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Employs 80 construction workers for 14-15 months

Additional submitted attachment is included below.

FORMAL OPPOSITION TO THE PROPOSED CORBY LITHIUM-ION BATTERY ENERGY STORAGE SYSTEM

Environmental, Reliability, Economic, Agricultural, and Public Safety Concerns

Statement of Opposition. This document sets forth a formal opposition to the proposed Corby Battery Energy Storage System (BESS), particularly as proposed for prime agricultural land and using lithium-ion battery technology. The concerns identified below are based on the project notes provided and focus on whether the project's environmental, reliability, economic, agricultural, and public-safety impacts have been fully evaluated.

1. Environmental Considerations and Alternative Site Selection

The Clean Energy Act goals can be met through an alternative placement at Lambie Park, where the infrastructure is already established in an industrial setting. The alternative would also allow for the use of safer technology than lithium-ion batteries.

The proposed project therefore raises a fundamental land-use question: whether prime agricultural land should be converted for a battery storage facility when an alternative industrial location is available. An industrially established site would more appropriately align the project with existing land uses while reducing the pressure to remove productive agricultural land from use.

In addition, the Environmental Impact Report (EIR) does not appear to account for the impacts associated with battery augmentation anticipated every two to three years. Any meaningful environmental analysis should address not only initial construction, but also the recurring activities, equipment, materials, transportation, waste, and land-use impacts associated with future augmentation over the life of the project.

2. Reliability and the Actual Cause of Local Power Interruptions

The stated reliability justification for the project should be carefully reconsidered in light of the actual causes of local power interruptions. The community's power is reportedly suspended primarily due to weather, particularly high-winds, rather than because the regional grid lacks sufficient generation.

PG&E reportedly cuts power for safety reasons because infrastructure beyond the power station is substandard and wildfire danger is elevated. If the principal cause of outages is the intentional de-energization of vulnerable infrastructure during high-wind conditions, battery storage does not necessarily address the underlying problem.

The project should therefore demonstrate, with specific evidence, how a BESS would resolve the particular outages experienced by the community rather than simply asserting that additional storage will improve reliability. Investment in infrastructure that directly contributes to the identified cause of outages may provide a more appropriate solution.

3. Efficiency and Energy Losses Associated with BESS

The project's efficiency should be evaluated based on the full energy pathway rather than only the amount of energy ultimately discharged from the facility. The project notes identify a reported approximately 15 percent loss of energy in the process of storing excess renewable energy generated during the day.

This energy loss should be transparently incorporated into the project's environmental and efficiency calculations. The analysis should identify the amount of renewable energy that must be generated to deliver a given amount of usable energy after storage losses, and should account for the associated infrastructure and operational impacts.

4. Economic Benefits and Unaccounted Public Costs

The economic-benefit analysis should be revisited because the state reportedly does not have a baseline or specific threshold against which the claimed economic benefits are measured. A declaration of a net economic gain should not exclude significant public costs resulting from the conversion of agricultural land to BESS use.

The analysis should specifically address potential decreases in surrounding property values, increased mitigation costs, increased property-insurance rates, and the loss of food production. These impacts are not limited to the approximately 65 acres directly occupied by the project. Surrounding farms that actively produce food may also be affected, and the economic consequences of those effects should be considered.

The County should also provide a clear calculation of the property-tax revenue that would be received over the proposed 30-year project period if the project were moved to an alternative site. The landowner currently pays property taxes, and the analysis should explain whether the proposed BESS would generate additional revenue beyond what is already collected from the property in its existing use. If the existing agricultural use is not tax-exempt, the project's claimed tax-revenue benefit should be stated as an incremental increase rather than as gross revenue.

The project's employment claims should likewise be presented accurately. The application materials reportedly indicate approximately 80 construction positions over a 14-to-15-month construction period, followed by approximately three ongoing positions. Those temporary construction jobs should not be presented as equivalent to long-term employment.

By contrast, agricultural land supports an ongoing local employment system that includes planting, harvesting, soil preparation, transportation, irrigation, and related activities. These jobs contribute to local economic sustainability and support the broader agricultural community. The economic analysis should account for the employment and economic activity that would be displaced or diminished by removing productive farmland from agricultural use.

5. Preservation of Agricultural Land and Food Production

Prime agricultural land is a finite resource with value beyond the tax revenue associated with the parcel itself. Converting productive farmland to a battery storage facility can result in a permanent or long-term loss of food-production capacity and the economic activity associated with farming.

The fact that the current owner purchased the property and has allowed it to remain underutilized does not establish that the land lacks agricultural value. Rather, the community should consider whether the appropriate public-interest response is to remove the land from agricultural production or to return it to active farming.

