

DOCKETED

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Comment Received From: Victoria Serr
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Lambie Industrial Park only option

Additional submitted attachment is included below.

To: California Energy Commission

Re: Corby Battery Energy Storage System Project — Docket No. 24-OPT-05

Subject: Request to Reject the Corby Agricultural Site and Require Serious Consideration of Lambie Industrial Park

Dear Commissioners:

I am writing to respectfully request that the California Energy Commission carefully reconsider the proposed location of the Corby Battery Energy Storage System (BESS) Project and reject the use of protected agricultural land for this industrial-scale facility.

The issue before the Commission is not whether battery energy storage can provide an important service to California's electrical grid. The issue is whether this particular project is being placed in the right location.

I believe the answer is no.

The proposed Corby BESS would occupy approximately 40.3 acres and consist of a 300-megawatt/1,200-megawatt-hour battery energy storage system, along with substations, inverters, roads, fencing, sound barriers, stormwater facilities, and other infrastructure. The project would connect to the Vaca-Dixon Substation by approximately a 1.1-mile transmission connection



crossing or approaching Interstate 80. C

CEQAnet

This is an industrial-scale facility. It should be located on land specifically planned and designated for industrial use rather than on agricultural land surrounded by residents, farms, transportation infrastructure, and other sensitive resources.

1. Agricultural Land Should Not Be Sacrificed When an Industrial Alternative Exists

The proposed Corby site is designated for agricultural use. The California environmental documentation identifies the existing land use as



Agriculture/Exclusive Agriculture. C

CEQAnet

Solano County has worked for decades to protect agricultural land from incompatible development. Agricultural land is not simply vacant land waiting for the next industrial project. It supports farming, food production, wildlife habitat, groundwater recharge, open space, and the rural character of the county.

Converting productive agricultural land to a permanent industrial battery facility creates an unnecessary precedent.

The Commission should ask a basic question:

Why should agricultural land be permanently converted for an industrial BESS when an industrially designated alternative exists?

The availability of an industrial alternative makes the loss of agricultural land particularly difficult to justify.

2. Measure T and Solano County's Land-Use Policies Must Be Taken Seriously

Solano County's Measure T establishes an orderly-growth policy and restricts changes to agricultural and open-space land-use designations without voter approval. SG Solano County

The CEC should not treat these policies as merely local preferences that can be disregarded because the project is proceeding through the state opt-in process.

The purpose of land-use planning is to determine where different types of development belong.

If an industrial facility is appropriate for an industrial zone, then placing it on agricultural land defeats the very purpose of a carefully developed land-use system.

The Commission should fully evaluate whether approval of the Corby site would undermine Measure T, the Solano County General Plan, agricultural

preservation policies, and the County's recently developed approach to locating industrial-scale BESS facilities.

3. Lambie Industrial Park Is a Logical Alternative

Solano County has specifically identified Lambie Industrial Park as an alternative that deserves analysis.

CEC documents describe Lambie Industrial Park as approximately 1,461 acres with an **Industrial land-use designation and Manufacturing General zoning**. County supervisors identified the property as potentially suitable for a BESS facility. The County and CEC staff also recognized that Lambie is farther from sensitive receptors such as residences, schools, and hospitals than sites

along the I-80 corridor. **C** California Energy Commission

This is exactly the type of location that should be considered for an industrial battery storage facility.

An industrial facility belongs in an industrial area.

The Commission should not allow the applicant's preferred location to receive greater consideration simply because it may be more convenient or less expensive for the developer. Environmental and public-safety considerations must be weighed against project economics.

Indeed, Solano County specifically advised the CEC that an adequate alternatives analysis should consider impacts to prime and non-prime farmland, sensitive receptors, biological resources, and emergency-service

access. **C** California Energy Commission

4. Wildlife and Biological Resources

The Corby site is located in an agricultural and open-space setting that provides habitat and movement areas for wildlife.

The Commission should carefully consider the cumulative impacts of converting this land to a fenced, paved, lighted and industrialized facility.

Wildlife impacts are not limited to the battery containers themselves. Roads, fencing, lighting, grading, drainage systems, transmission infrastructure, construction activity, noise and human activity can collectively alter habitat.

The CEC docket already contains recent public comments concerning biological resources, including concerns regarding white-tailed kites nesting

near the proposed site. **C** California Energy Commission

The Commission should require the applicant to demonstrate that the Corby site is environmentally superior to an already industrially designated alternative before allowing agricultural habitat to be permanently converted.

