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Fred Pozzuto - Hydrogen Energy California (HECA) Project PSA/DEIS (DOE/EIS-0431D) 08-AFC-08A

From: Wayne Clausen <wclausen@shafter.com>
To: "'fred.pozzuto@netl.doe.gov'" <fred.pozzuto@netl.doe.gov>
Date: 9/3/2013 9:17 PM
Subject: Hydrogen Energy California (HECA) Project PSA/DEIS (DOE/EIS-0431D) 08-AFC-08A

Dear Mr. Pozzuto:

The City of Shafter is concerned with the following in the PSA/DEIS for the proposed Hydrogen Energy California (HECA) Project:

The PSA/DEIS and Traffic Study Technical Memorandum (Revision 2) for the proposed Hydrogen Energy California Project fail to identify and analyze the project's potential significant impacts on traffic, congestion, and safety hazards at the intersection of Highway 43 and Los Angeles Avenue in the City of Shafter. The PSA/DEIS identifies the Highway 43 intersections at Shafter Avenue, Central Avenue, and Lerdo Highway but not at Los Angeles Avenue. The intersection is not signalized and is located adjacent on the west side of the Burlington Northern Santa Fe (BNSF) railroad. Los Angeles Avenue crosses the BNSF at grade. Beech Avenue connects to Los Angeles Avenue adjacent on the east side of the BNSF. Santa Fe Way connects to the intersection from the south. The Traffic Study Technical Memorandum (Revision 2) correctly illustrates the configuration of the intersection but does not identify it as such.

The Highway 43/Los Angeles Avenue intersection is very congested during am and pm peak hours. The combination of the intersection's close proximity to the BNSF and congestion creates a safety hazard for vehicles at the intersection and crossing the BNSF. Several years ago, a train hit a trailer truck that was unable to drive through the subject intersection. Train/vehicular collisions have occurred adjacent to the other City of Shafter intersections identified in the PSA/DEIS.

For the Highway 43/Los Angeles Avenue intersection, the level of service and safety hazard issues need to be identified and analyzed in the HECA PSA/DEIS. The subject PSA/DEIS also needs to identify and describe the size, weight, and operation of the trucks that are proposed for the HECA project. This information is vital for the City of Shafter to adequately analyze the potential significant impacts of the project. Even during non-peak hours, the proposed project may create safety hazards for all of the Highway 43 intersections in the City of Shafter. Table 7 on page 4.11-21 of the PSA/DEIS identifies 2,906 peak daily trips from the project. Page 1-41 of the PSA/DEIS executive summary reports additional truck trips may be added by the proposal. Until all of the proposed truck trips are identified, the truck types described, and all of the Highway 43 intersections in the City of Shafter adequately identified and analyzed, the City of Shafter will not be able to adequately assess the potential significant impacts of the project.

The PSA/DEIS identifies a number of unresolved issues related to project water use. The PSA/DEIS states "staff proposes to investigate in more detail alternative cooling options in the FSA/FEIS. The City of Shafter will address project water use at the time the investigation into alternative cooling options is reported by staff in the FSA/FEIS.

The City of Shafter greatly appreciates the opportunity to comment on the proposed Hydrogen Energy California (HECA) Project PSA/DEIS.

Sincerely,

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