

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	272428
Document Title:	Michael Geller Comments - Comments on Staff Assessment Section 5-9 Noise and Vibration
Description:	N/A
Filer:	System
Organization:	Michael Geller
Submitter Role:	Public
Submission Date:	9/10/2026 7:33:35 AM
Docketed Date:	9/10/2026

Comment Received From: Michael Geller
Submitted On: 9/10/2026
Docket Number: 24-OPT-05

Comments on Staff Assessment Section 5-9 Noise and Vibration

See Attached Comment Letter

Additional submitted attachment is included below.

California Energy Commission
Corby Battery Energy Storage System Project
Docket No. 24-OPT-05

Comments on Staff Assessment Section 5.9
Noise and Vibration

Commissioners:

I submit these comments regarding Section 5.9 of the Staff Assessment, Noise and Vibration.

Save Our Rural Town (SORT) has already submitted a detailed technical analysis of Section 5.9 dated August 20, 2026, TN 272083. I do not intend to duplicate that analysis. I respectfully ask the Commission to consider SORT's comments as part of the record addressing Noise and Vibration.

The following comments identify a limited number of additional issues that warrant attention.

1. Staff's Cumulative Noise Analysis Does Not Clearly Show the Actual Combined Sound Level

Staff identifies the Vaca-Dixon Power Center as the only nearby project that could combine with Corby to create a cumulative noise impact.

The Staff Assessment states that construction associated with the Vaca-Dixon Power Center could generate approximately 61 dBA Leq at Rec02. Staff also notes that the existing daytime ambient level at Rec02 is approximately 61 dBA Leq, and concludes that the additional Vaca-Dixon construction noise would not produce a perceptible cumulative effect.

That reasoning should be clarified.

Sound levels expressed in decibels are logarithmic. Two independent sources of equal sound level do not combine to produce the same sound level. Two 61 dBA sources combine to produce approximately 64 dBA.

Accordingly, if the existing ambient level at Rec02 is approximately 61 dBA and Vaca-Dixon construction also contributes approximately 61 dBA at that receptor, the combined level would be approximately 64 dBA before adding any contribution from Corby construction itself.

Staff should therefore show the actual logarithmic addition of:

existing ambient noise + Vaca-Dixon construction noise + Corby construction noise.

The current discussion appears to compare each source individually with the ambient level rather than clearly presenting the combined acoustical condition.

That distinction matters because Staff's own methodology recognizes that a 3 dBA increase can be perceptible and that larger increases may become increasingly significant depending on existing conditions and duration.

If the cumulative analysis reaches the same less-than-significant conclusion after proper logarithmic addition, Staff should show the calculation.

2. The Cumulative Analysis Should Address Overlapping Worst-Case Construction Conditions

Staff acknowledges that Corby and Vaca-Dixon could have overlapping construction activity.

It also recognizes that Corby construction could involve pile driving, grading, trenching, gen-tie work, equipment installation, and other high-noise activities.

The cumulative analysis should therefore identify the reasonably foreseeable overlapping construction scenarios used in its analysis.

- Which Corby construction phase was assumed to overlap with Vaca-Dixon?
- What equipment was assumed to operate simultaneously?
- What duration was assumed?
- Were pile-driving or other high-noise activities included?
- Were the combined effects evaluated at the most affected receptors?

A conclusion that cumulative impacts are not considerable should be supported by the actual combined scenario rather than by separate source comparisons.

3. Staff Should Require Operational Verification at True Maximum Noise-Producing Conditions

Staff proposes NOISE-4 to verify operational noise after the project is constructed.

That condition requires a community noise survey once the project is operating at 85 percent or greater of rated capacity and directs corrective measures if operational noise exceeds applicable limits.

The condition is useful, but the Commission should explain why testing at 85 percent of rated capacity is sufficient to establish compliance at the project's maximum simultaneous noise-producing condition.

A 300-MW BESS contains multiple noise sources, including cooling systems, inverters, transformers, substation equipment, and other electrical/mechanical components.

The relevant verification condition should capture the loudest reasonably foreseeable normal operating state, including maximum cooling demand and simultaneous operation of major equipment.

If Staff believes 85 percent operation necessarily produces the worst-case acoustical condition, the technical basis for that assumption should be disclosed.

Otherwise, NOISE-4 should require testing under the actual maximum reasonably foreseeable operating condition.

4. The Commission Should Address SORT's Baseline and Mitigation Concerns Directly

SORT's filing raises detailed concerns regarding Staff's construction-noise modeling, ambient baseline, pile-driving assumptions, sound-wall performance, low-frequency and tonal noise, and reliance on post-construction verification.

Those issues deserve a direct technical response from Staff.

In particular, Section 5.9 acknowledges that the existing environment is rural and agricultural, with measured daytime and nighttime sound levels varying considerably across the project area.

Where Staff relies on adjusted thresholds based on measured ambient conditions, the representativeness of those measurements becomes important.

The Commission should therefore ensure that any final findings respond specifically to the location, duration, and representativeness of the baseline measurements relied upon in the significance analysis.

5. Complaint Procedures Are a Backstop, Not a Substitute for Preventive Noise Control

Several of the proposed Conditions of Certification rely on complaint investigation and corrective action.

NOISE-1 establishes public notification and a complaint telephone number. NOISE-2 establishes a complaint-resolution process requiring investigation and feasible corrective measures.

Those procedures are appropriate as a backstop.

But they should not substitute for enforceable pre-operation limits and design requirements.

Residents should not have to experience excessive noise first and then establish through complaints that the project is too loud.

The primary protection should be project design, modeling, barrier design, equipment specifications, and verification demonstrating compliance before a persistent nuisance develops.

6. Requested Action

I respectfully request that the Commission require Staff to supplement Section 5.9 before adopting final findings.

Specifically, Staff should:

1. Provide the actual logarithmic cumulative-noise calculation combining existing ambient noise, Vaca-Dixon construction noise, and Corby construction noise at Rec02 and any other affected receptor;
2. Identify the overlapping construction scenarios, equipment, duration, and receptor assumptions used in the cumulative analysis;
3. Demonstrate that the cumulative analysis includes reasonably foreseeable high-noise construction activities;
4. Require NOISE-4 operational testing under the maximum reasonably foreseeable normal noise-producing condition, or explain why testing at 85 percent of rated capacity is technically equivalent to the worst case;
5. Respond directly to SORT's August 20, 2026 technical comments concerning construction noise, baseline measurements, pile driving, sound-wall assumptions, low-frequency and tonal noise, and operational verification; and
6. Ensure that complaint procedures remain supplemental safeguards rather than substitutes for preventive design and enforceable noise-performance standards.

SORT has already placed a detailed technical critique of Section 5.9 into the record.

These comments do not attempt to repeat that work.

They identify a narrower issue that should be easy for Staff to answer directly:

What is the actual combined cumulative noise level when existing ambient noise, Vaca-Dixon construction noise, and Corby construction noise occur at the same time?

The Commission should have that number before concluding that the cumulative noise impact is less than significant.

In addition to my comments, I formally incorporate by reference and fully support the technical comment letter submitted by Keep Vacaville Safe.

Respectfully submitted,

Michael Geller