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Comment Received From: Lisa Erickson
Submitted On: 7/14/2026
Docket Number: 26-OPT-02

Unacceptable Risks to Public Safety, Community Welfare and Environmental Resources

Please accept the attached letter, inclusive of three photos and two additional attachments, that opposes the siting of New Leaf Energy's proposed BESS at 90 Minto Road. The proposed project poses unacceptable risks to public safety, community welfare and environmental resources. I urge the California Energy Commission to deny this project and instead consider the development of safer energy storage alternatives in locations that do not threaten residential communities, agricultural lands and sensitive environmental resources.

Additional submitted attachment is included below.

July 12, 2026

Eric Veerkamp, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814
Electronic filing of a 7-Page Letter with 3 Photos and 2 Attachments

Subject: Comments by Lisa Erickson opposing Seahawk/ New Leaf Energy Storage Project (BESS).

Reference: AB-205 Application Submitted for a Proposed Battery Energy Storage Project (BESS) in Santa Cruz County, CA.
Docket Number 26-OPT-02.

Dear Mr. Veerkamp:

I am writing to oppose the New Leaf Energy BESS Project proposed for 90 Minto Road in Watsonville, CA. I have been a lifelong Santa Cruz County resident, am a Registered Nurse-Retired and a mother and grandmother of eight Santa Cruz community members. I live in an affordable housing apartment complex less than 800 feet from the proposed Seahawk (BESS) site. I have serious concerns about the significant risks this industrial facility poses to our community's safety, environment, and quality of life.

My home has been in the Shapiro Knolls Apartments for 12 years. There are approximately 450 residents living in this high density, 88 low-income-unit housing complex. Many of the residents have worked in our agricultural farming industry for generations. I have heard so much resistance to the proposed Seahawk project from the residents who have expressed awareness that this project may be constructed in our neighborhood. Many others do not know of the project at all. The majority of our diverse community is monolingually Spanish speaking and this brings the need for widespread bilingual information regarding the Seahawk BESS potential impact to our neighborhoods, farmland and ecosystems. I have not seen any information from New Leaf Energy regarding the Seahawk BESS in Spanish or English.

We trust your vision and expertise to protect our community and the delicate ecosystems surrounding this valuable area. There are several compelling factors existing in our neighborhood that demonstrate why siting New Leaf Energy's BESS project in this diverse residential and agricultural setting is not an acceptable choice. I discuss these below:

Vulnerable Population Safety:

The proposed location creates unacceptable risks to our community's most vulnerable residents. We have 19 schools in a 2-mile evacuation radius (historically used during containerized fires¹) from the proposed New Leaf Energy BESS site. (Please see Attachment 1, Table of Facilities Within 2 Miles of 90 Minto Road and Attachment 2, Map and Chart of Sensitive Receptors Within 2 Miles of 90 Minto Road.)

¹The January 16, 2025 Vistra Moss Landing BESS 300 fire resulted in the evacuation of 8 square miles, on a 1.0 to 1.5-mile radius. <https://www.mercurynews.com/2025/01/17/map-moss-landing-fire-evacuation/>

¹The August 30, 2025 California Flats Solar Projects fire resulted in a 2-mile evacuation. <https://eticaag.com/tesla-bess-fire-at-monterey-county-solar-farm/>

Planning for an emergency response to HF gas and its cohort, hydrofluoric acid, two potentially lethal byproducts of lithium fires, that involves the “Shelter-in-place” or “Seal-in-place” option is scientifically unsound and exposes nearby residents to unacceptable risk. When released into the atmosphere, HF readily bonds with moisture in the air to form thick, fuming hydrofluoric acid aerosols and vapors. Because these dense aerosols and cool, highly concentrated HF vapors are heavier than air, they can settle and accumulate near the ground.² HF gas cannot be kept out of homes by closing windows and doors and turning off all fans, air conditioning and furnace systems. All homes have passive ventilation, allowing HF to accumulate inside. In fact, the only true protection indoors requires an airtight indoor environment equipped with specialized, positive-pressure air filtration systems, like those found in medical settings. No one has this type of protection available to them.

