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<b>Project Title:</b>	Vaca Dixon Power Center Project
<b>TN #:</b>	271074
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*Comment Received From: Michael Geller  
Submitted On: 6/29/2026  
Docket Number: 26-OPT-01*

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

*Additional submitted attachment is included below.*

## **Re: Vaca-Dixon Energy Storage Project – Construction Access Inconsistent with Solano County Traffic Order No. 438**

Dear Commissioners:

This letter is intended to follow my original concerns expressed in my “Requesting Denial of the Application for the Vaca-Dixon BESS Facility” which I submitted on February 6, 2026, Docket Number 268498. I submit these additional comments regarding the proposed Vaca-Dixon 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. They also acknowledged that Willow Road may also see some insignificant extra traffic.

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 Willow Road, 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 Willow Road, 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. This deficiency alone seemingly would be enough to disqualify the application from being complete and I believe, should prevent the project from moving forward.

Thank you for your consideration of these comments.

Respectfully submitted,

Michael Geller