DOCKETED	
Docket Number:	24-OPT-02
Project Title:	Compass Energy Storage Project
TN #:	268023
Document Title:	Orange County Transportation Authority Comments - OCTA Comment Letter December 2025 Part One
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Organization:	Orange County Transportation Authority
Submitter Role:	Public
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Docketed Date:	12/22/2025

Comment Received From: Orange County Transportation Authority
Submitted On: 12/22/2025
Docket Number: 24-OPT-02

OCTA Comment Letter December 2025 Part One

Additional submitted attachment is included below.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

December 22, 2025

Ms. Renee Longman
California Energy Commission
715 P Street
Sacramento, CA 95814

Via: California Energy Commission : e-comment : Submit Comment

Subject: **Compass Energy Storage Project – San Juan Capistrano - Docket Number 24-OPT-02**

Dear Ms. Longman:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to comment on the Compass Energy Storage Project in the City of San Juan Capistrano (City). OCTA is the owner of the railroad right-of-way (ROW) located immediately adjacent east of the project site. Sole access to the site is through the geometrically constrained Rancho Capistrano public railroad crossing. The railroad ROW is active as passenger rail service (Southern California Regional Rail Authority [SCRRA] and Amtrak Pacific Surfliner) with 38 trains per day operating at a speed limit of 90 miles per hour and freight operators (BNSF Railway Company) up to four trains per day with a speed limit of 55 miles per hour, utilize this railroad line. We have been informed that both SCRRA and Amtrack have filed comment letters with the California Energy Commission (CEC) regarding this project.

OCTA submitted comments in October 2024 and in May 2025 noting concern about the Compass Energy Storage Project due to erosion along Oso Creek and associated risks to the active railroad ROW. As noted in both letters, significant creekbank instability and erosion adjacent to the rail corridor remain an unresolved issue. The City and County review and approvals of the Creek Rehabilitation Plan should directly address OCTA's concerns regarding erosion and channel stability affecting the railroad ROW and be cognizant of the San Diego Regional Water Quality Control Board's independent jurisdiction over waste discharge requirements and Clean Water Act 401 certification. Please consider our comments below in addition to our previously issued comments:

- The Rancho Capistrano crossing provides the sole vehicular access to the project area. Construction, delivery, and large maintenance vehicles may not be able to safely maneuver through this constrained crossing.
- The City retains an easement extending to the west side of the circular planter. The approved California Public Utility Commission (CPUC) plans and OCTA-issued crossing license include a raised median extending to this location to prohibit left turns onto the channel road.
- Right turns by trucks exiting the channel road could cause vehicles to swing wide and momentarily occupy the opposing travel lane and potentially become stuck between the median, creating a dangerous condition that may block the rail line.
- Left-turning trucks into the channel road may queue or stall, causing traffic to back up onto the railroad crossing.

Given the above operational and safety considerations, OCTA recommends that the City determine whether additional CPUC or SCRRA diagnostic review is warranted before allowing construction and maintenance vehicle or equipment access over the crossing.

The following should also be considered:

- The developer may need to obtain electrical utility easement adjustments for the feeder tie-in located on OCTA property. Please coordinate as appropriate with OCTA's Real Property Department.
- SCRRA may need to review and approve the feeder electrical work plan due to its proximity to the tracks and potential operational implications. Please coordinate with SCRRA.
- All access, construction activity, and utility work within or adjacent to the railroad ROW should be coordinated directly with OCTA and comply with all applicable SCRRA standards. Reference documents have previously been provided, including the CPUC approval, crossing maintenance agreement, and additional exhibits. All documents remain applicable to this project and its potential effects on the rail corridor.

Thank you for the opportunity to review this document. Should you have any questions or comments, please contact me at (714) 560-5907 or dphu@octa.net

Sincerely,

Dan Phu
Director, Transportation Planning and Analysis

DP:tc
Attachment

ATTACHMENT

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

October 17, 2024

Ms. Renee Longman
California Energy Commission
715 P Street
Sacramento, CA 95814

Via: efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-OPT-02

Subject: Compass Energy Storage Project – San Juan Capistrano - Docket Number 24-OPT-02

Dear Ms. Longman:

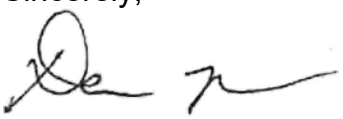
The Orange County Transportation Authority (OCTA) appreciates the opportunity to comment on the Compass Energy Storage Project in the City of San Juan Capistrano, Orange County. OCTA is the owner of the railroad right-of-way located adjacent to the east of the project site. Sole access to the site is through the geometrically constrained Rancho Capistrano public railroad crossing. The railroad right-of-way is active as passenger rail service (the Southern California Regional Rail Authority and Amtrak Pacific Surfliner) and freight operators (BNSF Railway) utilize this railroad line throughout the day. OCTA would like to share concerns about the design and siting of the facility in proximity to Oso Creek drainage course and highlight risks that this facility may pose to the railroad right-of-way.

The planned location of this project is immediately adjacent to an unimproved area of Oso Creek that is experiencing high velocity/volume flows. Recently, this has led to severe erosion on the Saddleback Church property, which is located immediately adjacent and to the north of the proposed project site. Attachment A is a February 2021 presentation prepared by Orange County Public Works which highlights the Oso Creek hydraulic issues. On page 17 of the presentation, Location #1 is just to the south of the existing concrete lined portion of the Oso Creek channel, this location reflects the high velocity creek flows into the Saddleback private property, immediately adjacent to the proposed Compass Energy Project. This issue should be addressed to mitigate further erosion and potential impact to the active railroad right-of-way.

The Rancho Capistrano public railroad crossing is the only access to the proposed development. The California Public Utility Commission (CPUC), in its capacity as the State Rail Safety Agency, has reviewed and approved the Rancho Capistrano crossing to be used as a public crossing with specific conditions. Attachment B is the CPUC's approval of the Rancho Capistrano crossing, and it includes specific scope to control vehicular movements to ensure crossing safety. OCTA is concerned that many large construction materials, supply, equipment delivery, and maintenance trucks will need to cross the Rancho Capistrano crossing. These types of vehicles may not appropriately fit the geometrics of the crossing as it had been designed for and may pose a safety risk to the public and the operating railroads.

Thank you for your consideration of these concerns. Should you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,



Dan Phu
Manager, Environmental Programs

c: Jim Beil, OCTA

Enclosures

Attachment A

SJC10 Rehabilitation Project Concepts

February 23, 2021

Agenda

- Introductions
- Background
  - South Orange County Water Quality Improvement Plan (WQIP) – Channel Erosion
  - Historical SJC10 Efforts
- SJC10 Existing Conditions
- SJC10 Rehabilitation Project Concepts
- Roundtable discussion
- Next Steps

Introductions

Jacqui Sedighi

South OC WMA

Background:
South OC WQIP – Channel Erosion

Jacqui Sedighi
County of Orange

Highest Priority Water Quality Conditions

Priorities			
	Human Pathogen Health Risk	Channel Erosion	Unnatural Water Balance
Goals and strategies	Focus on human waste source control	Focus on stream rehabilitation	Focus on unnatural, unpermitted dry weather runoff elimination

OC Public Works

MILESTONES

Channel Erosion

2018-21 – Develop intent, process, and qualities of the Geomorphically Referenced Basis of Design (GRBoD) projects

2020 – Finalize GRBoD Guidelines

2021 – Complete channel rehabilitation alternatives and feasibility studies

2023	2028	2033	2037	2042
2,000	6,000	12,000	18,000	23,000

Length of stream rehabilitated (lineal feet)

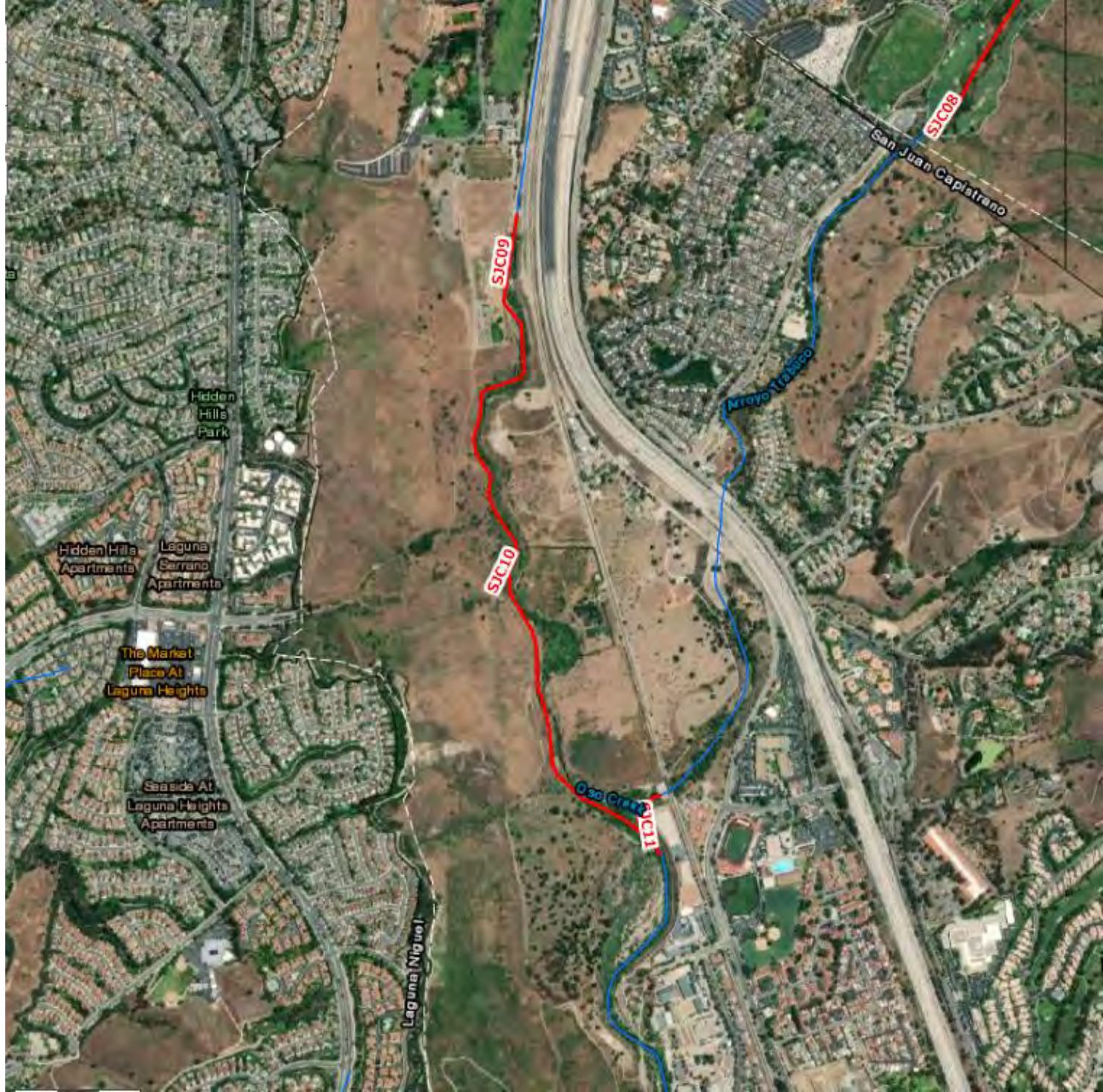
OC Public Works

Background:
Historical SJC10 Efforts

Jacqui Sedighi
County of Orange

SJC10

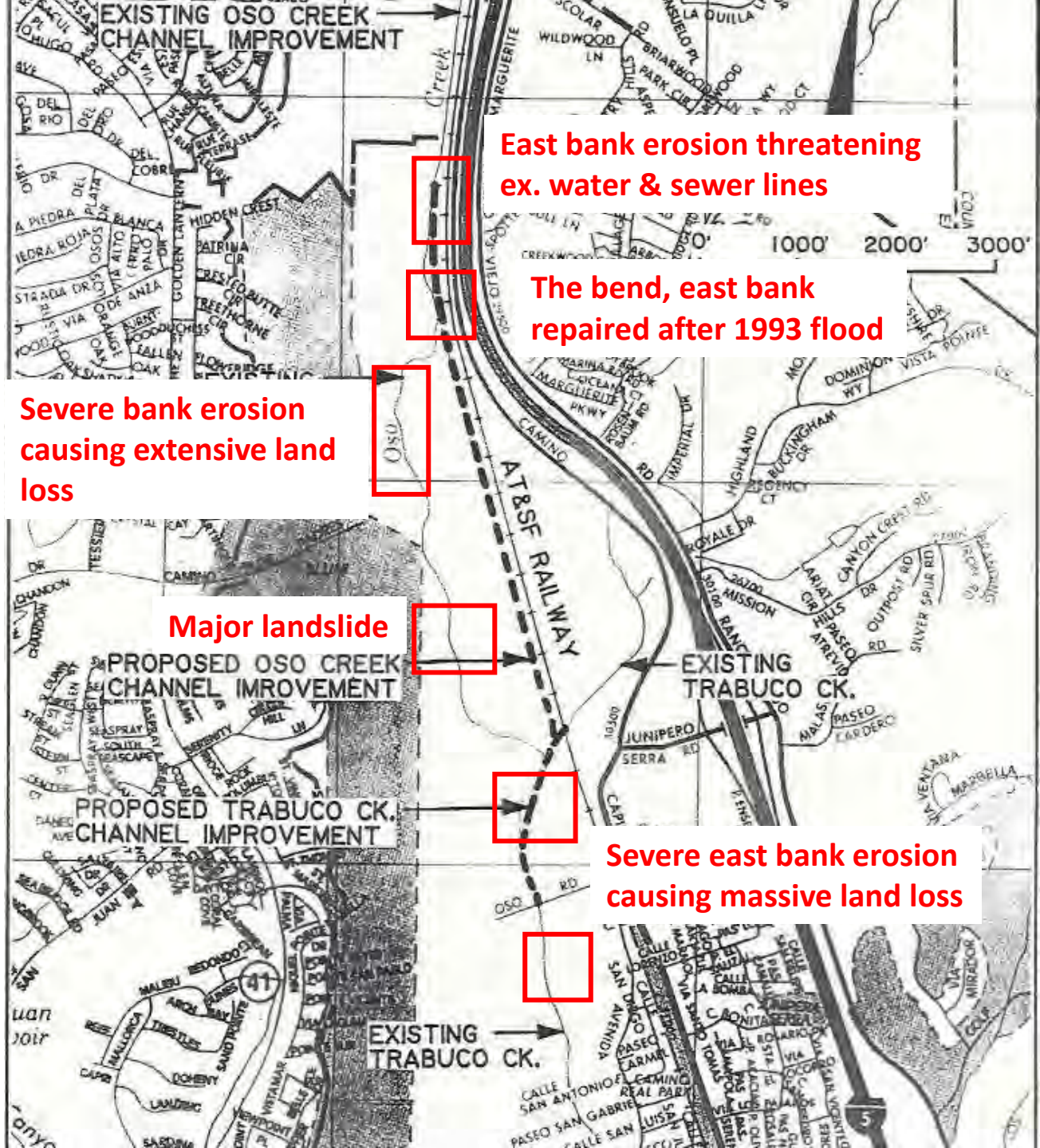
- **Location context:** Oso creek located west of I-5 in San Juan Capistrano
- **Current status:** stakeholder interest in implementing a solution
  - Hsaio family – greenhouses falling into the creek
  - Saddleback Church – field collapsed during recent rain



