

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	267174
Document Title:	Sarah Dunn Comments - Request for Comprehensive Cumulative Impact Analysis for NextEra Phase 1, Phase 2, and Middle River Power BESS Projects
Description:	N/A
Filer:	System
Organization:	Sarah Dunn
Submitter Role:	Public
Submission Date:	11/12/2025 11:38:56 AM
Docketed Date:	11/12/2025

Comment Received From: Sarah Dunn
Submitted On: 11/12/2025
Docket Number: 24-OPT-05

**Request for Comprehensive Cumulative Impact Analysis for
NextEra Phase 1, Phase 2, and Middle River Power BESS Projects**

Please see attachment

Additional submitted attachment is included below.

November 12, 2025

California Energy Commission

715 P Street Sacramento, CA 95814

Subject: Request for Comprehensive Cumulative Impact Analysis for NextEra Phase 1, Phase 2, and Middle River Power BESS Projects

Dear Commissioners and CEC Staff,

This letter serves as a formal request to the California Energy Commission (CEC), as the lead agency under the California Environmental Quality Act (CEQA) for the aforementioned BESS projects, to conduct a comprehensive cumulative impacts analysis that considers the combined effects of the **NextEra Phase 1 (0141-030-090), NextEra Phase 2 (APN 0141030100), and Middle River Power BESS projects (APN 0133060060) and any associated parcels affected by the gen-tie lines.**

NextEra's Corby Project, currently in review through the state opt-in process, seeks to develop agricultural land into industrial use. This doesn't follow the current land use policies and agricultural land use protections implemented in our county for decades. Approval of the Corby Project could set a precedent that may result in developing Solano County's agricultural and rural residential spaces into a new industrial area in our county.

We request that the Environmental Impact Report (EIR) or Staff Assessment for the **Corby Phase 1 (24-Opt-05)** project conduct a thorough cumulative impacts analysis. This analysis should assess the project's combined effects with other potential projects and the reasonably foreseeable development of a new industrial area in our county.

We urge the CEC to specifically evaluate the cumulative impacts on the following CEQA environmental checklist sections (Appendix G categories):

- **A. Aesthetics:** The combined visual impact of multiple BESS facilities and associated infrastructure on the landscape and viewsheds, particularly in the context of emerging industrial development.
- **B. Agriculture and Forestry Resources:** The potential for conversion of agricultural land, or impacts on adjacent agricultural operations, due to the concentration of these facilities and the surrounding industrial growth.
- **C. Air Quality:** The cumulative air emissions during the construction phases of all projects, potential emissions from BESS thermal events (fires) and associated emergency responses, and the potential impact on local air quality standards in a newly developing industrial zone.
- **D. Biological Resources:** The total habitat fragmentation and impact on sensitive species and ecosystems from the collective footprint of the facilities and the new industrial development.
- **E. Cultural Resources:** The combined effect on historical or unique cultural resources in the area, considering the entire footprint of the multiple projects.
- **F. Energy:** The cumulative demands on local energy infrastructure during construction and operation, and how these projects interact with regional energy plans in the context of a new industrial area.
- **G. Geology and Soils:** The cumulative impacts of extensive grading and construction on soil stability, erosion, and potential geological hazards across the larger, combined development area.

The development of these projects in proximity to one another means their individual effects, significant on their own, may be collectively magnified. A focused, integrated analysis is essential for the CEC to make a fully informed decision that protects public health, safety, and the environment.

We request that the CEC include this analysis in its upcoming environmental documents (e.g., Draft EIR/Staff Assessment) and provide ample opportunity for public review and comment on these specific cumulative concerns during public meetings.

Thank you for your attention to this important issue. We look forward to participating in the public process and receiving a response that confirms that this request will be addressed.

Sincerely,

Sarah Dunn

Keep Vacaville Safe