

DOCKETED

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Fire Risk Analysis is flawed

Additional submitted attachment is included below.

CEC staff,

My name is Stephen Brock and I am a retired 30 year LACounty Firefighter Specialist and have lived in Acton for 34 years.

I have sincere concerns about the Fire Risk Analysis that was submitted for this project. The developer's plan, according to Fire Risk Alliance recommendations, is for first responders to remain outside the perimeter of the facility and to utilize a one and one-half inch hose line that flows 125 gallons per minute to provide protection to adjacent exposures during a battery fire event.

The issue is that the PSRP is 600 ft at its widest point according to site plan, and there is no way a one and one-half inch hose line flowing 125 gallons per minute will reach a fire that may occur at the center point of the facility section which would be a distance of 300 ft. Its absolutely not possible.

To effectively reach a distance of 300ft in order to provide water to cool adjacent exposures (aka the neighboring containers to the burning battery container), it would require a deck gun or "ground monitor" flowing 1,000 gallons per minute using the smallest straight stream/straight bore nozzle-- and up to 1,500 gallons per minute if using a larger task force nozzle.

Herein lies the next issue.

The PSRP does not have a municipal water source and was issued a "Will Not Serve" letter by Los Angeles County Public Works Director, Mark Pestrella. This determination was based on the project being more than 2,000 ft from the closest water main. There would be significant and very costly upgrades required to the water system in order to accommodate a connection for a municipal source supply for this project. Thus far, the PSRP has not initiated actions or submitted plans to Public Works to do this.

Which leads us to their existing water resources which are woefully inadequate. Their site plan shows two 40,000 gallon water storage tanks. As I mentioned above, a deck gun/monitor conservatively estimated at flowing 1,000 gallons per minute would be required to mitigate the spread of a battery fire that may occur in the center of this enormous facility. In 80 minutes that water supply would be gone. And of course in approximately 53 minutes if using the larger nozzle flowing 1,500 gallons per minute. And this is not even considering additional hose lines may be required dependent upon the situation.

This photo below shows a "ground monitor" set up with a 1,500 gallon per minute task force nozzle. This large hose line is currently set up by LACity Fire during a response to an enormous 1000 ft x 500 ft cold storage building covered in solar panels that caught on fire in Boyle Heights on 6/17/26. This is the third day of this fire which included air attack water drops for the first 5 to 6 hours. A smaller secondary assist line is also set up.



At the point of depleting the stored water supply, the Fire Risk Analysis states that LACounty Fire Department personnel that are responding would set up a “shuttle service” to bring in more water by water tender trucks. Trust me, as a LACounty Firefighter Specialist (engineer) who pumped water to fires for nearly my entire 30 year career, I can assure you, LACounty Fire would not want to provide a water shuttle to a private project who should be responsible for having an adequate water supply. Especially in a high wind, high hazard brush area.

If this fire event included a brush fire encroachment, the Fire Department would also not want to bog themselves down with a relay shuttle situation. This creates a very dangerous situation for first responders and would limit their ability to quickly leave the area should it be necessary. A shift of wind or simply the unpredictability of a brush fire which creates its own weather system can cause first responders to have to quickly flee an area.

And then we can add in the fact that State Route 14 will be bumper to bumper with thousands of commuters caught in between people gawking at the fire and CHP freeway closures. Other alternative roads such as Soledad Canyon Rd, Sierra Highway and Angeles Forest Highway will be gridlocked as well with residents trying to evacuate with their animals in trailers. Couple this chaos with commuters trying to escape the gridlocked freeway and you’ve got an extremely dangerous situation.

All because this project was sited and approved without consideration of public safety.

All due respect, but the firefighters who prepare these fire risk analyses might be highly educated in the behaviors of a battery container fire, but most are not from Southern California where we deal with the constant threat of wildfires. Just as their knowledge may be superior on high rise fires, we in Southern CA have superior knowledge on brush and wildland firefighting.

This project poses many safety and health risks to the residents in the area simply through its location and use of lithium-ion battery technology. It also poses risks of interruption to the major State Route 14 transportation corridor and the Metro Rail System.

This enormous project can be sited safely away from all this and still serve our grid.

Please deny the Prairie Song Reliability Project in this very unsafe location near the residents of Acton and in the crucial State Route 14 transportation corridor.

Stephen Brock

30 year LACoFD Firefighter Specialist with 10 years in HazMat-- retired

34 year resident of Acton