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Comment Received From: Derek Johnson
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**Request for CEC Staff to Re-Evaluate Lambie Industrial Park
Alternative within the Staff Assessment**

Additional submitted attachment is included below.

September 2, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-OPT-05 – Written Comment on the Staff Assessment for the Corby Battery Energy Storage System Project

Dear Commissioners,

I am submitting this comment because the stakes for Solano County and its residents are far too high to be on the sidelines. The Staff Assessment's analysis of the Lambie Industrial Park Alternative is not merely incomplete - it is deeply flawed, and in several places, factually incorrect. These deficiencies undermine the credibility of the alternatives analysis and jeopardize public trust in the Commission's decision-making process.

Solano County's alignment on this issue is extraordinary. The Solano County Board of Supervisors, the Vacaville City Council, the Dixon Fire District Board, Vacaville Fire Fighters, the Solano County Farm Bureau, the Orderly Growth Committee, and an overwhelming number of residents all agree on one point: the Corby project does not belong on Prime farmland. They also point to the same obvious, common-sense alternative - the industrial-zoned Lambie Industrial Park, designated for industrial use for more than forty years.

Yet the Staff Assessment dismisses Lambie with an analysis that is indefensible. Several examples illustrate the severity of the problem:

Reliance on a single unexamined factor. Staff's rejection of Lambie is built almost entirely on gen-tie length. CEQA does not permit eliminating an alternative based on

one unexamined factor. Staff did not analyze alternative alignments, did not evaluate existing utility corridors, did not consider undergrounding, did not explore phased construction, and did not consult PG&E or CAISO regarding feasible interconnection configurations. These are basic CEQA requirements and they were simply not done.

Incorrect application of CEQA's "similar impacts" standard. Staff repeatedly states that Lambie's impacts would be "similar in severity" to Corby. Under CEQA, if impacts are similar, the alternative cannot be eliminated particularly when Lambie avoids a significant and unavoidable farmland conversion impact that would occur at the Corby site. That fact alone legally requires deeper analysis. Staff ignored that obligation.

Use of "unknown" impact areas as justification for elimination. Staff openly acknowledges that major impact areas at Lambie are "unknown" including cultural resources, biological resources, and underground utilities. Under CEQA, "unknown" is not a basis for elimination; it is a mandate for further study. Staff stopped precisely where CEQA requires them to continue.

Factual misrepresentation of Lambie's geography. The Staff Assessment claims Lambie consists of "rolling hills requiring more grading." This is false. Lambie is flat industrial land. This is not a minor oversight. It is evidence that staff either did not conduct an onsite visit or relied entirely on the applicant's narrative. If staff cannot accurately describe the topography of a 1,400-plus acre industrial zone, a zone with only 3% - 5% of its acreage used, the public cannot reasonably trust the conclusions drawn about it.

These are not small errors. They are structural failures that compromise the integrity of the alternatives analysis. If the Commission accepts the Lambie evaluation as-is without requiring a complete, independent, and properly scoped review, it will signal to the public that the Commission is willing to approve a project even when the CEQA analysis contains glaring omissions, factual inaccuracies, and unexamined assumptions.

I respectfully urge the Commission to require the staff to perform a full, accurate, and unbiased evaluation of the Lambie Industrial Park Alternative. Such analysis should be as robust and as detailed as if it were the originally chosen site. The public deserves an alternatives analysis based on a comprehensive evaluation.

Thank you for your consideration.

Sincerely,

Derek Johnson

Vacaville, California