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*Comment Received From: City Council of City of Vacaville
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**Vacaville City Council Comments on the Corby BESS
Environmental Document**

Additional submitted attachment is included below.



CITY OF VACAVILLE



Roy Stockton
Councilmember, District 1

Gregory Ritchie II
Councilmember, District 2

Michael Silva
Councilmember, District 3

John Carli
Mayor of Vacaville

Sarah Chapman
Councilmember, District 4

Ted Fremouw
Councilmember, District 5

Jeanette Wylie
Councilmember, District 6

September 14, 2026

Eric Knight, Program Manager
California Energy Commission
715 P Street
Sacramento, CA 95814

SUBJECT: City of Vacaville Comments on the Staff Assessment / Draft Environmental Impact Report for the Corby Battery Energy Storage System Project (Docket No. 24-OPT-05)

Dear Commissioners,

On behalf of the Vacaville City Council and the residents we serve, I am writing to convey our deep concern and collective opposition regarding the proposed Corby Battery Energy Storage System (BESS) Project. As elected community leaders, our primary responsibility is to protect the safety, health, and long-term vitality of the people of Vacaville and our surrounding Solano County neighbors. The City of Vacaville recognizes the importance of California's broader transition toward clean energy and supports efforts to advance a reliable, sustainable energy future. However, that transition must be pursued in a manner that prioritizes public safety, respects local and regional planning, and considers community impacts. Statewide energy objectives should not come at the expense of community safety, local self-determination, and decades of collaborative regional planning.

Disregard for Local Land Use and Rural Agricultural Planning

The proposed 40.3-acre project parcel sits outside Vacaville's city limits in unincorporated Solano County, in an area that has long been planned to remain preserved for agricultural and rural residential development. Our rural neighbors chose this corridor for its open landscape and peaceful agricultural heritage. The proposed facility would introduce a large-scale utility infrastructure use into an area characterized by agricultural and rural residential uses. Dropping a massive, uncrewed industrial utility complex into the middle of productive farmland is incompatible with this setting, directly violates Solano County's agricultural zoning, and would be inconsistent with Solano County's adopted land use and zoning framework.

Serious Detriments to the Northeast Growth Area (NEGA)

Immediately north of the project site across Kilkenney Road lies the City of Vacaville's Northeast Growth Area (NEGA), a 1,400-acre area situated squarely within our voter-approved Urban Growth Boundary and Sphere of Influence. The City is actively engaged in long-range planning for the Northeast Growth Area and the City's planning efforts are intended to evaluate the area's long-term potential for employment-generating uses, including business and industrial development. The City will complete the Northeast Growth Area Planning Study this fall, and the City Council is interested in initiating and completing a Specific Plan to thoughtfully transition this area into premier business and industrial park employment lands.



Siting an unattractive, volatile industrial battery installation right across the street directly jeopardizes this critical economic vision. The presence of a high-hazard facility within close proximity of our Urban Growth Boundary creates potential land use impacts that could discourage high-quality corporate investment and devalue surrounding employment lands that Vacaville is counting on for sustainable local jobs and economic prosperity. The Commission should not approve a project immediately adjacent to a planned future employment area without fully considering the potential consequences for decades of local and regional planning.

Flawed Economic Analysis and CEQA Inadequacies

From an environmental review perspective under the California Environmental Quality Act (CEQA) and the state's Opt-In law, the Staff Assessment contains a fundamental flaw: it assumes without proof that this project will provide a "net positive economic benefit" to our local community.

Under State law (Public Resources Code Section 25545.9), the State is required to demonstrate that a project truly benefits the local jurisdictions that host it. Instead, the document narrowly follows basic CEQA baseline rules by ignoring real-world economic impacts, completely failing to back up its claim of local benefit with hard facts. In plain terms, the state environmental document and staff assessment do not adequately evaluate the impacts, and assume our community will benefit, while completely ignoring two glaring financial and physical realities:

1. **Uncompensated Fire and Public Safety Costs:** It pushes the dangerous, expensive burden of emergency response onto local fire services without providing any funding or mechanism to pay for specialized training, equipment, or multi-day emergency standbys.
2. **Economic Harm to Our Growth Area:** It fails to account for how placing a 300-megawatt industrial battery complex on our doorstep will chill future private investment, drive down land values, and derail our community's planned job centers in the Northeast Growth Area.

A review that overlooks these real community costs cannot legitimately claim this project is an economic benefit to our area.

