

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



July 8, 2026

11-IMP-78

PM 5.770

Titan II Battery Energy Storage System and
Imperial Irrigation District R-Line Upgrades Project
NOP/Initial Study/SCH#2026060150

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 Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Titan II Battery Energy Storage System and Imperial Irrigation District (IDD) R-Line Upgrades Project located 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 the County of Imperial 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:

Future proposed access from SR-78 would need to be reviewed and approved by Caltrans.

Connecting a new public road or private road to a state highway and/or changing the type of traffic control requires the Caltrans Intersection Safety and Operational Assessment Policy (ISOAP) analysis.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Safety and Operational Assessment Policy (ISOAP). Alternative intersection design(s) will need to be considered in accordance with the ISOAP policy. Please refer to the policy for more information and requirements (<https://dot.ca.gov/programs/traffic-operations/isoap>).

For the Titan II Battery Energy Storage System and IID R-Line Upgrades 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-all.pdf> to determine if the project meets both of the screening criteria.

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>.

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.

Environmental

For potential subsequent approvals, such as encroachment permits, should they be necessary, this project must specifically identify and assess potential impacts caused by the project and/or impacts from mitigation efforts that occur within, or indirectly affects, Caltrans Right-of-Way (R/W). That includes, but is not limited to, 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 within upcoming environmental documents.

The following is a list of typically impacted categories on Caltrans' facilities. Should there be any potential impact to Caltrans' facilities from this project we recommend that they be addressed as appropriate within the upcoming DEIR:

- Noise
- Air Quality
- Hazardous Materials
- Community Impacts
- Visual/Aesthetic Impacts (including any removal of vegetation or trees)
- Biological Resources
- Cultural Resources
- Water Quality
- Agricultural/Farmland Impacts
- Traffic/Circulation

Additionally, please consider the following:

1. Caltrans recommends the replacement poles be made of weathered steel (not galvanized steel) to lower visual impacts below significance. Justification: Weathered steel has a dull brown color like the existing wood poles.
2. IID R-Line Upgrades – Please consider changing the pole description as shown below: The project would replace the existing transmission line wooden power poles with galvanized weathered steel monopoles.
3. Titan II BESS -Please describe the exterior color, finish and materials for the dedicated building walls and roof and how the building aesthetics (color, finish, materials) will blend with the desert environment. Security – Please describe how fencing will include tan-colored slats to screen the facility.
4. Caltrans recommends the number and location of replacement poles be very similar to the number and location of existing poles to lower visual impacts below significance.
5. The R-Line upgrade component involves replacing the existing 50- to 80-foot wooden transmission poles with new steel monopoles, which will generate treated wood waste subject to specific handling and disposal requirements under applicable hazardous materials regulations. Construction activities

associated with pole removal, installation of drilled foundations, and equipment staging may disturb soil. Because shallow soils along state highways may contain Aerially Deposited Lead (ADL), the applicant should evaluate this potential and ensure that all ground-disturbing work incorporates proper ADL screening, handling, and disposal procedures consistent with Caltrans hazardous materials protocols. The project is located within the Salton Sea Air Basin; therefore, air quality controls consistent with local regulatory requirements such as fugitive dust suppression, diesel emission minimization, and construction-phase best management practices should be incorporated into the project's environmental documentation.

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. 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