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Oppose siting the Prairie Song BESS in Acton's Very High Fire Hazard Severity Zone

To the Commissioners,

I am writing from Acton to object in the strongest possible terms to the proposed Prairie Song Reliability Project. The applicant is seeking to install a utility scale battery energy storage system that would place roughly two thousand thirty five containerized battery units across about seventy acres in a rural community mapped as a Very High Fire Hazard Severity Zone. This is gigawatt scale infrastructure. In practical terms, that is on the order of half the output of a single large nuclear plant such as Diablo Canyon. For a small town in the wildland urban interface, that scale is unacceptable.

Placing lithium ion storage in a Very High Fire Hazard Severity Zone is reckless. Our terrain is chaparral and grassland, our weather brings frequent Santa Ana conditions, and our neighborhoods sit downwind of the proposed site. Any ignition or battery off gassing would move quickly through populated areas before responders could establish control. High winds increase ember cast, overwhelm simple setbacks, and complicate evacuation. Acton already carries elevated wildfire risk. Adding a massive new ignition and plume source increases both the probability and the consequence of a bad day.

The chemistry does not cure the hazard. Lithium iron phosphate cells can enter thermal runaway under abuse conditions. When they burn, they release heat and toxic gases, including hydrogen fluoride and related phosphorus fluorides, along with dense smoke that reduces visibility and hampers firefighting. These emissions have driven shelter in place orders and evacuations at other large battery sites because they are corrosive to skin and lungs and are difficult to suppress. In a location that routinely sees high winds, plume behavior becomes more dangerous and less predictable. That reality demands conservative siting and full scale dispersion modeling, not wishful thinking and fence line monitors.

This project would industrialize a rural community that is defined by homes, small ranches, horses, and open views. Replacing that with thousands of steel boxes, switchgear, inverters, transformers, substation equipment, cooling fans, lighting, fencing, cameras, paved access, and water basins will permanently change the character of Acton. Noise, visible heat shimmer, and night glow do not belong in a valley known for dark skies and quiet evenings. The visual blight and perceived hazard will depress nearby property values and stigmatize the area in real estate listings.

The insurance impacts are not theoretical. California homeowners in wildfire prone zones already face skyrocketing premiums and nonrenewals. Underwriters evaluate both exposure and vulnerability. Dropping a gigawatt scale battery complex into a Very

High Fire Hazard Severity Zone increases perceived exposure, which will push more families into expensive last resort coverage or out of coverage entirely. Reduced insurability and reduced marketability combine to erode equity. That pressure will force some long time residents to sell, often at a discount, and the likeliest buyers for clusters of devalued parcels are the developer or affiliates seeking to expand the footprint.

Community consent matters. Acton residents and local representatives have been clear that this project is unwanted and inconsistent with adopted land use goals. Reliability for the broader grid does not entitle a developer to override the will of the people most at risk. There are alternatives. If the state needs storage at this scale, it can pursue intrinsically non flammable technologies such as aqueous flow batteries, or it can place lithium ion systems on appropriately zoned industrial land far from homes and away from Very High Fire Hazard Severity Zones. Either path requires the applicant to do the harder work of responsible siting rather than treating a rural town as a convenient blank space on the map.

To summarize the core defects. The project relies on a chemistry that produces toxic gases when burning. It is targeted for a Very High Fire Hazard Severity Zone with frequent high wind events. It will devalue nearby homes, undermine insurability, and push families to sell. It would sprawl across about seventy acres in roughly two thousand thirty five enclosures, imposing an industrial footprint entirely at odds with our rural character. Its power rating exceeds one billion watts, comparable to about half the output of a large nuclear unit, and yet it is proposed within a town rather than an industrial district. It defies the will of residents who have repeatedly said no.

For all these reasons, I urge the Commission to deny the Prairie Song application as proposed. At a minimum, require a full alternatives analysis that removes lithium ion from consideration at this site, relocates any storage to non VHFHSZ industrial land, and mandates independent worst case dispersion modeling for hydrogen fluoride and related gases with setbacks large enough to truly protect the public. Anything less fails the basic duty of care owed to the people of Acton.

Respectfully,
Jeremiah Owen
Acton Resident