Volatile Lithium-Ion Technology and Lack of Safer Alternatives

The project proposes lithium-ion batteries, a technology that carries well-documented risks of catastrophic thermal runaway, intense toxic gas generation (including hydrogen fluoride and hydrogen cyanide), and explosive deflagration. Both Solano County and the City of Vacaville have adopted ordinances to restrict or prohibit front-of-the-meter lithium-ion facilities in these sensitive, non-industrial locations.

Safer, non-flammable alternative battery chemistries exist today that are not prone to thermal runaway. It is deeply irresponsible that the California Energy Commission's environmental review failed to evaluate alternative, non-lithium battery technologies in its alternatives analysis. The City is concerned that the alternatives analysis does not appear to sufficiently evaluate whether commercially available energy storage technologies with different safety characteristics could reduce the potential risks associated with the proposed facility. However, even if safer technology were proposed, this specific site remains entirely inappropriate because it fundamentally conflicts with local agricultural regulations and planning policies.

Usurpation of Local Control

We are deeply concerned that the State of California has chosen to use the Assembly Bill 205 Opt-In Certification process to usurp local municipal and county land-use authority. Stripping local governments of our voice on high-stakes public safety decisions dismisses the valid, lived concerns of the very communities and families who live next door to these proposed installations. Although the Opt-In



Certification process establishes State jurisdiction over project certification, the City strongly believes that the Commission has a responsibility to meaningfully consider the expertise, adopted plans, public safety responsibilities, and long-term planning interests of affected local jurisdictions.

No Local Benefit, Only Local Burden

The Corby BESS project provides virtually no tangible energy, environmental, or economic benefit to the residents of Vacaville or Solano County. The Staff Assessment reflects insufficient demonstration of local and regional benefits and does not adequately quantify or substantiate the economic benefits that would accrue to Vacaville and surrounding jurisdictions. The off-take contracts and stored power are designated to serve broader regional entities outside our community. Our residents are being asked to shoulder all the risk—visual degradation, toxic fire exposure hazards, and falling property values—for a volatile industrial facility that gives nothing back to the local tax base or community it disrupts.

Unfair Burden on the Vacaville Fire Department

While the Staff Assessment notes that the project site falls under the primary jurisdiction of the Dixon Fire Protection District, the document explicitly acknowledges that the Vacaville Fire Department would actually be the first on scene. The document includes erroneous information about the location and response times associated with the Vacaville Fire Department, which is deeply concerning.

A major thermal runaway event or multi-day container fire at a 300 MW / 1,200 MWh facility requires enormous, specialized HazMat apparatus, vast quantities of cooling water, possible long duration incident response, and extended operational commitments. Shifting this hazardous emergency preparedness and response requirements burden onto the Vacaville Fire Department and our local taxpayers—to protect a private, uncrewed facility from which our City receives zero municipal tax revenue—is unacceptable.

Threat to Shared Groundwater and Public Water Supplies

We are alarmed that the project fails to identify a definitive, secured water source, leaving open the option of drilling an on-site groundwater well. The City of Vacaville operates a municipal water system nearby that relies in part on groundwater wells, as do neighboring agricultural operations and rural domestic wells. Pumping significant groundwater for site grading, dust suppression, and emergency storage tanks during construction threatens to draw down our shared aquifer and jeopardize surrounding water supplies. The City is concerned that the Staff Assessment does not sufficiently identify and evaluate the project's proposed water supply and the potential effects of any proposed groundwater extraction on municipal, agricultural, and domestic groundwater users.

Conclusion

Our community cares deeply about a clean energy future, but true sustainability cannot be built upon the sacrifice of local safety, local water resources, and community-driven economic planning. The concerns identified in this letter are not simply matters of preference; they involve the City's responsibility to protect its residents, provide emergency services, safeguard critical water resources, and plan responsibly for the long-term economic future of our community.

The Staff Assessment does not adequately address the potential impacts of the proposed Corby BESS facility on Vacaville's Northeast Growth Area, local emergency response capabilities, groundwater resources, land-use compatibility, and the City's taxpayers and residents. Nor does it sufficiently demonstrate that the project will provide benefits to the local community that are proportionate to the risks, costs, and impacts it may impose.

For these reasons, on behalf of the Vacaville City Council, I respectfully urge the California Energy Commission to **deny certification of the Corby BESS Project at the proposed location.**



If you should have any questions, please do not hesitate to contact me at john.carli@cityofvacaville.com.

Respectfully,

A handwritten signature in blue ink that reads "John Carli". The signature is fluid and cursive, with the first name "John" and last name "Carli" clearly distinguishable.

John Carli
Mayor, City of Vacaville

cc: Vacaville City Council
Savita Chaudhary, City Manager
Andria Borba, City Attorney
Erin Morris, Director of Community & Economic Development