

DEPARTMENT OF PUBLIC WORKS

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Doug Wilson - Interim Director

County of

INYO

DOCKET

11-AFC-2

DATE APR 30 2012

RECD. MAY 10 2012

Candace M. Hill, Planner II
State of California, Energy Commission
Siting, Transmission & Environmental Protection Division
1516 9th Street, MS 40
Sacramento, CA 94814-5512

April 30, 2012

Re: Hidden Hills Solar Energy Generating System, Application for Certification (11-AFC-2)

Access and Circulation Issues

Dear Ms. Hill:

We have reviewed the available information regarding the proposed Hidden Hills Solar Energy Generating System in regards to access and circulation. Based on the available information, the following access and circulation items would be required by Inyo County if not for the Energy Commission's exclusive permitting jurisdiction.

TURN LANES: Due to the potential speed differential and resulting conflicts for vehicles (including trucks) turning into and out of the project site to and from the east, turn pockets should be provided to accommodate the slower truck traffic that can be expected during both the long-term and the short-term. Based upon Table 5-12.7 currently, truck traffic to and from the west is not expected; however if truck traffic is expected from the west, then turn lanes into and out of the site at each access point should be considered. We suggest that the turn pockets be a minimum length of two of the maximum truck lengths to be entering the site. Turn lanes include acceleration lanes for trucks exiting the site. The lanes should include transitions for adding and dropping lanes.

ENTRANCE DRIVES: Entrance drives into the project site should be of sufficient length to support truck queues. We suggest two truck lengths plus a minimum of 10 feet between, or 170 feet.

INTERPRETIVE STOP: If an interpretive stop is provided, we suggest it should be constructed off the right-of-way for Old Spanish Trail. If parking is anticipated, it should have a travel width of a minimum of 10 feet in addition of the space designed for parking.

SIGNAGE AND TRAFFICE CONTROL: Appropriate signage should be required to provide for short-term and long-term safety of the motoring public. If necessary, temporary traffic controls should be considered for safety during construction.

INTERNAL CIRCULATION: Internal access drives and access to buildings should be reviewed to ensure proper internal circulation, taking into account truck movements and overhead clearance.

RIGHT-OF-WAY DEDICATION: We suggest that right-of-way be dedicated along the project frontage to accommodate turn lanes and potential future widening of Old Spanish Trail. We suggest that 12 feet be dedicated for each of the lanes mentioned for these purposes (24 feet where there would be a left turn lane and an acceleration/deceleration lane). We anticipate this will result in an additional right of way with a minimum width of 24 feet across the frontage on the property.

Old Spanish Trail during construction is of great concern, as well as safety issues at Emigrant Pass. It has come to our attention that damage is being incurred along roads at other power plants being constructed in the region, and that construction-related truck traffic is damaging the roads, which then causes damage to other vehicles. In addition to requiring the repair of Old Spanish Trail that will be incurred during the construction period, we request that the Energy Commission require that the developer indemnify the County for any damage that occurs due to project-related road deterioration during construction. We are also increasingly alarmed about the potential for vehicular truck-related conflicts at Emigrant Pass, and request that Energy Commission staff thoroughly vet all feasible means to prohibit construction and long-term truck traffic from utilizing Old Spanish Trail west of the project site.

Thank you. If you have any questions, please call me at 760.878. 0214 or email me at dwilson@inyocounty.us

Sincerely

Doug Wilson, PE

Interim Public Works Director

cc: BrightSource Energy