Efforts from 1990s

Problem:

- Both Oso and Trabuco incised due to reduction of upstream sediment supply
- Severe bank erosion and loss of valuable land, expected to become worse as meandering develops (1983, 1993…).
- Specific problem areas:
  - Potential failure of water & sewer lines – Oso Creek upstream
  - Major landslide adjacent to Oso Creek
  - Potential failure of railway and pipelines at crossing of Trabuco Creek
  - Potential failure of water line at the Oso Road crossing of Trabuco Creek



Source: "Preliminary Concept Design…", Simon, Li & Associates, Inc.

Efforts from 1990s

Proposed solution:

- "Erosion control measures shall be implemented immediately"
- Three alternatives for Oso Creek
  - Alt A – 34′ W x 10′ H reinforced concrete (R.C.) channel
  - Alt B – 18′ W x 16′H R.C. channel
  - Alt C - 18′ W x 16′H R.C. box culvert

Alt. A:	34′W x 10′H R.C. Channel:	$4.67 million + 10.9 Acres of R/W (approximately $820/LF)
Alt. B:	18′W x 16′H R.C. Channel:	$4.86 million + 10.6 Acres of R/W (approximately $850/LF)
Alt. C:	18′W x 16′H R.C. Box Culvert:	$8.46 million + 10.5 Acres of R/W (approximately $1,480/LF)

Source: "Preliminary Concept Design…", Simon, Li & Associates, Inc.

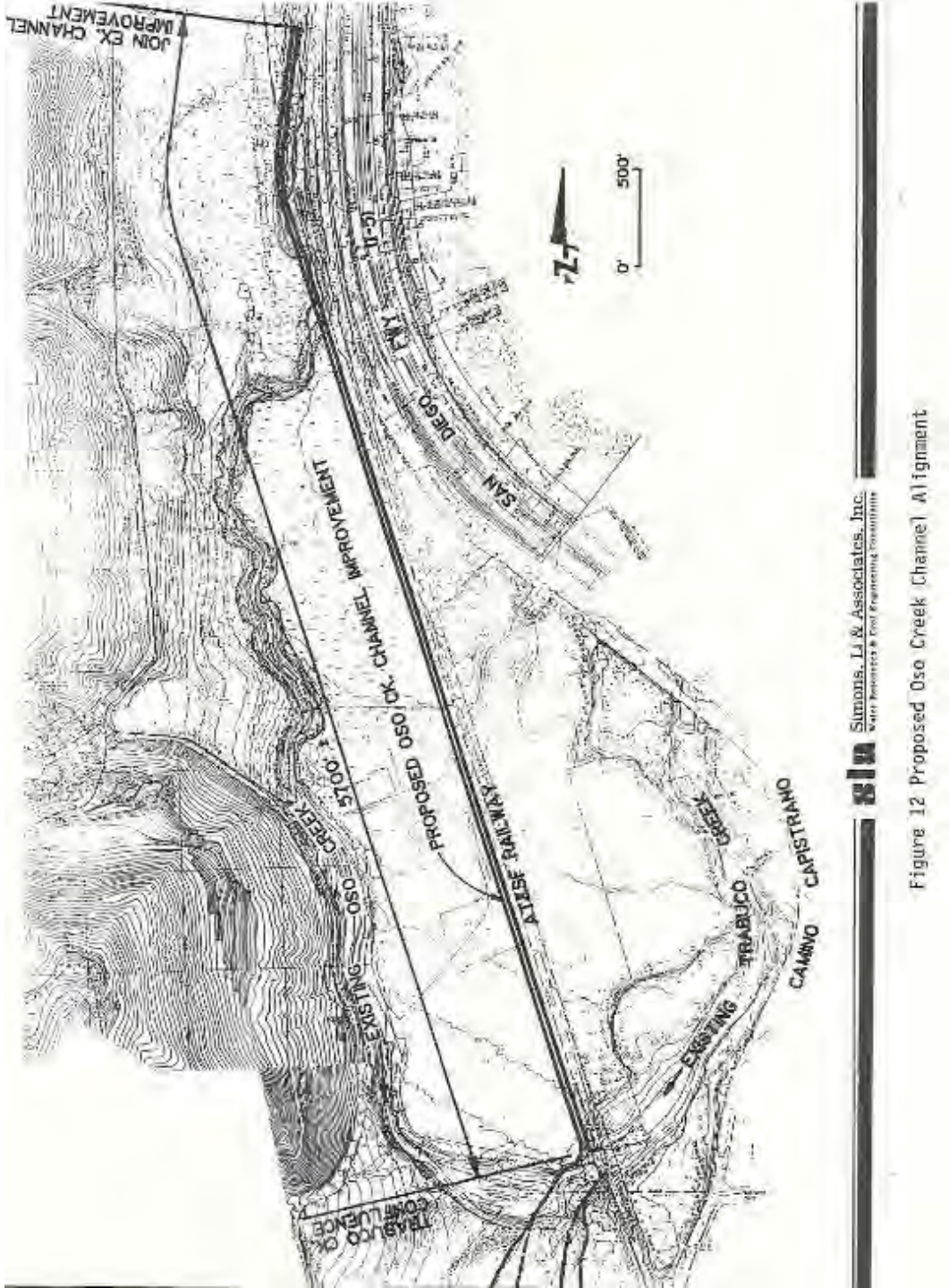
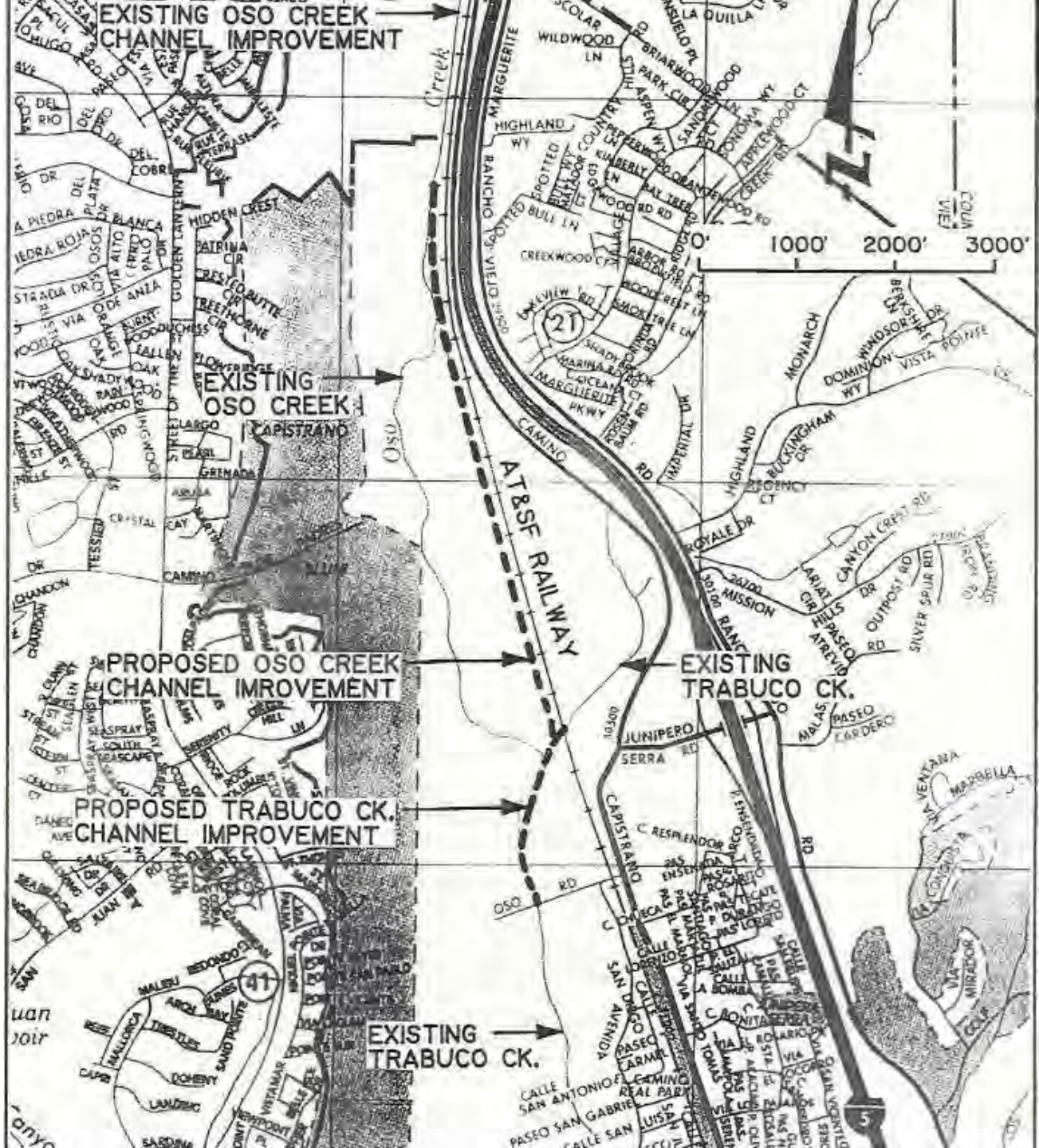


Figure 12 Proposed Oso Creek Channel Alignment

Efforts from 1990s

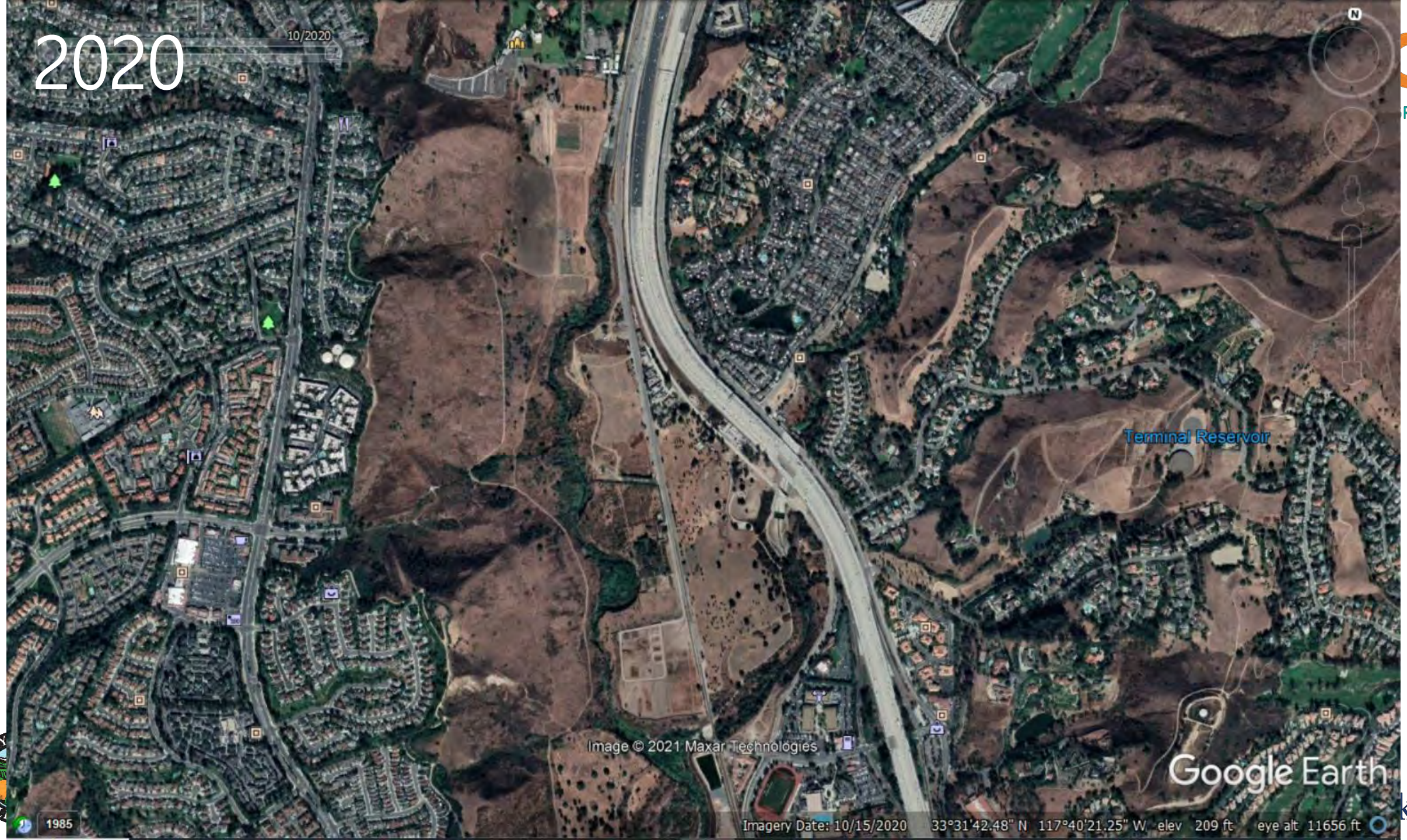
Outcomes:

- Cost-sharing example was developed but consensus was not reached
- OCTA moved forward will a smaller individual project to address the immediate need



Source: "Preliminary Concept Design…", Simon, Li & Associates, Inc.


