

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	270998
Document Title:	Michael Geller Comments - Corby Energy Storage Project- Construction Access Inconsistent with Solano County Traffic Order No 438
Description:	N/A
Filer:	System
Organization:	Michael Geller
Submitter Role:	Public
Submission Date:	6/25/2026 11:33:38 AM
Docketed Date:	6/25/2026

Comment Received From: Michael Geller
Submitted On: 6/25/2026
Docket Number: 24-OPT-05

**Corby Energy Storage Project-Construction Access Inconsistent
with Solano County Traffic Order No 438**

Additional submitted attachment is included below.

Re: Corby Energy Storage Project – Construction Access Inconsistent with Solano County Traffic Order No. 438

Dear Commissioners:

This letter is intended to follow my original concerns regarding Deficiencies in Traffic Conditions in the Project Update Addendum which I submitted in Docket #267480 on November 17, 2025. I submit these comments regarding the proposed Corby Energy Battery Energy Storage System (BESS) Project and the applicant's proposed construction access route.

The applicant's traffic analysis states that construction vehicles will access the project site by traveling from Weber Road to Byrnes Road and then to Kilkenny Road.

Earlier this year, Solano County adopted Traffic Order No. 438 establishing a 7-ton weight restriction on, among other roads, Weber Road, Byrnes Road and Willow Road. These are the very roads identified by the applicant for construction access.

Construction of a utility-scale battery energy storage facility will require numerous deliveries by heavy commercial vehicles, including cranes, battery containers, transformers, concrete trucks, steel deliveries, oversized hauling equipment, and other vehicles that substantially exceed a 7-ton weight limit.

Despite identifying Weber Road and Byrnes Road as the construction route, the applicant has not demonstrated how these heavy construction vehicles can legally utilize roads that are subject to the County's newly adopted weight restrictions. The record contains no evidence that Solano County has issued, or intends to issue, any exemption, special permit, or authorization allowing repeated overweight construction traffic associated with this project.

Because the applicant bears the burden of demonstrating that the project is feasible and can be constructed in compliance with applicable laws and regulations, this omission is significant. The Commission should not assume that exceptions to Solano County's roadway restrictions will be granted, particularly where no such approvals have been obtained or even requested.

Furthermore, the County's adoption of Traffic Order No. 438 reflects an engineering determination that Weber Road and Byrnes Road should not be subjected to heavy truck traffic. Those findings are directly relevant to the Commission's evaluation of transportation impacts, roadway safety, infrastructure protection, and the overall feasibility of the proposed construction plan.

Accordingly, I respectfully request that the Commission require the applicant to:

- Demonstrate that its proposed construction route is legally available for all anticipated construction vehicles.
- Identify every vehicle expected to exceed the posted 7-ton weight restriction.
- Provide written documentation from Solano County authorizing the use of Weber Road and Byrnes Road by overweight construction vehicles, if such authorization exists.
- Evaluate alternative construction routes if compliance with Traffic Order No. 438 cannot be demonstrated.

Until this information is provided, the Commission cannot reasonably conclude that the applicant has established a feasible and legally available construction access route for the project.

Thank you for your consideration of these comments.

Respectfully submitted,

Michael Geller