

# 3.0 COMMENTS AND RESPONSE TO COMMENTS

**DEPARTMENT OF TRANSPORTATION**  
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## LETTER 3

June 2, 2014

11-IMP-78  
PM 2.07  
Seville Solar Farm DEIR

Mr. David Black  
Planning and Development Services  
801 Main Street  
El Centro, CA 92243

Dear Mr. Black:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the Seville Solar Farm project near State Route 78 (SR-78). Caltrans has the following comments: 3-1

Utility Encroachment:

The DEIR identifies that the project is proposing a transmission line that will connect to the Imperial Irrigation District Switch Station near SR-78.

Please refer to Caltrans Encroachment Permits Manual ([http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment\\_permits\\_manual/index.html](http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html)) for guidance on utility encroachment. 3-2

Any traffic control for utility work will need to be addressed as part of Caltrans permit approval. Stoppage of traffic for placement of aerial lines, installation or removal of overhead conductors crossing a highway requires traffic control in accordance with policy shown in the Caltrans Standard Plans and the California Manual on Uniform Traffic Control Devices (MUTCD).

All proposed utility poles must be installed outside the clear recovery area. Please refer to the HDM section 309.1 (2) Clear Recovery Zone (CRZ). To verify compliance of the clear-recovery zone, please show location of existing and proposed utility poles.

Glint/Glare:

The EIR has documented that the project does not have any impacts associated with glint/glare and vehicles traveling on SR-78. 3-3

Access:

The DEIR identifies that the project is proposing a new access road from SR-78. The driveway will need to be paved based on Caltrans Highway Design Manual (HDM) standard driveway design. (See attachment J) 3-4

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The proposed driveway location must meet Caltrans sight distance requirements based on highway design speed and set-back requirements per the HDM.

3-4  
Continued

A Traffic Control Plan or construction traffic impact study may be required by the developer for approval by Caltrans prior to construction for any access to SR-78. The plans shall be prepared in accordance with Caltrans's *Manual of Traffic Controls for Construction and Maintenance Work Zones*. Due to in and out movement of slow trucks during construction, a temporary deceleration and acceleration lane should be provided as part of the Traffic Control Plan. All work proposed within the (R/W) requires lane and shoulder closure charts. All roadway features (e.g., signs, pavement delineation, roadway surface, etc.) within the State R/W must be protected, maintained in a temporary condition, and/or restored. For more information, contact the District Traffic Manager, Camille Abou-Fadel, at 619-718-7833

3-5

Any modification to the existing drainage and increase runoff to State facilities will not be allowed.

3-6

Any work performed within Caltrans R/W will require an encroachment permit, and must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits.

3-7

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

3-8

If you have any questions on the comments Caltrans has provided, please contact Roger Sanchez of the Caltrans Development Review Branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Development Review Branch

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### RESPONSE TO COMMENT LETTER 3

**Commenter:** Jacob M. Armstrong, Branch Chief, Development Review Branch, Caltrans

**Date of Letter:** June 2, 2014

**Response to Comment 3-1:** Introductory statement noting Caltrans received a copy of the Draft EIR. No response is required.

**Response to Comment 3-2:** The comment identifies requirements from the Caltrans Encroachment Permit Manual regarding utility encroachment for the transmission line that will connect to the IID Switch Station near SR 78. The comment also states that any traffic control for utility work will need to be addressed as part of the Caltrans permit approval. Lastly the comment requests that the location of existing and proposed utility poles be shown to verify compliance with the clear recovery area. These comments do not address the adequacy of the Draft EIR but are noted for the decision-makers' consideration. No further response is necessary.

**Response to Comment 3-3:** The comment notes that the EIR does not identify any glint/glare impacts to motorists driving on SR 78. KOP #1 and KOP #2 on pages 4.1-10 thru 4.1-13 depict views from SR 78 towards the Project site for both PV with HSAT and CPV with dual-axis trackers. As shown, in the visual simulations and confirmed by the Glare Hazard Analysis performed for the project, "Neither HSAT PV arrays or dual-axis tracking CPV arrays would present glare issues to other surrounding ground-level observation points (Good Company 2013)" (Draft EIR page 4.1-25).

**Response to Comment 3-4:** The comment notes that the Project is proposing a new access road from SR 78; that the driveway will need to be paved based on the provisions of the Caltrans Highway Design Manual (HDM); and that the driveway must meet Caltrans sight distance requirements based on highway design speed and set-back requirements per the HDM. Page 4.3-15 of the Draft EIR acknowledges that "The new access road would require review and approval by Caltrans. The internal circulation network and access would be reviewed by the Imperial County Public Works Department and Imperial County Fire Department to ensure the proposed Project has been designed in accordance with all applicable standards."

**Response to Comment 3-5:** The comment states that a Traffic Control Plan may be required by the developer or approval by Caltrans prior to construction for any access to SR-78. Caltrans review of a Traffic Control Plan is identified on page 4.3-2 of the Draft EIR.

**Response to Comment 3-6:** The comment states that modification to the existing drainage and increase in runoff to State facilities will not be allowed. The Preliminary On-Site and Off-Site Hydrology and Flood Hazard Analysis (AEI-CASC 2013) prepared for the proposed Project analyzed a worst-case scenario assuming 100 percent runoff with on-site storm water retention basins sized to fully retain the 100-year 24-hour peak flood volume resulting from precipitation (refer to analysis for Impact 4.11.3 on pages 4.11-24 thru 4.11-30 of the Draft EIR. The full Preliminary On-Site and Off-Site Hydrology and Flood Hazard Analysis is included in Appendix J of the Draft EIR). Thus, no modification to existing drainage or runoff to State facilities would occur.

**Response to Comment 3-7:** The comment states that work within Caltrans right-of-way will require an encroachment permit and an approved final environmental document. The comment also states that avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. No impacts resulting from Project construction or operation were identified within Caltrans right-of-way. However, page 2.0-33 of the Draft EIR acknowledges that Project will be required to obtain

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Encroachment Permits and Construction Traffic Control Plans for each solar project from Caltrans prior to construction.

**Response to Comment 3-8:** This comment provides contact information for encroachment permits and encourages early coordination with Caltrans. Comment noted.