There is an after school and summer school program at the Shapiro Knolls Apartments at 33 Minto Road for kids in grades 1-12. This is less than 800 feet from New Leaf Energy’s proposed BESS site. There are several daycare homes for the little ones in our neighborhood. (Please see Attachment 2.)

We would be placing these young lives in potential danger from toxic emissions, fire and explosion risks. Additionally, many residents in this neighborhood have disabilities, are senior citizens or are very young. This would prevent them from evacuating themselves safely during an emergency. It could also create life-threatening situations when combined with our area's limited evacuation infrastructure and proximity to New Leaf Energy’s proposed BESS site. Minto Road is a one-way road and a single ingress/egress evacuation scenario. Although a secondary emergency access road is planned to be used “as needed,” Minto Road is also identified as the main access road for fire engines and equipment that would be deployed to the proposed BESS facility during a thermal runaway fire incident.

Environmental Protection Concerns:

This project threatens critical environmental resources that require protection. The area contains both threatened and endangered wildlife species that would be adversely impacted by this industrial operation, including native bee populations essential to local agriculture. Two natural lakes need protection from potential contamination and disruption. The closest lake, College Lake, is within 500 feet downhill from the proposed site. College Lake has been developed into the \$80 million College Lake Integrated Resources Management Program that provides reclaimed irrigation water to Pajaro Valley farms. Pinto Lake is 0.8 miles from 90 Minto Road.

Furthermore, the project would permanently remove valuable agricultural land from production in a county whose primary economic asset is a \$1.6 billion agricultural industry. Land that is essential for local food production, rural economy, and sustainable farming practices. This property has supported our community, the wildlife and fed the country for generations.

Natural Disaster Vulnerabilities:

The proposed site sits in both flood and earthquake zone areas, creating catastrophic risks for lithium battery storage operations. These natural disaster vulnerabilities exponentially increase the potential for industrial accidents, toxic releases, and emergency situations that our community lacks the resources to handle effectively. This is evidenced by the Vistra Corp’s Moss Landing BESS 300 accident that began on January 16, 2025. This was a devastating local accident that occurred only eleven miles away. We are still dealing with the toxic ramifications from that avoidable tragedy. A choice to use

²<https://www.ncbi.nlm.nih.gov/books/NBK207733/>

alternative battery technology, like vanadium flow batteries, would prevent such disasters from reoccurring.

We have a meteorological history of heavy winter rains and catastrophic flooding. As recently as in December and January of 2022-2023 and again in March of 2023, a series of severe atmospheric river storms brought historic runoff that overwhelmed Salsipuedes and Corralitos creeks and flooded the College Lake and Holohan Road areas, forcing massive evacuations in several zones near Holohan Road, Grimmer Road (where the secondary access road is proposed), College Road, Freedom Road and Salsipuedes Creek.³ We have had a crushing earthquake of 6.9 magnitude on October 17, 1989. Watsonville was devastated by earth movement, liquefaction and subsequent fire.⁴



Watsonville police service specialist Carrie Carlen inspects the demolition site of Ford's Department Store in Watsonville. — *The Pajaronian* file.

We have smaller earthquakes frequently. An earthquake measuring 4.6 Mw occurred on April 2, 2026 southeast of Boulder Creek in the Santa Cruz Mountains, with an epicenter 20 miles from 90 Minto Rd on the San Andreas Fault System.

It would be unwise for us to assume we will not experience any more large natural disasters.

Non-Lithium Alternatives:

Several non-lithium battery systems are actively running and operating across California as alternatives for long-duration energy storage and micro-grid resilience.

Operational Sites in California:

- Turlock Irrigation District (TID) Project Nexus (Stanislaus County): This canal-top solar-plus-storage system utilizes an iron flow battery system
- SDG&E Miguel Substation (Bonita): Operating since 2017 with a 99% uptime rating, this is a vanadium redox flow battery system.

