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Public Safety and County Licensing

Please consider the attached suggestions to protect our community

Additional submitted attachment is included below.

PO Box 74
Aptos, CA 95001
June 19, 2026

Eric Veerkamp, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, California 95814

Re: Seahawk BESS Project Docket #26-OPT-02

Dear Mr. Veerkamp:

Hello. I have been looking further into the public safety issues that surround the proposed Seahawk BESS project here in Watsonville. Once again, I have found their application submissions severely lacking and faulty.

Their Emergency Response Plan is bordering on ridiculous. I do not believe they consulted with the proper local authorities to develop this plan and have no concept of the realities of the limitations on the 90 Minto Road site as far as evacuating residents in an emergency. I am still trying to find out who or where their referenced SME (Subject Matter Expert) is and how the first responders are going to be standing around waiting for this person or his/her AI stand-in is to assist them in an appropriate response??

First and foremost, I would like to address the problem with notification of first responders and subsequently sensitive receptors and residents and neighbors. We currently do not have an effective reverse 911 system in the County and will need to get one up and running that can contact the surrounding area within at least two miles in both English and Spanish. This notification is essential for people to protect themselves and possibly leave the area if the air becomes contaminated with cyclical aromatic hydrocarbons which even in small amounts can be lethal. We cannot expect closing windows and doors are adequate measures to protect people nearby.

We need air monitoring sensors that are effective and stationed completely around the facility with alarms similar to what is routine with nuclear facilities. In addition to perimeter and internal sensors, it would be good to have supplemental sensors out in the predicted plume zones. Additionally, there should be a fleet of drones ready to deploy with air monitoring, FLIR heat sensors and HD cameras. This would effectively allow the fire and public health crews to spot breakouts of gases and fumes and monitor for spread of fire to adjoining fuels through overhead line failures and shorting and arcing.

The County will need financial help with keeping these systems in top operational condition over the life of the project. I would highly recommend that the CEC have the operator work with the County on a site licensing plan that includes annual fees to cover these additional costs and burdens. Licensing should include the cost for operation of a new three-person department within the Environmental Health Agency that is specifically assigned to work with issues of public health and

environmental protection relating to this BESS or other BESS that may come down the road in the future. These staff positions would be responsible for updating the Emergency Response Plan, providing information and coordination with first responders, organizing and holding information meetings for neighbors, regular sampling of air and water, coordinating with the CPUC, tracking EMF and noise levels and regular independent testing of the sensors and alarms and readiness of drone deployments. Also, they would be on the frontline to handle complaints regarding violations of standards. One of these staff should act as a liaison with the County's Office of Readiness, Resilience and Recovery to be sure they are coordinating with medical facilities concerning adequate capacities in the case of a BESS failure.

As part of this project development continuum, it is essential that there be foundational work concerning the baseline information on air and water quality prior to construction of the BESS. This should be done by an independent accredited laboratory such as the work done by EMBER through San Jose State University. The State's lab in Oakland has not proved reliable in regard to how samples are taken, tracked and handled and, in any case, good science requires that there be correlations between labs to insure truly verified and accurate measurement numbers. EPA has been called out over and over on their poor science and this needs to be addressed here. One good source for guidance is the lab work sponsored by Blue Shirt Justice which has been called in on numerous toxic spill events.

A county has clear authority to require permits that address local land use, building codes, and fire safety. With AB205 the State CEC can step into this role. A business license is a separate requirement that registers the business operating within the county's jurisdiction and creates standards and procedures for safe operation. In coordination with CPUC requirements a local license is additional insurance that developers and operators are in compliance with standards that protect residents and do not burden taxpayers.

I am including a number of items here that should be included in a licensing agreement with the County:

**Elements for BESS Licensing in Santa Cruz County
(specific to lithium BESS)**

- No Grandfathering – All Code Upgrades Immediately enforced
- De-commissioning – Bond/Fund Set Aside for Clean-up and Restoration
- First User Right/Discount Rate (Up-takers) (non-renegotiable unless rate is lowered)
- Routine Safety Site Inspections and Air, Water, Soil Monitoring of Surrounding Areas (Sensitive Receptors within 2-mile zone) Coordinating with UCSC/CalFire Air Monitoring Drones. Covering costs of lab time/fees
- Insurance Requirement – Liability \$2 billion with a ratcheting for inflation over the life of the project

- Immediate Reporting to County, CEC, CPUC and State Hazardous Materials Agency and Shutdown for investigations of failures and infractions
- Battery Replacement every 5-7 years at a minimum (not a chargeable cost to users/rate payers) (safest – not cheapest)
- Ongoing upgrades and repairs by licensed contractors
- Noticing of surrounding neighbors and sensitive receptors on admin or operational changes (expansion/ceasing/changes to emergency plan)
- Operations during change of ownership of operators – Binding transferability
- Emergency Preparedness and Post-Incident funding - Information meetings for neighbors and schools and businesses. Reporting out to media. Vertebrate and Invertebrate testing. Illness and injury data collection and reporting.
- Remediation Plan after an incident – Clean-up Monitoring
- Record availability for inspections (inc. reporting of KW Charge and Discharge)
- Property Tax – Taxed at industrial land rate – no exceptions, deferrals or modification
- Monitoring Retention Ponds for run off – Capacity maintenance. Water testing and water release standards at College Lake or other waterways
- Site hardening for fire and safeguards for vandalism and sabotage and espionage – SCADA National Security Standards implemented

These and other requirements should be incorporated into the licensing agreement between this operator and the County before a permit is granted. All associated costs are to be borne by the operator as the County taxpayers should not be forced to bear the costs of a private for profit enterprise being placed in ultimately what is an unsuitable rural location close to farms, water sources and housing.

Please, include this into your review of the permit application by New Leaf Energy for the Seahawk 90 Minto Road BESS and any subsequent BESS applications to come before you that are siting in Santa Cruz County.

Thank you,
Karell Reader
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