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February 16, 2023

VIA UPLOAD

CITY OF LAS VEGAS PLANNING AND ZONING
495 Main Street, 3rd Floor
Las Vegas, NV 89101

***Re: Justification Letter – General Plan Amendment, Zone Change, Site
Development Plan Review, and Vacations for an Electric Utility
Substation
Aoki Energy Storage, LLC
APN: 126-01-201-008, 009, and 010***

To Whom It May Concern:

Please be advised this office represents Aoki Energy Storage, LLC., (the “Applicant”) in the above-referenced matter. The Applicant is proposing a Battery Energy Storage System (“BESS”) on approximately 12.8 acres, north of Kyle Canyon Road, on Log Cabin Way, just west of Rimrock Street (the “Property”). The Property is more particularly described as Assessor’s Parcel Numbers: 126-01-201-008, 009 and 010. The property is currently zoned Undeveloped (U/PCD), with a general plan designation of Planned Community Development (PCD) general plan. With the proposed use, the Applicant is requesting a general plan amendment, zone change and site development plan review.

General Plan Amendment and Zone Change

The Property is zoned U/PCD and planned PCD. The Property is surrounded by undeveloped land that is zoned either U/PCD or Civic District (C-V). Approximately 690 feet north of the Property, located on the northeast corner of Rocky Avenue and Gaisford Street is an existing electrical substation. The site of this existing electrical substation is more particularly described as Assessor’s Parcel Numbers: 126-01-101-002; 003; 004; and 016.

Further east on Kyle Canyon Rd., several properties have recently undergone general plan amendments and zone changes to allow for various types of commercial and residential uses. Due to the area’s rapid growth and development, there is an increasing demand for more energy and electric substations in the area.

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The Applicant is proposing a general plan amendment to Service Commercial (SC) and a zone change to C-1. The Applicant believes the general plan amendment and zone change are supported by the nature and character of the Property, including the existing electric substation on the corner of Rocky Avenue and Gaidford Street. Additionally, the Applicant believes SC conforms with the City's 2050 Master Plan, and the proposal is compatible and a harmonious use of the land.

The City's 2050 Master Plan mentions Kyle Canyon will see the eventual building-out of medium-low density suburbs currently under development agreements utilizing traditional neighborhood development, as seen near Kyle Canyon and the US-95. The 2050 projections estimate a population of 47,063 and 10,142 new housing units. As of now, Kyle Canyon lacks major city and regional facilities to support the projected growth. With that, projects like the Battery Energy Storage System that is being proposed by the Applicant will help meet the needs of this future community. The City's 2050 Master Plan states, as key implementation strategies, to build out subdivisions as traditional neighborhood development and to provide an array of city services and facilities as population increases.

Site Development Plan Review

The Applicant is proposing to develop a Battery Energy Storage System ("BESS") and private substation on approximately 12 acres. The proposed development will consist of multiple battery containers, multiple inverters/transformer power conversion systems, and an operations and maintenance facility with code required parking spaces at 1 for each 300 square feet of building including ADA parking stall. The building will contain offices and a shop used for minor repairs and storage of parts/materials used for maintenance and minor repair of onsite facilities. The operations building water and sewer service for restrooms will be provided via holding tanks, no public water or sewer connections are proposed with this development. At the northeast corner of the site is a proposed private substation where the onsite BESS facility will connect with offsite power lines and facilities. Access to the property will be taken from Puli Street along the western property line, via a private gated entry 32-ft in width. The site will be surrounded by a security fence consisting of 8-ft tall chain link with barbed wire on top up to 2-ft in height. Paved access to the site will be provided from the project entry on Puli Street, to Log Cabin Way and Shaumber Road, then south in Shaumber Road to Kyle Canyon Road (State Route 157 – NDOT). Shaumber Road north of Kyle Canyon Road is already in use as access to the Nevada Energy Substation located to the north. The project is requesting the deferral of full offsite improvements adjacent to this site and request to construct all adjacent roadways as a 32-ft wide paved access roadway, per uniform standard drawing 209.

The purpose of a BESS is to provide a reliable and stable supply of electricity to a power grid or to a specific electrical system. When demand for electricity is high, the BESS can discharge its stored energy to the grid or electrical system, providing additional power to help meet the demand. When demand is low, excess power can be stored in the battery for later use, and can also provide grid services such as frequency regulation, voltage support, and power quality control. By

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providing these services, BESS can help to improve the stability and efficiency of the overall power grid.

Waiver of Development Standards

The Applicant is requesting a complete waiver of all landscape requirements. Landscape waivers are not unusual in relation to electric utility substation uses and Battery Energy Storage Systems. Additionally, the requested landscape waiver is compatible and harmonious with the surrounding areas. The existing electric substation on the corner of Rocky Avenue and Gaidford Street, approximately 690 feet north of the Property, does not consist of any landscaping, and therefore, is not compliant with Code. Lastly, this request to waive landscaping supports valley-wise water conservation efforts by reducing water consumption, with no water extensions and meters proposed this site would be challenged to provide irrigation for any landscaping.

Vacation of Patent Easements

The vacation of multiple 33-ft wide patent easements along the boundaries of the three parcels included in this proposed development are being requested as these are not needed for roads or utility purposes. The requested patent easement vacation is not in conflict with the proposed dedication of the adjacent right of way dedications for Log Cabin, Puli, and Ruston alignments.

Thank you for your consideration of this request. Please let me know if you have any questions.

Sincerely,

KAEMPFER CROWELL



Lexa D. Green

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