³<https://pajaronian.com/flooding-causes-widespread-damage-watsonville-countywide/>

³<https://www.santacruzsentinel.com/2023/03/10/motorist-rescued-from-watsonville-floodwaters/>

⁴<https://pajaronian.com/remembering-loma-prieta-quake-left-watsonville-in-ruin-united-residents/>

- Cameron Corners Microgrid (San Diego County): This permanent wildfire-resilient micro-grid utilizes iron flow batteries.
- Naval Base San Diego. (San Diego County): A critical military facility using non-flammable zinc-based batteries from EOS Energy to maintain backup power.
- Paskenta Band of Nomlaki Indians Micro-grid (Corning): An operational, CEC-funded micro-grid that provides long duration resilience using solar power and zinc-bromide batteries.
- SDG&E (San Diego County) Vanadium batteries. Two years after becoming the first battery of its kind to be connected to the California grid to help support reliability and maximize the use of clean energy, the vanadium redox flow (VRF) battery based at a San Diego Gas & Electric substation is again breaking new ground. This time, the emerging battery technology is being tested as a means to help achieve zero-emission micro-grids – a tool to keep communities and critical facilities powered with clean energy during adverse weather conditions and power shutoffs.

This is but a handful of examples in California but there are many viable alternatives to lithium in the USA and worldwide. Some sites are using them to power back up situations and others are working with the grid. Using an alternative to lithium, if allowing batteries at this Minto Road site at all, would help assure public safety, maintain our personal quality of life and ensure there is less risk to the ecosystem, the farmland and our Earth as a whole.

Health and Safety Hazards:

Residents face multiple health risks from this industrial facility. Chronic noise pollution from inverters and cooling systems would disrupt sleep and degrade our residential quality of life. The project's proposed 266 containers would each put out 70-90 dB of noise from each of their HVACs. This is comparable to 266 running motorcycles or lawnmowers... 24 hours a day 7 days a week.

Diesel emissions from backup generators would create additional air quality and noise concerns. The lithium batteries themselves pose risks of toxic gas emissions, fire and explosions that could affect air quality and destroy public health. Electromagnetic fields from the facility raise additional health concerns that would deeply affect those in the surrounding area. We already suffer from the high EMF levels that the PG&E substation creates. This structure is directly next door to the Shapiro Knolls apartments; the parcels are immediately adjacent to each other.

Additional traffic from an industrial compound would dramatically add to the noise and pollution on an already saturated and overburdened narrow street. Minto Road and the homes on it were built between 1922-1952. There is only one narrow sidewalk on the North side of Minto Road. It measures a total of 790 feet starting at the end of the Schapiro Knolls apartments and then running in front of the apartment complex, five more homes and stopping at the parking lot to the Harvest Moon Market on Green Valley Road. This is the school bus stop. One of Santa Cruz County's Civil Engineers stated that "The beginning of Minto Road is about 30 feet wide. It narrows as the street continues down to about 14 feet wide. It is one lane in areas."

The street does not have any sidewalks or gutters on its south side. It has no crosswalks, bike lanes, center lines or sidelines anywhere. It is paved only to the end of the Schapiro Knolls apartments. It is then fixed gravel, gravel or dirt.

Children and pets use their yards and driveways to play. The lack of bike lanes and sidewalks already creates an unsafe area for pedestrians, wheelchairs, dogs, children and bikes. Adding this huge project to the neighborhood would make it an even more dangerous street for our residents. We already have the additional traffic from the substation to add to the congestion. The street is packed with parallel

parked cars. People use cones and garbage cans to mark a spot so they have a place to park when they come home.

Infrastructure Inadequacies:

The area's infrastructure cannot safely support this industrial operation. Traffic at Minto Road and Green Valley Road is already at peak burden. Additional industrial traffic would worsen the existing congestion. Evacuation of this area during a lithium battery fire incident would be extremely difficult and pose a high risk to residents.

The Application Part 2 Traffic and Transportation Section 3.12 states in response to the Criterion 3.12-4 question “Would the project result in inadequate emergency access?” that impacts would be “less than significant.” Criterion 3.12-4 states that “emergency services within the County provided by the Santa Cruz County Fire Department and Sheriff’s Department, in cooperation with local agencies” would have “emergency access to the project...through the project’s primary access driveway on Minto Road.” As described in detail in the preceding Health and Hazards section of my letter, the primary access road, Minto Road, is a very narrow two-lane road that narrows to about 14 feet in areas closer to the access gate to the proposed project. Minto Road runs directly in front of dense residential housing on both of its sides and directly in front of Shapiro Knolls Apartments, which is the last housing unit on the Green Valley substation side of the street. Schapiro Knolls is directly adjacent to the substation.

