DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

July 1, 2019

JULY 01 2019

STATE CLEARINGHOUSE

11- IMP-98 PM 22.193 Drew Solar Plant DEIR/SCH#201805103**6**

Ms. Patricia Valenzuela Planner IV County of Imperial Planning and Development Services 801 Main Street El Centro, CA 92243

Dear Ms. Valenzuela:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) (SCH# 201805103) for the Drew Solar Project located on State Route 98 (SR-98). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic

- New proposed driveway access on SR-98 will not be allowed since there are other reasonable alternatives access through Drew Road, Kubler Road, and Pulliam Road. If there is a need for another driveway access we recommend placing the driveway access on Pulliam Road, north of SR-98.
 - a. Creating a new driveway access creates additional conflict points for motorists on our state highway that do not currently exist.
 - b. Remove SR-98 access driveway from document and exhibits.
- 2. No open trenching will be allowed within highway right of way, per Encroachment Permit Manual Section 603.6. "Underground installations within highway right-of-way must be performed using a trenchless technology

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method (Bore & Jack, Horizontal Directional Drilling, Microtunneling, Pipe Bursting or Pipe Ramming)".

Right-of-Way

An encroachment permit will be required for any work within the Caltrans' Right-of-Way (R/W) prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, California Environmental Quality Act (CEQA) determination or exemption. The supporting documents must address all environmental impacts within the 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 as lighting, signs and guardrails.

Right-of-Way Utilities

Drew Solar, LLC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of SR-98 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' Right of Way (R/W) until an encroachment permit is approved.

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Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W:

http://www.dot.ca.gov/trafficops/ep/manual.html

Please see Chapter 17 of the Project Development Preparation Manual (PDPM) for requirements regarding utilities and state R/W: https://dot.ca.gov/hq/oppd/pdpm/pdpmn.htm

If you have any questions, please contact Mark McCumsey, of the Caltrans Development Review Branch, at (619) 688-6802 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

MAURICE EATON, Branch Chief

Local Development and Intergovernmental Review Branch