

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
(559) 908-7064 | FAX (559) 488-4195 | TTY 711
www.dot.ca.gov



Governor's Office of Planning & Research

Aug 24 2022

August 24, 2022

STATE CLEARINGHOUSE

FRE-5-4.456

NOP – Notice of Preparation of an EIR

NOP – Key Energy Storage Project (EIR 8189)

SCH # 2022070414

<https://ld-igr-gts.dot.ca.gov/district/6/report/25490>

SENT VIA EMAIL

Jeremy Shaw, Planner
Development Services and Capital Projects Division
County of Fresno – Department of Public Works and Planning
2220 Tulare St., 6th Floor
Fresno, CA 93721

Dear Mx. Shaw:

Thank you for the opportunity to review the Notice of Preparation (NOP) for the Key Energy Storage Project, which proposes to construct an energy storage system and appurtenant transmission infrastructure on an approximately 208-acre portion of three parcels (318-acres). The project includes a 500-kilovolt overhead generation tie line, which would extend north to the adjacent Pacific Gas and Electric Gates Substation. The facility, once constructed, would be operated remotely with periodic augmentation of batteries and weekly on-site maintenance requiring one or two workers in a light utility truck. The project site is located on the southeast corner of Lake Avenue and Jayne Avenue, approximately 1.5 miles east of the Interstate 5 (I-5) and Jayne Avenue interchange and 1.6 miles west of State Route (SR) 269 and Jayne Avenue intersection.

This project was previously reviewed as part of the Unclassified Conditional Use Permit (CUP) No. 3734 and Environmental Impact Report (EIR) No. 8189 applications with our office submitting a comment letter dated February 17, 2022. For reference, the previous comment letter is included as Attachment "A".

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. It is expected that the proposed project, during construction, could potentially impact nearby state highway facilities and local roads.
2. Given that the project site is located near I-5 and SR 269 and the potential trip generation from construction, the proposed project may have a significant impact on the state highway facilities. **It is recommended that a Traffic Impact Study (TIS) be conducted. The scope of the study should include safety, operations, and queuing analysis for the intersection within the I-5 / Jayne Avenue interchange.**
3. As mentioned, it is recommended that a traffic study be conducted to properly assess the potential impacts of the project, **a Scope of Work should be prepared and submitted to Caltrans for review and approval, at minimum a Transportation Management Plan (TMP) may be required for construction traffic.**
4. Oversize and/or overweight trucks using the state highway will require Transportation Permits from Caltrans.
5. An encroachment permit must be obtained for all proposed activities for placement of encroachments within, under or over the State highway rights-of-way. Activity and work planned in the State right-of-way shall be performed to State standards and specifications, at no cost to the State. Engineering plans, calculations, specifications, and reports (documents) shall be stamped and signed by a licensed Engineer or Architect. Engineering documents for encroachment permit activity and work in the State right-of-way may be submitted using English Units. The Permit Department and the Environmental Planning Branch will review and approve the activity and work in the State right-of-way before an encroachment permit is issued. The Streets and Highways Code Section 670 provides Caltrans discretionary approval authority for projects that encroach on the State Highway System. Encroachment permits will be issued in accordance with Streets and Highway Codes, Section 671.5, "Time Limitations." Encroachment permits do not run with the land. A change of ownership requires a new permit application. Only the legal property owner or his/her authorized agent can pursue obtaining an encroachment permit.
6. Prior to an encroachment permit application submittal, the project proponent is required to schedule a "Pre-Submittal" meeting with District 6 Encroachment Permit Office. To schedule this meeting, please call the Caltrans Encroachment Permit Office - District 6: 1352 W. Olive, Fresno, CA 93778, at **(559) 488-4058**

Jeremy Shaw, NOP – Key Energy Storage Project (EIR 8189)

August 24, 2022

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Please review the permit application - required document checklist at:

<https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?fmid=TR0402&distpath=MAOTO&brapath=PERM>

Please also review the permit application - processing checklist at:

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/tr-0416-applicable-review-process-checklist.pdf>

If you have any other questions, please call or email Christopher Xiong at (559) 908-7064 or Christopher.Xiong@dot.ca.gov.

