

California Department of Transportation

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March 23, 2022

11-IMP-115

PM 4.04

Vikings Solar Energy Generation and Storage Project

DEIR/SCH# 2021050036

Ms. Diana Robinson
Planning Division Manger
Imperial County Planning & Development Services Department (ICPDS)
801 Main Street
El Centro, CA 92243

Dear Ms. Robinson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Vikings Solar Energy Generation and Storage Project located near State Route 115 (SR-115). 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.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

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:

Traffic Engineering and Analysis

1. The "Transportation and Traffic" Chapter of the DEIR needs to be updated to reflect the actual viable access to the Project Site. Page 4.15-14 needs to be updated per our previous comments re-stated below:
2. All construction vehicles and heavy truck deliveries shall not use the dirt access road at the Intersection of SR-115/Evan Hewes Highway and Nelson Pit (dirt) Road.
 - a. The shoulder structural section would be severely impacted and possibly damaged if the construction site is accessed via this intersection.
 - b. The motoring public will not be expecting construction vehicles and heavy trucks to enter and exit from Nelson Pit Road.
 - c. There will be heavy soil tracking onto the state facility.
3. Access to the project site shall be made via only the paved roads of Kavanaugh Road, Miller Road, and Nelson Pit Road.
4. The intersections of SR-115/Evan Hewes Highway at Miller Road, and SR-115/Evan Hewes Highway at Kavanaugh Road will require some type of notice to motorist on SR-115 of construction vehicles entering/ exiting the construction site.
 - a. Possible offsite traffic control signs or PCMS's might be required on SR-115.
 - b. Possible Encroachment Permit might be required.
5. Provide a construction access route exhibit to see how trucks will impact SR-115.

Comments to the DEIR

6. Remove Intersections 2, 5, and 6 from the study since these intersection lead to dirt roads that are very unlikely to be used when there are existing viable paved roads that lead to the project site.
7. Page 4.15-14 states: "the construction worker traffic is expected to travel to the site from either SR-115 east or I-8 east, to north on Miller Road and east on Nelson Pit Road to the Project site."
 - a. There are two direct ways to get to the project site using paved roads and not dirt roads as shown on this study. It is highly unlikely that motorist will use these dirt roads when there are viable paved roads that lead to the project site.
 - b. Construction workers coming from Holtville will most likely use eastbound SR-115/Evan Hewes Highway and merge onto eastbound Kavanaugh Road, then that road turns southbound and becomes Miller Road. Then a left turn will be made onto eastbound Nelson Pit Road. Please note that Nelson Pit Road is only paved from Miller Road to the east only.

- c. Construction workers coming from the I-8 Freeway ramps will turn onto northbound SR-115. Then they will make a left onto northbound Miller Road and make a right on Nelson Pit Road. I do not believe that motorist will use Bonds Corner Road intersection instead of the next intersection to the East that gives you a more direct route to the project site.
8. Page 4.15-14 trip distribution does not make sense and conflict with comments on page 4.15-3.
9. Any impacts, structures, utilities, or other miscellaneous items related to this project that do encroach within Caltrans Right-of-Way (R/W) will require further review and encroachment permits.
10. Please see my redline comments on the "Transportation and Traffic" section of the DEIR attached.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of Imperial, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

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 contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

Right-of-Way Utilities

McIntyre Environmental, 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-115 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' R/W until an encroachment permit is approved.

As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

Please see the following chapters in the Caltrans' manuals:

- Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada-a11y.pdf> .
- Chapter 2-2.13 of the Plans Preparation Manual for requirements regarding utilities and state R/W: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/cadd/ppm-text-ch2-sect2-13-a11y.pdf>

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- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-all.pdf>.

If you have any questions or concerns, please contact Charlie Lecourtois, IGR Coordinator, at (619) 985-4766 or by e-mail sent to charlie.lecourtois@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON

Branch Chief

Local Development Review

Attachment – TE&A Comments and Review of Pg 343-363 from DEIR