

DEPARTMENT OF TRANSPORTATION

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Sep 18 2020

STATE CLEARINGHOUSE

September 18, 2020

Mr. John Forsythe, Project Manager
CA Public Utilities Commission (CPUC)
c/o Aspen Environmental Group
235 Montgomery Street, Suite 640
San Francisco, California 94104-2920

File: Ker/Iny-395,168
NOP DEIR
SCH#: 2020080553

**Ivanpah-Control Project – Southern California Edison (SCE) Application No. 19-07-015
Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)**

Dear Mr. Forsythe:

Thank you for giving the California Department of Transportation (Caltrans) District 9 the opportunity to comment during the NOP phase for the Ivanpah-Control (I-C) Project, which will rebuild transmission lines in eastern Kern and Inyo counties (District 9), and in San Bernardino County (District 8). Over the last few years we have interacted with the CPUC and project proponents. We offer the following:

- In Inyo County, a small portion of the line falls within a designated US 395 Scenic Highway section near Aberdeen.
- As noted in the April 2020 Proponents Environmental Assessment (PEA), Caltrans Encroachment Permit(s) will be required for utility crossings (such as shown in PEA Figure 3.5-3 and Figure Set 3.7-2) within State right-of-way (R/W). Utility standards depend upon the type of highway facility (i.e. access control, conventional, interstate, etc.). Specifications may be found in Section 600 Utility Permits of the **Encroachment Permit Manual** at: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada.pdf>

If the I-C Project requests deviations from the Encroachment specifications, the Caltrans Exceptions Procedure could be instigated. However, this process could complicate the permit process; approval of exceptions might not be granted. See: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/f0017805-chapter-3-a11y.pdf>

The permit application may be found at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>

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For more information, you may contact Stephen Winzenread, D9 Permit Engineer at (760) 872-5222 or stephen.winzenread@dot.ca.gov.

- The PEA already notes use of the CA Manual of Uniform Traffic Control Devices for traffic control, which will also require a Caltrans encroachment permit for State highway facilities. Short term closure of a State highway is required when stringing lines across it. The project should also try to avoid helicopters with loads crossing the highway to also preclude highway closure. We look forward to reviewing the I-C Project Traffic Management Plan.
- Potential Material Yards (i.e. staging areas) are noted in PEA Table 3.7.1 and Figure Set 3.7-1. Any State highway access (PEA section 3.7.1.3) for these need to be further assessed. Access improvements might be required with a Caltrans encroachment permit.
- In Inyo County, the Olancha-Cartago US 395 4-lane project is in the vicinity of the I-C Project. SCE and Caltrans D9 staff have been interacting to ensure that pole relocations/replacements necessary for the US 395 project will be consistent with the I-C Project. Caltrans D9 contacts are:
 - Julie Nellis (760) 872-0721 julie.nellis@dot.ca.gov
 - Cory Freeman (760) 872-0716 cory.freeman@dot.ca.gov
- The I-C Project might need to consider other adjacent utility easements in some areas. Within Caltrans R/W, we can use a consent to common use (CCUA) or joint use agreement (JUA) for those adjacent easements. Julie Nellis is the D9 point of contact.

We value our cooperative working relationship with the CPUC regarding project impacts on the state transportation system. For any questions, feel free to contact me at (760) 872-0785 or at gayle.rosander@dot.ca.gov.

Sincerely,



GAYLE J. ROSANDER
External Project Liaison

c: State Clearinghouse
Rosa Clark, Caltrans D8
Mark Reistetter, Julie Nellis, Cory Freeman; Caltrans D9