

California Department of Transportation

DISTRICT 11
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SAN DIEGO, CA 92110
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www.dot.ca.gov



December 23, 2024

11-IMP- 8, 86
PM VAR
Wildcat Energy Farm
NOP/SCH#2024110680

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

Dear Mr. Black:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation of a Draft EIR (NOP) for the Wildcat Energy Farm Project located near Interstate 8 (I-8) and 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:

Traffic Engineering and Analysis

- Initial Study and Notice of Preparation Report, Figure 7 indicated that the L-Line will cross SR-86 south of State Route 78 (SR-78) and the Wildcat-Line will cross I-8. Mention the crossings on Caltrans' Right-of-Way (R/W) under "Environmental Setting" on page 14 for both lines.
- Section XVII. Transportation point C indicated that "the project would not result in any changes to any roads, intersections, streets, highways, including new access points from SR-86....". Provide information in the report regarding where the project access would be in related to SR-86. Please clarify which access road will be connected to SR-86 from the project site. This project is in the access-controlled area, access opening inside access control will not be allowed.
- The submittal mentioned a Traffic Impact Analysis is proposed as part of the Environmental Impact Report (EIR). Please provide it when the document is available for review.
- Provide project additional trips for during and after construction. Please identify how many trucks and regular vehicles will be accessing the site daily. An acceleration and deceleration lanes may potentially be required based on the type and number of vehicles accessing the proposed road/driveway.
- Include the potential impacts and mitigation measures for this proposed project.
- All discretionary fixed objects/poles shall be located beyond the clear recovery zone at a minimum of 52 feet from edge of traveled way. See Highway Design Manual Topic 309.1(2)(b) for additional information.
- The Draft EIR will need to include further discussion and details regarding the Wildcat Line crossing at I-8.
- An encroachment permit will be required for the Wildcat Line crossing at I-8.

Utilities Engineering

- Design/Utility Plans need to be submitted to Caltrans for review and approval.
- All underground and overhead utilities are to be shown on the plans.
- Any overhead lines are to meet the clearance required by state policy.
- Avoid crossing the State R/W if possible.
- Utility poles must be located outside of State R/W.
- Underground lateral crossings are preferable.
- Any crossings are preferred through existing access points.
- Placement of longitudinal utility encroachments within access-controlled State highway R/W is prohibited under Caltrans' policy. Any deviations require an

approved encroachment policy exception (Caltrans Encroachment Permit Manual Section 602.4C).

Landscape Architecture/Glare

The NOP submittal package mentions that a glare study will be prepared for the proposed project in the EIR to address potential impacts to drivers on nearby roadways and on the State Highway system. Please provide the glare study to ensure that reflection from the solar arrays does not affect drivers on SR-86. The glare study is required by Caltrans for further evaluation.

The project proposes solar panels which may result in glare that impacts drivers on the State Highway System. Glare from night lighting should also be considered. A secondary visual impact may result when viewing the solar panel facility from the highway. A long-term visual impact would occur at the end of the life span for the solar project if the solar panels were abandoned in place.

Please update the Project Boundary limits in Figure 6 of the NOP. The Project Boundary lines encroach into Caltrans' State-owned R/W at Salton Drive/SR-86. Please move the Project Boundary outside of State-owned R/W.

As a condition of approval, the project will include the following visual impact minimization measures:

- Solar Photovoltaic (PV) panels are constructed of dark-colored (usually blue or black) materials and are covered with anti-reflective coatings.
- Project lighting is hooded and oriented downward to avoid spill over into adjacent parcels.
- Non-reflective matte surfaces are used on solar arrays, Battery Energy Storage System (BESS), and gen-tie line to minimize glare.
- Project perimeter fencing and access gates are 6ft. high and include tan wooden slats to screen view of the solar arrays from the adjacent properties.
- Unpaved roadside areas between SR-86 and perimeter fencing are seeded with a native seed mix of desert shrubs, flowers, and grasses.
- Concrete ditches and aprons proposed within Caltrans' R/W will be colored tan.
- The site will be fully restored to pre-project conditions at the end of lifespan or after closure.

