

## DOCKETED

<b>Docket Number:</b>	08-AFC-08A
<b>Project Title:</b>	Hydrogen Energy Center Application for Certification Amendment
<b>TN #:</b>	201452
<b>Document Title:</b>	City of Wasco Comments: Revised Comment Based on Wasco Coal Terminal Supplemental Environmental Analysis
<b>Description:</b>	N/A
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*Comment Received From: Roger Mobley*

*Submitted On: 12/19/2013*

*Docket Number: 08-AFC-08A*

**Revised Comment Based on Wasco Coal Terminal Supplemental Environmental Analysis**

*Additional submitted attachment is included below.*



December 19, 2013

**CALIFORNIA ENERGY COMMISSION**

Attn: John Heiser, Project Manager 1516  
Ninth Street, MS-15 Sacramento, CA  
95814-5512

**RE: Hydrogen Energy California - Preliminary Staff Assessment / Draft Environmental Impact Statement (08-AFC-8A) - Revised Comments Based on Wasco Coal Terminal Supplemental Environmental Analysis**

California Energy Commission Staff:

The City of Wasco has reviewed the above referenced supplemental environmental analysis regarding the Wasco Coal Terminal and Transportation Alternative 2. Three comments from our previous letter dated September 30, 2013 have been adequately addressed in this document. As a result, we are withdrawing comments 1 through 3 as shown below and amending comment number 4. In addition, we have added new comments regarding the CEC staffs draft PSA/DEIS Conditions of Certification.

1. ~~The use of the existing Coal Terminal Facility in Wasco to supply the proposed plant with coal (Transportation Alternative 2), will require an amendment of the existing terminal facility's City of Wasco Conditional Use Permit. This should be indicated in the document on page 3.14 in the "Project Location and Jurisdiction" section. The supplemental environmental analysis addresses the City's concern that the requirement for a City of Wasco Conditional Use Permit Amendment be acknowledged in the public record.~~
2. ~~The document is unclear with respect to the total number of daily truck trips proposed from the Wasco Coal Terminal under Transportation Alternative 2. Please clarify the total number of daily truck trips proposed from this facility, what the likely hourly number of trips will be and the total number of hours per day the coal terminal facility will be in operation. Table 2-1 of the supplemental environmental analysis clarifies this issue.~~
3. ~~This document did not consider the impacts of the proposed High Speed Rail Facility as it relates to this project. The High Speed Rail alignment currently under consideration will terminate Wasco Avenue at approximately the Jackson Avenue alignment. This would eliminate the Wasco Avenue transportation route as an option for this project and would require the project to rely solely on the proposed Highway 43 Route through Wasco. Section 2.4 of the supplemental environmental analysis brings this issue to light and discusses it to the greatest extent possible at this point in time.~~



The City of Wasco still has concerns regarding the immediate and long term impact of this project on local streets and intersections. Based on the supplemental environmental analysis, and in order to address these concerns, the City amends previous comment number 4 as follows:

4. In order to address the immediate and long term impacts of this project on local streets, please incorporate the following as recommended Conditions of Certification for Transportation Alternative 2:

Immediate improvement of truck route streets within Wasco: (Trans - 3)

- a. Reconstruction of "J" Street from Poso Avenue north to and including the "H" Street intersection to a Traffic Index (T.I.) of 9 Standard.
- b. Reconstruction of Poso Avenue from State Highway 43 to "J" Street to a T.I. of 9 Standard.
- c. Reconstruction of Wasco Avenue from Poso Avenue south to the Wasco city limits to a T.I. of 9 standard.
- d. Reconstruction of "H" Street from "J" Street to 9<sup>th</sup> Street to a T.I. of 9 standard.
- e. Reconstruction of 9<sup>th</sup> Street from "H" Street to "J" Street to a T.I. of 9 standard.

Reconstruction of these roadway segments shall be complete prior to operation of the Wasco Coal Terminal in association with the facility constructed by the applicant under California Energy Commission Docket Number 08-AFC-8A. The applicant at their option may choose to either reconstruct these roadway segments, or pay the full cost for the City of Wasco to reconstruct these roadway segments. The full cost of reconstruction shall be determined by the City upon completion of the improvements and upon final calculation of construction costs shall be considered the Actual Cost of Construction.

Long term maintenance of truck route streets within Wasco: (Trans-4)

- a. A user fee shall be established to address the long term impacts to City roadways along the coal transfer truck route segments, and such fee will be used to cover any costs associated with future reconstruction needs. This user fee shall be based on a cost/ton of transferred coal and shall be negotiated and entered into as part of the City of Wasco Conditional Use Permit Amendment for Savage Coal (CUP 489-87 Amendment).

Traffic Safety and Noise: (Trans - 2 & Noise - 9)

- a. ~~Restrict project truck trips in Wasco to between the hours of 7:00 am and 7:00 pm.~~ **The noise analysis submitted as part of the supplemental environmental analysis addressed this concern.**

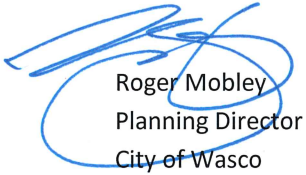
In addition to the comments above, based on City Staffs review of the HECA response to the CEC staffs proposed Conditions of Certification, the City has the following comments:

- a. City staff agrees with the HECA comment on Trans-2 that converting the intersections of J Street & H Street, 9<sup>th</sup> Street & H Street, and 9<sup>th</sup> Street & J Street to 3-way stop intersections is not necessary.
- b. Under Trans-3 it appears that the HECA staff is proposing to remove reference to improvements to streets located within the City of Wasco based on a traffic index analysis conducted by the Kern



County Roads Department. The County analysis did not address roads within the Wasco city limits. However, City Staff does not believe that a pavement analysis within the City is necessary, and that rather, as indicated above in Comment 4, "Immediate maintenance of truck route streets within Wasco", reconstruction of the street segments noted in Comment 4 should be implemented prior to the commencement of operations of the HECA plant and transport of coal from the Wasco coal facility to the HECA plant.

Should you have any questions regarding the above, please do not hesitate to contact us. Regards,



Roger Mobley  
Planning Director  
City of Wasco

Cc: Dan Allen, City Manager  
Paul Paris, City of Wasco Public Works Director  
Bob Wren, City of Wasco Deputy Public Works Director  
Alec Kimmel, Caltrans District 6  
Fred Bush, Savage Coal

CUP 489-87 File