DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836 SACRAMENTO, CA 94236-0001 (916) 653-5791

October 14, 2019

Ms. Cindi Hoover Planner II Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, California 93301-2323 VIA email: <u>hooverc@kerncounty.com</u> Governor's Office of Plenning & Research OCT 17 2019 STATE CLEARINGHOUSE

Re: SCH# 2019090305 Pastoria Solar Project by Pastoris Solar Energy Company, LLC - Notice of Preparation

Dear Ms. Hoover:

The California Department of Water Resources' (DWR) State Water Project's (SWP) Division of Operations and Maintenance (O&M) has reviewed the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the proposed Pastoria Solar Project. We have the following comments.

Project Description

The proposed project is described as the installation of 350,000 PV panels in a gross area of 650 acres. Construction is expected to last for approximately 240-construction days over a 12-month period occurring Monday through Friday between the hours of 7:00 am and 6:00 pm but may be subject to additional hours/days if needed. Construction workforce is expected to peak at 400 individuals with an average of 190 individuals per day. During the same 12-month construction period, approximately 5 to 10 trucks per day will deliver loads to the site.

Specific Comments

DWR appreciates the transportation impacts will be analyzed in the EIR. Specifically, DWR is concerned about increased traffic due to the project's proposed use of Edmonston Pumping Plant Road (Road), increased deterioration of the Road due to the proposed project.

The Road currently serves as access for aggregate trucks, DWR personnel and vehicles, and Tejon Ranch personnel. If the Road is used for delivery trucks and workforce vehicles involved in the solar project, those vehicles would need to enter and exit the Road at an agricultural road located approximately a 1/4-mile east of the bridge over the California Aqueduct along with the existing truck and other vehicle traffic. The increase in

Ms. Cindy Hoovre October 14, 2019 Page 2

traffic at this specific location due to construction traffic needs to be analyzed in the EIR, included in any traffic mediation plan, and mitigated.

Any traffic study prepared for the project must include DWR's safety concerns regarding increased traffic volume and frequency entering and exiting the Road. Please note, only legal leads will be allowed to cross the bridge over the aqueduct. During the proposed project's construction, DWR may need to close the Road due to a DWR emergency or for oversized loads access to DWR facilities.

DWR requests a joint inspection of the Road between DWR and the Pastoria Solar Energy, LLC both prior to and after completion of the project. Any damage associated with the increased traffic caused by the proposed project is the responsibility of Pastoria Solar and needs to be mitigated. DWR will need the construction site manager contact information during the construction in the event DWR needs to close the Road.

Please send a copy of any subsequent environmental documentation or correspondence relating to this project to me and:

Leroy Ellinghouse, Chief SWP Right-of-Way Management Section Division of Operations and Maintenance Department of Water Resources 1416 Ninth Street, Room 641-1 Sacramento, California 95814

If you have any questions or need additional information, please contact me at (916) 653-6840 or Nancy.Finch@water.ca.gov.

Sincerely,

Nancy Finch Attorney III

cc: State Clearinghouse 1400 10th Street, #12 Sacramento, California 95814