

# **RESPONSES TO LATE COMMENTS AND ERRATA**

## **FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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### **WESTLANDS SOLAR PARK MASTER PLAN AND WSP GEN-TIE CORRIDORS PLAN**

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STATE CLEARINGHOUSE No. 2013031043

#### **WESTLANDS WATER DISTRICT**

**JANUARY 2018**

**ADDENDUM TO VOLUME 3**

## **INTRODUCTION**

Subsequent to the release of the Final Program EIR on the Westlands Solar Park Master Plan and WSP Gen-Tie Corridors Plan on December 8, 2017, a second comment letter was received from the County of Fresno on December 22, 2017. In order to respond to Fresno County's second comment letter, WWD has prepared this addendum to the Final PEIR. This addendum document provides responses to the comments made in the second Fresno County letter, and also includes an Errata page which makes revisions to the PEIR based on comments contained in Fresno County's second comment letter.

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# County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING  
STEVEN E. WHITE, DIRECTOR

December 22, 2017

Kiti Campbell, Senior Resources Engineer  
Westlands Water District  
3130 N. Fresno Street  
Fresno, CA 93703-6056

SUBJECT: Westlands Solar Park Master Plan and WSP Gen-Tie Corridors Plan  
Final Program Environmental Impact Report (PEIR)

Dear Ms. Campbell:

The County of Fresno appreciated the opportunity to comment on the Draft PEIR for the WSP Solar Park Master Plan and WSP Gen-Tie Corridors Plan. However, we believe that some of the concerns that we expressed during our review of the Draft PEIR were not adequately addressed in the Final PEIR.

First, the County of Fresno believes that traffic index analysis needs to be performed for Fresno County roadways for both the Westlands Solar Park Plan and Gen-Tie Corridors project. Fresno County roads (Jayne Avenue and Gale Avenue) may be utilized for both construction and operational purposes as these roadways provide connections to both Interstate 5 and State Route 269. The pavement conditions of these roads should be assessed for the project's truck traffic impacts.

FRE2-1

Second, in the Draft PEIR Table TR-2 FAR-TERM (2030) Traffic Conditions showed the roadway segment of Jayne/Nevada Avenue between Interstate 5 and State Route 33 operating at an LOS D with the proposed project. Fresno County General Plan Policy TR-A.2 states that 'The County shall plan and design its roadway system in a manner that strives to meet Level of Service (LOS) D on urban roadways within the spheres of influence of the cities of Fresno and Clovis and LOS C on all other roadways in the County.' The acceptable LOS C for County roadway was not addressed in the final PEIR. This impact is considered significant by the County and it needs to be addressed.

FRE2-2

If you have any questions regarding these specific concerns about the Final PEIR please contact Mohammad Alimi with the Design Division of the Department of Public Works and Planning. You may contact him by phone at (559) 600-4505 or by email at [malimi@co.fresno.ca.us](mailto:malimi@co.fresno.ca.us).

Thank you for considering the impact of this project on the County of Fresno and for incorporating our feedback into the updated PEIR. You may also contact me at (559) 600-9669 or [dacrider@co.fresno.ca.us](mailto:dacrider@co.fresno.ca.us).

Sincerely,

Danielle Crider, Planner  
Development Services and Capital Projects Division

Kiti Campbell, Senior Resources Engineer  
December 22, 2017  
Page 2 of 2

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Transmission Facilities EIR\Final PEIR Response Letter.docx

cc. Bernard Jimenez, Assistant Director  
William M. Kettler, Development Services and Capital Projects Division  
Chris Motta, Development Services and Capital Projects Division  
Mohammad Alimi, Design Division  
Harpreet Kooner, Design Division  
Frank Daniele, Road Maintenance and Operation

## **G. RESPONSES TO FRESNO COUNTY'S SECOND COMMENT LETTER, DATED DECEMBER 22, 2017**

The substantive comments from Fresno County's second comment letter on the Draft PEIR are reproduced in full in the comments below.

### **Comment FRE2-1**

Truck Impacts to Roadways. First, the County of Fresno believes that traffic index analysis needs to be performed for Fresno County roadways for both the Westlands Solar Park Plan and Gen-Tie Corridors project. Fresno County roads (Jayne Avenue and Gale Avenue) may be utilized for both construction and operational purposes as these roadways provide connections to both Interstate 5 and State Route 269. The pavement conditions of these roads should be assessed for the project's truck traffic impacts.

