

DOCKETED	
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Project Title:	Corby Battery Energy Storage System Project
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Document Title:	Corby Battery Energy Storage System (BESS) Project - Draft Environmental Impact Report
Description:	N/A
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September 11, 2020

California Energy Commission
Docket Unit, MS-4
Docket No. 24-OPT-05
715 P Street
Sacramento, California 95814

Re: Corby Battery Energy Storage System (BESS) Project – Draft Environmental Impact Report

To the Honorable Members of the California Energy Commission (CEC):

Pursuant to the California Environmental Quality Act (CEQA), the Dixon Fire Protection District Board (DFPD Board) submits this letter in opposition to the Corby Battery Energy Storage System (BESS) Project as currently proposed. The Dixon Fire Protection District is an independent fire protection district established under Section 13800 of the California Health and Safety Code and is responsible for fire protection and prevention, rescue services, emergency medical services, and hazardous emergency response services.

The DFPD Board's opposition is based primarily on the significant public safety and environmental risks created by the selected project location, as described in the Draft Environmental Impact Report (Draft EIR). The Draft EIR does not adequately analyze or compare the consequences of a thermal runaway event, which remains a foreseeable and serious risk for this type of facility.

Such an event could create severe risks for residents, first responders, motorists, hospital patients, and the broader public, while also causing immediate and ongoing environmental impacts that could persist long after the emergency event itself.

Although the Draft EIR generally acknowledges the challenges and dangers associated with a thermal runaway event near sensitive receptors including residences, the freeway, populated areas, and a hospital, it does not provide a meaningful analysis of the short- and long-term health impacts that could result from the release of highly toxic gases and heavy metals. The Draft EIR also does not adequately compare the number of people who could be exposed at the proposed site with the number who could be exposed at the Lambie Industrial Park alternative.

This omission is particularly significant because the proposed site is located near substantially more sensitive receptors. The potential acute and chronic health risks, including respiratory, pulmonary, cancer-related, and other medical impacts to first responders and members of the public, should be evaluated by appropriate environmental health specialists, industrial hygienists, or environmental impact professionals. Comparable air quality and health-risk analyses are commonly prepared for transportation and construction projects. Their absence here represents a serious deficiency, particularly where the selection of one site over another directly affects the scope and severity of potential exposure.

The Draft EIR is also deficient because it does not include a meaningful analysis or comparison of local and regional evacuation needs. Any evaluation of evacuation impacts must account for the concentration of sensitive receptors surrounding the proposed site and compare those impacts with the Lambie Industrial Park alternative. Without this analysis, the Draft EIR fails to provide decision-makers and the public with the information necessary to understand the practical emergency-response implications of the selected location.

The Board recognizes that this project is complex, relies on evolving technologies, and presents risks that may be most significant under emergency or unanticipated conditions. However, recent incidents in other jurisdictions demonstrate that these risks are real and must be thoroughly evaluated before project approval and site selection. Facilities that depend heavily on technology and internet-connected systems may also be vulnerable to criminal activity or cyber-related threats.

For these reasons, the DFPD Board requests that the CEC, as lead agency, address the deficiencies in the Draft EIR, correct the project's flaws, select Lambie Industrial Park as the more appropriate location, protect local resources and public health, and fully comply with CEQA.

Sincerely,

A black and white image of a handwritten signature, which appears to read "Ernie Van Sant". The signature is written in a cursive, flowing style.

Ernie Van Sant
Chair
Dixon Fire Protection District Board