Design

There are several Caltrans projects in the Project Initiation Document (PID) phase along SR-86 near the Wildcat Energy Farm Project footprint. These projects include:

- Project ID # 1123000293 (EA 43194) (IMP - 86 Postmiles R37.248 to 67.824). This project proposes pavement rehabilitation, drainage work, roadway signs, lighting, and census work. The project is anticipated to take place completely within Caltrans' R/W. There is subbase stabilization that is projected to be included as part of the pavement rehabilitation, which may include lime treatment to depths of 6-ft below grade. Coordination with this project is advised.
- Project ID # 1124000037 (EA 43208) (IMP - 86 Postmiles 12.323 to 17.998). This project proposes pavement rehabilitation, bicycle and pedestrian infrastructure improvements, and ADA infrastructure. Coordination with this project is advised.
- Project ID # 1124000038 (EA 43209) (IMP - 86 Postmiles 17.998 to R31.84). This project proposes pavement preservation, traffic signals, bicycle and pedestrian infrastructure improvements. Coordination with this project is advised.
- Project ID # 1123000001 EA 4B018 (IMP - 86 - Postmile 24.05 to 67.82) broadband project installing fiber optic conduit. The broadband project will be running through the proposed project area but is still in the early design phase. The broadband project will likely remain within Caltrans' R/W, and construction is anticipated sometime between October 2024 and November 2025. Coordination with Caltrans is advised to minimize delay.

Additionally, near the Wildcat Energy Farm Project footprint, Caltrans has three planned projects along I-8 within the Postmile (PM) range R26 to R30. The following are projects in the PID phase along I-8:

- Project ID # 1123000291 (EA 43192) (IMP – 8 Postmiles R10.000 to R28.000). This project proposes pavement rehabilitation, abandon culvert, signs, lighting, census station, weigh-in-motion system, green zone paint, and guardrail. Coordination with this project is advised.
- Project ID # 1124000035 (EA 43206) (IMP – 8 Postmiles R5.100 to R47.100). This project proposes pavement rehabilitation, deck repair, polyester overlay, approach slab repair, railing upgrade, joint seal replacement, and substructure repair. Coordination with this project is advised.

- Project ID # 1124000219 (EA 43234) (IMP – 8 Postmiles R25.900 to R31.800). This project proposes pavement rehabilitation, drainage restoration, lighting and signage replacement, and ADA curb ramp upgrades. Coordination with this project is advised.

Hydrology and Drainage Studies

- Please provide hydraulics studies, drainage and grading plans to Caltrans for review.
- Provide a pre and post-development hydraulics and hydrology study. Show drainage configurations and patterns.
- Provide drainage plans and details. Include detention basin details of inlets/outlet.
- Provide a contour grading plan with legible callouts and minimal building data. Show drainage patterns.
- On all plans, show Caltrans' R/W.
- Early coordination with Caltrans is recommended.
- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.

Hauling/Traffic Control Plan

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>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the intersections between SR-86/Harvard Ave and SR-86/Air Park Dr, and I-8 locations that will be impacted by the project at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage. Potential impacts to the highway facilities (I-8 and SR-86) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

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 and I-8.

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final Environmental Document. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.

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, 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 including but not limited to structures, intelligent transportation systems elements, highways, roadways, on- and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. 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.

Right-of-Way Utilities

Please provide documentation that shows the existing IID "L" line and Wildcat lines that are within Caltrans' R/W.

SR-86 is an access-controlled State highway. There is an access opening at Air Park Drive and Harvard Avenue where you can cross the highway from east to west. Currently there is a frontage road on the west side owned by the State. If

the applicant is considering requesting another access opening, they would have to go through the de-cert process. The de-cert process requires an internal Red Flag review and if the review proceeds to next steps a deposit is required to proceed with the decertification request. This would need to go to the California Transportation Commission (CTC) for final review. This process may result in either approval or denial.

At our last meeting with them they indicated they would not be considering another access opening. There are no other easements adjacent to our facilities at this location (see attached Caltrans Right of Way Maps).

RAI Energy 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-86 and I-8 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.

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. As part of the encroachment permit process, the applicant must provide an approved final environmental document including 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>

- Chapter 17 of the Project Development Procedures Manual <https://dot.ca.gov/-/media/dot-media/programs/design/documents/pdpm-chapter17-a11y.pdf>.

