

DOCKETED

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Comment Received From: Becky Steinbruner

Submitted On: 8/18/2026

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Sequoia Energy Must Apply with Santa Cruz County LAFCO for Water Supply Service

Dear CEC and Staff,

Currently, property at 90 Minto Road project site is not served by municipal water provider City of Watsonville Public Works Department. Currently, the property at 90 Minto Road is not included within the City of Watsonville water service boundaries, and would be required to undergo analysis and approval by Santa Cruz County LAFCO for annexation or an Extra-territorial Service Agreement (ESA). The applicant has not submitted any documentation showing action with Santa Cruz County LAFCO or the City of Watsonville to obtain water service for any hydrants required by the Fire Marshal for fire suppression and / or battery container cooling in a thermal runaway event.

State and County Fire Code for private hydrants is specified in FIRE FLOW REQUIREMENTS (CFC 508; Appendix B; FPO 6; NFPA 1142; SC 7.92) 508.3 & B105.1

There is 20 PSI residual Tbl. B105.1)

Fire Flow requirements:

Urban sprinklered from 4801-6200 sf: 1000 GPM for 2 hrs. (120,000 gals.) Tbl. B105.1)

. The National

Fire Protection Association Standard for the Installation of Stationary Energy Storage Systems (NFPA 855)1 requires minimum water flow densities for sprinkler systems of 0.3 gallons per minute per cubic foot. Fire management investigations have also recommended large water densities on the order of 500 hundred gallons per minute for a 1MWh system.

The Seahawk BESS Project applicant must provide clear documentation that Santa Cruz County LAFCO has approved amending the Service Area Boundaries of Watsonville City Water Department to include 90 Minto Road service. This service must not adversely affect fire flow for neighboring residential areas within the City's Central city and southeast label service areas in order to protect public health and safety.

Sincerely,
Becky Steinbruner