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Opposition to Corby

Dear California Energy Commission:

On behalf of the Pleasants Valley Agricultural Association, we respectfully submit our formal opposition to the proposed location of the Corby Battery Energy Storage System in Solano County.

We want to be clear about our position. PVAA is not opposed to responsible energy storage or California's efforts to create a reliable and resilient electrical grid. We are opposed to locating an industrial-scale battery energy storage facility on agricultural land when appropriately planned and industrially zoned locations are available and should be considered. We are also questioning lithium ion as the type of technology used for a BESS.

We would like the commission to again consider these points:

1. Industrial-Scale Energy Infrastructure Belongs in Industrial Areas

The Corby project is a proposed 300-megawatt, 1,200-megawatt-hour battery energy storage facility occupying approximately 40 acres. This is major industrial energy infrastructure. PVAA believes facilities of this scale should be located in areas planned and zoned to accommodate industrial uses, where surrounding land uses, infrastructure and emergency-response capabilities are compatible with the nature of the facility. The California Energy Commission's environmental review includes consideration of alternatives, and the Corby proceeding has included discussion of Lambie Industrial Park as a potential alternative location.

PVAA asks the Commission to give meaningful consideration to appropriately zoned industrial locations rather than unnecessarily converting agricultural land to industrial energy use.

2. Protect Solano County's Agricultural Land

Agricultural land is not vacant land waiting for another use. It is a productive, economic and natural resource.

Solano County's agricultural landscape supports farmers, ranchers, food production, agricultural businesses and the rural communities surrounding them. This land provides food locally, regionally and according to our 2025 Solano County Agriculture Report, 37 Countries across the globe. Once agricultural land is converted to industrial use, the consequences can extend beyond the boundaries of a single project. Approval of one industrial facility can contribute to the cumulative conversion and fragmentation of an agricultural region and create pressure for additional industrial development. This would set a precedent.

PVAA asks the Commission to consider not simply the approximately 40-acre footprint of Corby, but the precedent established by placing industrial-scale energy infrastructure within an agricultural area.

3. Fire, Hazardous Materials and Emergency Response

As you understand, large-scale lithium-ion battery facilities present unique emergency-response considerations, including thermal runaway and the challenges associated with managing battery fires. For PVAA, the question is not simply whether a facility can be engineered to meet applicable standards. An industrial area designed to accommodate industrial activities provides a fundamentally different land-use context.

4. Protect Solano Irrigation District Canals, Water and Surrounding Agriculture

Water is the lifeblood of agriculture. Solano Irrigation District infrastructure is present within and around the project area. In the event of a battery fire, equipment failure, chemical release or other emergency, our primary water source and soils will be at significant risk of contamination, which would have catastrophic results to our local, regional and national food source.

5. Interstate 80, Transportation and Regional Emergency Access

The project's proximity to Interstate 80 creates another significant concern. Interstate 80 is one of Northern California's most important transportation corridors, connecting Solano County with Sacramento, the Bay Area and the national interstate transportation system. PVAA believes the Commission must fully evaluate how a significant incident at the facility could affect transportation, emergency response, evacuation and access to this critical corridor. Again, this brings us back to the fundamental land-use question: Why introduce industrial-scale battery infrastructure into an agricultural area near a major interstate when appropriately zoned industrial locations can be considered? Good land-use planning should reduce conflicts between incompatible uses, not create them.

6. Evaluate Alternatives to Lithium-Ion Technology

PVAA also asks the Commission to meaningfully evaluate alternatives to conventional lithium-ion battery technology. Lithium-ion batteries are not the only means of providing grid-scale energy storage. As you know, the U.S. Department of Energy is researching, demonstrating and supporting multiple energy-storage technologies, including flow batteries, sodium-based systems, iron-based batteries, thermal storage, compressed-air storage and other long-duration storage technologies. These technologies have different levels of commercial maturity and different characteristics involving performance, duration, materials, cost and safety. PVAA is not suggesting that any one technology is automatically appropriate for this project. PVAA feels that the applicant has not demonstrated that lithium-ion is the safest and most appropriate technology. California has choices in both technology and location. Those choices should be fully considered before agricultural land is converted to industrial energy use.

The Pleasants Valley Agricultural Association supports responsible energy planning and recognizes California's need for a reliable electrical grid. But responsible planning

also means putting the right project in the right place as well as the use of the safest technology.

Solano County's agricultural lands produce food, sustain agricultural businesses, support our rural economy and provide an irreplaceable resource for future generations. Industrial-scale energy infrastructure should be directed toward appropriately planned and industrially zoned areas rather than unnecessarily converting productive agricultural land.

We therefore respectfully request that the California Energy Commission not approve the Corby Battery Energy Storage System at its proposed agricultural location and instead require meaningful consideration of appropriately zoned industrial alternatives.

Respectfully submitted,

Gaul Culley
President
Pleasants Valley Agricultural Association