From:	Jaime.Torres@dot.gov
To:	Garcia, Edgar W SAJ
Cc:	Carlos.MACHADO@dot.gov; Martin.Knopp@dot.gov
Subject:	Permit Application No. SAJ- 2010-02881 (IP-EWG)
Date:	Friday, December 17, 2010 1:44:47 PM

Dear Mr. Garcia:

Find below our initial comments regarding the installation of the gas line and the referenced permit application:

· The existing "Policy on the Accommodation of Utilities on Highways Right of Way" adopted by the Puerto Rico Highway and Transportation Authority (PRHTA) and approved by Federal Highway Administration (FHWA) on May 30, 1990, Sec 5-5.02(a); p.28, does not include longitudinal installation of pipeline conveying gas, oil, gasoline and other flammable or dangerous substances within the control access lines of controlled-access highways nor within tunnels or on major bridges. Hence, a project level agreement for this particular utility accommodation would be needed. FHWA approval for the proposed utility installation would constitute an administrative action.

Controlled access highways relevant to Via Verde are: PR-22 and PR-2

· In areas where PRHTA policy permits the longitudinal installation, the installation should be outside the Right of Way. If evaluated alternatives demonstrate this option not feasible, then any above the ground portion of the utility line, or appurtenances must be installed outside the roadway clear zone or be shielded in a way to protect the traveling public.

· Underground utilities within the clear zone must be designed to handle static and dynamic loads associated to heavy vehicles over the area of influence above the utility line. (ex. errant vehicles departures, disabled trucks, or maintenance vehicles)

· How is the proponent planning to maintain the traffic during construction on the affected highways? He must demonstrate operations and safety analysis to assess potential impacts on traffic, during construction, and during maintenance operations; as well as mitigation strategies.

As the project continues to develop, we may have more detailed site specific comments.

If you have additional questions, feel free to contact our Division Office.

Best Regards,

Jaime F. Torres Gonzalez

Area Engineer

Federal Highway Administration

Puerto Rico & US Virgin Island Division

350 Ave. Carlos Chardon

Suite 210

San Juan, Puerto Rico 00918

Tel. 787-766-5600 X-229

Fax. 787-766-5924

Cel. 787-365-2079

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