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Comment Received From: Norma Karg

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24-OPT-02 and Compass Energy Storage Project NOP Comments

Dear California Energy Commission,

As a resident of San Juan Capistrano, I urge the CEC to deny the Compass Energy Storage Project (250 MW battery energy storage system) due to its failure to meet the Opt-In Certification program's requirements under Assembly Bill 205. The project poses significant risks to public safety, the environment, and the local economy, as outlined below.

1. Failure to Demonstrate Net Positive Economic Benefit

The CEC requires projects to provide an "overall net positive economic benefit" to local governments and communities (AB 205). This project fails to meet this standard:

Increased Insurance Costs: The project is located in a high fire risk area, exacerbating financial strain on property owners already facing rising fire insurance premiums or cancellations due to wildfire devastation. A battery energy storage system (BESS) in this area could further increase rates and reduce insurability, negatively impacting homeowners and businesses.

Property Value Decline: The perceived danger of a BESS in a densely populated area may deter residents and investors, leading to reduced real estate values and rental income, undermining local economic stability.

Lack of Community Benefit Agreements: Saddleback College, a key local stakeholder, has not accepted proposed community benefits, indicating insufficient community support or tangible economic gains.

Increased Local Costs: Enhanced emergency response resources, funded by local taxpayers, would be required to address potential disasters, diverting funds from other community priorities.

2. Significant Fire Risk in a High-Risk Area

The CEC must evaluate environmental and safety impacts under CEQA-equivalent standards. The project's location in a high fire risk area, as classified by CAL FIRE, presents unacceptable risks:

Historical Fire Incidents: South Orange County experiences frequent wildfires, exacerbated by Santa Ana winds, which can rapidly spread fires. A 2022 BESS fire in Moss Landing, CA, and other incidents nationwide highlight the real risk of thermal runaway in lithium-ion batteries, which can produce intense, difficult-to-extinguish fires.

Local Fire Authority Concerns: The Orange County Fire Authority has indicated limited capacity to manage a large-scale BESS fire, increasing the risk of catastrophic consequences.

Contrary to Fire Mitigation Efforts: The project undermines local efforts to reduce fire risks through brush clearance and utility hazard removal, introducing a new high-risk utility in a vulnerable area.

3. Public Safety Risks in a Densely Populated Area

The CEC must ensure projects protect public health and safety. The project's proximity to critical infrastructure and dense populations poses significant risks:

Dense Population and Sensitive Receptors: approximately 200,000 people live, work, and recreate within a 5-mile radius, with schools, a level 1 trauma center, medical facilities, care homes, and businesses nearby. A BESS incident could disrupt these critical services.

Environmental Contamination Risk: BESS failures can release toxic chemicals into soil, groundwater, and nearby Trabuco Creek, which flows to the Pacific Ocean, potentially causing widespread environmental harm.

Proximity to Transportation Infrastructure: The site's location near train tracks and a freeway increases risks of cascading impacts from an incident, potentially disrupting regional transportation and emergency access.

4. Potential Attraction for Security Threats

The CEC must consider risks to public safety, including potential vulnerabilities to malicious acts. The project's proximity to critical infrastructure, including train routes and a freeway, could make it a target for vandalism or terrorism, amplifying risks of a catastrophic incident that could disrupt South Orange County's connectivity and safety.

5. Errors and Inadequacies in the Application

The CEC requires complete and accurate applications under its CEQA-equivalent process. The applicant, Compass Energy LLC, has not adequately addressed:

Incomplete Fire Risk Mitigation: The application lacks a comprehensive fire mitigation plan tailored to the site's high fire risk designation and local wind patterns, failing to meet California Fire Code and NFPA 855 standards.

Inadequate Environmental Impact Analysis: The application underestimates potential impacts on water quality and sensitive ecological areas, such as Trabuco Creek, violating CEQA requirements for thorough environmental review.

Insufficient Public Safety Measures: The application does not demonstrate adequate coordination with local fire authorities or real-time environmental monitoring plans, as required for BESS safety under AB 205.

The Compass Energy Storage Project fails to meet CEC's Opt-In Certification requirements due to its negative economic impacts, significant fire and safety risks, potential security vulnerabilities, and incomplete application. Approving this project in a high-risk, densely populated area would contradict California's goals of ensuring safe, reliable, and environmentally sustainable energy systems. I respectfully request the CEC deny this project to protect our community's health, safety, and economic well-being.

Sincerely,

Norma Karg

San Juan Capistrano, CA