5. Groundwater and Water Resources

The project description includes an optional groundwater well, water tank and



stormwater retention facilities. C CEQAnet

That raises legitimate questions about groundwater use, groundwater quality, stormwater management, contamination risks, and long-term water-resource impacts.

A large battery facility should not be approved without a comprehensive evaluation of:

- Existing groundwater conditions;
- The depth and quality of groundwater;
- Potential impacts from construction;
- Stormwater runoff and drainage;
- Potential battery-related contaminants;
- Fire-suppression water requirements;
- Long-term groundwater monitoring; and
- Potential impacts to neighboring agricultural wells.

The Commission should also consider whether placing the project on industrial land with appropriate infrastructure would reduce these conflicts with agricultural water resources.

6. Fire Risk and Emergency Response

Fire safety is one of the most serious concerns surrounding a large lithium-ion BESS facility.

A battery fire is not equivalent to an ordinary structure fire. Thermal runaway can create difficult firefighting conditions and may produce hazardous combustion products.

The Commission should require a site-specific evaluation of the consequences of a major battery fire, including evacuation, smoke dispersion, firefighting access, water requirements, emergency personnel exposure, and the ability to isolate the affected equipment.

The question should not simply be whether a fire is unlikely.

The question should be:

What happens if a fire occurs?

The location of a facility determines how many people and critical facilities could be exposed to the consequences of an emergency.

An industrial location farther from homes, schools and hospitals provides a greater margin of safety.

7. Impact on Regional Hospitals and Emergency Services

A major emergency involving a BESS facility could require substantial involvement from fire departments, emergency medical personnel, law enforcement and hospitals.

The CEC should evaluate whether local and regional emergency services have adequate resources, training, equipment and capacity to respond to a prolonged battery fire or hazardous-material incident.

The analysis should include potential impacts on regional hospitals if injured residents, firefighters, workers or members of the public require treatment.

The Commission should not assume that existing emergency resources can simply absorb another high-hazard industrial facility.

8. Interstate 80 and Transportation Impacts During an Emergency

The proximity of the project to Interstate 80 deserves particular attention.

A major fire or smoke-producing event could potentially affect visibility, traffic flow, emergency access, evacuation routes and transportation operations.

If emergency officials determine that portions of I-80 or nearby roads must be closed or restricted, the consequences could extend well beyond the immediate project neighborhood.

The Commission should require a detailed emergency traffic analysis addressing:

- I-80 closures or restrictions;
- Emergency vehicle access;
- Evacuation routes;
- Traffic congestion during an emergency;

- Alternate routes;
- Smoke and visibility impacts;
- Coordination with Caltrans and local law enforcement; and
- The ability of emergency personnel to reach the site without creating additional traffic hazards.

The location of an industrial facility should take these consequences into account before approval.

9. Noise Pollution

BESS facilities can generate continuous noise from HVAC systems, inverters, transformers and other equipment.

Noise is not limited to the construction period.

The CEC should evaluate the project's operational noise at neighboring residences and other sensitive receptors, including nighttime conditions when background noise levels are lower.

Residents should not be required to accept permanent industrial noise simply because the project provides a statewide energy benefit.

If the same energy-storage function can be performed at a properly zoned industrial site farther from residences, the industrial site should receive serious preference.

10. Impact on Residents and Quality of Life

Residents surrounding the Corby site should not bear a disproportionate share of the project's risks and impacts.

Those impacts can include:

- Construction noise and traffic;
- Permanent industrial noise;
- Visual impacts;
- Lighting;
- Fire and hazardous-material concerns;
- Emergency evacuation concerns;
- Traffic impacts;
- Loss of agricultural and rural character;
- Potential air-quality concerns during a fire; and
- Uncertainty regarding future property values and insurance.

The benefits of the electrical grid are regional and statewide, while many of the risks associated with this particular location would be borne by nearby residents.

That imbalance should be carefully considered by the Commission.

11. Property Values

The CEC should not dismiss concerns about surrounding property values merely because they are difficult to quantify.

People make major financial investments when purchasing homes and property. The presence of a large industrial battery facility, particularly one associated with potential fire and hazardous-material concerns, may affect how buyers perceive nearby properties.

