contacting: d3rwmaprequest@dot.ca.gov.

Hydraulics

The development of this site will increase the impervious surface area by constructing roads, driveways, parking lots, buildings, etc., with a corresponding increase in surface water runoff. This project will decrease surface water detention, retention, and infiltration. No net increase to 100-year storm event peak discharge may be realized within the State's highway ROW and/or Caltrans drainage facilities because of the project. Any cumulative impacts to Caltrans drainage facilities arising from the effects

of development on surface water runoff discharge from the 100-year storm event should be minimized through project drainage mitigation measures.

Increases in peak runoff discharge for the 100-year storm event to the State highway ROW and Caltrans' highway drainage facilities must be reduced to at or below the pre-construction levels. The cumulative effects on drainage due to deployment within the region should be considered in the overall development plan of this area.

All grading and/or drainage improvements must maintain or improve existing drainage pathways and may not result in adverse hydrologic or hydraulic conditions within the State's highway ROW or to Caltrans drainage facilities. The developer must maintain or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished by implementing stormwater management Best Management Practices (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.). Once installed, the property owner must adequately maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.

Runoff from the proposed project that will enter the State's highway ROW and/or Caltrans drainage facilities must meet all regional water quality control board water quality standards before entering the State's highway ROW or Caltrans drainage facilities. Appropriate stormwater quality Best Management Practices may ensure that runoff from the site meets these standards (i.e., it is free of oils, greases, metals, sand, sediment, etc.). Once installed, the property owner must adequately maintain these systems in perpetuity.

All work proposed and performed within the State's highway ROW must be per Caltrans' standards and require a Caltrans Encroachment Permit before commencing construction.

For the Encroachment Permit application, provide drainage plans and calculations for the pre- and post-100-year peak run-off (quantities and velocities) and water quality treatment for all discharges to the State's highway right-of-way and Caltrans' highway drainage facilities.

Encroachment Permit

Access onto the highways will require an encroachment permit. Applicants traffic study should provide a recommendation on access needs for construction and future operational and maintenance work. The traffic study should also address any

widening, turn lanes, any emergency vehicle access for the development of the project sites.

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.

If you have any questions regarding these comments or require additional information, please contact Robynn Spence, Local Development Review Coordinator, by phone at (530) 812-6874 or via email at D3.local.development@dot.ca.gov.

Sincerely,

David J. Smith

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

Caltrans Comment Letter - Twin Cities Solar and Battery Energy Storage System

Final Audit Report 2026-06-26

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