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Threat to Hwy 80 Could be avoided at Lambie

Additional submitted attachment is included below.



Date: September 14, 2026

To: California Energy Commission

Docket Unit, Docket No. 24-OPT-05

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From: Keep Vacaville Safe

Subject: Supplemental Comments - Caltrans Letter Corroborates Off-Gas / I-80 Closure Hazards & Reaffirms Need for Lambie Industrial Park Alternative (Docket No. 24-OPT-05)

Dear CEC Commissioners and Staff,

Keep Vacaville Safe submits this supplemental public comment to highlight critical corroborative findings in the September 14, 2026 comment letter submitted by the California Department of Transportation (Caltrans) regarding the Corby Battery Energy Storage System (BESS) Draft Environmental Impact Report (DEIR) / Staff Assessment.

Caltrans' formal review directly validates our core public safety concern: **a thermal runaway event at the proposed Corby site poses a direct threat to Interstate 80.**

Specifically, Caltrans explicitly notes:

"Because the Battery Energy Storage System facility is located approximately 0.6 miles from I-80, a thermal runaway incident or toxic plume could severely impair driver visibility and traffic flow on the highway."

Caltrans further requires the Lead Agency to develop an **I-80 Emergency Incident Traffic Management Plan** jointly with Caltrans and the California Highway Patrol (CHP) to establish:

"...automated Changeable Message Signs (CMS) and pre-established detour protocols for rapid deployment during a highway closure."

Caltrans' requirement for pre-planned highway closure protocols confirms that a thermal runaway event involving toxic plumes and visibility loss cannot be dismissed as speculative, localized, or easily contained to the immediate project site.

Comparative Analysis: Proposed Site vs. Lambie Industrial Park Alternative

This severe vulnerability underscores why the proposed agricultural location is uniquely dangerous and why the **Lambie Industrial Park Alternative** must be fully evaluated and adopted:

1. **Superior Physical Setback:** At Lambie Industrial Park, a BESS facility can be sited **2 to 3 miles away** from both Highway 12 and Highway 113, compared to the proposed site's dangerous **0.6-mile proximity** to I-80.
2. **Substantially Lower Traffic & Freight Vulnerability:**
 - **Interstate 80 (Proposed Site Hazard):** I-80 is a primary transcontinental interstate corridor carrying high-density regional commuter traffic and interstate heavy freight movement between San Francisco, Sacramento, and Reno. Shutting down or impairing I-80 due to a toxic plume creates major regional gridlock, severe economic disruption, and cascading safety hazards across Northern California.
 - **Highways 12 & 113 (Lambie Industrial Park Context):** State Route 113 (Vic Fazio Highway) and State Route 12 serve local traffic and regional rural connections with significantly lower daily traffic volumes. The Corby BESS could be sited to increase distance (2–3 miles) from these highways, combined with substantially lighter traffic conditions drastically reduces driver exposure, simplifies incident management, and minimizes broad economic and traffic disruption.
3. **Appropriate Zoned Land Use:** Lambie Industrial Park is specifically zoned for industrial infrastructure, avoiding the unnecessary conversion of prime agricultural land while providing proper industrial buffers away from major interstate arteries.

The CEC cannot issue a Statement of Overriding Considerations or certify this DEIR when a superior, industrial-zoned alternative—such as Lambie Industrial Park—is available to eliminate severe transportation safety hazards identified directly by Caltrans. We urge the Commission to reject the current site and direct the project to an appropriately zoned industrial location.

Respectfully submitted,

Keep Vacaville Safe