Over 35,000 people reside in a 2-mile radius around 90 Minto Road. (Please see Attachment 2.) The applicant needs to provide an exact population number on Minto Road and its only side street, Meidl Avenue and a traffic study specific to a hypothetical worst-case scenario fire in which a two-mile radius would be evacuated to effectively assess the evacuation impacts of the project on Minto Road and Meidl Avenue residents. The applicant also needs to provide an exact population number in a two-mile radius of Minto Road and a traffic study specific to a hypothetical worst-case scenario fire in which a two-mile radius would be evacuated – to effectively assess the evacuation impacts of the project on residents in the affected area.

Criterion 3.12-4 also provides a description of secondary access roads, describing the geographic locations of three proposed options for emergency access and stating that “the secondary access road would provide additional emergency access to the site and would only be used as-needed.” The applicant needs to provide an analysis of the three proposed secondary access roads and their use impact on evacuation in a hypothetical worst-case two-mile evacuation scenario.

Our first responder resources are inadequate to handle a lithium battery emergency and the local fire departments lack the specialized equipment necessary to fight lithium battery fires effectively. Our two hospitals do not have the staff, training or space to handle the acuity of injuries and exposure issues. The number of first responders and community members requiring immediate emergency care would overwhelm our small city’s facilities. Watsonville Community Hospital is 2.25 miles away from the proposed New Leaf (BESS). It has 106 total licensed beds and a basic emergency room.⁵ Dominican hospital is 12.5 miles away and it has 222 licensed beds and a basic emergency room.⁶ The county’s official evacuation site is at the fairgrounds – only 1.5 miles away from the New Leaf Energy’s proposed BESS site. All of these facilities would be directly affected by any accident or natural disaster/event.

⁵<https://watsonvillehospital.org/about-us/>

⁶<https://hcai.ca.gov/facility/dominican-hospital/>

Conclusion:

The proposed New Leaf Seahawk (BESS) project poses unacceptable risks to public safety, environmental resources, and community welfare. The combination of vulnerable populations, environmental sensitivity, natural disaster risks, infrastructure inadequacies and our community's direct experience with lithium battery thermal runaway fires makes this location entirely inappropriate. I urge the California Energy Commission to deny this project and instead consider the development of safer energy storage alternatives in locations that do not threaten residential communities, agricultural lands and sensitive environmental resources.

Thank you for your thoughtful consideration of the people, our neighborhoods and the environment.

Sincerely,
Lisa Erickson



Minto Road facing College Lake. This narrow access route is the main road to the New Leaf Energy's proposed BESS site. The road narrows down to 14-15 feet towards the end and is used for parking on both sides. Please note that there is not enough room for two lanes of traffic to pass safely at the same time. First responders and fire departments would be required to use this same road for emergency access and disaster staging. Minto Road would also serve as a critical evacuation route during emergencies. How will this work during winter conditions or in a crisis requiring ambulance pick-up or life-flight response? There just isn't the infrastructure available for a facility of the proposed size and type.



Beginning of Minto Road – a one-way road – at the Green Valley Road stop light. This is looking down towards the PG&E sub-station and New Leaf Energy's proposed BESS site on the side of the street that has a narrow sidewalk. The sidewalk only goes to the end of the Shapiro Knolls Apartments. As Minto Road is the primary ingress/egress route for any emergency it should be noted that it is full of cars parallel parking every single day 24/7.



As stated in the letter above, Minto Road residents are putting cones and garbage cans in the street, in front of homes, to secure parking spaces. This further narrows the road and limits the flow of traffic. There are no sidewalks, curbs or traffic lines in the middle or on the sides of Minto Road. In any type of evacuation or an emergency that requires a response by ambulance, police or fire this would block the cars leaving and the responders from quickly moving in. The Schapiro Knolls apartments alone have over 150 vehicles with only ONE small driveway to get in and ONE small driveway to get out to Minto Road. Minto Road is not paved to the end and there are large holes and dirt that causes mud and standing water in areas. This is an unincorporated, rural area that has been used for farming. It is not zoned or developed for industrial use.

