

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



July 25, 2024

11-IMP-86
PM 47.093
NorthStar 3 Solar Energy Site
MND/ SCH# 2024060955

Mr. Gerardo Quero
Planner II
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243

Dear Mr. Quero

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the NorthStar 3 Solar Energy Site Project located near State Route 86 (SR-86). 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.

We look forward to working with the County of Imperial (County) 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:

The following comments below were previously included in the Caltrans letter dated February 01, 2024, and were not addressed by the applicant. The unaddressed comments are listed below for Hydraulics and Design:

Hydraulics

- Please provide preliminary grading plans, include contour grading at 0.1-foot intervals.
- Please provide a hydrology and hydraulics study for the proposed project. Include existing and proposed conditions.
- Please show how the parcels will be accessed. Please clarify if a driveway or a private road will be constructed. Provide a preliminary design showing these improvements.
- Provide a site plan showing the existing Caltrans SR-86 centerline stationing, Caltrans' Right-of-Way (R/W), existing drainage facilities, and proposed project improvements.

Design

Near the NorthStar 3 Solar project footprint, Caltrans has 2 planned projects on SR-86: PID 1123000001 (IMP-086-25/67.8) Broadband project installing fiber optic conduit. PID 1122000280 (IMP-086-34.8/64.1) Bridge Preservation.

At the planned project access point (what was formerly Sandy Beach Road), a culvert is present under the intersection. If heavy loads, beyond what SR-86 is designed to bear, are planned for transport, future coordination may be needed to avoid damage to State facilities during construction.

Environmental

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in the analysis for any work identified in Caltrans' R/W and any additional mitigation measures identified for the Final Environmental Document.

It is recommended that the project is designed and abides by local MS4 (Municipal Separate Storm Sewer System) Permit requirements.

Should elements of the project and/or mitigation measures change to effect Caltrans' R/W, we would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Caltrans will continue our coordination efforts to ensure that it can use your environmental documentation for our subsequent environmental compliance with the encroachment permit process.

An encroachment permit will be required for any work within the Caltrans' 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.

Landscape Architecture

The following comments below were previously included in the Caltrans letter dated January 18, 2024, and were not addressed by the applicant. The unaddressed comments are listed below:

Section 4.5 Mitigation Measures of the Visual Resources Assessment states no mitigation measures are required:

"The analysis, in this section, shows less than significant impact for the four criteria. Therefore, no mitigation measures are required."

As a condition of approval, the project should list visual impact minimization measures that will be project features. Below is a list of visual impact minimization measures that are listed in the Visual Impact Assessment. These measures should be incorporated in the project:

- Solar PV panels are constructed of dark-colored (usually blue or black) materials and are covered with anti-reflective coatings.
- Project perimeter fencing is 6 ft. high chain link fence with secured access gates will include wooden slats to screen the property. The slat color would blend with natural desert colors.
- Project lighting is hooded and oriented downward so as not to spill over into adjacent parcels.
- The project includes non-reflective matte surfaces on solar arrays, BESS and gen-tie line.

- The lifespan of the proposed project is 20 years. The site will be fully restored after closure.

Glare

The proximity of the project site to SR-86 raises some concerns regarding potential glare that could pose a potential risk to motorists traveling on SR-86. The project's potential glare characteristics should be considered as part of the County's Permit approval. Caltrans would want to ensure that all lighting, including reflected sunlight and reflected night lighting, within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on SR-86.

System Planning

Please see the following planned Caltrans projects for consideration due to possible impacts at the proposed project site:

- Caltrans is planning a Middle-Mile Broadband project (EA 4B018) to add conduit, fiber optic cable, and supporting elements by trenching in the State Right-of-Way (R/W) along SR-86 with construction scheduled for 2025.
- Caltrans is planning a Pavement Rehabilitation project (EA 43194) on SR-86 with construction scheduled for 2029.

Hauling

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-86.

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.

It is also understood by our agency that no new utility crossings on State facilities will occur as a result of this project. However, 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 visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit.
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to D11.QMAP.Permits@dot.ca.gov. Early coordination with Caltrans is strongly advised for all encroachment permits.

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

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review