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Comment Received From: Sarah Dunn
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Lambie Industrial Park as an alternative should be considered

Additional submitted attachment is included below.

October 8, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Lambie Industrial Park as an alternative site. Docket: 24-OPT-05

Dear Commissioners,

As a Vacaville resident and vocal community advocate for battery energy storage system (BESS) safety, I want to thank the CEC staff for addressing the alternative project sites they've identified and asked the applicant to analyze. The applicant's response has proven these sites are feasible and meet two out of their three project objectives. The applicant has also offered two solutions to meet the third and final objective of constructing and operating a 300MW BESS close to the Vaca-Dixon substation. The solutions include; a longer gen-tie line to connect to the Vaca-Dixon substation or a Material Modification Assessment (MMA) by CAISO in order to connect elsewhere. I'm respectfully urging you to instruct the applicant to further analyze and pursue the Lambie Industrial Park location over the current proposed project location. The Lambie Industrial Park location is a much more appropriate location for the Corby Project. It follows Solano County's current land use policies, avoids taking state protected agricultural land out of production and places the project away from sensitive receptors, reducing safety risks which are the core reasons for the large public opposition. The applicant's dismissal of this location is due to inconvenience rather than feasibility.

1. Lambie Industrial Site is Superior From a Land Use Standpoint.

• Conformance with New Ordinance and Long-Standing County Mission to

Preserve Agriculture: The Solano County BOS amended Ordinance No. 2024-1852-U to allow front-of-the-meter BESS specifically within Manufacturing and Industrial Zoning Districts. The Lambie Industrial Park is zoned Manufacturing General, making it the clear preferred location under the County's new policy direction. In 2024, Solano County updated their agricultural mitigation policy to protect our quickly disappearing agricultural lands. Preserving agriculture is a decades-long priority of our County. In 2008, voters adopted Measure T which protects agricultural land from being developed into other uses. Any zoning changes to agricultural zoned parcels need to be approved by the voters.

- **Avoidance of Prime Agricultural Land:** Unlike the proposed site, which is known to be located on Prime Farmland, Unique Farmland and Farmland of Statewide Importance, the Lambie Industrial Park would not require the conversion of state-protected agricultural resources into an industrial use or risk contamination of these sensitive areas. A BESS in the Lambie Industrial Park would also have no negative economic impact to Solano County's agricultural sector, unlike the current proposed location. It would not require any agricultural mitigation or additional land to be purchased by the applicant. Siting BESS on land already designated industrial, honors the County's commitment to preserving its valuable agricultural base. This heritage and priority should outweigh any unwanted logistical changes.

- **Substantially Reduced Risks to Sensitive Receptors:** County Supervisors explicitly identified the Lambie Industrial Park as suitable because it is "located farther away from sensitive receptors (residences, schools, hospitals, etc.)" than sites along the I-80 corridor. This significantly reduces risks to public safety in the case of a thermal runaway incident and quality-of-life impacts (noise, visual, emergency response). It would eliminate the risk of a potential I-80 closure during a case of a thermal runaway incident. These are all major reasons for the public opposition and moving the Corby Project to the Lambie Industrial Park would address and eliminate those concerns.

2. Environmental Challenges Could Outweigh Contamination Risk at Current Proposed Project Location.

The applicant raises concerns about the potential for higher-quality habitat for species like the Swainson's hawk and burrowing owl, and the presence of vernal pool habitat, at the alternative sites. However, some of these factors are present and also have to be studied and potentially mitigated at the current proposed project location along with agricultural mitigation.

- **Mitigation is Standard Practice:** Environmental constraints are common in infrastructure development. The proper response to the potential presence of sensitive biological resources (including raptor nests and vernal pools) is to conduct comprehensive site-specific surveys, adjust the BESS footprint to avoid critical habitats, and develop robust mitigation plans. Without formally studying these biological resources, the applicant is merely guessing that there would be more negative impacts at the alternative location.

- **Controllable Development Footprint:** The Lambie Industrial Park is 1,461 acres, while the BESS facility requires only a 25-acre footprint. Because of the industrial site's large area, there could be ample opportunity to "microsite" the facility to avoid sensitive areas, such as the presence of suspected vernal pools, which could minimize impact.

- **Avoidance of Contamination Risk:** Utilizing the Lambie Industrial Park, avoids the environmental risk posed by placing a lithium BESS on prime agricultural land, where a failure could result in soil and groundwater contamination from toxic chemicals, harming current and future farming potential and disrupting the operating farms in the direct vicinity.

2. The Longer Gen-tie Line or Change in Interconnection Point Are Solutions.

The applicant states there are two options that would make the Lambie Industrial Park feasible, a longer gen-tie line or changing the interconnection point. While they stated they would offer additional challenges, it was never stated it wasn't possible. The claimed technical drawbacks of a longer gen-tie line and a potential delay in the timeline are minimal relative to the benefits of appropriate siting:

- **Minimal Energy Loss:** in my research, while a longer gen-tie line introduces additional resistive losses, the overall round-trip energy losses for modern, high-voltage BESS connections over these transmission distances are generally minimal. The developer's claim that the longer line introduces significant losses decreasing project efficiency fails to prioritize the broader public good over minor electrical degradation.

- **Logical Siting Near Existing Energy Hubs:** The Lambie Industrial Park is a viable alternative because it's located near existing energy infrastructure. As CEC staff has pointed out, the area is already an active energy hub, home to the Montezuma Wind Energy Center and cited for its "existing natural gas peaker plants" that already offer grid interconnection.

- **Short term delays are minimal for a long-term project:** If a gen-tie line is not preferred, and a request for a Material Modification Assessment (MMA) by CAISO is needed for changing the interconnection point, the project should be still feasible at the Lambie Industrial Park. Considering, the project if approved, is a long-term project (15-30 years), a potential six-month delay is reasonable to ensure the project is permitted responsibly and in the best possible location that reduces negative impacts.

Conclusion

The applicant has confirmed the Lambie Industrial Park alternative site would meet the project's core objectives and could be utilized for the Corby Project. Given that this alternative site offers direct compliance with Solano County's BESS zoning objectives, follows the County's General plan and conforms with Measure T, it would be a much better use of land for the Corby Project in my opinion. It would also eliminate the permanent loss of prime agricultural land, and significantly reduce negative impacts on the surrounding community, these benefits collectively outweigh the logistics and/ or minor energy efficiency loss of extending the gen-tie line or modifying the MMA. The Corby Project located at the Lambie Industrial Park, is a solution where all stakeholders

can benefit. The applicant should be directed to fully evaluate the feasibility of obtaining site control and permitting for the Corby Project at the Lambie Industrial Park.

Thank you for your consideration,

Sarah Dunn

Vacaville, CA