Sincerely,



DAVID PADILLA, Branch Chief
Transportation Planning – North

C: State Clearinghouse

Attachment "A":

Comment letter dated February 17, 2022

Attachment A

California Department of Transportation

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
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February 17, 2022

FRE-5-4.456

Application for CUP – Conditional Use Permit

EIR No. 8189 and CUP No. 3734

<https://ld-igr-gts.dot.ca.gov/district/6/report/25490>

SENT VIA EMAIL

Jeremy Shaw, Planner
Development Services and Capital Projects Division
County of Fresno – Department of Public Works and Planning
2220 Tulare St., 6th Floor
Fresno, CA 93721

Dear Mr. Shaw,

Thank you for the opportunity to review the Conditional Use Permit (CUP) No. 3734 application and Project Description for the upcoming Environmental Impact Report (EIR) No. 8189, proposing to construct an energy storage system and appurtenant transmission infrastructure on an approximately 208-acre portion of three parcels (318-acres). The project includes a 500-kilovolt overhead generation tie line, which would extend north to the adjacent Pacific Gas and Electric Gates Substation. The facility, once constructed, would be operated remotely with periodic augmentation of batteries and weekly on-site maintenance requiring one or two workers in a light utility truck. The project site is located on the southeast corner of Lake Avenue and Jayne Avenue, approximately 1.5 miles east of the Interstate 5 (I-5) and Jayne Avenue interchange and 1.6 miles west of State Route (SR) 269 and Jayne Avenue intersection.

General Comments

Construction would occur in four phases. Phase 1 is to begin in 2024 and take 12 months to complete in 2025. Phase 2 would follow with 12 months completing in 2026 with Phase 3 and 4 expected to take an additional 1-3 years. In total, the project anticipates being in construction for 3 to 5 years. Up to 300 worker trips and 80 vendor truck trips per day would be anticipated during the construction phases. Given that the project site is near I-5 and SR 269 and the potential trip generation from construction, the proposed project may have a significant impact on the state highway facilities. It is recommended that a Traffic Impact Study (TIS) be conducted. The scope of the study should include safety, operations, and queuing analysis for the intersection within the I-5 / Jayne Avenue interchange.

Caltrans provides the following comments to better support the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. It is expected that the proposed project, during construction, could potentially impact nearby state highway facilities and local roads.
2. As noted above, Caltrans recommends that a traffic study be conducted to properly assess the potential impacts of the project, a Scope of Work should be prepared and submitted to Caltrans for review and approval, at minimum a Transportation Management Plan (TMP) may be required for construction traffic.
3. Oversize and/or overweight trucks using the state highway will require Transportation Permits from Caltrans.
4. An encroachment permit must be obtained for all proposed activities for placement of encroachments within, under or over the State highway rights-of-way. Activity and work planned in the State right-of-way shall be performed to State standards and specifications, at no cost to the State. Engineering plans, calculations, specifications, and reports (documents) shall be stamped and signed by a licensed Engineer or Architect. Engineering documents for encroachment permit activity and work in the State right-of-way may be submitted using English Units. The Permit Department and the Environmental Planning Branch will review and approve the activity and work in the State right-of-way before an encroachment permit is issued. The Streets and Highways Code Section 670 provides Caltrans discretionary approval authority for projects that encroach on the State Highway System. Encroachment permits will be issued in accordance with Streets and Highway Codes, Section 671.5, "Time Limitations." Encroachment permits do not run with the land. A change of ownership requires a new permit application. Only the legal property owner or his/her authorized agent can pursue obtaining an encroachment permit.
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Please review the permit application - required document checklist at:

<https://forms.dot.ca.gov/v2Forms/servlet/FormRenderer?frmId=TR0402&distpath=MAOTO&brapath=PERM>

Jeremy Shaw, EIR No. 8189 and CUP No. 3734
February 17, 2022
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Please also review the permit application - processing checklist at:

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/tr-0416-applicable-review-process-checklist.pdf>

If you have any other questions, please call or email Christopher Xiong at (559) 908-7064 or Christopher.Xiong@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Padilla', with a long horizontal flourish extending to the right.

DAVID PADILLA, Branch Chief
Transportation Planning – North