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Comment Received From: Robin Jaeckel
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Opposition to Corby Battery Energy Storage System Project

Additional submitted attachment is included below.

To the California Energy Commission:

I am writing to formally submit our opposition to the proposed Corby Battery Energy Storage System Project. While clean energy infrastructure is critical for California's grid, the specific hydrological conditions and risks outlined in **Section 5.16 (Water Resources)** of the CEC Staff Assessment present significant threats to our local water supply security, surrounding agricultural operations, and regional water quality.

Our primary objections regarding water resources are detailed below.

1. Direct Threat to Shallow Groundwater and Local Well Infrastructure

The Staff Assessment explicitly acknowledges that the project site suffers from **shallow ground water**, Stating that **dewatering may be required** during the construction phase. The disruption of shallow groundwater tables threatens to alter local flow dynamics and potentially impact the shallow domestic and agricultural wells that nearby residents on Kilkenny and Byrnes Roads rely upon. Deep piling and extensive foundation construction in high groundwater zones risk creating direct conduits for surface contaminants to reach the local water supply.

2. Escalating Strain on a Regulated and Stressed Groundwater Basin

The applicant lists groundwater from an optional onsite well as a primary water supply for both construction and operations. The project sits within the **Solano subbasin**, which is under strict oversight by a groundwater sustainability agency due to long-term regional supply challenges under the **Sustainable Groundwater Management Act (SGMA)**. Introducing a major commercial utility that consumes local groundwater or relies on purchased water from the **Solano Irrigation District (SID)** that would otherwise support local agriculture-is an irresponsible use of a critical, strained resource during a time of rigorous water management.

3. Serious Risk of Severe Chemical Contamination from BESS fires

A catastrophic battery fire or thermal runaway event introduces massive water quality risks. A container fire at the BESS would necessitate substantial water volume for cooling and suppression. The Staff Assessment acknowledges this extreme hazard by requiring a specific **soil and water quality sampling plan in case of a container fire at the BESS**. Fire runoff from lithium-ion systems carries highly toxic chemical byproducts. Which was experienced by (NextEra East Hampton BESS).

Because groundwater at the site is exceptionally shallow, toxic runoff could rapidly breach the water table or overwhelm the proposed stormwater retention basins, permanently poisoning local agricultural soil and regional aquifers.

4. Severe Stormwater Runoff Risks and Canal Disruption

The construction of a massive, heavily graded BESS yard holding up to **341 battery enclosures** and associated industrial infrastructure fundamentally changes the absorption capacity of the land. This massive increase in impervious surfaces creates serious risks of contaminated stormwater runoff. Furthermore, the gen-tie line must be routed directly beneath the crucial **Solano Irrigation District (SID) canal**. While the applicant intends to use horizontal directional drilling (HDD) to cross the canal, the CEC admits there is a **potential risk of inadvertent drilling fluid returns ("frac-outs")**. Any structural

compromise, fracture, or chemical leak into the SID canal would instantly disrupt agricultural water delivery and devastate surrounding active farms.

I have questions:

1. **Sustainable Extraction Limits:** Given that the project lists an “optional groundwater well” as a primary operational water supply source under the Sustainable Groundwater Management Act, what are the exact volumetric limits on extraction to guarantee neighboring agricultural operations do not experience well-drawdown?
2. **Worst-Case Thermal Runaway Supply:** Public scoping comments highlighted that the applicant intends to maintain less emergency water on-site than locally recommended. How can staff justify a “Less Than Significant” baseline if the on-site water tank capacity cannot sustain the multi-day cooling operations required to fully suppress a full-scale lithium-ion battery fire scenario?
3. **Solano Irrigation District (SID) Strains:** If water is purchased from the Solano Irrigation District (SID) instead of a well, what guarantees ensure this supply will not place unsustainable demands on local agricultural allotments during prolonged drought cycles?
4. **Stormwater Basin Capacity:** The project features proposed stormwater retention basins. Are these basins physically lined, and if not, how will they prevent residual agricultural chemicals or industrial pollutants from leaching directly into the shallow groundwater?
5. **Dewatering Risks:** Due to known shallow groundwater at the project site, dewatering will be required during heavy grading. Where exactly will this extracted groundwater be discharged, and what treatment protocols will ensure it conforms with the Central Valley Regional Water Quality Control Board requirements without spreading existing subsurface contamination?
6. **Long-term Sanitary Oversight:** The staff assessment states that sanitary wastewater needs will be permanently handled by portable toilets via a local contractor. Why is a project of this industrial scale not required to build an ecofriendly, self-contained wastewater treatment system to eliminate long-term transit emissions and spill risks on local rural roads?

Conclusion

The water resource restrictions, required dewatering mitigations, toxic fire sampling conditions, and high-risk canal crossings analyzed in Section 5.16 prove that an industrial facility of this nature is a direct threat to Solano County’s water security. An energy project should not be built at the expense of local agricultural water safety and clean groundwater supplies.

We urge the California Energy Commission to deny certification for the Corby BESS project.

Sincerely,

Robin Jaeckel, Willow Rd., Vacaville, Ca