### **Response FRE2-1**

Comment noted. As stated in Response FRE-1 in the main Final PEIR document, during Fresno County's project review for the portions of the gen-tie projects within Fresno County, the project proponent will confirm study parameters for potential project roadway impacts with Fresno County staff, as required. The newly submitted comment (above) states that Fresno County roads (Jayne Avenue and Gale Avenue) may be utilized for construction and operation purposes for both solar projects and gen-tie projects. In response, it is acknowledged that Jayne Avenue will be utilized during construction of the Kings County segments of the southern gen-tie line. (It is noted that only a very short portion of the northern gen-tie corridor extends into Kings County, so Fresno County will have CUP jurisdiction over the construction of most of the northern gen-tie line.) However, it is anticipated that construction and operational traffic for the WSP solar projects will primarily utilize SR-198, SR-41, and Avenal Cutoff Road to gain access to the WSP plan area since these routes provide more direct access to the WSP plan area from the state highway system than Jayne and Gale Avenues. Nevertheless, it is expected that Kings County will seek comments from Fresno County on CUP applications for solar projects and gen-tie projects proposed within Kings County in conjunction with Kings County's routine request for comments from interested agencies as part of its formal "Project Review – Consultation Notice" letters that Kings County issues for all CUP applications. This early consultation process will provide Fresno County with an opportunity to raise concerns with respect to potential impacts to Fresno County roads, which concerns will receive due consideration from Kings County staff who may request that the applicants conduct such roadway impact studies as may be deemed appropriate under the circumstances of each CUP application.

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### **Comment FRE2-2**

Traffic Operations Level of Service. Second, in the Draft PEIR Table TR-2 FAR-TERM (2030) Traffic Conditions showed the roadway segment of Jayne/Nevada Avenue between Interstate 5 and State Route 33 operating at an LOS D with the proposed project. Fresno County General Plan Policy TR-A.2 states that "The County shall plan and design its roadway system in a manner that strives to meet Level of Service (LOS) D on urban roadways within the spheres of influence of the cities of Fresno and Clovis and LOS C on all other roadways in the

County.” The acceptable LOS C for County roadway was not addressed in the final PEIR. This impact is considered significant by the County and it needs to be addressed.

**Response FRE2-2**

Comment noted. The entry on Table TR-2 indicating that the segment of Jayne Avenue between Interstate 5 and State Route 33 operates at LOS D is a *typographical error*. This entry should indicate LOS C (i.e., the cumulative traffic increment of 254 daily trips added to the baseline of 10,560 daily trips yields a total of 10,814 daily trips, which is well below the LOS D threshold of 13,800 daily trips). This typo is corrected in the Errata pages which follow.

# ERRATA

The following additional revisions are hereby made to the Draft PEIR on the Westlands Solar Park Master Plan and WSP Gen-Tie Corridors Plan. Double underlining depicts text added while ~~strikeouts~~ depict text removed.

## 3. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

### 3.13. TRANSPORTATION/TRAFFIC

#### 3.13.3. ENVIRONMENTAL IMPACT ANALYSIS

##### Table TR-1 – Near-Term Traffic Conditions – WSP Construction

Page 3.13-11 CORRECT the typographical errors in the far-right column: “LOS Impact Threshold (Impact?),” for the below-listed roadway segments as follows:

<u>“Lincoln/Gale Avenues</u>	
- b/n Avenal Cutoff & SR-269	... <del>D/E</del> <u>C/D</u> (No)
*	
*	
<u>Nevada/Jayne Avenues</u>	
- b/n Avenal Cutoff & SR-269	... <del>D/E</del> <u>C/D</u> (No)
- b/n SR-269 & I-5	... <del>D/E</del> <u>C/D</u> (No)
- b/n I-5 & SR-33	... <del>D/E</del> <u>C/D</u> (No)”

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Page 3.13-11 REVISE footnote 8 as follows:

<sup>8</sup> Minimum LOS Standards by Agency: Kings County = LOS D; Caltrans = LOS C; Fresno County = LOS D (urban); LOS C (rural).

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##### Table TR-2 – Far-Term (2030) Traffic Conditions – WSP Construction + Operations

Page 3.13-14 CORRECT the typographical errors in the far-right column: “LOS Impact Threshold (Impact?),” for the below-listed roadway segments as follows:

<u>“Lincoln/Gale Avenues</u>	
- b/n Avenal Cutoff & SR-269	... <del>D/E</del> <u>C/D</u> (No)
*	
*	
<u>Nevada/Jayne Avenues</u>	
- b/n Avenal Cutoff & SR-269	... <del>D/E</del> <u>C/D</u> (No)
- b/n SR-269 & I-5	... <del>D/E</del> <u>C/D</u> (No)
- b/n I-5 & SR-33	... <del>D/E</del> <u>C/D</u> (No)”

Page 3.13-14 CORRECT the typographical error in the eighth column: “LOS with Project,” for the below-listed roadway segment as follows:

“Nevada/Jayne Avenues

\*

- b/n I-5 & SR-33                      ...~~D~~ C”

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Page 3.13-14 REVISE footnote 8 as follows:

<sup>8</sup> Minimum LOS Standards by Agency: Kings County = LOS D; Caltrans = LOS C; Fresno County = LOS D (urban); LOS C (rural).

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**Table TR-3 – Near-Term Cumulative Traffic Conditions**

Page 3.13-29 CORRECT the typographical errors in the far-right column: “LOS Impact Threshold (Impact?),” for the below-listed roadway segments as follows:

“Lincoln/Gale Avenues

- b/n Avenal Cutoff & SR-269      ...~~D/E~~ C/D (No)

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\*

Nevada/Jayne Avenues

- b/n Avenal Cutoff & SR-269      ...~~D/E~~ C/D (No)

- b/n SR-269 & I-5                      ...~~D/E~~ C/D (No)

- b/n I-5 & SR-33                      ...~~D/E~~ C/D (No)”