ATTACHMENT 1

Table of Facilities Within 2 Miles of 90 Minto Road

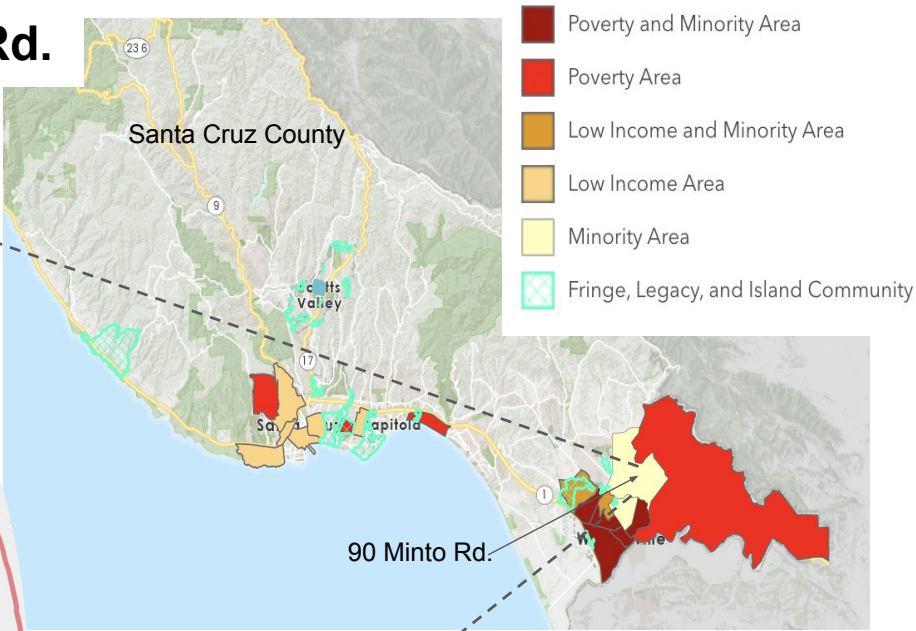
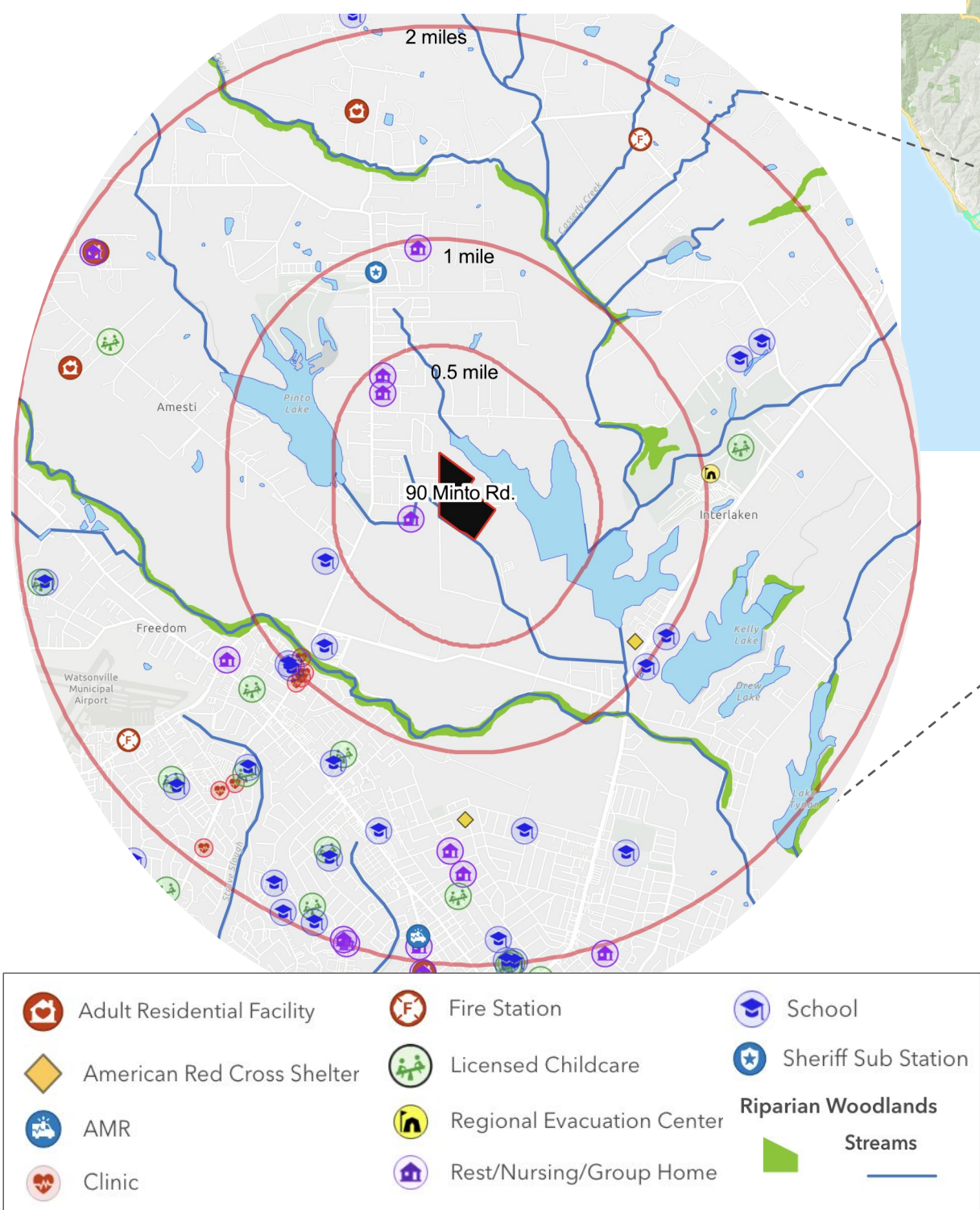
Facilities within 2 miles of 90 Minto Rd.