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

Attachments:

1. Right of Ways Map No. 73602.15
2. Right of Ways Map No. 73602.16
3. Right of Ways Map No. 73602.17
4. Right of Way Map No. 73602.18

COUNTY OF IMPERIAL
T. 11 S. R. 10 E. S. B. M.

TRACT 600

DD 25600-01-01

DISTRICT RIGHT OF WAY ENGINEER, DISTRICT II, RCE 13042

T. 10 S. R. 10 E. S. B. M.

TRACT 600

SEC. 5

SEC. 4

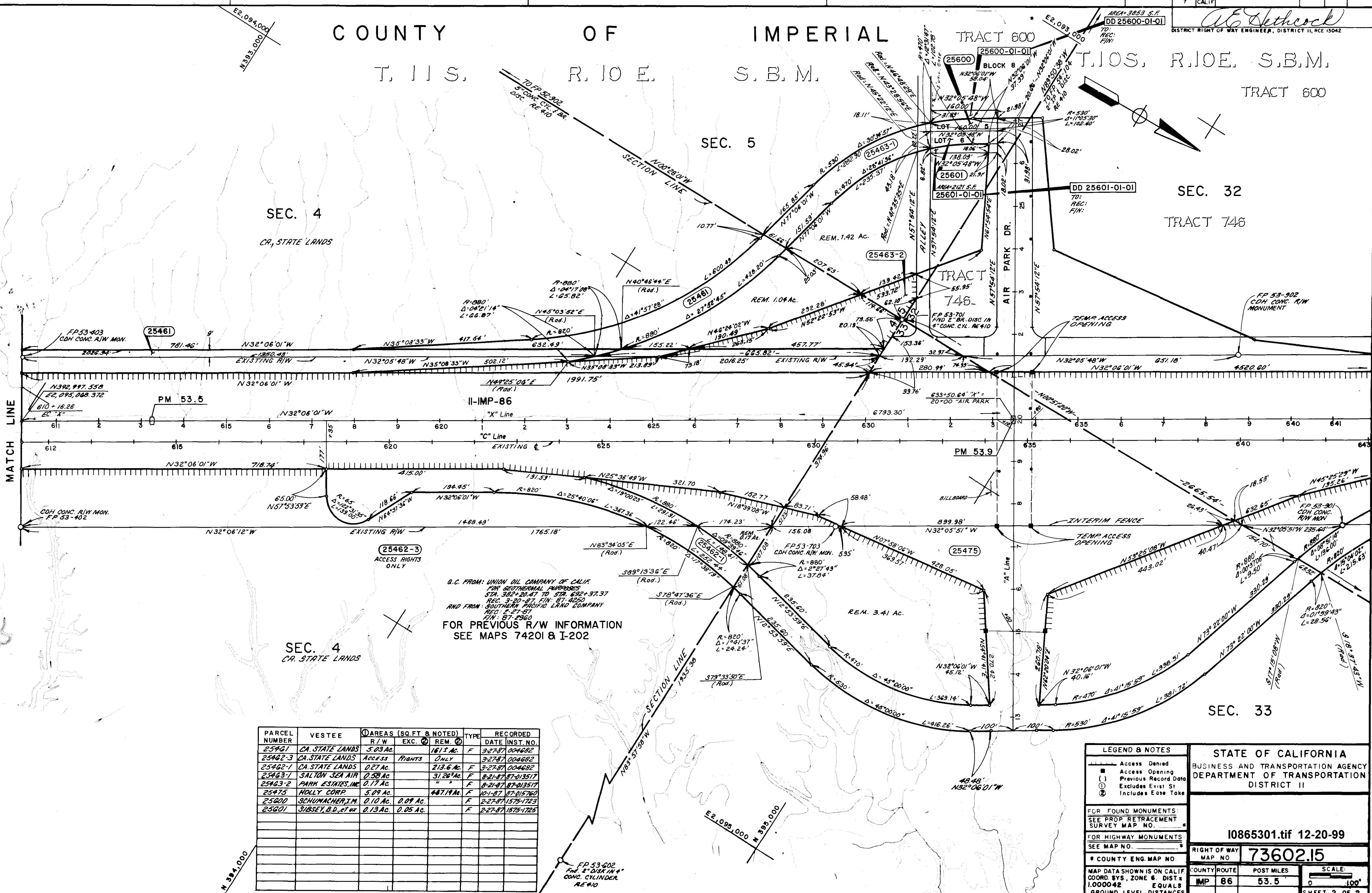
CA, STATE LANDS

SEC. 32

TRACT 746

FOR THIS AREA SEE MAP 73602.14

FOR THIS AREA SEE MAP 73602.16



B.C. FROM: UNION OIL COMPANY OF CALIF.
FOR GEOTHERMAL PURPOSES
STA. 382+20.47 TO STA. 632+37.37
REC. 3-20-87 FIN. ST. 8250
AND FROM: SOUTHERN PACIFIC LAND COMPANY
REC. 2-27-87
FIN. ST. 2960
FOR PREVIOUS R/W INFORMATION
SEE MAPS 74201 & I-202

PARCEL NUMBER	VESTEE	AREAS (SQ. FT. & NOTED)	TYPE	RECORDED DATE INST. NO.
25461	CA, STATE LANDS	5.03 AC.	EXC. ②	3-27-87 004682
25462-3	CA, STATE LANDS	Access Rights	ONLY	3-27-87 004682
25462-1	CA, STATE LANDS	0.27 AC.	RIGHTS	3-27-87 004682
25463-1	SALTON SEA AIR	0.58 AC.		8-21-87 87-013517
25463-2	PARM ESTIMES, INC.	0.17 AC.		8-21-87 87-013517
