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Comment Received From: Robin C. Farkas
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Docket Number: 24-OPT-05

Oppose Kilkenny site support Lambie Industrial Park

See attached document.

Additional submitted attachment is included below.

PUBLIC COMMENT

Corby Battery Energy Storage System Project*Oppose siting at Kilkenny Road and Byrnes Road; require a feasible industrial-zoned alternative*

September 14, 2026

California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

Via: e-comment portal and email to docket@energy.ca.gov

Docket No.: 24-OPT-05

Project: Corby Battery Energy Storage System Project

Re: Comments on the Staff Assessment / Draft EIR — Oppose siting at Kilkenny Road and Byrnes Road; require a feasible industrial-zoned alternative

Dear Commissioners and Staff:

I am Robin C. Farkas, a Vacaville / Solano County resident submitting these comments on the Staff Assessment and Draft Environmental Impact Report for the Corby Battery Energy Storage System Project (Docket 24-OPT-05).

I support energy storage as a grid resource. I **oppose** constructing this 300 MW / 1,200 MWh lithium-ion facility on prime agricultural land at Kilkenny Road and Byrnes Road. I ask the Commission to **deny certification at the proposed site** and to require the applicant to pursue a **feasible industrial-zoned alternative**, principally **Lambie Industrial Park** and, if needed, the Montezuma Wind / Birds Landing industrial energy area already identified in CEC data requests.

1. The Kilkenny site is the wrong land use.

The proposed facility would occupy approximately 40.3 acres of Exclusive Agriculture / prime farmland immediately outside Vacaville city limits, about 250 feet from the city boundary, across Interstate 80 from PG&E's Vaca-Dixon Substation. Solano County's BESS ordinance and local planning direction have steered front-of-the-meter storage toward manufacturing and industrial districts, not Exclusive Agriculture. CEC staff have already noted a land-use and agriculture conflict. Converting this parcel is a permanent loss of working farmland next to homes, orchards, wells, Solano Irrigation District canals, I-80, and nearby sensitive uses, including residences, senior communities, and Kaiser Permanente's Level II trauma center. That impact is not "mitigated" by a one-time foundation gift.

2. Public-safety and emergency-response risk is concentrated on the wrong neighbors.

The Vacaville Firefighters Association (Local 3501) formally opposed this location because lithium-ion thermal-runaway fires can burn for days, release toxic gases, threaten I-80, and strain local fire resources that were not sized or funded for this use. The site is designed to be unstaffed after construction. A 24,000-gallon on-site tank and remote sensors do not change the fact that first response falls on local departments that have said this siting is unsafe. Assembly Bill 205 should not be used to place that burden next to homes when industrial land exists in the same county.

3. Water and agriculture impacts are not "less than significant" for the people who live here.

Neighbors have documented a shallow water table, infiltration-based stormwater design, nearby domestic and agricultural wells, and active orchard operations. A fire, leak, or contaminated suppression runoff at Kilkenny would not stay on a 40-acre pad. An industrial park with manufacturing zoning, greater setbacks from residences and hospitals, and existing industrial infrastructure is the lower-consequence location for the same technology.

4. A feasible industrial alternative is already in the CEC record.

CEC staff requested analysis of:

Lambie Industrial Park — roughly 1,461 acres bounded by Lambie Road, Goose Haven Road, and Creed Road; Solano County land-use designation Industrial, zoning Manufacturing General. County Supervisors identified this property as more appropriate because it is farther from residences, schools, and hospitals than I-80 corridor sites. Access is from State Route 12 to Lambie Road.

Montezuma Wind Energy Center / Birds Landing area — existing energy infrastructure, substation and switchyards, and industrial energy use.

The applicant's main objection is that those sites are farther from Vaca-Dixon, would need a longer generation-tie line, might miss 2027 contract dates, and could raise costs for offtakers. That is a developer schedule and cost argument, not proof that no prudent and feasible alternative exists. Contract timing with CleanPowerSF, Marin Clean Energy, and PG&E Resource Adequacy is not a CEQA license to occupy Exclusive Agriculture next to Vacaville when the County has already pointed to industrial land.

Under the Opt-In / AB 205 standard, the Commission should not override local land-use policy unless the project is required for public convenience and necessity **and** no other prudent, feasible means exist. A 300 MW / 1,200 MWh battery energy storage system can meet the same grid function on Manufacturing General land. Locating it on Kilkenny Road is a preference, not a necessity.

5. Local risk, exported product.

The facility's capacity is already contracted to CleanPowerSF, Marin Clean Energy, and PG&E Resource Adequacy. Those are legitimate statewide reliability products. They do not justify converting Vacaville-edge farmland when Solano County industrial land can host the same product with fewer sensitive receptors.

Request for relief

1. Do **not** certify the project at Assessor's Parcel Number 0141-030-090 (Kilkenny Road / Byrnes Road).
2. Find that the Draft EIR / Staff Assessment alternatives analysis is inadequate to the extent it dismisses Lambie Industrial Park and Montezuma Wind because they are not adjacent to Vaca-Dixon or might delay a 2027 commercial operation date.
3. Require a revised alternatives analysis that treats industrial zoning, distance to homes, hospital, and I-80, fire-service capacity, groundwater and agricultural exposure, and consistency with Solano County BESS siting policy as primary screening criteria—not only generation-tie length and offtake dates.
4. If the Commission believes storage at this interconnection is needed, condition any approval on relocation to **Lambie Industrial Park** or another industrially zoned site with comparable or better emergency-response access and far fewer sensitive receptors.

Energy storage belongs on industrial land. Kilkenny Road is not that land.

Respectfully submitted,

Robin C. Farkas
Vacaville, CA
robin.farkas@comcast.net
September 14, 2026