

DOCKETED

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Comment Received From: Jonna Henderson
Submitted On: 9/8/2026
Docket Number: 24-OPT-05

Opposition to Corby Project

Re: Opposition to Corby Battery Energy Storage System Project
Docket No\ 24\OPT\05

Dear Commissioners:

I am a Vacaville area resident writing to oppose certification of the Corby Battery Energy Storage System Project at its proposed location southwest of Kilkenny and Byrnes Roads.

Please see attached document for my written statement.

Additional submitted attachment is included below.

Opposition to Corby Battery Energy Storage System Project

Docket No. 24-OPT-05

Dear Commissioners:

I am a Vacaville-area resident writing to oppose certification of the Corby Battery Energy Storage System Project at its proposed location southwest of Kilkenny and Byrnes Roads.

I recognize that energy storage is important to California's electrical grid. My opposition is not to energy storage in principle; it is to placing a 300-megawatt, 1,200-megawatt-hour industrial lithium-ion battery facility on approximately 40.3 acres surrounded by agricultural land and rural residences.

Solano County's agricultural landscape is not vacant land waiting for industrial development. It is a productive, interconnected system of farms, ranches, irrigation facilities, soils, groundwater, local roads, homes, and agricultural businesses. Once farmland is converted to a permanent industrial use, its productive capacity and rural character cannot simply be recreated elsewhere.

The proposed agricultural-conservation mitigation does not adequately address this loss. Preserving acreage somewhere else does not restore the soil at this location, protect neighboring agricultural operations, or eliminate the risks introduced into this particular farming area. The Commission should also fully address the project's inconsistency with Solano County's agricultural zoning, Ordinance No. ZT-25-02, and the voter-approved agricultural protections embodied in Measure T. State certification authority should not be used to dismiss these locally adopted protections without a complete and legally supported analysis.

Fire and hazardous-release risks are equally concerning. Lithium-ion battery systems can experience thermal runaway, propagation between cells or units, reignition, flammable-gas accumulation, and the release of smoke, corrosive compounds, and toxic combustion products. Depending on battery chemistry and fire conditions, emissions can include carbon monoxide and hydrogen fluoride, among other hazardous substances. The relevant question under CEQA is not whether modern batteries are safer than earlier systems. It is whether this specific 1,200-MWh installation, in this specific agricultural and residential setting, has been demonstrated to prevent a foreseeable failure from becoming an off-site public-health or environmental incident.

The Draft EIR appears to rely heavily on equipment certifications, monitoring systems, separation distances, emergency planning, and compliance with fire codes. Those measures may reduce risk, but they do not eliminate thermal runaway or its consequences. Detection is not the same as containment, and an emergency-response plan is not evidence that hazardous smoke, contaminated runoff, or fire propagation will remain within the project boundary.

I therefore request that the Commission require, before considering certification:

1. Installation-specific fire and propagation testing that represents the final battery chemistry, enclosure, rack arrangement, ventilation system, state of charge, and spacing proposed for Corby—not merely component-level certification or testing of a materially different configuration.
2. Independent modeling of credible worst-case fire, explosion, and toxic-plume scenarios, including adverse wind and weather conditions, with disclosure of predicted concentrations and clearly defined evacuation and shelter-in-place zones.
3. A binding plan for containing, sampling, treating, and disposing of all contaminated firewater and stormwater, with no uncontrolled discharge to surrounding farmland, irrigation canals, drainage systems, or groundwater.

4. Baseline testing of nearby soil, surface water, irrigation water, and groundwater before construction, followed by periodic monitoring during operation and mandatory post-incident testing by an independent qualified laboratory. Testing should cover contaminants associated with the actual batteries and fire-suppression materials used at the facility.
5. A site-specific emergency-response plan prepared with—and accepted by—the responsible fire agencies, including adequate equipment, trained personnel, air monitoring, evacuation authority, access routes, water supply, mutual-aid arrangements, and guaranteed project-owner funding for training and response throughout the facility's operating life.
6. Public disclosure of who will make emergency decisions at an ordinarily unstaffed facility, how quickly qualified personnel can arrive, and how residents, farmers, schools, livestock operators, and travelers on nearby roads and Interstate 80 will be notified and protected.
7. Financial assurance sufficient to cover emergency response, environmental testing, cleanup, agricultural losses, decommissioning, battery disposal, and long-term remediation without shifting those costs to residents, farmers, local fire districts, or taxpayers.

The Commission should also reconsider environmentally preferable alternative sites, particularly appropriately zoned industrial locations with greater separation from residences and productive farmland. The proximity of the Vaca-Dixon Substation may benefit the developer, but convenience of interconnection does not establish that this is the safest or least environmentally damaging feasible location.

CEC staff has already acknowledged that the project would cause a significant and unavoidable impact to the rural visual character of the area. That harm should not be overridden based primarily on generalized statewide energy benefits and temporary construction activity when a different location could provide energy storage without permanently industrializing protected agricultural land.

For these reasons, I respectfully request that the California Energy Commission deny certification of the Corby project at the proposed site. At a minimum, the Commission should require a revised and recirculated environmental analysis that fully evaluates agricultural conversion, Measure T, alternative industrial sites, installation-scale fire behavior, toxic-air consequences, contaminated runoff, emergency-response limitations, and the cumulative effects of other proposed battery facilities in the area.

Clean-energy infrastructure should be located responsibly. California should not achieve its energy goals by concentrating avoidable industrial hazards in an established agricultural and residential community.

Thank you for including these comments in the formal record.

Sincerely,

Jonna Henderson
Vacaville, California