

DOCKETED

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Comment Received From: Eric Romingquet
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Emergency Planning Dispersion Modeling and Sensitive Receptors

Additional submitted attachment is included below.

Emergency Planning Dispersion Modeling and Sensitive Receptors

September 11, 2026

California Energy Commission

Docket Unit, MS-4

Re: Docket No. 24-OPT-05 (Corby Battery Energy Storage System Project)

715 P Street

Sacramento, CA 95814

(Submitted electronically via CEC e-Commenting System)

Subject: Public Comment on Deferred Emergency Planning, Limited Dispersion Analysis, and Sensitive Receptors

Dear California Energy Commission and Commission Staff,

At the September 1 public meeting, I raised concerns about the absence of a meaningful evacuation plan and the limited distance used in the Staff Assessment's fire-related modeling. I submit these written comments so that the Commission can address those concerns in the administrative record.

The proposed site is approximately 1.25 miles from Kaiser Permanente Vacaville, Solano County's only Level II trauma center. Other nearby receptors within a potential two-mile planning area include Solano Community College, The Father's House school, and the Lonza facility. The Staff Assessment should identify and evaluate the institutions, populations, transportation routes, and emergency operations that could be affected by a prolonged battery incident.

1. Core Emergency Response Plan Is Deferred

Reference: Proposed WORKER SAFETY-1, WORKER SAFETY-2, and PH-1; Staff Assessment pp. approximately 167-168 and 759-760.

Issue: The operational BESS Emergency Response Plan is not due until 120 days before operation. The present record therefore does not allow the public to evaluate evacuation triggers, protective-action zones, shelter-in-place criteria, road closures, notification methods, re-entry standards, mutual-aid responsibilities, or management of a multi-day incident.

Why it matters: The plan is central to the conclusion that public-health and safety impacts can be controlled. Deferring the plan prevents meaningful public review of whether protective actions are workable for nearby hospitals, schools, residents, motorists, and industrial facilities.

Requested correction: Prepare and docket the core Emergency Response Plan before certification. Require written concurrence from Dixon Fire and Vacaville Fire and establish measurable evacuation, shelter, notification, road-closure, re-entry, and mutual-aid standards.

2. Modeling and Protective-Action Planning Stop Too Close to the Project

Reference: Staff Assessment fire and public-health analysis discussed at the September 1 public meeting; proposed PH-1 and PH-2.

Issue: The Staff Assessment's reported fire modeling extends only about 0.38 mile from the battery units, while major sensitive receptors are farther away. A comparable California BESS incident at California Flats reportedly resulted in a two-mile evacuation order. An evacuation order from another event is not proof that Corby will produce identical impacts, but it is a reasonable scenario that warrants analysis and explanation.

Why it matters: A less-than-significant conclusion is not well supported if the analysis boundary excludes locations that could fall within a plausible protective-action area. Site-specific meteorology, smoke and toxic-gas dispersion, duration, wind shifts, and roadway effects should determine the study area rather than an unexplained short radius.

Requested correction: Run and publish site-specific worst-case and reasonably foreseeable dispersion scenarios beyond 0.38 mile, including at least a two-mile screening analysis or a documented technical explanation for a different boundary. Map all sensitive receptors and identify protective actions for each.

3. Air Monitoring May Begin After the Most Critical Period

Reference: Proposed PH-2; Staff Assessment pp. approximately 760-761.

Issue: The third-party air-monitoring consultant may take up to two hours after notification to begin monitoring. Hand-held detectors and a drone do not provide the same continuous coverage as fixed, real-time monitoring.

Why it matters: Responders and the public may need immediate protective-action decisions. A two-hour delay could leave the incident commander without reliable fence-line and downwind data during an early release or changing wind conditions.

Requested correction: Require permanent real-time fence-line and downwind monitoring, redundant transmission of data to the incident commander and health agencies, numerical shelter-in-place and evacuation thresholds, and prompt public release of validated monitoring results.

4. Remote Operation May Delay Technical Support

Reference: Proposed WORKER SAFETY-7(k); Staff Assessment pp. approximately 154-155 and 171.

Issue: The remotely operated facility may rely on either a mobile command center or a project representative arriving within 15 minutes with telemetry access. The condition does not clearly identify who selects the option, how continuous availability is guaranteed, or what happens if communications or roads fail.

Why it matters: Immediate telemetry and qualified technical assistance may affect isolation, responder positioning, evacuation decisions, and protection of adjacent battery units. A delayed laptop response is not equivalent to direct, redundant access.

Requested correction: Require immediate redundant telemetry access for the incident commander, continuous qualified technical support, backup communications and staffing, and operational testing with local fire agencies before commissioning.

Conclusion and Requested Action

The Commission should expand the public-health analysis to include all reasonably foreseeable protective-action areas and nearby sensitive receptors. The core emergency plan, monitoring thresholds, and responder access arrangements should be available for public and agency review before certification, not shortly before operation.

Please explain in writing why the dispersion analysis stops at approximately 0.38 mile and how the Commission determined that hospitals, schools, colleges, nearby residents, Interstate 80 traffic, and industrial facilities outside that distance do not require additional analysis.

Thank you for your consideration and for providing a written response to these issues before project certification.

Sincerely,

Eric Romingquet
Vacaville Resident