

DOCKETED	
Docket Number:	26-OPT-02
Project Title:	Seahawk Battery Energy Storage System
TN #:	271039
Document Title:	Katherine Rice Comments - Opposition to New Leaf Energy BESS at 90 Minto Road, Watsonville
Description:	N/A
Filer:	System
Organization:	Katherine Rice
Submitter Role:	Public
Submission Date:	6/26/2026 11:23:28 AM
Docketed Date:	6/26/2026

Comment Received From: Katherine Rice

Submitted On: 6/26/2026

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Opposition to New Leaf Energy BESS at 90 Minto Road, Watsonville

Dear Commissioners,

I am writing to strongly oppose New Leaf Energy of Massachusetts's™ proposed lithium Battery Energy Storage System (BESS) at 90 Minto Road in Watsonville, and to oppose the siting of lithium battery chemistry in Santa Cruz County altogether.

Safer Alternatives Exist. Lithium Is Not Necessary. There are proven, commercially available, non-flammable alternatives to lithium battery chemistry for utility-scale energy storage, most notably sodium-ion technology, which is already deployed in Watkins, Colorado and in use globally. The Commission should require that any BESS approved in Santa Cruz County use non-flammable chemistry before placing a facility the size of ten football fields adjacent to homes, schools, natural lakes, and some of the most productive farmland in the United States.

This Is the Heart of America's™ Food Supply. Watsonville and the Pajaro Valley are not incidental agricultural land – they are among the most productive food-producing regions on Earth. The Pajaro Valley's™ 55,000 acres of farmland produce more than 60 crops, and Watsonville food processors freeze and distribute more fruits and vegetables than any other single area in the United States. More than \$280 million per year is spent transporting fresh and frozen crops from Watsonville to global destinations. If the Pajaro Valley were its own county, it would rank fifth in agricultural production in the entire state of California.

Santa Cruz County is the third-ranked county in California for organic agricultural sales, with gross organic sales approaching \$951 million annually. The Watsonville/Salinas strawberry zone supplies a significant portion of the country's™ strawberry crop. California grows over 91% of the nation's™ strawberries, and this region is central to that production. The County's™ top commodities – strawberries, apples, lettuce, fresh flowers, and bush berries – feed not just Santa Cruz County, but the nation and the world.

Placing a flammable industrial facility of this scale on the edge of these fields is not just a local risk. It is a national food security risk.

Chemical Contamination Will Reach Far Beyond the Neighborhood.

A lithium BESS fire does not stay contained to its site. The Moss Landing battery fire of January 2025 – just miles from 90 Minto Road – demonstrated this with devastating clarity. Soil samples taken within two miles of the Moss Landing facility by scientists from San Jose State University's™ Moss Landing Marine Laboratories detected elevated concentrations of nickel, manganese, and cobalt deposited recently into wetland soils. Researchers confirmed that these heavy metal nanoparticles were shallow in the soil, consistent with the fire's™ timeline, and warned that they – will

chemically transform as they move through the environments and potentially through the food web, affecting local aquatic and terrestrial ecosystems.â€”

Peer-reviewed science confirms that lithium-ion battery fires release a toxic cocktail: cobalt, nickel, manganese, lithium, and aluminum particulates as fine and ultrafine aerosols, as well as hydrogen fluoride, acrolein, persistent organic pollutants, and PFAS compounds from fire-suppression foam. Firefighting water runoff becomes heavily contaminated with soluble metals, fluoride ions, and toxic organics â€” frequently exceeding safe discharge levels. This runoff and leachate does not stay put. Research published in Energy & Environmental Science (RSC) confirms that contaminants can migrate many kilometers through soil and groundwater from the original site. For the agricultural fields surrounding 90 Minto Road, this is not hypothetical. These contaminants would leach into the Pajaro Valleyâ€™s irrigation water, into its groundwater, and into the soils that grow food consumed across the country. Heavy metals bio-accumulate up the food chain. Contamination of irrigation sources or soil chemistry could compromise organic certification for farms that have built their livelihoods on clean-soil standards â€” standards that Santa Cruz Countyâ€™s farmers have upheld for generations. The people poisoned would not only be the residents of Watsonville. They would be everyone who eats a strawberry, a head of lettuce, or an apple grown in the Pajaro Valley.

College Lake and Natural Resources Are Irreplaceable.

College Lake is home to threatened and endangered species and contains Ohlone cultural and prehistoric evidence of irreplaceable historical significance. It sits within a flood zone and an earthquake zone â€” both of which dramatically increase the risk of a structural failure, chemical release, or fire at a concrete BESS facility of this scale. Once College Lake and its surrounding ecosystem are contaminated, there is no remediation. These natural resources, and the birds, fish, and wildlife that depend on them, exist nowhere else in the County.

Environmental Justice and Predatory Siting.

Within two miles of 90 Minto Road live 28,450 Latino residents, including 2,948 monolingual Spanish speakers who have been nearly entirely excluded from any meaningful public engagement â€” there has been only one meeting with New Leaf Energy, in December 2024, and it was conducted without adequate language access. Also within this radius: 3,010 people living with disabilities, 4,221 people on SNAP, 6,985 children and youth aged 0â€”14, 4,680 people over 65, 12 schools, 11 childcare centers, and 2 eldercare facilities within one mile of the proposed site.

This is textbook environmental racism and predatory siting. An out-of-state corporation â€” New Leaf Energy of Massachusetts â€” is proposing to place a facility that no affluent community would accept, adjacent to one of Californiaâ€™s most vulnerable, hardworking, and underrepresented populations. The developers are not owed a substation for cost-effective energy distribution at the expense of the health and safety of the people of Watsonville.

Measure J Must Be Honored.

Measure J was passed by Santa Cruz County voters to protect valuable agricultural

land from development. This proposal violates the spirit and intent of that mandate. The people of this County have already spoken.

We respectfully and urgently ask the Commission to:

1. Deny the application for the proposed lithium BESS at 90 Minto Road in Watsonville.
2. Prohibit lithium battery chemistry in BESS facilities sited in Santa Cruz County.
3. Require safer, non-flammable alternatives such as sodium-ion chemistry for any energy storage approved in this region.
4. Conduct a full Environmental Justice review that accounts for the demographic vulnerability of the surrounding community and the critical agricultural resources at stake.

The people of Watsonville “ and the people across this country who depend on its fields “ deserve better than this.

Sincerely,
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