

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	272640
Document Title:	Jake Goetze Comments - Protect Vacaville Families Reject a Corby BESS Site Where Modeled Toxic Off-Gas Exposure Exceeds Public Health Thresholds
Description:	N/A
Filer:	System
Organization:	Jake Goetze
Submitter Role:	Public
Submission Date:	9/13/2026 2:43:30 PM
Docketed Date:	9/14/2026

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Submitted On: 9/13/2026
Docket Number: 24-OPT-05

Protect Vacaville Families Reject a Corby BESS Site Where Modeled Toxic Off-Gas Exposure Exceeds Public Health Thresholds

Additional submitted attachment is included below.

TO: California Energy Commission

RE: Draft Environmental Impact Report (EIR) / Staff Assessment, Corby Battery Energy Storage System (BESS) Project (Docket No. 24-OPT-05)

To the California Energy Commission Siting Committee and Staff,

I am writing as a local resident to share my serious concerns regarding the Draft Environmental Impact Report (EIR) for the proposed Corby BESS project.

While I appreciate that the Energy Commission tried to look at fire frequency, the data used just doesn't cover enough time. These utility-scale Lithium Iron Phosphate (LFP) container systems haven't been in place long enough for anyone to truly understand their long-term safety or how often fires will happen as the equipment ages. Trying to judge the safety of a facility like this based on only three to five years of operational history isn't enough to guarantee our safety over the entire lifespan of the project.

What is most alarming to me as a neighbor is what the EIR says about off-gassing during a fire or thermal runaway event. According to the report's own modeling, an off-gas failure would expose the nearest residential homes to toxic emissions that exceed the AEGL-1 safety limit by 3.44 times. AEGL-1 is the line where the public starts experiencing health irritation and discomfort. Exceeding that safe health limit by over 300% at people's front doors is completely unacceptable.

How can the state justify putting an unproven system, one that your own report shows putting nearby homes over safe toxicity limits by 3.44 times, right next to our residential neighborhoods, farms, and sensitive local water sources?

Every type of energy production has risks, as the report points out. But responsible planning means putting risky facilities where they won't harm people. When nuclear power was first being built out in America, strict rules required these plants to be placed far away from families and homes. Why are battery storage facilities being fast-tracked into residential and agricultural areas before we even understand the full risks? The state needs to be proactive about safety, not wait for an accident to happen before reacting. Meeting arbitrary energy numbers shouldn't come at the cost of neighborhood safety.

Before any final decisions are made on this project, the CEC must directly address and answer the following questions in the Final EIR:

1. How can the CEC logically conclude that an off-gas scenario exceeding the safe AEGL-1 toxic threshold at the nearest residential homes by 3.44 times is a "less than significant" impact under CEQA guidelines? What specific scientific evidence supports declaring a 344% exceedance of a public health threshold as "insignificant"?
2. Given that AEGL-1 represents the threshold where the public experiences notable discomfort and health irritation, how did the CEC evaluate the impact of a 3.44x exceedance on vulnerable groups like children, elderly residents, and individuals with respiratory conditions living nearby?
3. At 3.44 times the AEGL-1 threshold, how close does the modeled toxic off-gas concentration come to reaching or exceeding AEGL-2 limits, which is the threshold for irreversible health

effects or impaired ability to escape, and why is that safety margin considered acceptable near homes?

4. Does this modeling reflect true worst-case atmospheric conditions such as nighttime temperature inversions and low wind speeds?

5. If the CEC is relying on future emergency response plans or fire suppression systems to call this 3.44x AEGL-1 exceedance "less than significant," how does this comply with CEQA Guidelines § 15126.4 prohibiting the improper deferral of mitigation measures?

6. What specific, verifiable engineering controls will guarantee that toxic off-gassing never reaches nearby families during a thermal runaway event?

7. Given that your fire frequency analysis relies on limited 3- to 5-year operational spans, how does the CEC plan to model thermal runaway risks for equipment operating in years 8 through 15 as components degrade over time?

8. Why is the CEC allowing utility-scale battery storage facilities to be sited immediately adjacent to homes and sensitive water bodies, rather than adopting strict setback standards similar to historical precedent set for other hazardous energy infrastructure?

9. Why is the CEC prioritizing this specific site over viable alternative locations that are far removed from residential homes, agricultural land, and local water sources?

This is simply the wrong location for this project. Those of us living in Vacaville and Solano County want energy storage done right and done safely. We don't want our neighborhood to turn into another failure statistic in the EPRI BESS database. I urge the Commission to listen to the community, answer these critical questions, reject this site, and move this facility to a safer alternative location.

Sincerely,

Jake Goetze