1994
5/1994
N
Terminal Reservoir
Image U.S. Geological Survey
Google Earth
1985
Imagery Date: 5/31/1994 33°31'42.48" N 117°40'21.25" W elev 209 ft eye alt 11656 ft


2020
10/2020
Terminal Reservoir
Image © 2021 Maxar Technologies
Google Earth
1985
Imagery Date: 10/15/2020 33°31'42.48" N 117°40'21.25" W elev 209 ft eye alt 11656 ft

Rehabilitation Alternatives and Feasibility Studies:

Rehabilitation Project Concepts for SJC10

Chris Pendroy, MS, CPSWQ, QSD/P, ENV SP
Kayla Kilgo, PhD, PE, ENV SP
Ben Willardson, PhD, PE, D.WRE, QSD/P

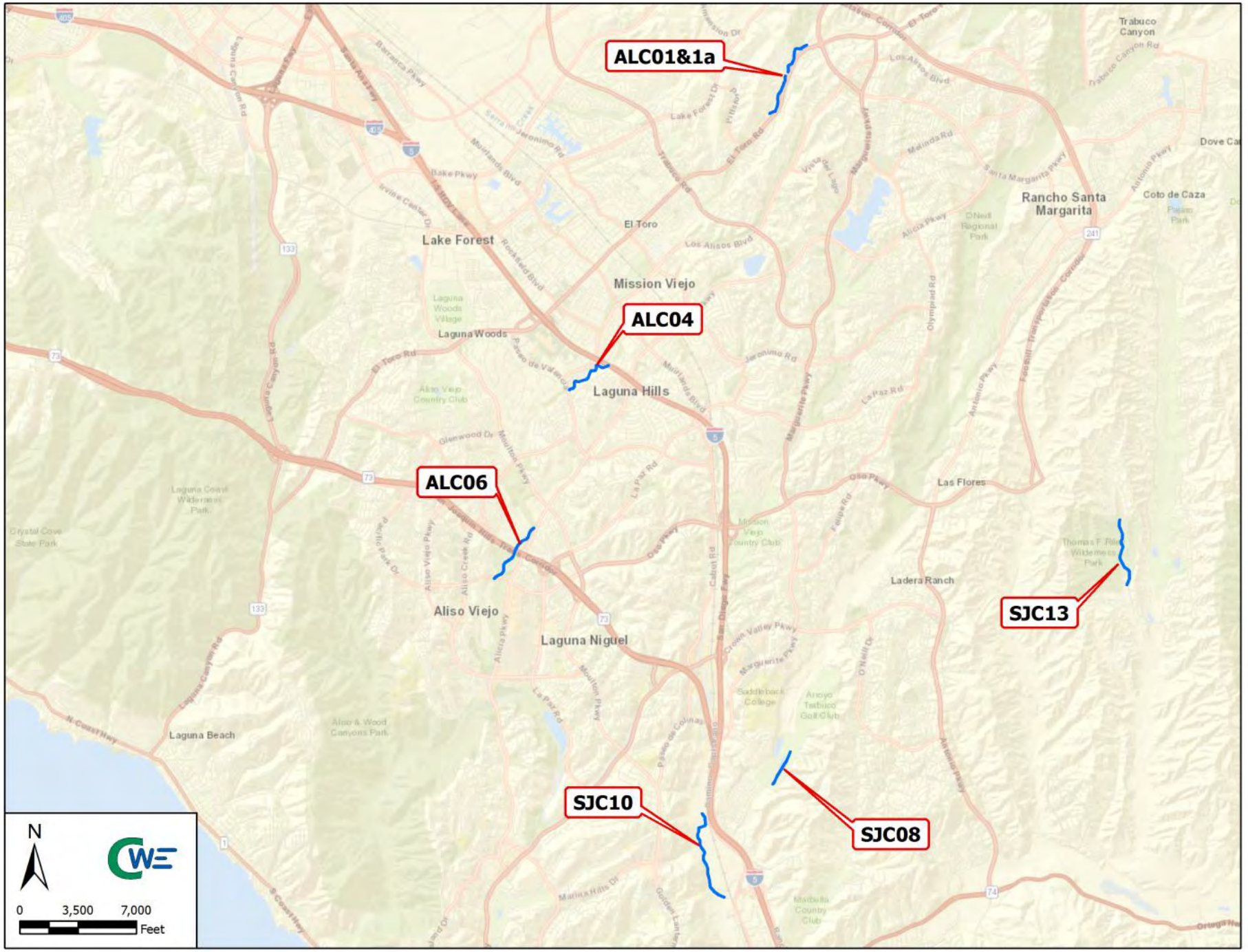
H2OC STORMWATER PROGRAM

OC Public Works

SJC10 Existing Conditions

Kayla Kilgo and Chris Pendroy
CWE

Study Reaches



SJC10 (Part of Oso Creek)