25475	HOLLY CORP.	5.09 AC.		10-1-87 87-015760
25600	SCHUMACHER I.M.	0.10 AC.		2-27-87 1575-1723
25601	SIBSEY B.D. ET AL	0.13 AC.		2-27-87 1575-1725

LEGEND & NOTES

- Access Denied
- Access Opening
- Previous Record Data
- Excludes Exist. St.
- Includes Easement

FOR FOUND MONUMENTS:

SEE PROP. RETRACEMENT

SURVEY MAP NO.

FOR HIGHWAY MONUMENTS:

SEE MAP NO.

* COUNTY ENG. MAP NO.

MAP DATA SHOWN IS ON CALIF.

COORD. SYS. ZONE 6. DIST. 1

1,000,000 EQUALS

GROUND LEVEL DISTANCES

STATE OF CALIFORNIA

BUSINESS AND TRANSPORTATION AGENCY
DEPARTMENT OF TRANSPORTATION
DISTRICT II

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RIGHT OF WAY

MAP NO. 73602.15

COUNTY ROUTE

IMPERIAL 86

POST MILES

53.5

SCALE:

0 100'

SHEET 2 OF 2

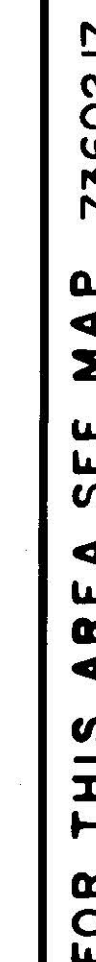
FOR THIS AREA SEE MAP

CLC

I0865301.TIF

Project Engineer
R.H. KREIDT
Date
1/86

At Hethcock



REVISIONS

STATE OF CALIFORNIA			
BUSINESS AND TRANSPORTATION AGENCY			
DEPARTMENT OF TRANSPORTATION			
DISTRICT II			
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RIGHT OF WAY MAP NO.		73602.16	
COUNTY	ROUTE	POST MILES	SCALE:
IMP	86	53.9	0 10 0'
		SHEET OF	

