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Docket Number:	26-SPPE-01
Project Title:	RB Inyokern Data Center (RBIDC)
TN #:	273402
Document Title:	Caltrans District 09 Formal Comments for Inyokern Data Center
Description:	The California Department of Transportation (Caltrans), District 9, acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and pursuant to California Streets and Highways Code section 670 et seq., submits the following comments on the Small Power Plant Exemption application for the RB Inyokern Data Center. Caltrans has jurisdiction over the safety, operation, preservation, and multimodal function of State Route 178 and U.S. Route 395, which directly serve the project vicinity.
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Organization:	Caltrans
Submitter Role:	Public Agency
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California Department of Transportation

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November 4, 2026

Elizabeth Huber, Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dear Elizabeth Huber and CEC Review Team:

The California Department of Transportation (Caltrans), District 9, acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and pursuant to California Streets and Highways Code section 670 et seq., submits the following comments on the Small Power Plant Exemption application for the RB Inyokern Data Center. Caltrans has jurisdiction over the safety, operation, preservation, and multimodal function of State Route 178 and U.S. Route 395, which directly serve the project vicinity.

Encroachment Permit Requirements
Any action that enters, crosses, or physically affects the State Highway System—including construction, trenching, utility installation, driveway connections, frontage improvements, or temporary traffic control—requires an Encroachment Permit issued by Caltrans District 9. No ground disturbance within the state highway right-of-way (ROW) may occur without an approved permit. Coordination may occur through the District 9 Permits Office at d9.permits@dot.ca.gov.

I. Project Footprint and Building Area Consistency

The applicant proposes a 99-MW hyperscale data center campus on approximately 50 acres (APNs 084-010-43, -44, -45, and -48), north of SR 178 between North Brown Road and US 395. The SPPE Application (TN 269893) presents a 238,000-square-foot building footprint, while the project's traffic analysis (Appendix H.1 Revision 1, TN 271096) models trip generation using 270,218 square feet under ITE Code 160. Caltrans recommends reconciling this 32,218-square-foot discrepancy to ensure consistency between environmental documentation, engineering plans, and transportation modeling.

II. 99-MW Electrical Interconnection and Highway Easements

Delivering the project's 99-MW operational load requires electrical infrastructure that crosses or parallels Caltrans facilities.

SR 178 Underground 34.5-kV Utility Easement
A dedicated 30-foot-wide utility easement conveys medium-voltage power from the Point of Interconnection on APN 084-010-48 across SR 178 to the main campus. Plans submitted for

Encroachment Permit review should document trench depth, clearances from pavement structure and subgrade, and proposed restoration methods.

SCE 115-kV Subtransmission Lines
Two proposed 115-kV overhead subtransmission routes from the Inyokern Substation should demonstrate compliance with Caltrans standards for wire clearances, pole setbacks, and roadside recovery.

III. Construction Traffic and Capital Project Coordination

Construction is anticipated to occur over a 48-month period (2027–2031), generating substantial activity on SR 178 and US 395.

Heavy Truck Activity:
Months 1–8 are expected to average ~47 heavy vendor/haul truck trips/day; Months 9–48 are estimated at ~94 heavy truck trips/day, plus three daily deliveries for dust suppression.

Workforce Commute:
Workforce peaks around 592–600 workers in Month 20.

Highway Capacity Benchmark Clarification:
The applicant cites a generalized two-lane roadway capacity of 15,000 vehicles per day. Caltrans notes that this planning-level benchmark does not adequately represent the operating context of SR 178 through Inyokern, where the highway functions as the community's main street and the proposed project access is near existing local land uses. The baseline operational forecast for the SR 178 Pavement Rehabilitation Project (EA 09-38330) identifies a projected 2028 AADT of approximately 3,170 vehicles per day for the affected segment. The transportation analysis should use this localized forecast, together with appropriate peak-hour and turning-movement data, to evaluate project-generated truck traffic, access operations, turning conflicts, queueing, sight distance, and pedestrian and bicycle safety. A generalized theoretical roadway-capacity value does not substitute for this site-specific analysis.

Caltrans Capital Project Overlap & Construction Windows
Caltrans District 9 has reviewed the proposed data center construction schedule relative to planned State Highway Operation and Protection Program (SHOPP) projects along the SR 178 corridor and identified two distinct coordination considerations.

Adjacent Active Overlap — Caltrans Pavement Project EA 09-38331
Data center construction is anticipated to begin in 2027 and may overlap with construction activities associated with EA 09-38331. Although the EA 09-38331 project limits do not overlap the proposed data center site, the project corridor is immediately adjacent to the development area, with work activities occurring near the US 395/SR 178 interchange. Construction haul trucks and employee commute traffic accessing the site from US 395 may travel through or adjacent to active Caltrans work zones. Accordingly, the developer's construction traffic manager and Caltrans should coordinate to address traffic control, haul routes, staging, and work-zone safety.