Intensive Bank Erosion

Right bank erosion near the upstream end of the study reach

Left bank erosion viewed from right bank downstream of greenhouse location

Upstream End of SJC10

Rip rap near upstream end of study reach

Looking downstream from the rip rap lined banks

Wolman Pebble Count Location 1

Looking upstream from Wolman Pebble Count Location 1

Looking downstream from Wolman Pebble Count Location 1

Downstream of Location 1

Right bank erosion

Right bank erosion and evidence of recent collapse

Recently Collapsed Bank

Looking downstream

Recent collapse along right bank

Bank Erosion

Right bank erosion


Left bank erosion

Bank Erosion

Left bank erosion near greenhouses

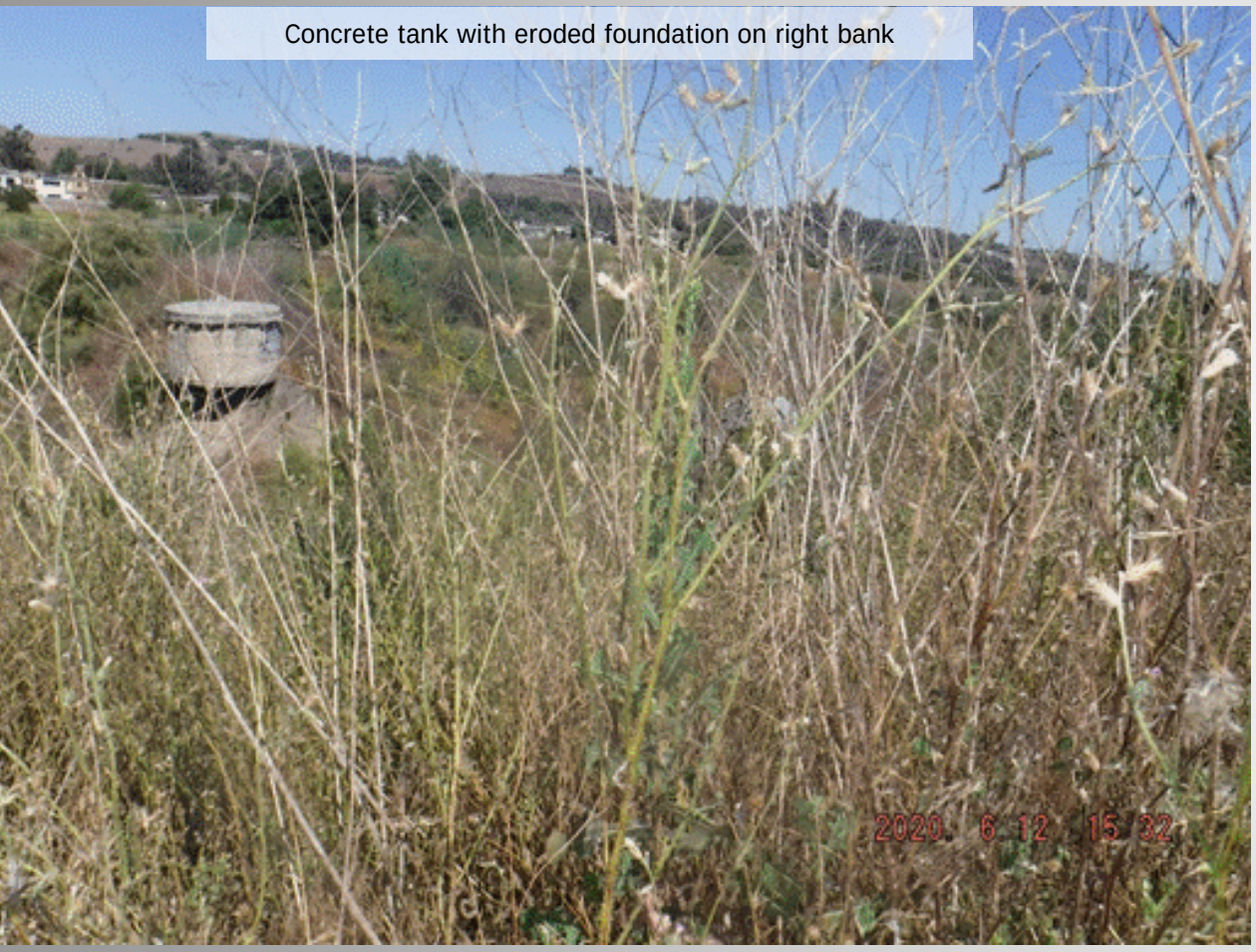
Left bank erosion near greenhouses

Bank Erosion

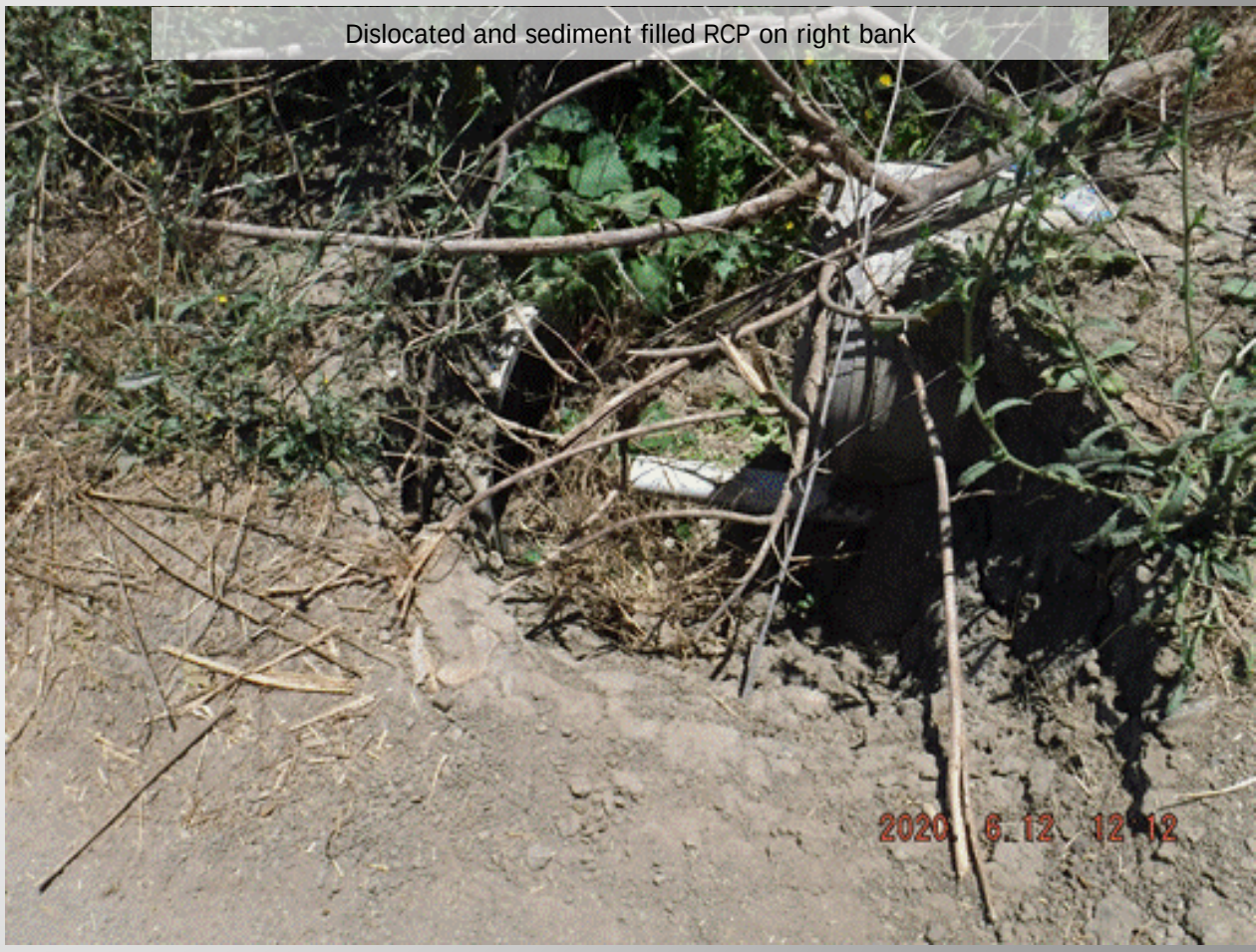

Looking downstream of greenhouses

Looking upstream towards greenhouses

Bank Erosion



Concrete tank with eroded foundation on right bank



Dislocated and sediment filled RCP on right bank

Oso and Trabuco Creek Confluence

Heavy vegetation downstream of confluence viewed from right bank

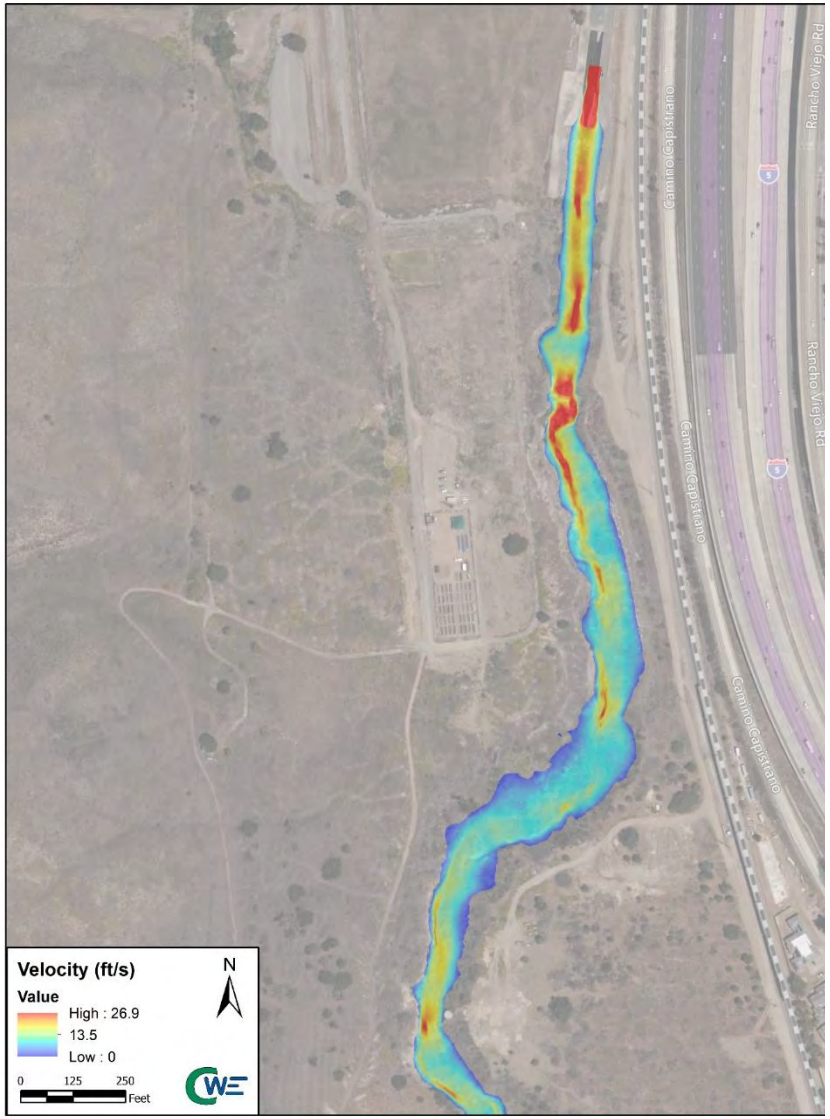
Right bank erosion along Trabuco Creek upstream of confluence with Oso Creek

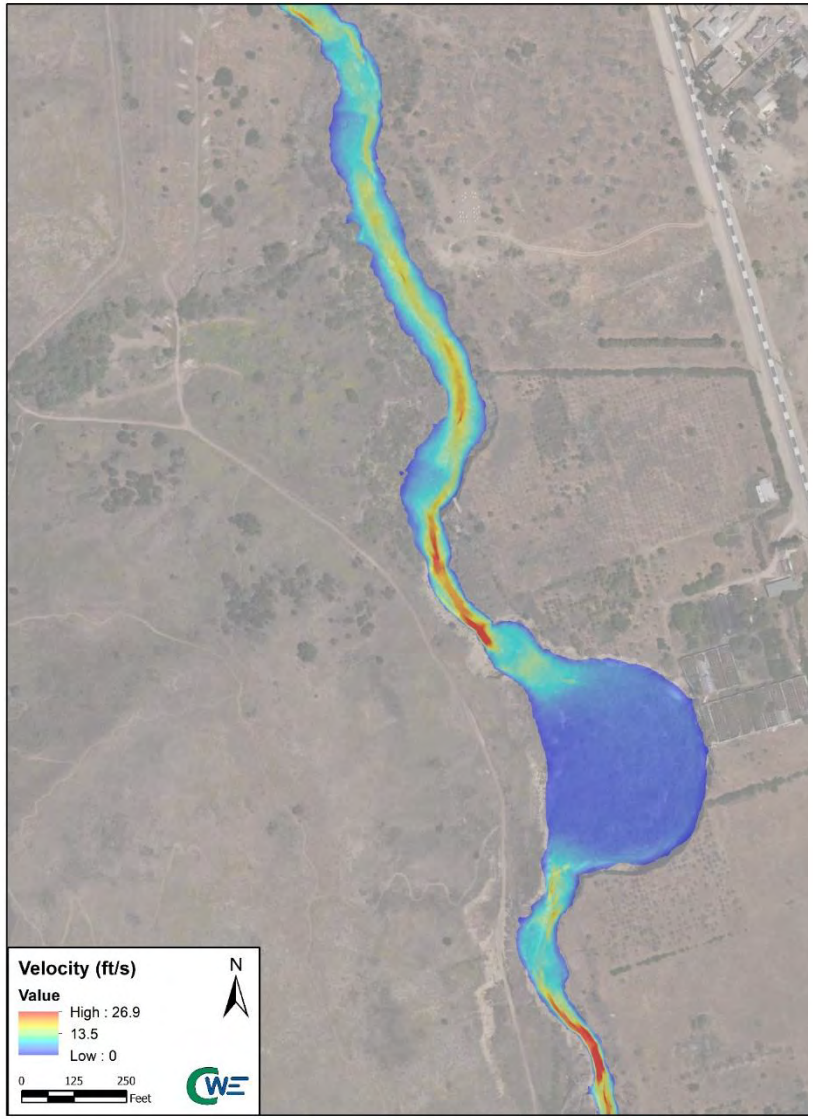
Wolman Pebble Count Location 2

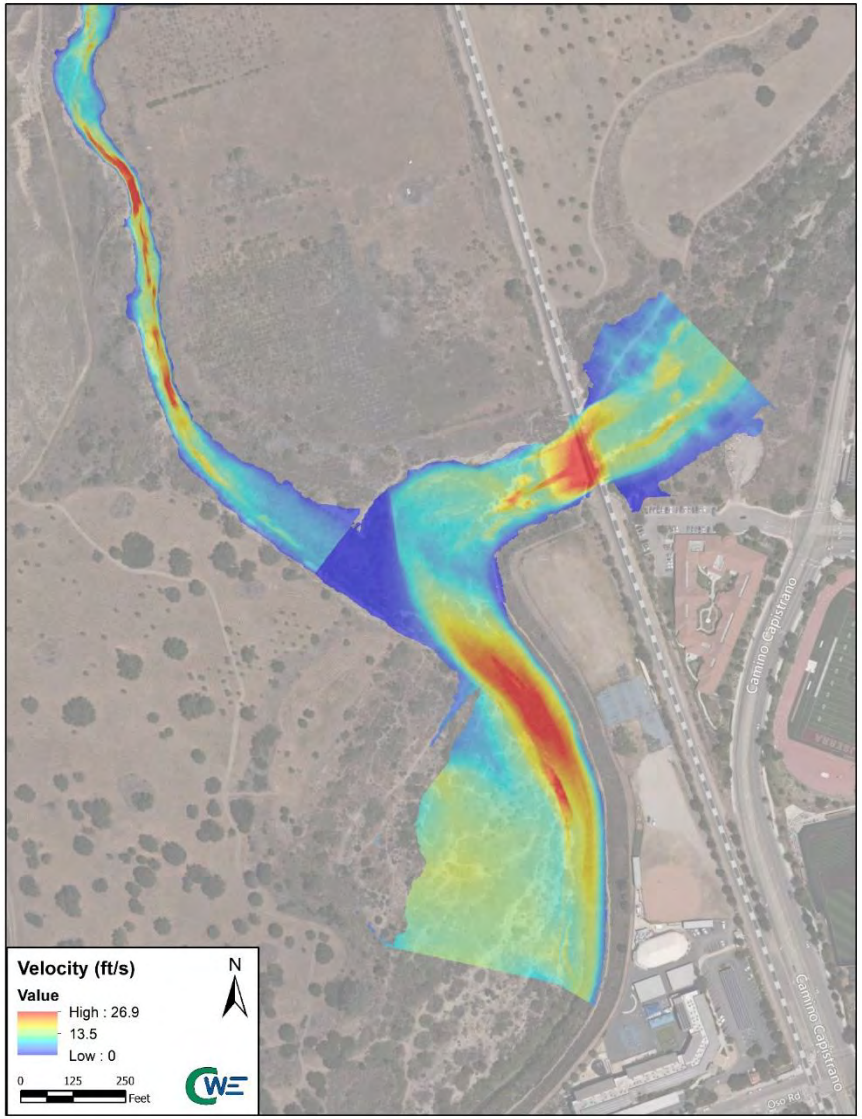

Looking upstream from Wolman Pebble Count Location

Looking downstream from Wolman Pebble Count Location

Existing Conditions Velocities



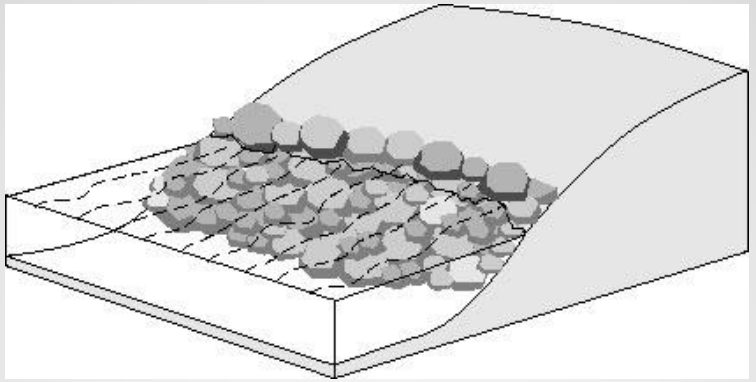




SJC10 Rehabilitation Design Concepts

Ben Willardson and Chris Pendroy
South OC WMA

Concept #1: Rip Rap Revetment



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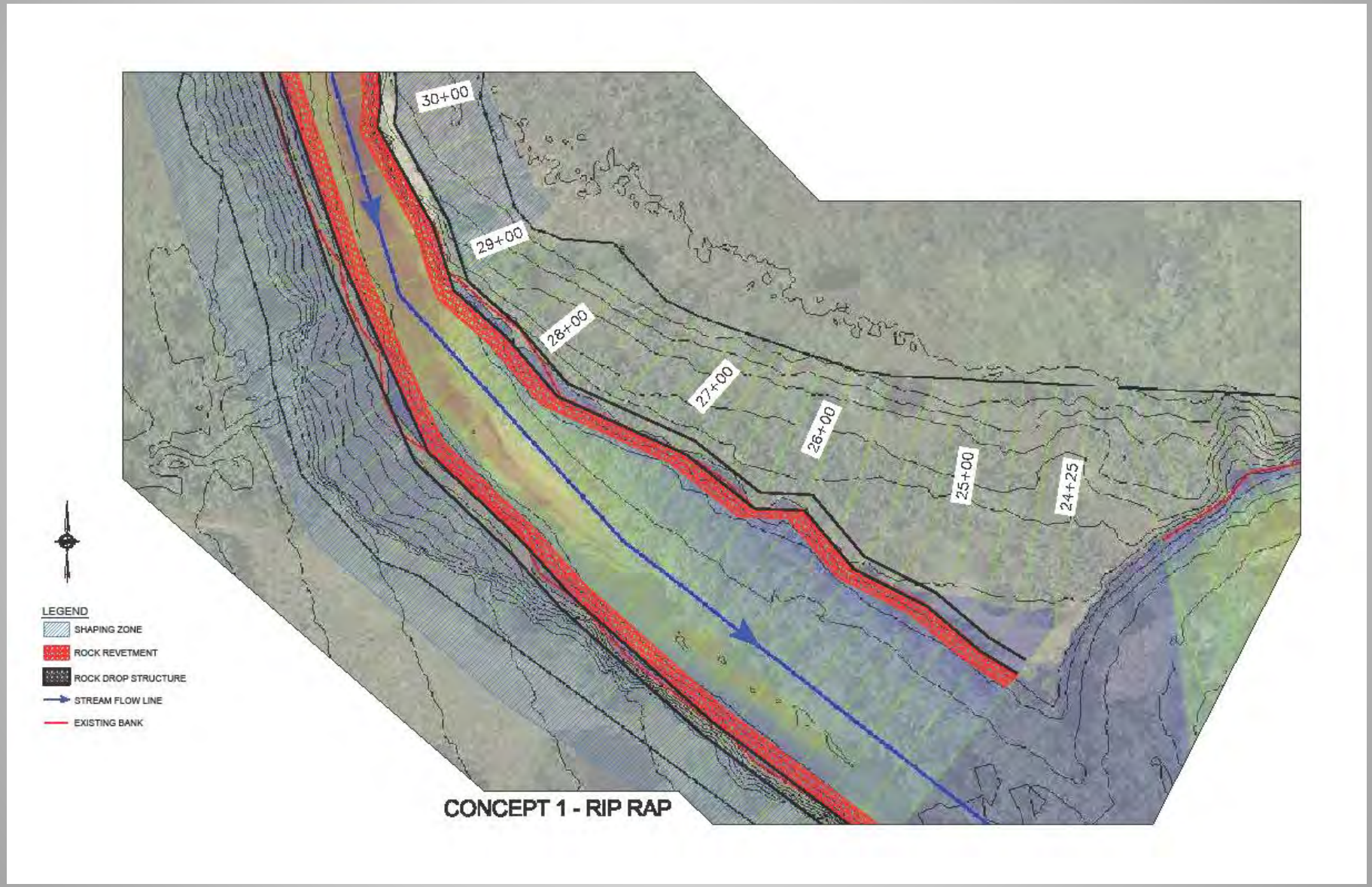