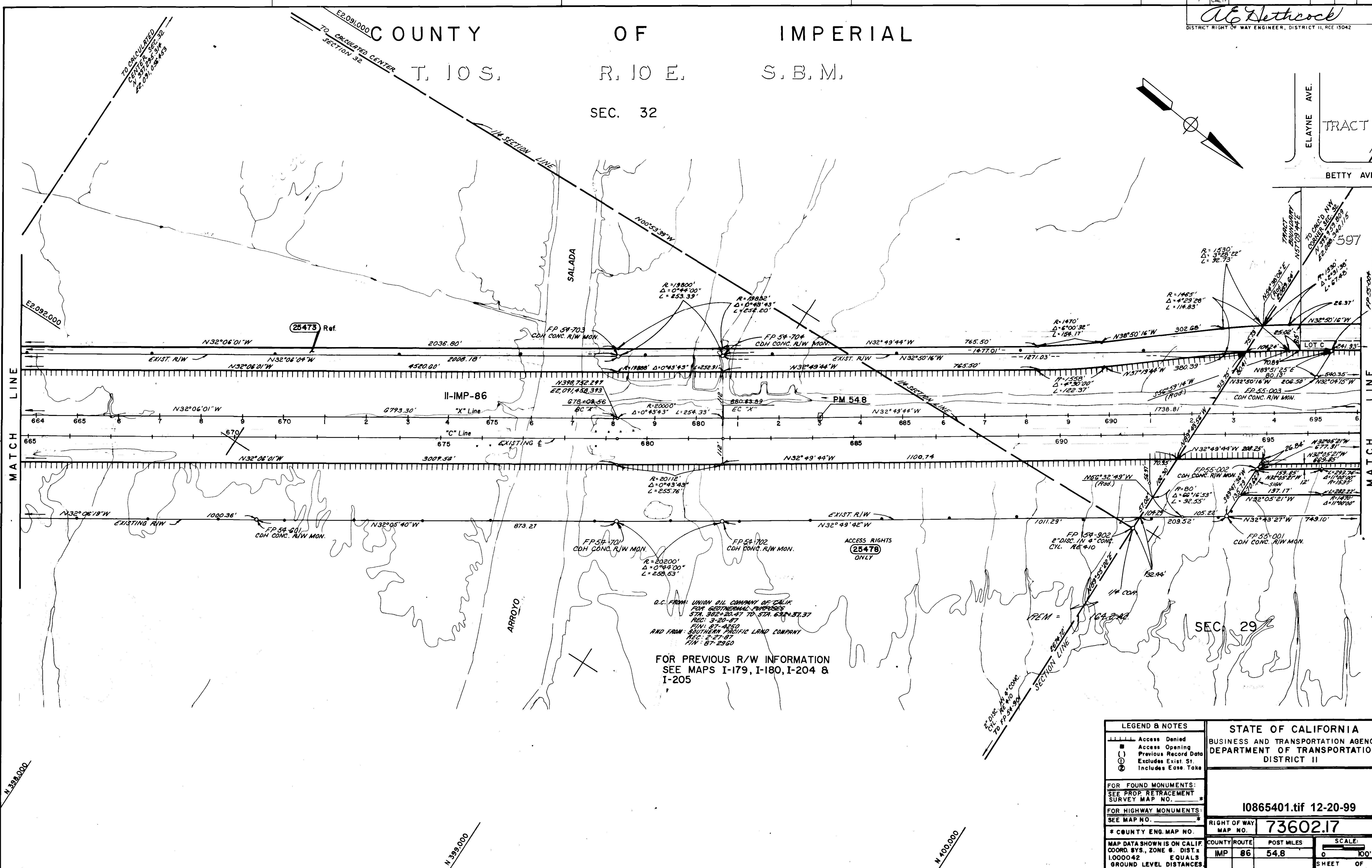
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TRACT

BETTY AVE.

FOR THIS AREA SEE MAP 73602.16

FOR THIS AREA SEE MAP 7360218
2004 CONC. HWM FROM



LEGEND & NOTES

Access Denied

Access Opening

Previous Record Data

Excludes Exist. St.

Includes Easement

FOR FOUND MONUMENTS:

SEE PROP. RETRACEMENT SURVEY MAP NO. _____ *

FOR HIGHWAY MONUMENTS:

SEE MAP NO. _____ *

* COUNTY ENG. MAP NO. _____

MAP DATA SHOWN IS ON CALIF. COORD. SYS., ZONE 6, DIST. X, 1000042 EQUALS GROUND LEVEL DISTANCES.

STATE OF CALIFORNIA

BUSINESS AND TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION

DISTRICT II

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RIGHT OF WAY MAP NO.

73602.17

COUNTY ROUTE

IMP 86

POST MILES

54.8

SCALE:

0 100'

SHEET OF

I0865401. TIF

