

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	272625
Document Title:	Robin Jaeckel Comments - Opposition to Corby Battery Energy Storage System Project
Description:	N/A
Filer:	System
Organization:	Robin Jaeckel
Submitter Role:	Public
Submission Date:	9/11/2026 11:03:53 PM
Docketed Date:	9/14/2026

Comment Received From: Robin Jaeckel
Submitted On: 9/11/2026
Docket Number: 24-OPT-05

Opposition to Corby Battery Energy Storage System Project

Additional submitted attachment is included below.

To the Honorable Commissioners:

I am writing to formally submit my opposition to the proposed Corby Battery Energy Storage System Project (24-OPT-05), with specific focus on the severe, unmitigated impacts that artificial light at night (ALAN) will introduce to our quiet, rural environment. The Staff Assessment acknowledges that the facility introduces a distinct industrial character contrasting with the existing rural, agriculture landscape. Overriding local zoning protections to insert a heavily monitored, illuminated **300-megawatt footprint** will permanently damage the ecological balance and human health of this agricultural region.

The proposed outdoor lighting plan fails to protect our dark skies due to the following critical deficiencies:

1. Direct Threat to Special-Status Wildlife and Avian Species

The project site directly intersects and borders vital foraging and nesting grounds for several protected, sensitive, and state-listed species. Siting an industrialized, artificially illuminated footprint here will disrupt key biological cycles.

Disorientation of Nesting Raptors: The Staff Assessment confirms active nesting pairs of **Swainson's hawks** (state threatened) and **white-tailed kites** (state fully protected) within a 0.5-mile radius of the project infrastructure. Introducing commercial security lighting up to **14 feet in height** risks blinding, disorienting, and disrupting the nocturnal hunting efficiency of these sensitive raptors.

Impact on Special-Status Invertebrates: The site supports foraging and movement habitat for **Crotch's bumble bee** (state candidate for listing) and the **monarch butterfly** (federal candidate). Artificial night lighting alters the behavior of nocturnal insects and can fatally lure them away from host vegetation, further crashing the local insectivore food web.

Disruption of Burrowing Mammals: The project vicinity hosts **Western burrowing owls** (state candidate for listing) and **American badgers** (state species of special concern). Constant ambient light trespass degrades the cover of darkness these species rely on to forage safely without heightened predation risks.

2. Adverse Human Health Risks and Proximity to Residents

The Staff Assessment notes the extreme proximity of this industrial project boundary to local homes.

A residential property at **5405 Kilkenny Road** sits a mere **57 feet north** of the project boundary.

The historic **Cathrine Kilkenny Residence at 5310 Kilkenny Road** sits directly adjacent to the gen-tie Infrastructure.

Even with "controlled" or motion-activated fixtures, the massive integration of low-light recordable **Closed -Circuit Television (CCTV) cameras** and **thermal imaging cameras** spanning across **341 battery enclosures** will permanently eliminate nighttime privacy. Constant light trespass into nearby bedrooms suppresses human melatonin production. This causes circadian rhythm disruption, sleep degradation, and elevated long-term risks for metabolic and cardiovascular illnesses.

3. Inadequacy of Proposed Mitigation (Condition VIS-3)

While Condition of Certification **VIS-3** mandates an outdoor lighting control and management plan, It does not go far enough to maintain the rural integrity of Solano County's **Exclusive Agriculture (A-40) zone**. The Commission must mandate strict dark-sky protocols, including a total prohibition on blue-rich white LEDs, strict enforcement of ultra-warm temperatures (**2200K or less**), and absolute motion-activation lockouts after 10:00 P.M.

Questions:

1. **Insufficiency of Motion Activation:** "The Staff Assessment states that security lighting at the onsite substation will be controlled through motion sensors or manual activation. However, given the extensive recordable CCTV and thermal imaging networks monitoring 341 battery enclosures, will the movement of large wildlife (like the American badger) or changing weather conditions trigger these motion sensors, constantly, converting "intermittent" lighting into continuous, disruptive ambient illumination?"
2. **Risks to Special-States Foraging:** "Condition **BIO-7** mandates downward-facing, fully shielded lighting to minimize backscatter into adjacent wildlife habitats. Since special status species such as the **Western burrowing owl** and **Swainson's hawk** forage immediate adjacent to the site, how has the Commission quantified the exact threshold of "spillover" lux levels that will remain after shielding and will it still blind or deter these raptors from hunting successfully?"
3. **Insect Lure Effects:** "The project area contains foraging habitat for **Crotch's bumble bee**, which is highly sensitive to habitat degradation. Artificial lighting is proven to attract and exhaust nocturnal insects, depleting the local food web. What specific studies within the Staff Assessment prove that the "lower Kelvin" lights will completely eliminate the fatal attraction loop for local invertebrates?"
4. **Melatonin Suppression and Sleep Quality:** "The Staff Assessment highlights that a residential property at **5405 Kilkenny Road** sits a mere **57 feet north** of the project boundary. Given this extreme proximity, what specific peer-reviewed medical data did the Commission use to conclude that a **14-foot lighting fixture**, even if shielded, will not cause blue-light trespass into adjacent home windows and suppress human melatonin production?"
5. **Security Lighting vs. Thermal Imaging Privacy:** "If the project relies on thermal imaging cameras and low-light recordable **CCTV cameras** to protect the perimeter, why is visible overhead security lighting up to 14 feet required at all? Why hasn't the Commission mandated a 100% dark site design using purely infrared or thermal optics to protect both neighboring sleep quality and local wildlife cycles?"
6. **Enforceability of the Lighting Management Plan:** "Condition **VIS-3** requires the preparation of an outdoor lighting control and management plan. Who will be responsible for independently monitoring the site at midnight to ensure light trespass does not exceed local Solano County thresholds? If a violation occurs, what are the immediate, legally binding penalties or shut-off requirements imposed on the operator?"

Because this project causes a substantial, unavoidable adverse change to the environmental and visual setting of this agricultural region, I urge the California Energy Commission to deny certification for the Corby BESS project at this location.

Thank you for your time and consideration.

Sincerely,

Robin Jaeckel, Vacaville resident