

COUNTY OF COLUSA

DEPARTMENT OF PUBLIC WORKS

ROAD COMMISSIONER-SURVEYOR-ENGINEER
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LOREN CLIFTON, DIRECTOR

December 19, 2007

California Energy Commission
Energy Facilities Siting Division
1516-9th Street (MS-15)
Sacramento, CA 95814

Attn: Jack Caswell, Project Manager

DOCKET 06-AFC-9
DATE DEC 19 2007
RECD. DEC 20 2007

Dear Mr. Caswell:

Upon review of the final staff assessment document for the proposed Colusa Generating Station, the Colusa County Public Works Department does not agree with the proposed mitigating measures as stated regarding Transportation as shown in the document.

We acknowledge that your document recognizes the fact that two bridges mentioned in the report along the originally conceived route to the plant require replacement. It should be noted that to replace the Theresa Creek bridge on McDermott Road will require permits from the State Department of Fish and Game and the U.S. Army Corps, as well as a clean-water certification from the water board. These agencies are not normally known for rapid turnaround, which should be taken into consideration regarding the construction scheduling. We had also previously understood that the extra-heavy loads that will be brought in during construction would be off-loaded from the railroad at the Delevan siding. The current staff assessment now indicates these loads will be off-loaded in Williams and trucked to the site, which would then potentially affect many other County routes beyond the three previously listed. Our position on this matter is that if there is no reasonable way to off-load these items at Delevan and restrict construction activity to the original route of Delevan, McDermott and Dirks roads, there will need to be an added assessment by the stakeholders of the yet to be determined routes to be used for conveying materials and equipment from all points of delivery to and from the construction site. The proposed route(s) will require an Engineers evaluation and report with County Public Works oversight to determine required repair and upgrades to the roads and potential traffic circulation impacts, noting particularly impacts to farming operations when the Contractor will be sharing the roadway with farm operators and movement of farm equipment and produce haulers. It would seem conceivable to us that off-loading in Williams will likely result in needed upgrades to other County bridges and road sections and require a more extensive role by the Project Developers in traffic circulation management and safety. The added time delays and expense to evaluate and implement these improvements may justify the time and expense to upgrade the existing rail siding at Delevan and isolate required bridge and road improvements and traffic safety and circulation issues to within close proximity of the site. Our preference would obviously be to have the loads hauled by rail as previously proposed to keep the number of County Roads affected to a minimum.

Under TRANS-2, page 4.10-17, the recommendation suggests the applicant repair damaged road facilities to original or near original condition. The document also recommends the applicant work with Public Works to comply with applicable design and construction standards. In our opinion, this mitigation verbiage is much too

vague to avoid possible confusion as to what needs to be done in the future. There will be a great number of extra-legal loads brought in during the construction of the plant, some of which will certainly cause visible, measurable damage to the existing road facilities. This damage should be reasonably easy to identify and repair, but there will undoubtedly be additional damage to roads which cannot immediately be seen but will show effects in the years after construction. We have expressed our concerns to CEC staff previously but apparently our comments went largely unheard.

The Colusa County Planning Commission has approved the tentative parcel map for the powerplant project with conditions for Public Works as follows:

- 1) The applicant replaces the County owned "Theresa Creek" bridge on McDermott Road
- 2) The applicant replaces the privately-owned Glenn-Colusa Irrigation District Bridge on the extension of Dirks Road
- 3) The applicant repair damaged areas of County Roads "as needed" during construction under County supervision
- 4) The applicant resurface (asphalt overlay) Delevan, McDermott and Dirks Roads after construction is complete, with County approval of design and County supervision

In our opinion, these four conditions in combination with the use of the rail siding at Delevan adequately mitigate the anticipated effects of the construction of the powerplant. They also leave little room for debate as to what will need to be done. We suggest you consider modifying TRANS-2 to reflect the conditions shown here. In practice, the conditions required on the parcel map should result in the necessary improvements, but having them re-stated as part of their state approval should eliminate future confusion. We also have strong concerns about the possible off-loading of the heaviest machinery in Williams for the previously-stated reasons.

Thank you for your time and consideration.

Sincerely,

Loren Clifton
Director of Public Works

By: _____
Jon S. Wrysinski
Assistant Director

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