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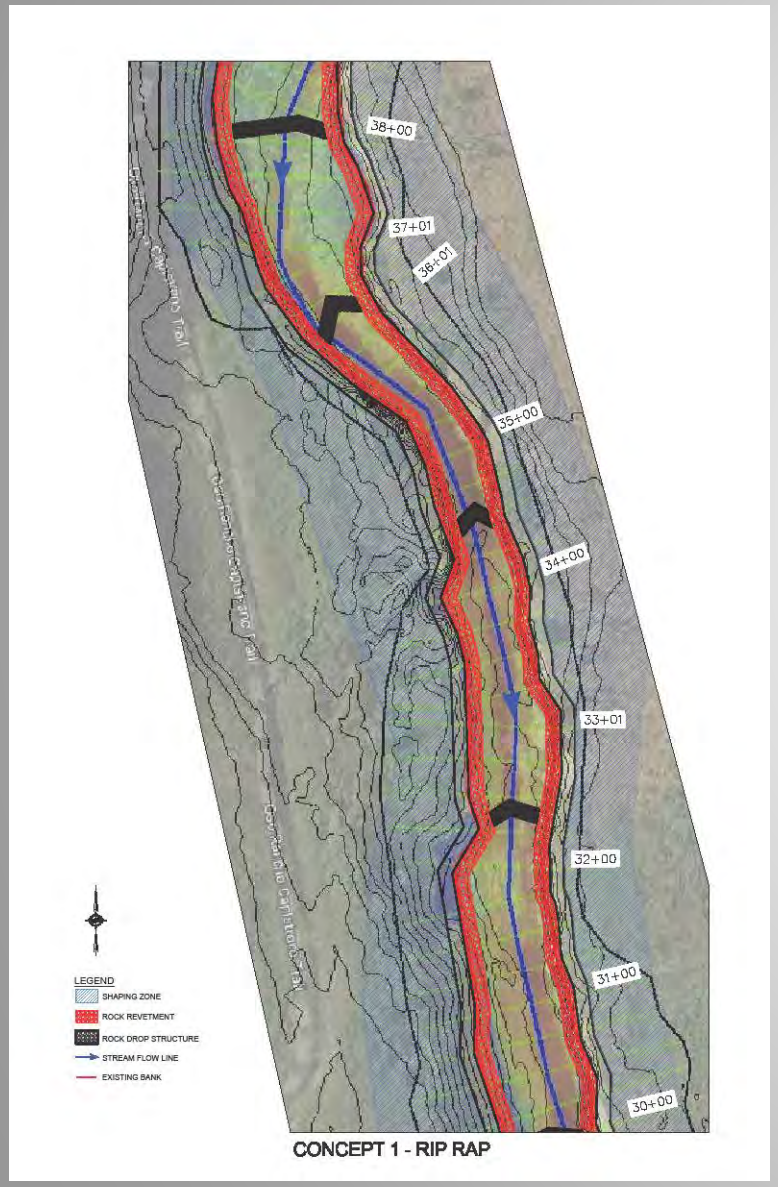
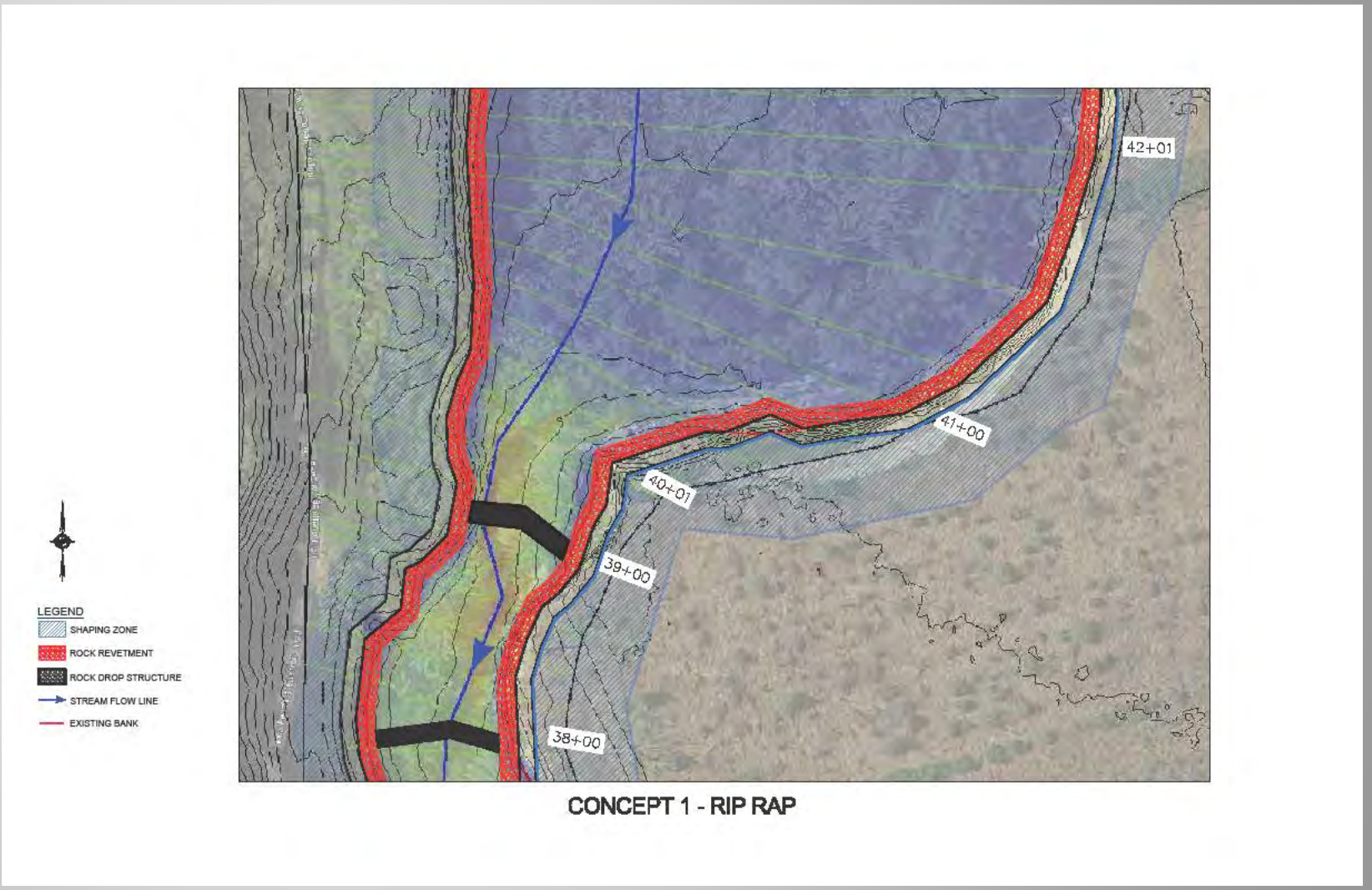


CONCEPT 1 - RIP RAP



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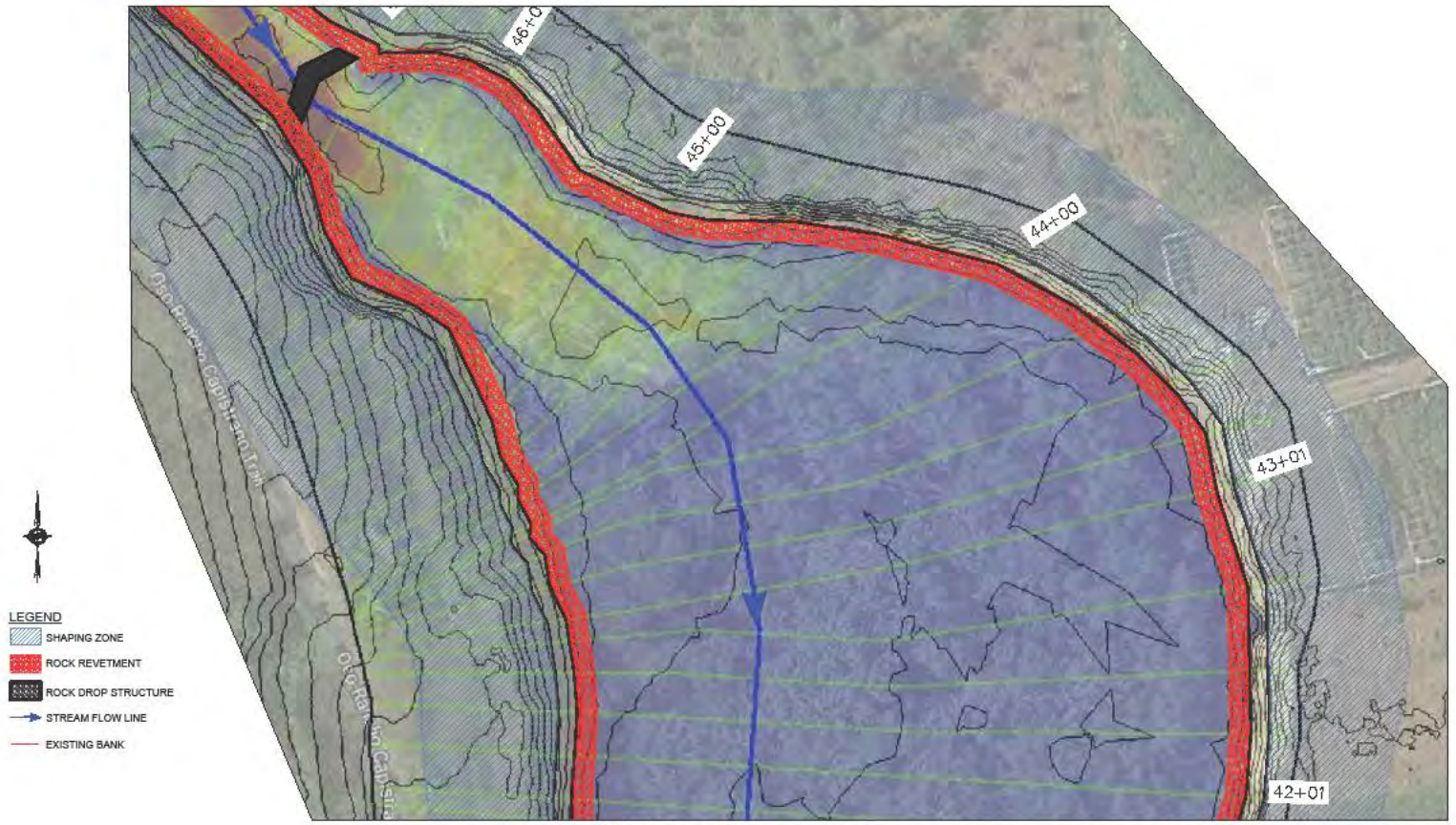