Included in New Leaf's Analysis	Santa Cruz County	New Leaf Energy
K-12 Schools	19	12
Licensed Childcare	10	2
Rest/Nursing/Group Home	11	2
Not Included in New Leaf's Analysis		
EDUCATION	Santa Cruz County	New Leaf Energy
Adult Education Schools	2	-
CHILDCARE	Santa Cruz County	New Leaf Energy
Licensed In-Home Family Day Care*	47	-
MEDICAL & RESIDENTIAL	Santa Cruz County	New Leaf Energy
Adult Residential Facility	4	-
Clinic	7	-
EMERGENCY SERVICES	Santa Cruz County	New Leaf Energy
AMR Station	1	-
Emergency Operations Center	1	-
Fire Station	2	-
Regional Evacuation Center	1	-
Sheriff Sub Station	1	-
American Red Cross Shelter**	5	-
*In-home family day care addresses are protected by California law; count reflects provider self-reporting confirmed through community outreach (D. Dutton-Jones & E. Montes, June 2026). **ARC shelters serve a dual role as sensitive receptors and evacuation destinations. Sources: Santa Cruz County GIS Facilities Layer (June 2026); California CDSS; community outreach (D. Dutton-Jones & E. Montes); ArcGIS analysis (C. Lackey, June 2026). New Leaf source: OpenStreetMap 2023 + Vantor 2024, disclosed in figure captions, Figures 3.5-1-1 through 3.5-1-4 (Section 3.5, May 2026 application).		

ATTACHMENT 2

Map and Chart of Sensitive Receptors Within 2 Miles of 90
Minto Road

Sensitive Receptors within 2 miles of 90 Minto Rd.



Demographics	Within 2 miles of Site	Santa Cruz County
Total population	35,558	262,930
Total households	9,740	95,039
Average household size	3.62	2.62
Hispanic / Latino	80.00%	36.00%
Median household income	\$94,426	\$110,321
Households receiving SNAP	16.50%	9.30%
Spanish-only speakers (18–64)	6.90%	2.30%
Spanish-only speakers (65+)	2.00%	0.60%
Households with disability	29.20%	23.40%

C. Lackey, June 2026. Spatial analysis conducted in ArcGIS Online using Santa Cruz County open data, California CDSS licensing data, and Esri Living Atlas. CalEnviroScreen 4.0 data from California OEHHA.