

## Response to Comment Letter I29

York Heimerdinger  
March 4, 2014



Comment Letter I29

I29-1

The County of San Diego (County) acknowledges the commenter's concern related to access from Ribbonwood Road to the parcel adjacent to the Rugged site. In the case that the Tule Road proposed under Tule Wind project Major Use Permit 3300-09-019 is not constructed, access would be provided to the northwestern subarea of the Rugged solar farm site from Ribbonwood Road via an off-site access road (Western Access Road; see Final Program Environmental Impact Report (FPEIR) Figure 1-8) that would be wholly contained within Assessor's Parcel Number (APN) 611-09-09-00. No encroachment onto the private residential APN 611-091-02-00 would occur. The information in this comment will be in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.

The DPEIR addresses traffic impacts of the Proposed Project, including the increase in traffic volumes and the impact of heavy construction vehicles on local roads. The County found that there would be less than significant impacts related to traffic on local roads from Proposed Project construction or operation. Therefore, the County disagrees that the "Project's easement proposal" would negatively impact the referenced parcel or that the access road would be overburdened with heavy equipment traffic during construction.

RECEIVED  
MAR 04 2014  
PDS DIRECTORS OFFICE

TO: COUNTY OF SD PLANNER - ROBERT HINGTON  
RE: PROPOSED "RUGGED" SECTION OF SOTEC SOLAR PROJECT  
EASEMENT PROPOSED FROM RIBBONWOOD ROAD.

IN REGARDS TO THE EIR PROPOSALS FOR EASEMENT TO "RUGGED PROJECT NORTH" OFF RIBBONWOOD ROAD.

IS THE PROPOSED ACCESS ROAD TO BE BUILT FROM RIBBONWOOD ROAD TO THE NORTHERN PORTION OF THE "RUGGED" SECTION (NORTH) NOT ON THE SAME RESIDENTIAL LOTS EASEMENT FOR (APN 611-091-02-00)?

WILL APN<sup>15</sup> 611-091-02-00, RESIDENTIAL ZONED LOT'S EASEMENT (LEGAL), BE USED AS THE "RUGGED" NORTH PROPOSED EASEMENT FROM RIBBONWOOD RD TO PROJECT AREA?

HOW DOES THIS PROJECT'S EASEMENT PROPOSAL NOT NEGATIVELY IMPACT THIS APN OWNER?

DON'T THIS ACCESS ROAD EASEMENT APPEAR TO BE "OVERBURDENED" WITH THE PROPOSAL HEAVY EQUIPMENT TRAFFIC DURING CONSTRUCTION?

HAS THIS EIR ADDRESS<sup>ED</sup> THE TRAFFIC OVERBURDEN OF PROPOSED LOCAL EASEMENT TRAFFIC PATTERN AND TYPE AND WEIGHT OF EQUIPMENT THAT ARE TO TRAVEL UPON THIS EASEMENT DURING AN ANNUAL CONSTRUCTION YEAR? WHERE ARE THE TRAFFIC STUDIES?

WOULD YOU PLEASE ASK SOTEC TO PREPARE LOCAL CONSTRUCTION TRAFFIC STUDIES THAT EVALUATE THE MASSIVE AMOUNT AND WEIGHT OF CONSTRUCTION EQUIPMENT ON RIBBONWOOD RD AND SAID "RUGGED ROAD" DIRT EASEMENT PLEASE?

YORK HEINERDINGER

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	<p>Project design feature PDF-TR-1 provides that the applicants will notify property owners and tenants at least 24 hours in advance of construction activities that would obstruct access to properties and alternative access would be provided (DPEIR, p. 3.1.8-24). PDF-TR-1 also requires the preparation of a traffic control plan to ensure safe and efficient traffic flow in local areas and on the Proposed Project sites during construction (DPEIR, pp. 3.1.8-22 to 3.1.8-23) and preparation of a construction notification plan to inform residents and property owners within 1,000 feet of Proposed Project components (DPEIR, p. 3.1.8-23). In addition, a public liaison officer would be available to respond to specific concerns of neighboring property owners (DPEIR, p. 3.1.8-23).</p> <p>The commenter requests that construction traffic studies be prepared to evaluate the amount of traffic and weight of construction vehicle traffic on Ribbonwood Road and the access road to the Rugged site. The transportation and traffic analysis completed for the DPEIR determined that current traffic levels on Ribbonwood Road north of Interstate 8 (I-8) are approximately 270 average daily trips (ADT; DPEIR, Table 3.1.8-5). The design capacity of the roadway segment is assumed to be less than 4,500 ADT, the design capacity of a rural residential collector road, as Ribbonwood Road north of I-8 is unclassified by the County (DPEIR, pp. 3.1.8-16 to 3.1.8-17). Given the</p>
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design capacity of this roadway, the DPEIR concluded that the addition of 160 ADT during the construction of the Rugged solar farm would not cause this segment of Ribbonwood Road to exceed its design capacity. Therefore, impacts would be less than significant (DPEIR, pp. 3.1.8-16 to 3.1.8-17). PDF-TR-1 will be implemented to ensure that the anticipated increased traffic flows and the presence of large trucks would not create a safety hazard or be a temporary inconvenience to travelers along affected regional and local roadways (DPEIR p. 3.1.8-31). Refer to the response to comment C2-106 regarding transportation impact fees.

#### References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.