The County itself has acknowledged that residents have raised concerns about property values and insurance costs in discussions surrounding BESS

facilities.  Solano County

The Commission should require a transparent socioeconomic analysis of potential property-value impacts rather than assuming there will be none.

12. Homeowners' Insurance

Residents should also not be left to absorb increased insurance costs resulting from a large battery facility located nearby.

If insurers determine that properties in the surrounding area carry additional risk, homeowners could face higher premiums, reduced coverage or difficulty obtaining insurance.

The applicant should be required to investigate this issue with insurance professionals and provide evidence regarding the potential effect of the proposed facility on surrounding homeowners' insurance.

A project should not externalize its risk onto neighboring property owners.

13. Compatibility With County Ordinances and Planning Policies

The CEC should give substantial weight to Solano County's land-use planning and its evolving BESS regulations.

Solano County has been working on rules governing battery energy storage systems, including requirements intended to address siting and safety. The County has also received substantial public input concerning the appropriate

distance of BESS facilities from homes and sensitive uses.  Solano County

The Commission should not create a situation in which an industrial-scale project is approved in a location that local planning policies would otherwise discourage.

State authority should not become a reason to ignore sound local planning principles.

14. The Applicant Should Not Be Allowed to Dismiss Lambie Merely on Cost or Convenience

If the Lambie Industrial Park alternative requires additional infrastructure, a longer transmission connection, or other expenditures, those costs should be evaluated—but they should not automatically eliminate the alternative.

Solano County specifically told the CEC that the alternatives analysis should not reject environmentally superior alternatives merely through conclusory claims of economic infeasibility, and that environmental impacts must be

balanced against project costs. **C** California Energy Commission

That principle is particularly important here.

The cost of moving a project to a better location should be compared against the long-term cost of losing agricultural land, increasing community risk, affecting residents, burdening emergency services and potentially creating transportation, environmental and public-health consequences.

15. A Better Location Is Available

This is ultimately a question of responsible planning.

If California needs battery storage—and I recognize that California does—then these facilities should be placed where they can provide their intended electrical benefits while minimizing unnecessary impacts on people, farmland, wildlife and emergency services.

Lambie Industrial Park presents a fundamentally different land-use context because it is identified as industrial and zoned Manufacturing General. The CEC's own documents recognize that it is farther from sensitive receptors and that County supervisors have identified it as potentially suitable for BESS

development. **C** California Energy Commission

That makes Lambie worthy of serious consideration as an environmentally and publicly responsible alternative.

Request to the Commission

I respectfully ask the California Energy Commission to:

1. **Reject the proposed Corby agricultural site as the preferred location for the BESS facility.**
2. **Require a complete and objective comparison between the Corby site and Lambie Industrial Park.**
3. **Give full consideration to the protection of prime and other valuable agricultural land.**
4. **Evaluate compliance with Measure T, the Solano County General Plan and applicable County land-use policies.**
5. **Fully evaluate groundwater, stormwater and soil impacts.**
6. **Conduct a comprehensive fire-risk and emergency-response analysis.**
7. **Evaluate potential impacts to I-80 and surrounding transportation routes during a major fire or emergency.**
8. **Evaluate impacts on regional hospitals, fire departments, emergency medical services and other emergency responders.**
9. **Conduct a thorough operational and construction noise analysis, including nighttime impacts.**
10. **Evaluate potential impacts on surrounding property values and homeowners' insurance costs.**
11. **Fully analyze biological resources and wildlife impacts.**
12. **Require the applicant to demonstrate why an industrially designated location such as Lambie is not environmentally superior to the proposed agricultural site.**
13. **Give greater weight to a location that is already planned and zoned for industrial development.**

The residents of Solano County should not have to choose between supporting California's clean-energy goals and protecting their homes, farms, water, wildlife and public safety.

We can do both.

The question is not whether California should build energy storage. The question is **where it should be built**.

When an industrially designated alternative such as Lambie Industrial Park is available, the Commission should not permanently sacrifice agricultural land and place a large battery facility closer to residents and sensitive resources without demonstrating that there is no better alternative.

I respectfully request that the California Energy Commission require the Corby BESS Project's site selection to be reconsidered and that Lambie Industrial Park receive the full, independent and objective environmental and public-safety analysis it deserves.

Thank you for your consideration and for your responsibility to protect both California's energy future and the communities in which these projects are located.

Respectfully,