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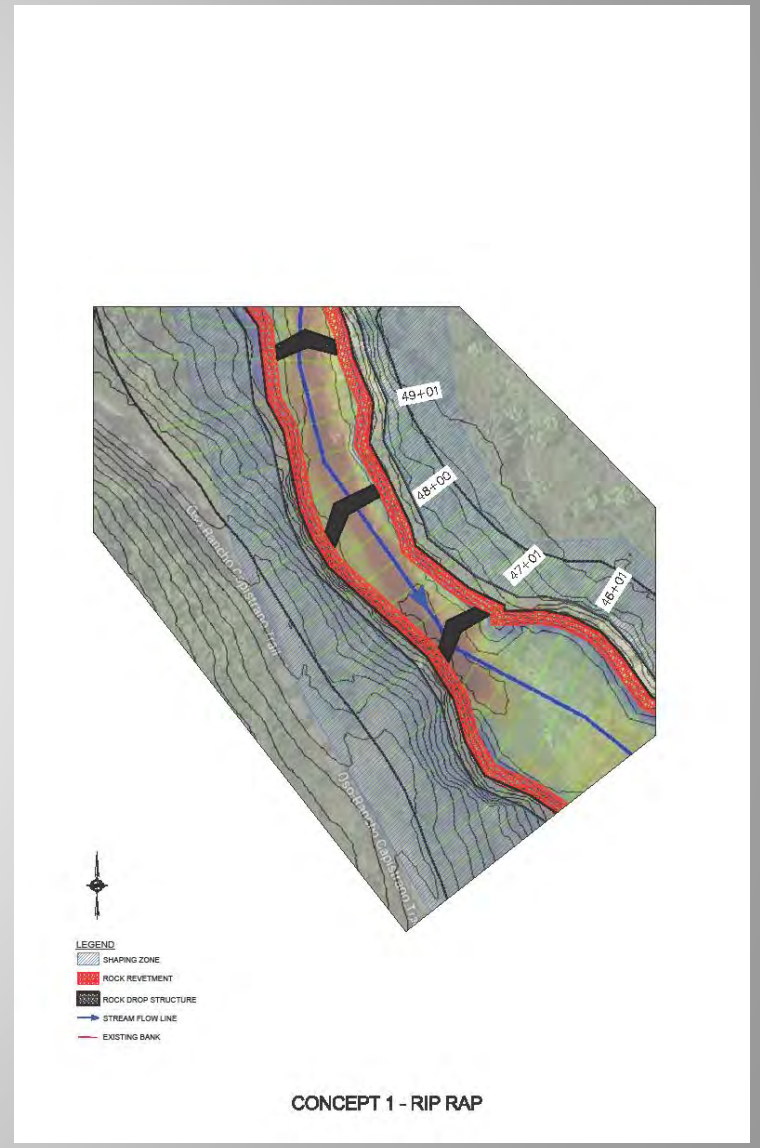

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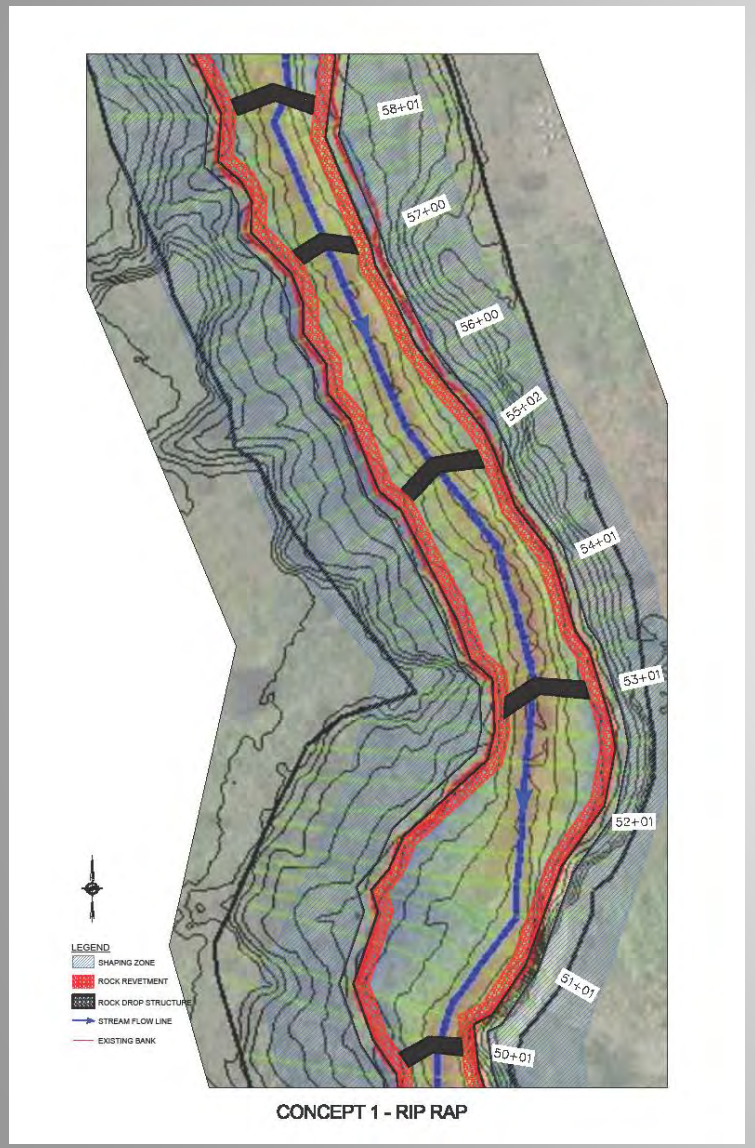

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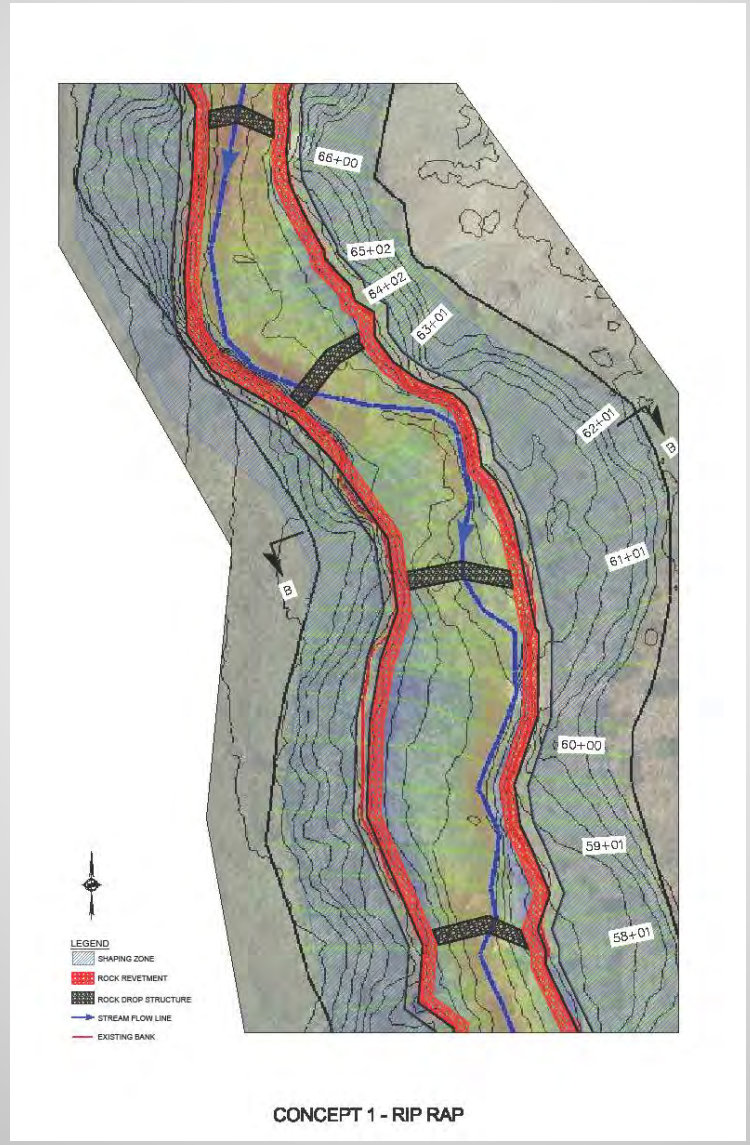

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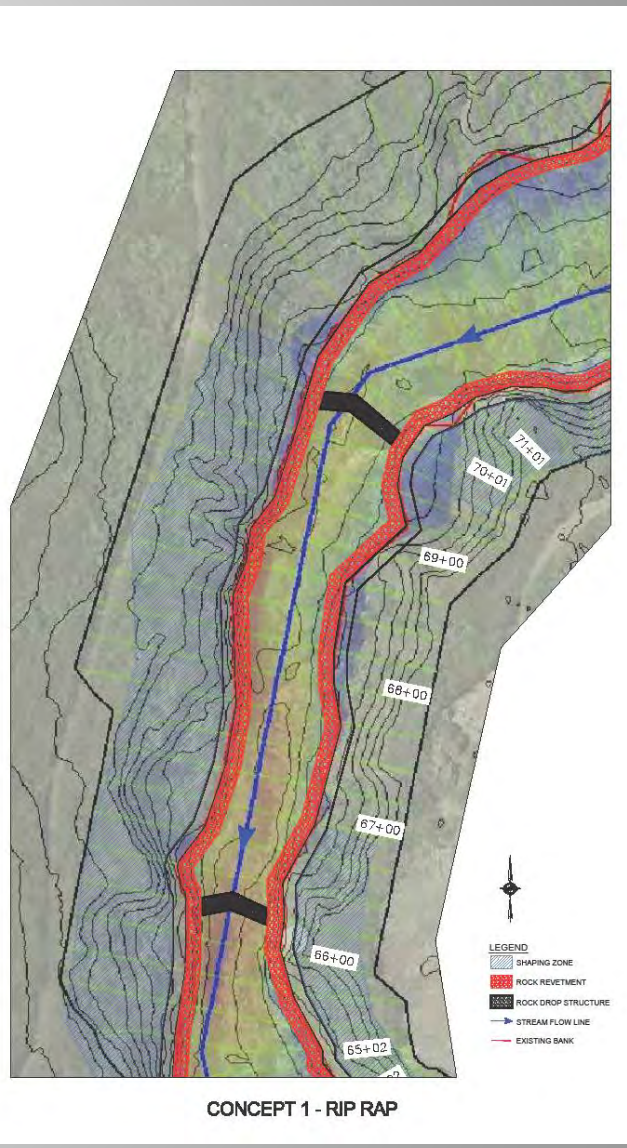

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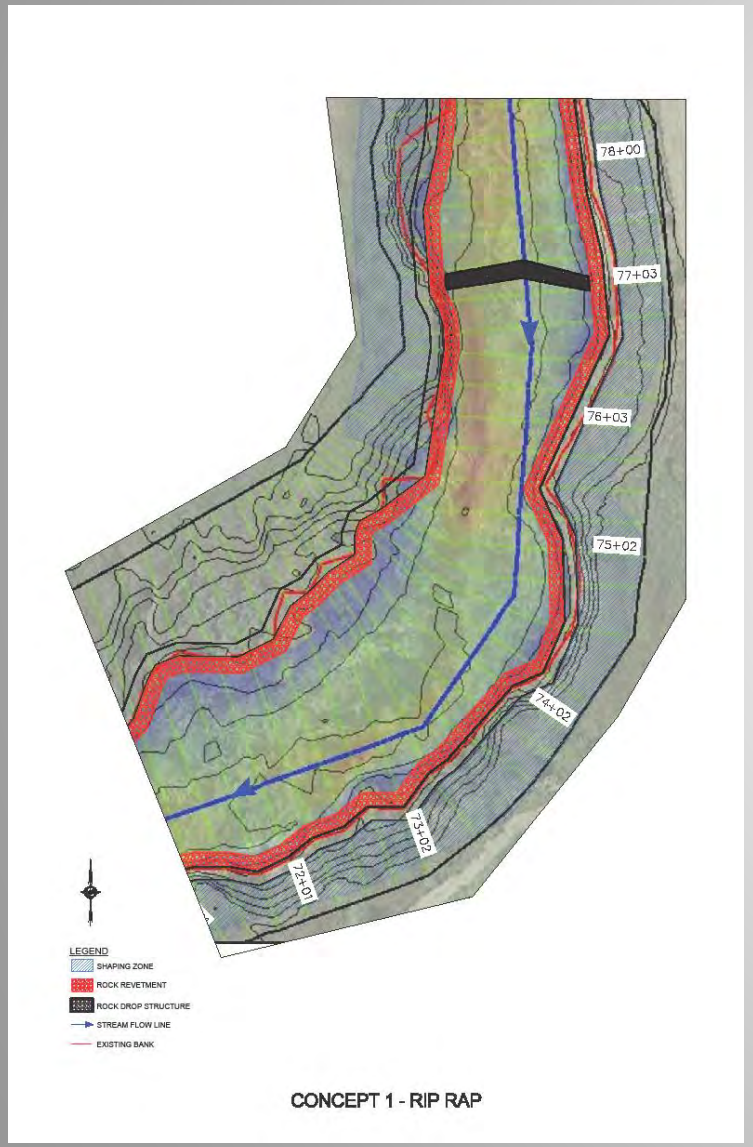

