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August 12, 2013

Ms. Christina R. Stora
Compliance Project Manager
California Energy Commission
Siting, Transmission, & Environmental Protection (STEP) Division
1516 Ninth Street, MS 2000
Sacramento, CA 95814

Preliminary Staff Assessment for the Palen Solar Electric Generating System
CEC-70-2013-003-PSA, Docket Number 09-AFC-7C

Dear Ms. Stora:

The California Department of Transportation (Caltrans), District 8, appreciates the opportunity to review the Preliminary Staff Assessment for the Palen Solar Electric Generating System. The Amended project will now consist of two 760-foot solar power towers, a solar field of 85,000 heliostats, administration building, warehouse, evaporation ponds, maintenance complex, a meter/valve station for natural gas, on-site switchyard, and a 10-mile single-circuit 230kV generation tie-line which will connect to the Red Bluff Substation. The site is approximately 0.5 miles north of Interstate 10 (I-10) and 10 miles east of Desert Center in an unincorporated area of Riverside County. An extension of the Corn Springs Road at the I-10 Interchange will access the site.

Although we are continuing to review and research certain portions of the Assessment the following comments are for your consideration:

Access Road
• Right-of-way (RW) for I-10 extends beyond the Corn Springs Road Interchange. Design and construction for the project access road connection to Corn Springs Road Interchange shall follow the guidelines in Caltrans Highway Design Manual Section 504.8 - Access Control. http://www.dot.ca.gov/hq/oppd/hdm/hdmtoc.htm
• The delivery of turbine equipment, construction materials, water trucks, tractor trailers, and other heavy equipment may have an impact on the State Highway System. Therefore, we recommend the project owner restore all public roads, easements, and rights-of-way that have been damaged due to project-related construction activities to original or near-original condition in a timely manner. Repairs and restoration of access roads may be required at any time during the construction phase of the project to assure safe ingress and egress.
Dust Control:

- During construction activities, efforts should be made to minimize and prevent dust emissions from creating poor visibility conditions along the State highway.
- Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) should be used on all construction areas that may be disturbed.
- Vehicles on unpaved areas to the construction site should not travel at such speeds that they create visible dust emissions.
- Prevention of dust/sand track-out to the Corn Springs Interchange should be prevented.

Desert Tortoise

Condition of Certification BIO-9 requires installation of security and desert tortoise exclusionary fencing around the entire Project Disturbance Area and portions south of I-10. Proper fence maintenance is a critical prevention of tortoise road mortality. We suggest an MOU with PSEGS and Caltrans to implement mitigation measures for PSEGS installation and maintenance of the fencing throughout the life of the project.

Glint and Glare

Further consultation with Caltrans HQ and District Staff is needed before mitigation measures are proposed. We ask for an extension before submitting any comments on this subject.

I-10 Tie-line Proposed Condition of power line placement

- When/if lane closures are required on the State Highway System during construction we recommend that the Section 517 of the Encroachment Permits Manual be referenced for the proper procedures to manage traffic during construction. The manual can be accessed online at: http://www.dot.ca.gov/hq/traffops/developserv/permits/
- A Transportation Control Plan should be formulated to reduce traffic congestion in the event of overlapping construction schedules from the other projects in the area. TRANS-1
- It is suggested that there be appropriate signage notifications of construction traffic throughout the construction period.
- Workers times should be staggered, limit truck deliveries to off-peak hours, and implement measures to ensure I-10 operates at Level C or higher during peak travel time. TRANS-2
- Issuance of a Caltrans Encroachment Permit will be required prior to any construction within the State R/W and shall be in compliance to all current design standards, applicable policies, and construction practices. TRANS-4

Transportation Permit

Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. Requests for such special permits require the completion of a Transportation Permit. For information regarding Transportation Permit application for travel within the State of California contact:

"Caltrans improves mobility across California"
require the completion of a Transportation Permit. For information regarding Transportation Permit application for travel within the State of California contact:
Transportation Permits Office
1823 14th Street
Sacramento, CA 95811-7119
Main number: (916) 322-1297

More Permits contact information at: http://www.dot.ca.gov/hq/traffops/permits/contact.htm

**Project Development Procedures Manual Chapter 17 - Transverse Utility Encroachment**

New utility installations, and adjustment or relocation of existing utilities, may be permitted to cross a freeway or expressway. To the extent feasible and practicable, they should cross on a line generally normal to, but not less than 60° from the freeway longitudinal alignment, and preferably under the freeway. The utility should be located in such a manner that it can be serviced, maintained, and operated from outside the right of way, except for special cases covered under "New Utility Longitudinal Encroachments".  
http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm#pdpm

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact me at (909) 383-4557 for assistance

Sincerely,

[Signature]

DANIEL KOPULSKY
Office Chief
Community and Regional Planning

c: Andrea Koch, CA Energy Commission, Traffic and Land Use
Haissam Yahya, CT Traffic Operations – Surveillance Region B
Richard Goh, CT Encroachment Permits – Riverside County

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