

DOCKETED	
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Project Title:	Corby Battery Energy Storage System Project
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Document Title:	Derek Johnson Comments - Request for CEC to Address Ag Land Conversion and Economic Displacement
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Comment Received From: Derek Johnson
Submitted On: 11/17/2025
Docket Number: 24-OPT-05

Request for CEC to Address Ag Land Conversion and Economic Displacement

Additional submitted attachment is included below.

Docket No. 24-OPT-05

Re: Request for CEC to Address Conversion of Prime Agricultural Land and Economic Displacement for the Corby Battery Energy Storage System Project

Dear Honorable Commissioners,

At its core, Solano County is an agricultural county. By the numbers from both the county and the USDA:

- Nearly 67% of our land is devoted to farming.
- Ranked among the top five counties in California for sheep, lambs, and sudangrass hay production.
- Generates \$1.66 billion annually in gross output, supporting over 6,000 jobs directly and indirectly.
- Over 90% of these farms are family-owned, land stewarded by generations who depend on its continued fertility.

This is by no means marginal land. The crops and livestock are not just commodities; they are part of our county's identity and the livelihood for many families. We contribute to both domestic consumption as well as an export economy. Yet, the Corby BESS Project threatens to stall a solid economic engine.

From the Corby BESS filings (TN 259886, TN 259883, TN 259884, TN 259896, TN 259897), the applicant asserts:

- "Hundreds of good-paying jobs" during the construction phase.
- "Long-term employment opportunities" for skilled technicians and site managers, though no specific figures are provided.
- "Millions in additional revenue" for Solano County through property taxes, local spending, and community benefits.
- A 300 MW / 1,200 MWh facility that will enhance renewable energy integration and grid stability.
- Partnerships with land trusts for agricultural mitigation and contributions to California's clean energy goals.

Yet despite said assertions, their own documents fail to describe or mitigate how this project will be a net benefit to Solano County or offset the threats to its agricultural economy and heritage:

- The project site includes 12.9 acres of Prime Farmland, 9 acres of Farmland of Statewide Importance, and 18.4 acres of Unique Farmland (TN 259883).
 - In sum, approximately 40 acres will be removed from agricultural production for up to 30 years.

- Mitigation is speculative at best and doesn't guarantee comparable soil quality and productivity be conserved within Solano County or to the benefit of Solano County or its residents.
- No quantified long-term employment or revenue projections are provided to support claims of "hundreds of jobs" and "millions in revenue."
 - Construction jobs are temporary and the construction time is measured in months, not years.
 - Operational staffing for battery facilities is minimal.
 - Property tax to the County has ranged anywhere from \$40M - \$70M over the life of the facility, coming nowhere near Solano's agricultural value.
- Solano County Resource Management raised concerns about battery fire suppression and electrolyte discharge into Kilkenny Canal and nearby wells (TN 259896).
 - Dixon Fire Department reported 12 to 14-minute response times (TN 259897) yet applicant's project is outside the Dixon Fire Department's jurisdiction.
 - The applicant failed to interview either Solano County Fire services or neighboring jurisdictions more likely to render assistance like Vacaville Fire.
- The applicant's own Visual Impact Assessment concedes degradation of scenic agricultural landscapes along I-80 and the Vacaville-Dixon Greenbelt (TN 259884).

To be blunt, the Corby Battery Energy Storage System will permanently convert this prime farmland into an industrial site. Once soils are compacted under concrete pads, access roads, and heavy infrastructure, their natural structure, microbial life, and water-holding capacity are destroyed. After a 20- or 30-year project cycle, proponents may suggest the land could be "returned" to agriculture. But the science is clear: recovery of prime soils after industrial disturbance can take 50 to 100 years, maybe more, and even then, full restoration is rarely achieved. In practical terms, that means the land is lost to agriculture. To approve this project would be to set a precedent that prime farmland is expendable, the families who tend it are expendable, and the economic value it generates is expendable.

Approval of Corby BESS cannot be viewed in isolation. If this project is approved, it sets a precedent for additional BESS sitings within this area of Solano County.

- Each project removes prime farmland for decades and likely forever. Multiple projects could erode hundreds or thousands of acres over time, undermining the county's \$1.66 billion agricultural economy.
- How many BESS facilities should a single area or community be asked to bear? How much farmland should be converted to industrial use before the state says "enough"?
- Farmland is finite.
 - Every acre lost is an acre no longer producing food.
 - The cumulative effect of approving Corby and similar projects is a direct threat to the food supply chain and those who work to keep food flowing.
- Sacramento brands itself the Farm-to-Fork Capital, yet approving successive BESS projects on prime farmland undermines that very identity.

- Any accidental events cause reputational harm and damage to Solano's agricultural brand.

Renewable energy is important, but siting matters. Solano County has alternatives – identified within its ordinance governing BESS development - that do not require the permanent destruction of our most valuable soils yet the applicant has rejected them. They continuously refer to their contracts and the additional time of construction as barriers. Ironically, their green concern isn't a reference to energy or prime farmland, rather the color of money they intend to make for their investors.

Agriculture provides enduring, measurable benefits to Solano County and, in turn, California. The Corby BESS project offers speculative, short-term gains at the cost of permanent farmland loss, contamination risk, and precedent for the continued and cumulative industrialization of agricultural land in the county.

We cannot talk about a green, sustainable future while simultaneously on the cusp of destroying prime farmland, the livelihoods that depend on it, and the economic engine the land powers. Therefore, I respectfully urge you to evaluate the applicant's project speculations against the presented facts.

Sincerely,

A handwritten signature in black ink that reads "Derek Johnson". The script is fluid and cursive, with the first letters of "Derek" and "Johnson" being capitalized and prominent.

Derek Johnson