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CEQA Objection Letter - Socioeconomics

Additional submitted attachment is included below.

PUBLIC COMMENT / FORMAL CEQA OBJECTION LETTER

TO: California Energy Commission (CEC) Siting Division

RE: Corby Battery Energy Storage System (BESS) Project — Staff Assessment Section 5.11, Socioeconomics

SUBMITTED BY: Roslyn Kline, Vacaville Resident

I. INTRODUCTION AND EXECUTIVE SUMMARY

These comments address Section 5.11, Socioeconomics, of the Staff Assessment for the Corby Battery Energy Storage System Project. Section 5.11 concludes that most population, housing, and public-service impacts would be less than significant or would result in no impact. Several of those conclusions depend, however, on generalized assumptions about worker availability, temporary housing, worker behavior, and public-service demand that should be supported more directly by project-specific evidence.

The most important issue is fire protection. Section 5.11 acknowledges that a significant BESS fire could increase demand on the Dixon Fire Department (DFD), that additional staffing would be needed for a new fire company to staff Station 82, and that a project condition is intended to address financial hardship associated with the added fire-protection demand. Those admissions should be reconciled transparently with the section's ultimate less-than-significant-with-mitigation finding.

These comments do not contend that every socioeconomic effect is necessarily significant. They request that the Commission distinguish supported conclusions from assumptions, quantify reasonably foreseeable cumulative demands where practicable, and demonstrate that the public-service mitigation on which Staff relies is enforceable and adequate for the life of the project.

II. DETAILED COMMENTS

1. Regional Employment Totals Do Not Establish Actual Available Labor Supply

Staff relies on California EDD occupational projections showing approximately 10,160 workers in relevant construction occupations in 2022, projected to increase to approximately 11,550 by 2032. Staff then reasons that the approximately 80 average and 131 peak Corby construction workers can be supplied from the regional labor pool.

The data establish the size of the occupational workforce, but they do not by themselves establish how many workers will be uncommitted and available during Corby's 14- to 15-month construction period, or how many possess the specialized electrical and high-voltage skills needed for particular project tasks. Staff should identify the factual basis for concluding that the relevant labor will be available when required, especially if other major projects are under construction at the same time.

2. Temporary-Housing Capacity Should Be Tied to Functionally Available Lodging

Staff cites approximately 6,687 vacant housing units in Solano County, together with hotels, motels, Airbnb units, campgrounds, and recreational-vehicle parks, and concludes that temporary lodging would be sufficient even if some workers came from outside the area.

That is a reasonable starting point, but gross housing vacancy is not the same as short-term lodging actually available to construction workers. The final analysis should explain the extent to which the vacancy figure represents units available for temporary occupancy and should identify the lodging assumptions used for any non-local workforce. A project-specific estimate of the number of workers expected to require temporary lodging would make the conclusion considerably more transparent.

3. Several Worker-Behavior Assumptions Should Be Supported Rather Than Presumed

Section 5.11 repeatedly states that few, if any, workers are expected to seek temporary lodging; that temporary construction workers generally do not bring families; that they usually return to their primary residences on weekends; and that temporary workers are unlikely to make meaningful use of parks, libraries, or other public facilities.

These may ultimately prove to be reasonable assumptions, but the Staff Assessment should identify the empirical or comparable-project basis for them. The issue is not whether a temporary worker might visit a library or park. The issue is whether Staff's population, housing, and public-service conclusions depend materially on assumed worker behavior and, if so, whether those assumptions are supported.

4. Cumulative Labor and Housing Demand Should Address Plausible Construction Overlap

Staff recognizes that cumulative socioeconomic effects could occur when projects have overlapping construction schedules and draw from the same labor and housing markets. It also states that exact timing is uncertain and that many projects may not overlap.

Uncertain timing does not require Staff to assume that every listed project will be constructed simultaneously, but neither should it prevent evaluation of a reasonable overlapping-construction scenario. The final assessment should identify the projects most likely to overlap with Corby, estimate their combined peak workforce where information is available, and explain whether that combined demand changes the labor or temporary-housing conclusions.

