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Additional Considerations

Additional submitted attachment is included below.

KEEP VACAVILLE SAFE

California Energy Commission

Project Title: Corby Battery Energy Storage System Project 24-OPT-05

Subject: Additional Comments to Be Considered

Dear Commissioners and Staff,

We are continuing to express our strong opposition to the proposed Corby Battery Energy Storage System (BESS) Project in Solano County. The site selection for this utility-scale lithium-ion battery project presents unacceptable risks to public safety, emergency services, agricultural land, and surrounding residents. Recent incidents across California clearly demonstrate that battery storage fires are not isolated, short-lived anomalies or confined to aging equipment, but represent an inherent operational and post-incident hazard. Have some additional points that we want you to consider whilst revising the EIR for the Corby Project.

1. Thermal Runaway Is a Foreseeable Operational Risk, Not a Rare Accident

The CEC's environmental review framework and staff analysis acknowledge that fire events and upset conditions will occur during the operational lifespan of the Corby BESS Project. Categorizing thermal runaway and battery fires as "rare, low-probability accidents" fundamentally mischaracterizes the operational reality of utility-scale energy storage.

Given the fire frequency analysis presented in the draft EIR and the missing fires that should be represented in that report mentioned in our comments TN 272600, fire frequency could be occur once as soon as 9 -13 years during operation. Based on the Chi-Square 95% UCL analysis a fire could occur as soon as 5.6-6.5 years. Between thousands of battery cells housed within high-capacity enclosures, system-level component degradation, thermal management failures, and manufacturing defects and other causes, this makes thermal runaway a **predictable operational risk over the life of the project**. Evaluating these events as baseline operational hazards, rather than unexpected anomalies, demands that the CEC apply the highest standard of siting scrutiny.

2. Thermal Runaway Cannot Be Stopped: Distance Is the Only True Mitigation

Fire safety experts and emergency responders widely acknowledge **once thermal runaway begins in a lithium-ion battery cell, it cannot be stopped by active suppression systems**. Traditional fire suppression systems at best attempt to cool adjacent containers, but the chemical reaction itself produces its own oxygen and off-gasses toxic, flammable fumes until the fuel load is fully consumed.

Because active suppression cannot extinguish thermal runaway, **physical distance from sensitive receptors is the single most effective safety mitigation for toxic exposures**. Placing a 300 MW facility on Kilkenny Road in close proximity to sensitive receptors, agricultural operations, and local waterways relies , on mechanical systems and battery cells operating without defect, rather than real, passive safety buffers. The CEC has the obligation to ensure a safe operation of the Corby Project and should include distance from sensitive receptors as part of the mitigation. If this cannot be achieved at the proposed location, then the project should not be approved.

3. Failure of the Draft EIR to Address Evacuations and Traffic Impacts on Rural Roads and Interstate 80

A glaring and critical deficiency in the Draft Environmental Impact Report (EIR) is its failure to evaluate emergency evacuation scenarios resulting from a catastrophic thermal runaway event.

The Draft EIR does not adequately model or analyze:

Rural Road Gridlock: Kilkenny Road and Byrnes Road are narrow, two-lane rural corridors incapable of handling simultaneous emergency responder arrival and mass resident evacuation during a sudden fire event.

Interstate 80 & Regional Arterial Disruption: The proposed project sits adjacent to key regional transportation corridors, including Interstate 80 and I-505. Toxic smoke plumes, shelter-in-place orders, or precautionary highway closures resulting from thermal runaway would trigger widespread regional traffic gridlock on I-80.

Evacuation Routing Conflicts: The EIR fails to account for how emergency vehicles accessing the facility will navigate roads blocked by evacuating residents, agricultural equipment, and rerouted highway traffic.

By treating fire hazards in isolation without modeling real-world evacuation traffic flow, the Draft EIR presents an incomplete and flawed risk assessment.

4. Lambie Industrial Park Is the Clearly Superior Alternative

Solano County officials and planning documents have repeatedly identified **Lambie Industrial Park** as a suitable and superior site for utility-scale BESS placement:

Maximizes Distance from Sensitive Receptors: Lambie Industrial Park is located significantly farther from rural homes, schools, and populated areas, dramatically reducing evacuation risks and toxic smoke exposure during a thermal runaway event.