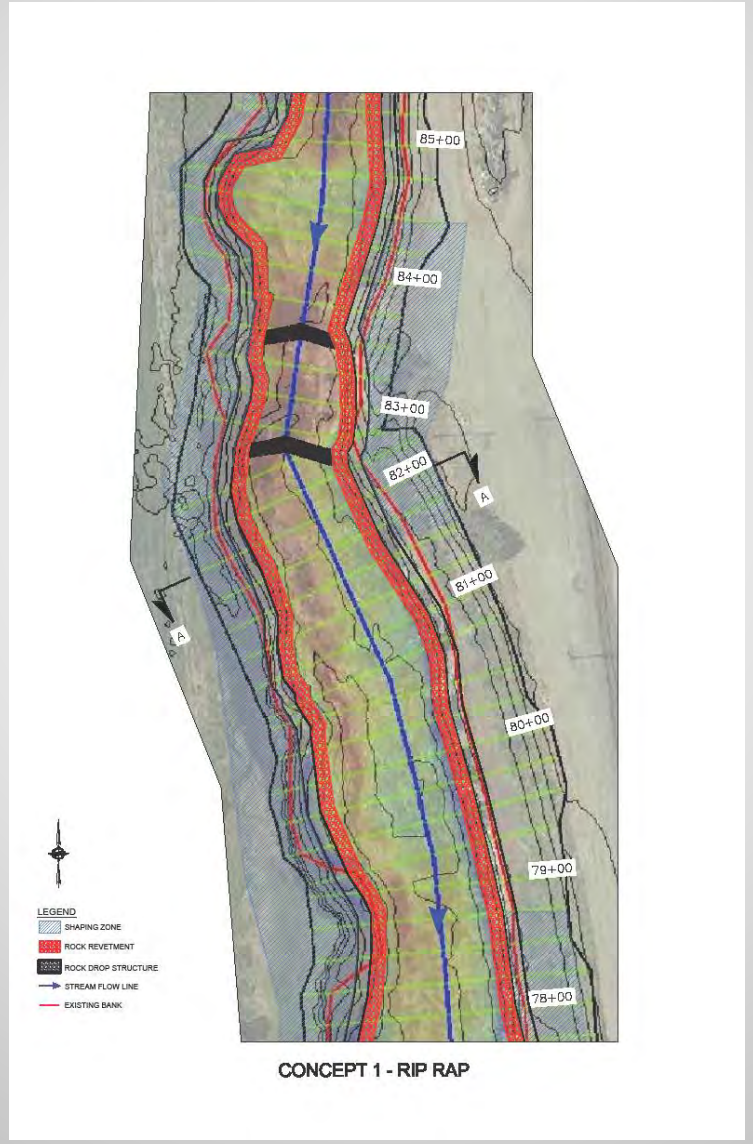

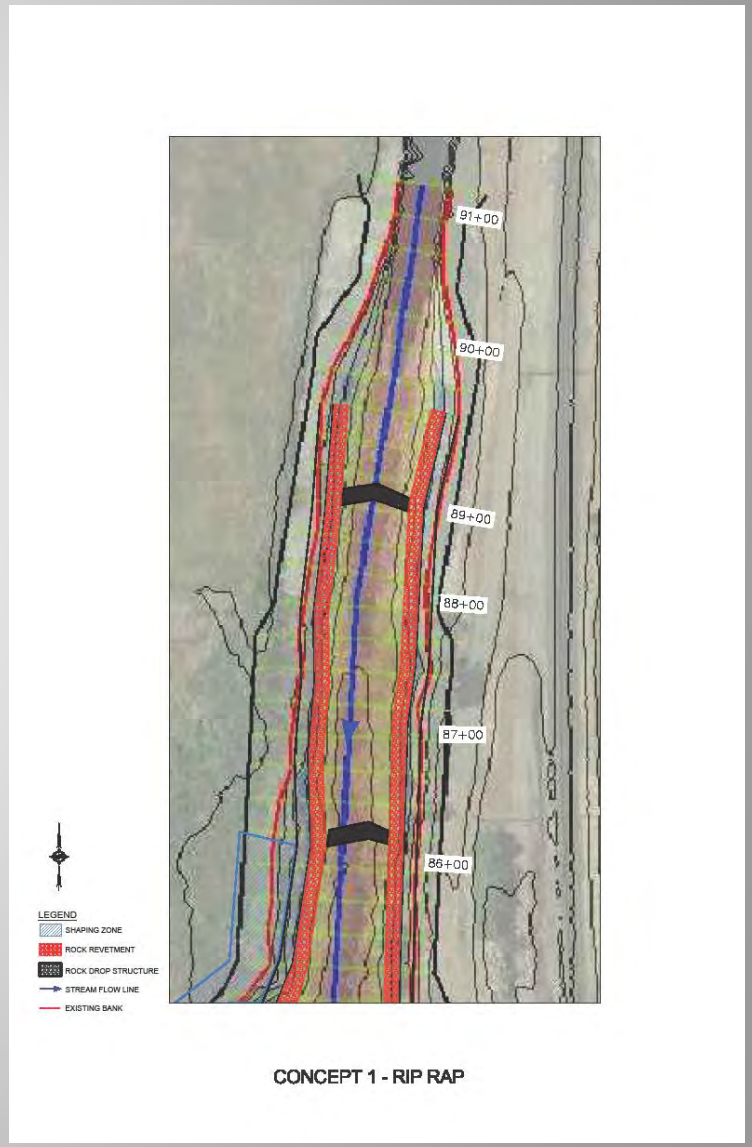

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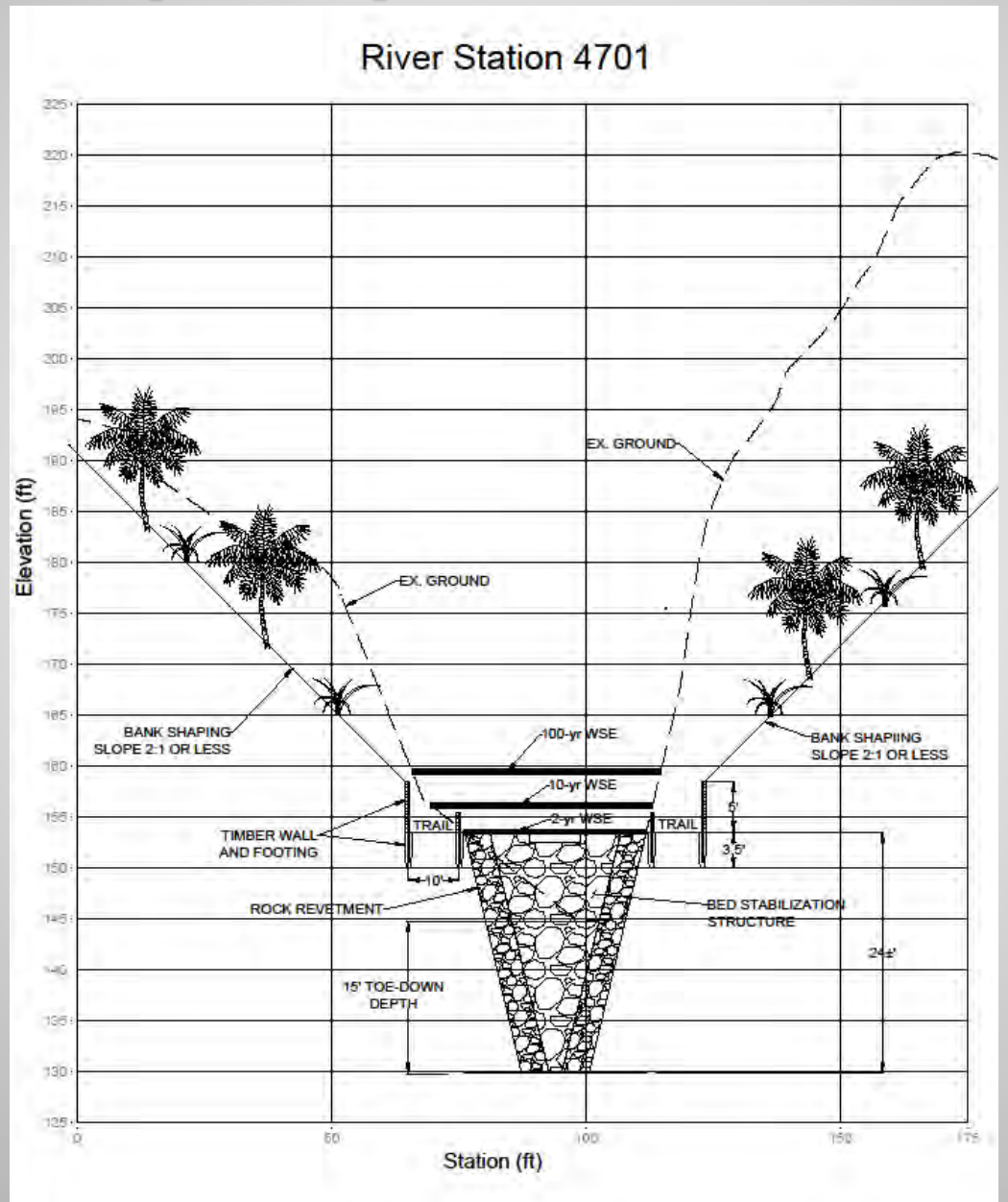

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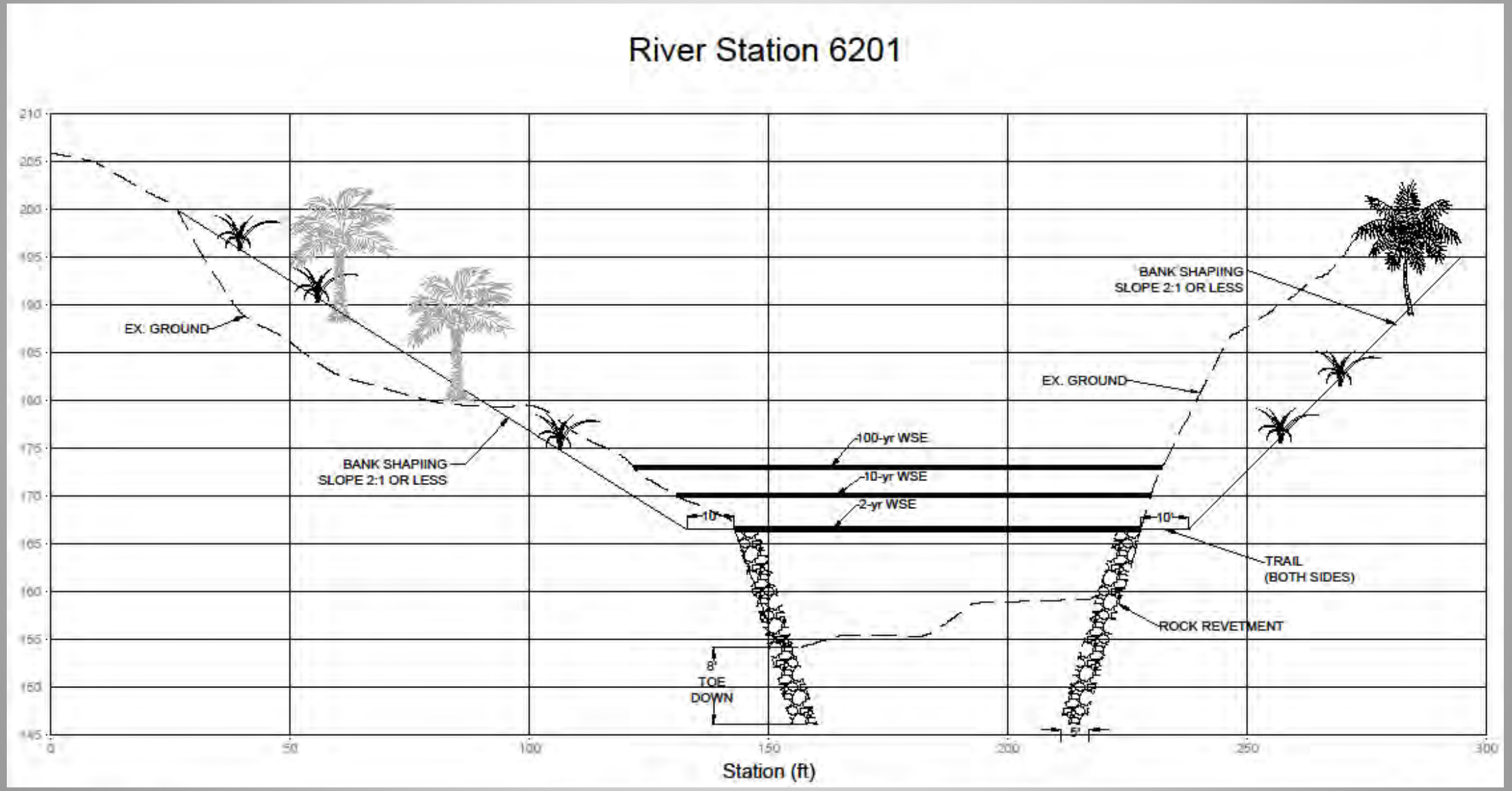

