California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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Renee Longman, Project Manager
California Energy Commission
715 P St
Sacramento, CA 95814

Re: Corby Battery Energy Storage System Project – Draft Environmental Impact Report (DEIR)

Dear Renee Longman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Corby Battery Energy Storage System Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the September 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The project applicant is proposing to construct a 300-megawatt battery energy storage system on an approximately 40.3-acre privately owned parcel. The project site is currently used as agricultural land for row crops. The project would connect to the Pacific Gas and Electric (PG&E) Vaca-Dixon Substation across Interstate 80 (I-80) northwest of the project site, using an approximately 1.1-mile long 230-kilovolt (kV) generation tie (gen-tie) line; portions of which would be installed overhead and underground.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide (*link*).

The project VMT analysis and significance determination are undertaken in a manner consistent with the City's adopted VMT policy. Per the DIER, this project is found to have a less than significant VMT impact with mitigation incorporated, therefore working towards meeting the State's VMT reduction goals.

Please also consider the measures listed below are quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Implement Commute Trip Reduction Program (Voluntary and/or Mandatory)
- Implement Commute Trip Reduction Marketing)
- Implement Subsidized or Discounted Transit Program
- Provide Employer-Sponsored Vanpool
- Implement Employee Parking Cash-Out
- Implement Preferential Parking Permit Program
- Implement Telecommute and/or Alternative Work Schedule Program
- Provide Electric Vehicle Charging Infrastructure
- Designate Zero Emissions Delivery Zones
- Provide Local Shuttle (gas or electric) to Increase Transit Outreach

Traffic Safety
To properly evaluate the traffic safety impacts of this project along Interstate 80 (I-80), please provide the following:

- Site-Specific Traffic Control Plan (TCP): Provide the TCP and Caltrans Encroachment Permit conditions for the I-80 overhead span for review.
- Material Specifications and Glint/Glare Hazard Evaluation: Provide technical material details and a focused Glint/Glare Hazard Evaluation to demonstrate that non-reflective, anti-glare hardware and conductor materials will be used to prevent specular reflection into high-speed driver sightlines on I-80.
- I-80 Emergency Incident Traffic Management Plan: Because the Battery Energy Storage System facility is located approximately 0.6 miles from I-80, a thermal runaway incident or toxic plume could severely impair driver visibility and traffic flow on the highway. Please provide an I-80 Emergency Traffic Contingency Plan developed jointly with Caltrans and California Highway Patrol (CHP),

incorporating automated Changeable Message Signs (CMS) and pre-established detour protocols for rapid deployment during a highway closure.

Highway Operations
To evaluate the impact on the State Transportation Network (STN), please provide the following:

- Please provide the Construction Management Plan (mitigation TRANS-1) in the Caltrans encroachment permit application package for Caltrans concurrence.
- Existing plus Construction Condition are not mentioned in the documents provided. Please provide a copy of the Existing plus Construction Condition calculations for review.
- The DEIR states that construction traffic may increase existing peak-hour traffic movements by as much as three times at some study intersections. Please provide the AM and PM peak-hour turning movement volumes (i.e., total and truck volumes) to conduct delay and queue analysis, for Existing and Existing plus Construction Conditions at the I-80/Weber Road interchange.
- The DEIR states that I-80 would be used extensively by heavy trucks during construction. Since the VMT analysis evaluates worker trips only and does not include construction truck trips, please provide the number of heavy vehicle trips expected to use I-80 daily.
- Appendix A identifies several nearby cumulative projects. Please confirm and make sure this project's cumulative conditions incorporated the other cumulative projects generated trips on I-80/Weber Road interchange during the project's construction.
- For the Construction Traffic data, please provide construction traffic distribution for the peak hour or peak period for operational analysis.
- The project would include a 300-megawatt (MW), 1,200-megawatt-hour (MWh) battery energy storage system (BESS), associated project substation, inverters, and other ancillary facilities. Provide or discuss the trip generation and distribution for the proposed project. Page 5.14-14 states there are only 6 party time staff and 3 or 4 vehicular trips during the peak hour. Please identify if there will be any freight traffic.
- The traffic impact study should include existing no-build, existing + construction, (maybe existing + project (after construction)), cumulative no build, cumulative + construction, (maybe cumulative + project). Although the report identified less than significant impact on VMT, Highway Operation needs to request operational analysis to evaluate if there is potential safety impact resulted from the construction and operation traffic impact on the STN and identify necessary mitigation measures if needed.

Hydrology
The project is in multiple different zones as shown on the Federal Emergency Management Agency (FEMA) floodplain map FIRM 06095C0168E effective 5/4/2009. Any floodplain impact must be documented and mitigated; please provide a floodplain analysis report. Any additional floodplain impacts on existing adjacent properties must be explained. Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. If the project involves drainage work that flows into the State Drainage System, please provide a Drainage Design Memo. The Drainage Design Memo should include an assessment of both pre-project and post-project conditions for the existing drainage system. The Drainage Plan and Profile Sheets should show the lengths, sizes, and types of all new and existing pipes, inlets, outlets, and drainage system components, including any identified utility conflicts. Provide drainage details and profiles for all connections to the existing drainage system. All assumptions and calculations used in designing the drainage system must be clearly documented and included.

Cultural Resources
Should construction activities within Caltrans' Right-of-Way (ROW) take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

Construction-Related Impacts
Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*).
Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Lead Agency
As the Lead Agency, the California Energy Commission is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access
If any Caltrans facilities are impacted by the project, those facilities must meet Americans with Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit
Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.). Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual (*link*) and Caltrans Standard Plans and Specifications (*link*).

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (*link*)
- Caltrans Encroachment Projects Processes – Information Video (*link*)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (*link*)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, maintenance agreements, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Thailiya Thomas, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Sincerely,

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse