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Comments on Emergency Planning and Wildlife Connectivity â€“ Potentia-Viridi BESS Staff Assessment (SCH #2025090227)

Dear Commissioners,

Thank you for the opportunity to comment on the Staff Assessment for the proposed Potentia-Viridi Battery Energy Storage System. Iâ€™m excited about this technology and the project location near the substation seems nearly ideal. However, I respectfully recommend strengthening several aspects of the analysis and mitigation framework to help guard against environmental risks and negative impacts on sensitive species.

Wildlife Connectivity and Mitigation Effectiveness

The project site contributes to regional wildlife movement, including for the San Joaquin kit fox. While a 3:1 mitigation ratio is proposed, the EIR does not ensure that mitigation will maintain local connectivity. Mitigation lands should be located within the same ecological region, prioritize connectivity, and include clear habitat quality and performance standards. A formal connectivity analysis and post-construction monitoring should be required.

Habitat Avoidance and Species Protection

The EIR emphasizes minimization rather than avoidance. The project should avoid high-value habitat features (e.g., dens, riparian areas) to the maximum extent feasible and include species-specific management plans with seasonal restrictions and clear protocols.

Long-Term Monitoring and Adaptive Management

Mitigation should include multi-year monitoring of species presence, habitat condition, and movement, along with adaptive management requirements if performance standards are not met.

Indirect, Cumulative, and Environmental Risks

Additional analysis is warranted for indirect and cumulative impacts, including habitat fragmentation, lighting, and disturbance.

The EIR should also strengthen evaluation of:

Stormwater and flooding, including resilience to extreme storm events
Seismic risk, particularly cascading scenarios (earthquake leading to equipment failure and fire)
Extreme heat, ensuring cooling systems remain effective during prolonged heat waves
High winds, including dust emissions, fire behavior, and smoke dispersion under windy conditions

Fire Safety and Transparency

Given the scale of the facility, final vendor-specific safety documentation (e.g., UL 9540A testing, hazard mitigation analysis, and emergency response plans) should be completed and made publicly available prior to approval.

Oversight and Accountability

Independent monitoring, public reporting, and clear enforcement mechanisms should be required to ensure mitigation measures are fully implemented and effective over time.

In summary, while the proposed mitigation measures are substantial, the ecological and environmental context of this site warrants a stronger emphasis on avoidance, connectivity, resilience, and long-term performance. Strengthening these elements would improve protection of sensitive species and ensure more robust environmental outcomes.

Thank you for your consideration.

Sincerely,

Kate Blumberg