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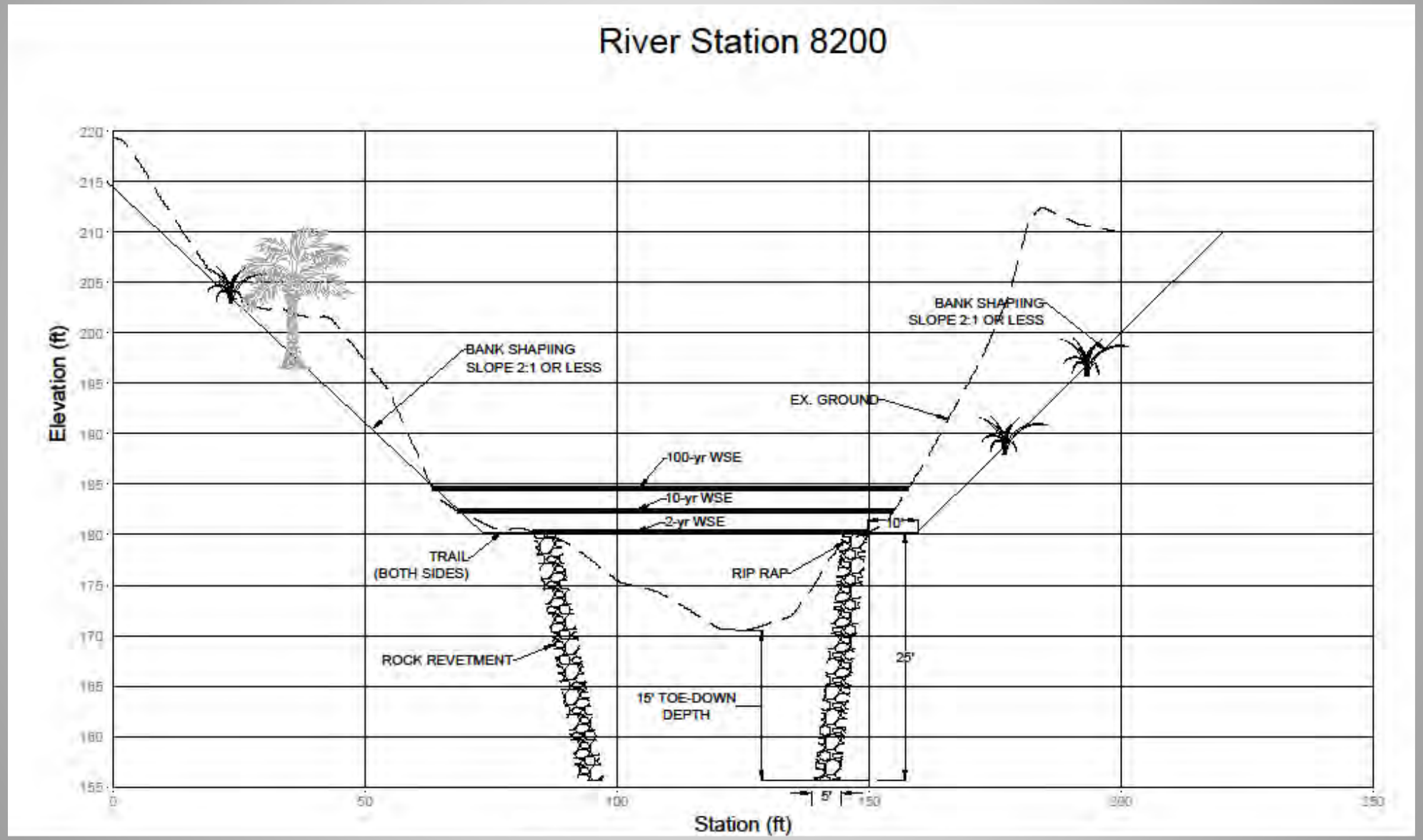
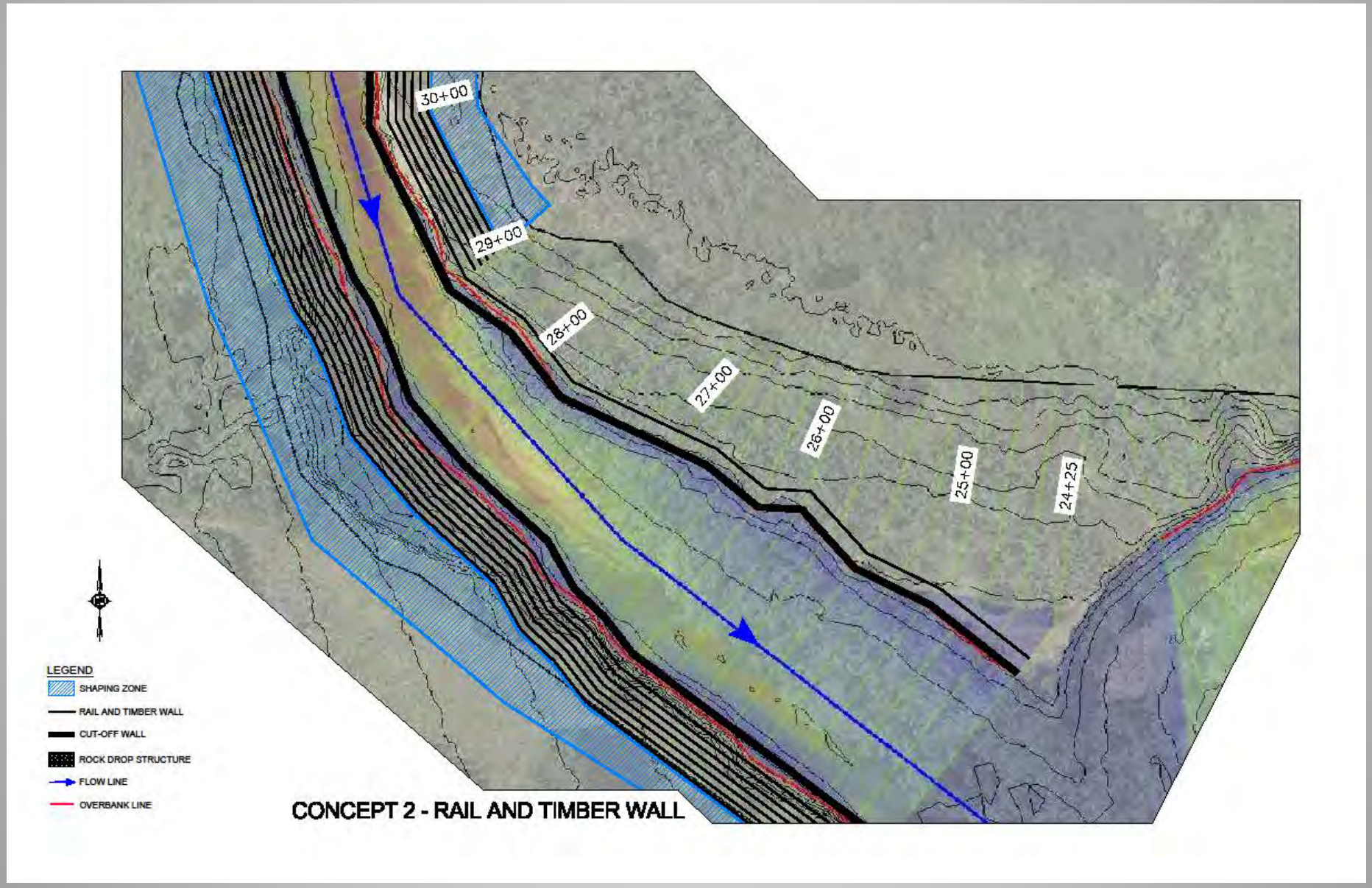


Concept #1: Costs

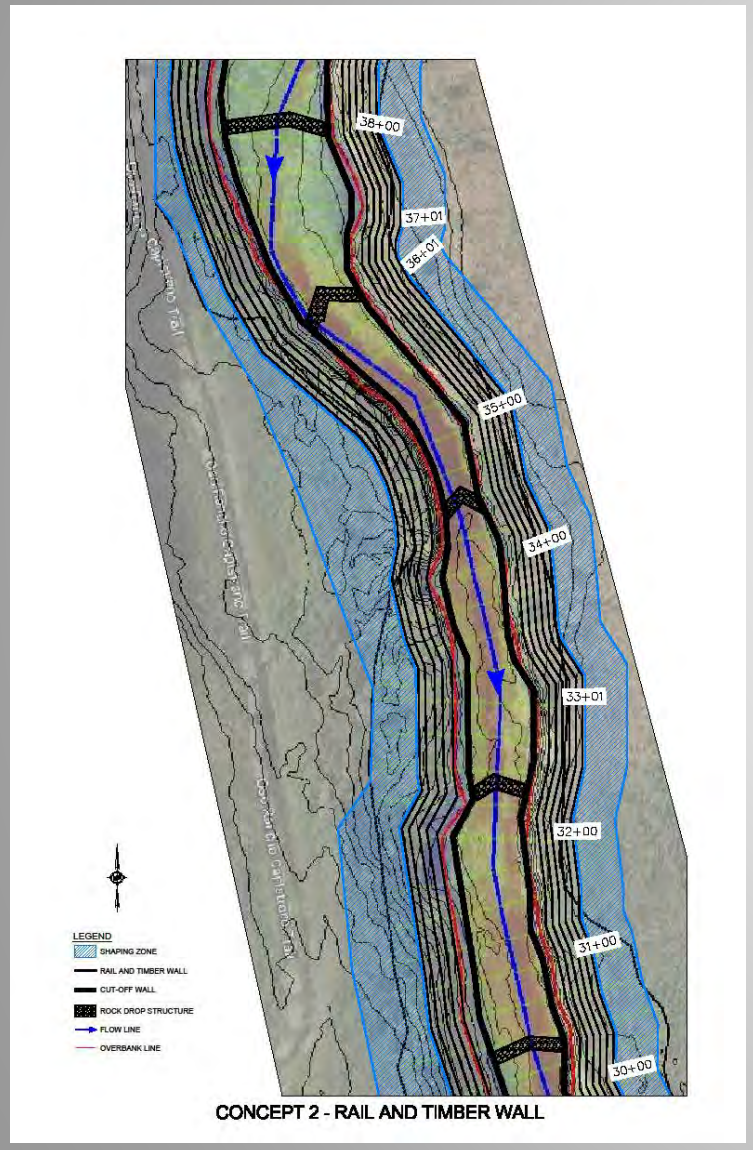
ITEM #	DESCRIPTION	UNIT/LF	QUANTITY [LF]	UNIT PRICE/LF	COST
1	Mobilization (5%)	LS	1	$2,410,200	$2,410,200
2	Clearing and Grubbing	SF	13,055	$13	$169,715
Riprap Revetment					
3	Excavation	CY	13,055	$210	$2,741,550
4	Backfill	CY	13,055	$90	$1,174,950
5	4T Rock	TON	13,055	$2,200	$28,721,000
Bed Stabilization					
6	Excavation	CY	1,310	$333	$436,230
7	Backfill	CY	1,310	$249	$326,190
8	2T Rock	TON	1,310	$1,814	$2,376,864
Bank Shaping and Planting					
9	Excavation	CY	10,475	$300	$3,142,500
10	Backfill	CY	10,475	$600	$6,285,000
11	Planting	SF	10,475	$5	$52,375
12	Mulching	SF	10,475	$18	$188,550
				ENGINEER'S ESTIMATE	$48,025,124
				30% Contingency	$14,407,537
				CONSTRUCTION BUDGET	$62,432,661

Concept #2: Rail and Timber Wall

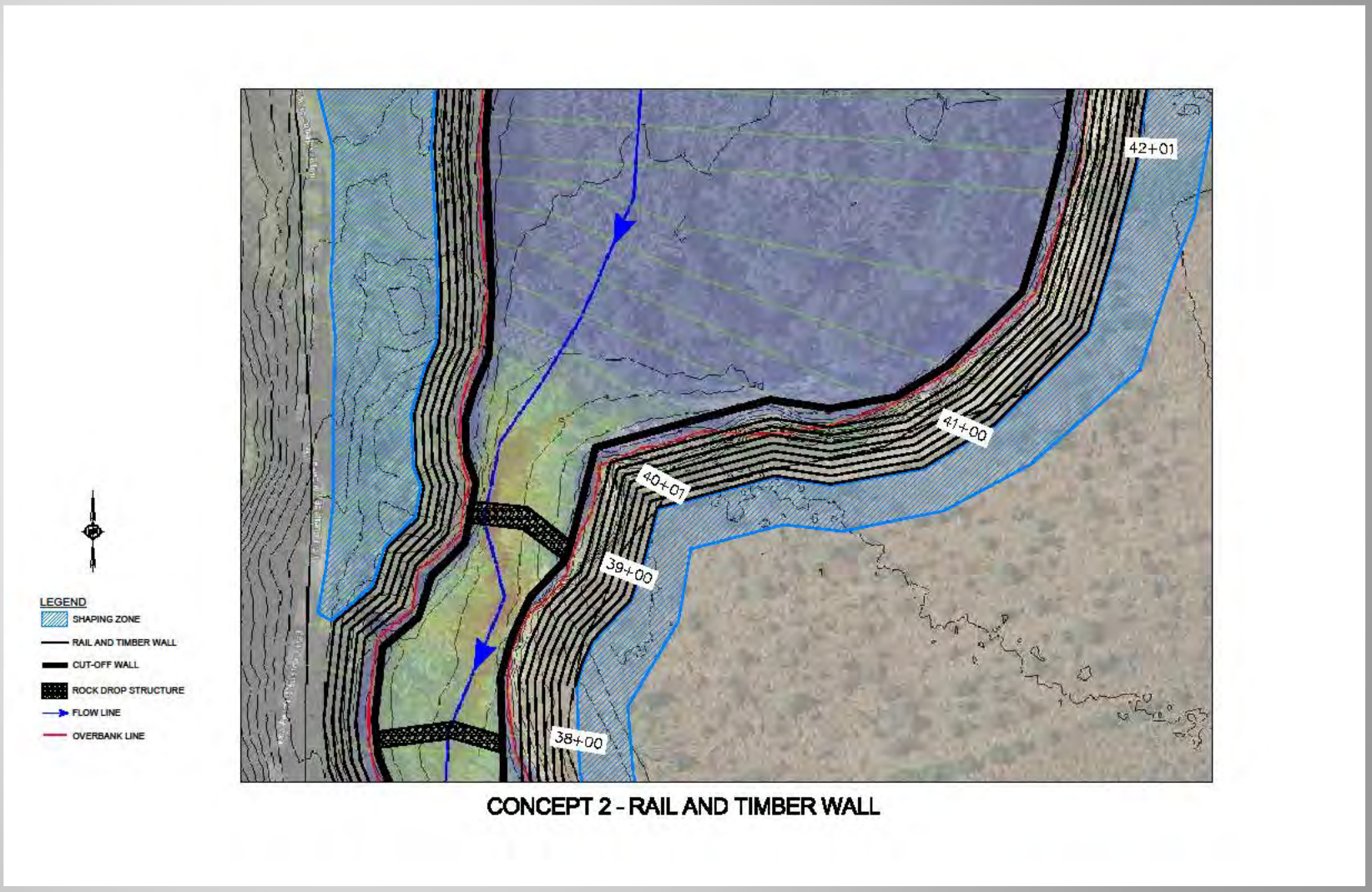
Concept #2: Rail and Timber Wall



Concept #2: Rail and Timber Wall



CONCEPT 2 - RAIL AND TIMBER WALL



CONCEPT 2 - RAIL AND TIMBER WALL