Bringing the property back into productive agricultural use would support local food production, sustain agricultural employment, and contribute to the regional farming economy.

6. Fire Response and Public Safety

The economic and environmental analyses should include the costs associated with law enforcement and potential fire response that would not otherwise be required if the property remained in agricultural use.

The project notes raise a specific concern that neither the City of Dixon's fire jurisdiction nor Vacaville is presently prepared with the specialized tools necessary to combat a lithium-ion battery storage incident. This issue warrants a detailed, project-specific emergency-response analysis.

Before approval, the project should identify the equipment, training, personnel, response protocols, water and other resources, mutual-aid requirements, evacuation considerations, and associated public costs necessary to respond to a lithium-ion battery fire or thermal event. The analysis should also identify which agency would bear those costs and whether adequate funding would be provided by the project rather than by existing public resources.

7. Clarification of Claimed Tax Revenues

The project documentation should provide a detailed accounting of the tax revenues expected to be generated by the Corby BESS project for Dixon Unified School District, Solano Community College, and Dixon Fire.

Those figures should be presented as incremental revenue attributable to the proposed project, rather than as gross taxes that could also be generated by continued use of the property for farming. The analysis should distinguish between taxes already associated with the property and any additional revenue resulting specifically from the BESS project over the proposed 30-year period.

8. Requested Correction to the Economic-Benefit Statement

The project documentation reportedly states on Page 71: "Following construction, the project would employ a minimal number of staff and continue to contribute tax revenues to the state and local community."

That statement should be revised to accurately reflect the limited nature of the claimed ongoing fiscal contribution. A more appropriate formulation is:

"Following construction, the project would employ a minimal number of staff and continue to minimally contribute tax revenues to the state and local community."

This wording more accurately reflects the project's stated level of ongoing employment and the need to distinguish minimal incremental tax benefits from broader claims of economic benefit.

9. Greenhouse Gas Emissions, Carbon Sequestration, and the Loss of Agricultural Carbon Benefits

The project's greenhouse-gas analysis should evaluate not only the emissions reductions that may be associated with battery storage, but also the carbon sequestration that would be lost if the proposed project converts agricultural land to a battery storage facility. Any assessment of greenhouse-gas benefits should include the amount of carbon sequestration that could otherwise occur over the full life of the proposed project and should account for that lost sequestration as an impact of the proposed land-use conversion.

This consideration is particularly important because the proposed project would occupy approximately 65 acres of land for a projected 30-year project period. The greenhouse-gas analysis should identify, using appropriate site-specific data and methodology, the amount of carbon that could be sequestered by the

land over that period under continued agricultural or other feasible land uses, and compare that amount with the project's claimed greenhouse-gas emissions reductions. The analysis should also explain whether construction, operation, maintenance, battery augmentation, transportation, and eventual decommissioning affect the project's net greenhouse-gas benefit.

This issue is also directly relevant to the alternatives analysis. Section 11.3, Finding of Fact, on page 11-4 reportedly states that there are no feasible alternatives to the Corby BESS Project that would avoid or substantially lessen significant visual-resource impacts while achieving most of the project's benefits and objectives. If an alternative industrial site such as Lambie Park can achieve the project's objectives while avoiding or substantially reducing the conversion of agricultural land and the associated loss of carbon sequestration, that finding should be reevaluated.

Accordingly, the decision-making body should require transparent, site-specific calculations of existing and potential carbon sequestration over the proposed project life, identify the sequestration that would be lost through conversion of the agricultural site, and incorporate that loss into the project's net greenhouse-gas and alternatives analysis. Without this information, the claimed greenhouse-gas benefits and the conclusion that there are no feasible alternatives have not been fully demonstrated.

10. Conclusion and Request

For the reasons outlined above, the proposed Corby lithium-ion BESS should not be approved in its current form. The project analysis should be supplemented to fully evaluate the alternative Lambie Park location, safer battery technology, recurring battery augmentation, actual causes of local power interruptions, energy losses, agricultural and food-production impacts, property-value and insurance effects, displaced agricultural employment, emergency-response requirements, and the true incremental tax revenues attributable to the project.

At a minimum, the decision-making body should require a transparent comparison between the proposed agricultural-site location and the alternative industrial location at Lambie Park. That comparison should account for both project benefits and public costs over the full life of the project.

Protecting productive agricultural land, accurately evaluating the source of local reliability problems, and ensuring that public agencies are not left with unaccounted emergency-response costs are essential considerations in determining whether this project serves the public interest.

Concerned farmer near the proposed project site,

Charlene Schmid