5. Fire-Protection Demand Is the Central Socioeconomic and Public-Service Issue

Section 5.11 acknowledges a point that deserves greater emphasis. Staff states that a BESS fire at the project site could have a significant impact on DFD by requiring resources and personnel for an extended period. Staff further states that the increased demand could be mitigated through WORKER SAFETY-7, which includes equipment, safety protocols, training, and funding intended to help reduce the fire-protection demands placed on DFD.

Staff also reports that DFD's existing full-time and volunteer firefighter staffing is sufficient to respond to current calls and that its existing physical infrastructure would be adequate. At the same time, Section 5.11 states that the project would require additional staffing for DFD to add a new fire company to staff Station 82 in order to avoid increased response time to an emergency within DFD's jurisdiction.

Those statements are not necessarily irreconcilable, but they require a clear explanation. If existing staffing is sufficient for existing conditions, yet Corby creates enough incremental demand to require a new company at Station 82, the Commission should identify the incremental staffing and operating cost attributable to Corby, the funding mechanism, its duration, escalation over the project's operating life, and what happens if actual emergency-response costs exceed the assumed amount.

Staff's separate public-health analysis uses a frequency framework indicating that a BESS fire event is infrequent, not impossible. It should not be described as a prediction that a fire will occur in a particular year. The relevant socioeconomic question is whether the mitigation is adequate for the reasonably foreseeable emergency demand Staff itself has chosen to analyze.

The final socioeconomic finding should also demonstrate how the adopted conditions answer operational and fiscal questions concerning staffing, equipment, training, response times, water supply, mutual aid, and whether a Corby emergency could degrade service elsewhere.

6. Sheriff's Office Staffing Warrants a More Careful Explanation

Section 5.11 reports 59 vacancies in the Solano County Sheriff's Office, a 10.1 percent vacancy rate. Staff nevertheless finds no impact to police protection, reasoning that the construction workforce is unlikely to increase demand materially and that project security measures would reduce theft and security calls.

Under the CEQA public-services threshold, the principal question is whether the project would create a need for new or physically altered governmental facilities whose construction could cause significant environmental effects. The vacancy figure alone therefore does not establish a significant CEQA impact. It does, however, make Staff's service-capacity conclusion worth explaining more carefully. The final assessment should identify the expected project-related calls for service, explain why they can be absorbed despite existing vacancies, and identify the project security measures on which that conclusion depends.

III. CONCLUSION AND REQUESTED ACTION

Section 5.11 contains useful regional data, but several conclusions would be stronger if they were tied more directly to project-specific evidence. Most importantly, Staff should reconcile its finding that existing DFD resources are adequate with its separate conclusion that Corby-related demand requires additional staffing for a new company at Station 82 and financial support to avoid degradation of emergency response.

Before relying on Section 5.11 to support certification, the Commission should:

- identify the factual basis for the assumed availability of construction labor and temporary housing;
- evaluate a reasonable overlapping-construction scenario for cumulative labor and lodging demand;
- identify the empirical basis for worker-behavior assumptions that materially affect public-service conclusions;
- quantify the incremental DFD staffing, training, equipment, and operating costs attributable to Corby and demonstrate that the funding mechanism remains adequate and enforceable for the project's operating life; and
- explain why anticipated law-enforcement demand can be absorbed in light of the Sheriff's Office staffing vacancies identified by Staff.

Until those issues are resolved, the Commission should not rely on Section 5.11 as a basis for concluding that the proposed Kilkenny Road location creates no material socioeconomic or public-service concern. Where an industrial alternative can avoid or reduce the burden placed on rural public-service providers, that siting consideration should be weighed before certification.

In addition to these comments, I fully support the technical comment letter submitted by Keep Vacaville Safe.

Thank you for your consideration,

Roslyn Kline