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Comment Received From: Ruthie Brock
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Site Alternatives, CEQA Requirements

Additional submitted attachment is included below.

CEC Commissioners and Staff,

CEQA requires a reasonable range of potentially feasible alternatives that could reduce significant impacts from a proposed project.
However, none of the alternative sites provided by applicant succeed in reducing the impacts of the PSRP to the community of Acton and it's residents. *Therefore the applicant has yet to fulfill the requirement under CEQA to provide a feasible alternative that reduces the numerous potential impacts of the project.*

I wish to respectfully bring the following to the attention of Staff;

*The Prairie Song has been proposed in Acton, which is a designated Very High Fire Hazard Severity Zone by both Cal Fire and the CPUC.

*The PSRP is proposed entirely on A-1 and A-2 zoned property where BESS is not an allowable use under LACounty Zoning Code.

*The PSRP is in great proximity to sensitive receptors, many of whom are being pressured to sign purchase option agreements to avoid the numerous impacts from living in close proximity to this enormous project.

*The PSRP is proposed in a major transportation corridor adjacent to State Route 14 and Metro Rail service.

*The PSRP proposes two 40,000 gallon water storage tanks and has no municipal water source. This is totally inadequate for a BESS with 2,035 lithium ion battery units and an elevated risk of fire due to the sheer numbers of containers.

*The PSRP applicant has been informed by Public Works that a municipal water source connection is not possible without considerable and costly system upgrades due to being more than 2,000 ft from existing water mains.

*The PSRP will result in significant noise impacts during both construction and operation.

*The PSRP introduces an enormous, unsightly, industrial land use in an area that is designated as a "scenic resource" by the LA County General Plan and Antelope Valley Area Plan.

None of the alternative sites provided by applicant succeed in reducing the impacts of the PSRP to the community of Acton and it's residents. Therefore the applicant has yet to fulfill the requirement under CEQA to provide a *feasible alternative that reduces the numerous potential impacts of the project.*

The CEC has provided notice it will be necessary to extend the timeline for the EIR/SA by 75 days, with a new release date of January 11, 2027.
I believe that while the CEC is using this extended time period to analyze potential impacts of the changes created by the updated scope of work required by SCE for the project's interconnection, that the applicant should be required to submit any additional *genuinely feasible* alternative sites that meet the CEQA requirement for reducing impacts. This should

be done as timely as possibly to allow the CEC staff time to analyze the potential impacts without further delays.

Potential Site Alternatives

A feasible location with reduced impacts would be in the designated LA County Economic Opportunity Area, identified by LA County in their DRAFT Renewable Energy Ordinance Update as having potential for substantial BESS development. This area is on the north side of Hwy 138 on the western edge of Pearblossom.

Several other feasible locations were identified by Save Our Rural Town ("SORT", TN268133--submitted Jan. 5, 2026). One alternative site location is described as a "26 square mile area in unincorporated East Antelope Valley that is designated for industrial purposes and where no residential uses are permitted." It includes large tracts of vacant and irrigated lands that are adjacent to industrial uses and outside of mapped Significant Ecological Areas. According to both the 1980 and the 2015 County General Plans, these tracts of land are "intended to be used for major utilities, transportation facilities, waste facilities, etc." The tracts are owned by the City of Los Angeles and they lie adjacent to aerospace facilities and an airstrip owned by the US Government (known as Air Force Plant 42).

Another alternative identified by SORT where the BESS can be located far from homes and outside of "High" and "Very High" Fire Hazard Severity Zones is the west side of the Antelope Valley which has large tracts of vacant land that are close to existing 500 kV transmission corridors which terminate at the Vincent substation and are still great distances from residential neighborhoods. These areas, according to SORT, are also near existing roadways where connections to the existing 500 kV transmission corridors can be achieved largely via local agency franchise agreements.

Yet another feasible alternative that has been mentioned by both SORT and myself, but seemingly dismissed by staff, is the original site location mentioned in the LGIA which is said to be "24.4 miles from the Vincent Substation." The PSRP, which received its interconnection approvals through the LGIA as the "Angeleno BESS", was originally proposed as a solar farm/battery energy storage facility. There is no reason this original location, "24.4 miles from interconnection at the Vincent Substation", would not still be feasible for the PSRP as a "BESS only" project. The applicant has said that this prior proposed site location was never really specified, therefore it was a generalized statement of location. I believe "24.4 miles" is too specific a number to be a " hypothetical" location. If the transmission lines are followed from the Vincent Substation to the east for approximately 24.4 miles, the location would be in the vicinity north of the Hwy 138 and Hwy 18 split, southeast of Lake Los Angeles, where there is little to no current development. This location needs to be investigated and evaluated as a possible site alternative since it may potentially greatly reduce impacts.

Once again, all prior site alternatives that have been submitted by the applicant were still within a Very High Fire Hazard Severity Zone, still in a location with no municipal water source, still sited on A-1 or A-2 property where BESS is not an allowable use. and still in great proximity to sensitive receptors.

(continued...)

Request For Action

For all of these above reasons, I ask that the CEC staff require the applicant identify and submit truly feasible site alternatives that will meet the requirements under CEQA by reducing project impacts, and that staff also explore the numerous alternatives identified by Save Our Rural Town and myself.

Ruthie Brock
Acton