

<b>DOCKETED</b>	
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<b>Project Title:</b>	Elmore North Geothermal Project (ENGP)
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**Elmore North Geothermal Project - Docket # 23-AFC-02**

*Additional submitted attachment is included below.*

## California Department of Transportation

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July 29, 2024

11-IMP-111  
PM 36.146  
11-IMP-86  
PM R27.185  
Elmore North Geothermal Project  
PSA Review  
CEC-700-2024-002-PSA  
Docket Number 23-AFC-02

Mr. Eric W. Veerkamp  
Project Manager  
California Energy Commission  
Docket Unit  
715 P Street  
Sacramento, CA 95814

Dear Mr. Veerkamp:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Preliminary Staff Assessment (PSA) for the Elmore North Geothermal Project (ENGP) located near State Routes 111 and 86 (SR-111, SR-86) in Imperial County. 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 California Energy Commission in areas where the agency 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 Impact Analysis**

1. Please provide the traffic analysis worksheets and electronic files.
2. Page 5.14-7 indicates the Imperial County Vehicle Miles Travels (VMT) threshold is 110 trips per day and Page 5.14-13 indicates daily trips of 388 for project Operations. Provide a VMT analysis or justification why one is not needed.
3. Provide the construction management plan for the vehicle trips during construction. The construction management plan for the vehicle trips during construction should also address a scenario if all the cumulative construction projects are generating trips and being constructed concurrently.

### **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>

### **Environmental**

Caltrans appreciates the opportunity to comment on the Preliminary Staff Assessment. The analysis presented does not have any impact on Caltrans' Right-of-Way. 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.

Please contact us when you discover that Caltrans' R/W is affected as we would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance. Caltrans would welcome the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

### **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 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 process.
- have an approved environmental document.

are to submit documents for QMAP process via email to [D11.QMAP.Permits@dot.ca.gov](mailto: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 Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review