Sequential Coordination Requirement — Caltrans Pavement Project EA 09-38330
The project's SR 178 frontage, access, and proposed utility-crossing improvements are located within or directly affect the EA 09-38330 project corridor. Based on the currently identified schedules, major data center construction activities are expected to occur before or during the early implementation period of EA 09-38330. Therefore, coordination is necessary to avoid conflicts between private development improvements and planned State Highway System improvements. The project applicant should coordinate utility, access, and frontage work with Caltrans to minimize impacts to future pavement rehabilitation activities.

Utility and Frontage Improvement Completion Prior to Pavement Rehabilitation
To avoid disturbing newly rehabilitated pavement, Caltrans requests that utility crossings, driveway connections, frontage improvements, and other work requiring excavation or modification of SR 178 be completed before pavement resurfacing under EA 09-38330, to the extent feasible. This coordination should include the proposed 34.5-kV utility crossing, driveway and access improvements, and pedestrian facilities within state right-of-way. Completing this work before pavement rehabilitation would reduce subsequent pavement cuts, settlement risks, and damage to newly constructed roadway facilities.

Construction Traffic Management Plan (CTMP – MM 4.16-1 and MM 4.16-2)
Caltrans requests that the Construction Traffic Management Plan include the following:

- Compliance with the California Manual on Uniform Traffic Control Devices and applicable work-area traffic-control requirements
- Designated haul routes and peak-hour delivery restrictions
- Worker transportation-demand-management measures, including staging and shift staggering
- Coordination with Caltrans capital projects EA 09-38330 and EA 09-38331
- Emergency-access procedures developed in coordination with Caltrans, the California Highway Patrol, and the Kern County Fire Department
- Preconstruction and postconstruction pavement-condition documentation

These elements would support Encroachment Permit review and help avoid or minimize construction-related mobility and safety effects.

IV. Local Circulation and Complete Streets

Specific Plan Amendment (PLN25-0028)
The lead agency should evaluate the proposed removal or modification of the planned 90-foot secondary collector to determine whether the change could redirect local traffic to SR 178 or North Brown Road.

Active Transportation, Bicycle Facilities, and Pedestrian Accessibility
Consistent with applicable California Complete Streets policies, the applicant should evaluate bicycle, pedestrian, and transit-access improvements associated with project frontage and access modifications along SR 178. Given the project's proximity to Inyokern and the potential

for employee, transit-user, pedestrian, and bicycle activity, frontage improvements should be evaluated where supported by project impacts and Encroachment Permit requirements.

Bicycle Facility Integration
Project-related driveway aprons, deceleration lanes, shoulder modifications, and frontage improvements affecting SR 178 should maintain the continuity of existing or planned bicycle facilities and should be designed in coordination with applicable Caltrans Complete Streets guidance and planned corridor improvements.

Pedestrian Accessibility and Transit Connectivity
Where project-related frontage improvements are required within state right-of-way, the design should provide accessible pedestrian routes across driveway connections and should evaluate connectivity between project access points and nearby transit service. Any pedestrian improvements within the State Highway System should be coordinated with planned SR 178 improvements and reviewed through the Encroachment Permit process.

V. Recommended Conditions for CEC Consideration

Caltrans requests that the CEC consider incorporating the following transportation measures into the project approval, as applicable:

- **Encroachment Permit:** Obtain a Caltrans Encroachment Permit before beginning work within or affecting SR 178 or U.S. 395 right-of-way.
- **Construction Traffic Management Plan:** Prepare a plan addressing haul routes, peak-hour restrictions, worker transportation-demand-management measures, emergency access, and coordination with EA 09-38330 and EA 09-38331.
- **Pavement Condition Documentation:** Document preconstruction and postconstruction pavement conditions and establish an appropriate mechanism for repairing documented project-related damage.
- **Utility and Frontage Work:** Coordinate the proposed 34.5-kV crossing, driveway work, access improvements, and other frontage modifications so that work affecting SR 178 is completed before pavement rehabilitation under EA 09-38330, to the extent feasible.
- **Complete Streets and Accessibility:** Evaluate multimodal accommodations where warranted by project impacts and supported through Encroachment Permit review.
- **Traffic Analysis Reconciliation:** Reconcile the building area used in the trip-generation analysis with the project description and use localized traffic data to evaluate access operations, truck movements, queueing, sight distance, and multimodal safety.

Caltrans appreciates the opportunity to comment on the proposed project and looks forward to continued coordination with the California Energy Commission and the applicant. Questions regarding these comments may be directed to District 9 Local Development Review at Caltrans.D09.LDR.Review@dot.ca.gov or 760-874-8318.

Sincerely,

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