Protects Critical Water and Agricultural Resources: Unlike the proposed Corby site, which encroaches on protected agricultural land and nearby rural water sources, Lambie Industrial Park is an existing industrial zone (Manufacturing General) specifically designated for heavy infrastructure.

Honors Solano County's Land Use Ordinance: Placing BESS at Lambie aligns directly with Solano County's local BESS zoning framework, which restricts industrial-scale facilities away from agricultural and rural residential zones. The CEC must not dismiss Lambie simply to accommodate developer convenience or gen-tie preference when a safer industrial alternative exists.

5. Recurring Flare-Ups at Moss Landing BESS Demonstrate Ongoing Post-Fire Hazards

The ongoing disaster and multi-phase cleanup at the Moss Landing facility in Monterey County underscore that a battery storage fire is not a single-day event. Following the massive **January 16, 2025** fire, the site experienced a significant third fire flare-up on **September 18, 2026**, when remaining energized battery modules inside the structurally damaged facility reignited.

Damaged lithium-ion batteries remain volatile, thermally unstable, and prone to repeated reignition for months or years while hazardous debris removal is underway. Placing a facility of this scale exposes surrounding communities to extended periods of continuous hazard, repeated air quality advisories, and prolonged hazmat operations.

6. Mandatory Inclusion of Post-Incident and Cleanup Risks in the Project EIR

The Environmental Impact Report (EIR) for the Corby project must comprehensively evaluate the full lifecycle risks of thermal runaway, including extended post-fire management. Standard EIR evaluations often mistakenly treat battery fires as acute, single-day events controlled by automated suppression systems.

As Moss Landing demonstrates, the CEC's environmental review must analyze:

Multi-Month Volatile Stabilization Risks: The hazard of recurring flare-ups and reignition during de-energizing, handling, and cleanup operations.

Long-Term Environmental Hazards: Extended 24/7 fence-line air monitoring, runoff from continuous suppression water, toxic ash dispersion, and soil contamination associated with lingering damaged cells.

Prolonged Community Exposure: The environmental health impacts of repeated shelter-in-place orders, road closures, and lingering toxic releases on rural residents over extended remediation timelines.

7. The Myth of "New System Safety" in La Verne, CA

The BESS explosion and fire at a Metropolitan Water District facility in La Verne, CA, on **September 22, 2026**, forced the emergency evacuation of over 500 nearby homes. Crucially, this BESS installation was **brand new** at the time of failure. This proves that brand-new, modern equipment equipped with current safety technologies remains vulnerable to catastrophic thermal runaway.

The fallout from the La Verne incident has led to a negligence class-action lawsuit filed against both the Metropolitan Water District and system manufacturer Siemens. Relying on claims that a project will utilize brand-new technology does not eliminate community risk, multi-day displacement, or legal liability.

8. Respect Solano County's Local Safety Policies

Solano County enacted specific local zoning ordinances and safety policies for BESS facilities after an extensive stakeholder process involving fire safety experts, planning staff, and local residents. The County’s regulatory framework was explicitly crafted to protect public health, safety, and rural land uses by restricting industrial-scale BESS facilities away from agricultural and residential zones. State agencies must respect local government authority and land-use policies established by the jurisdiction that will ultimately bear the burden of any emergency response.

Conclusion & Requested Actions

California's energy storage goals must not come at the cost of public safety, environmental health, or local self-governance. Because thermal runaway is a foreseeable operational risk that cannot be stopped once started, site selection and physical distance are the primary lines of defense.

I respectfully request that the California Energy Commission:

1. **Deny certification** for the Corby Battery Energy Storage System at the proposed Kilkenny Road location.

2. **Re-categorize thermal runaway as a foreseeable operational risk** within the regulatory review process rather than a rare accident.

3. **Reject the Draft EIR as inadequate** until it fully models emergency evacuation scenarios, rural road congestion, and highway traffic impacts along I-80 and I-505 during a thermal runaway event.

4. **Mandate Lambie Industrial Park as the superior alternative**, recognizing its industrial zoning, greater buffer distance from sensitive receptors, and protection of agricultural land and water resources.

5. **Require the project EIR to thoroughly model multi-month post-fire risks**, recurring flare-up hazards, and toxic cleanup impacts.

6. **Respect Solano County's local zoning policies** and local governance.

Thank you for your consideration and commitment to public safety.

Sincerely,

Sarah Dunn

Keep Vacaville Safe