DOCKETED	
Docket Number:	26-OPT-02
Project Title:	Seahawk Battery Energy Storage System
TN #:	273636
Document Title:	Carol Bjorn Comments - Letter to CEC from Ban Lithium BESS Santa Cruz
Description:	N/A
Filer:	System
Organization:	Carol Bjorn
Submitter Role:	Public
Submission Date:	11/16/2026 10:57:39 AM
Docketed Date:	11/16/2026

Comment Received From: Carol Bjorn
Submitted On: 11/16/2026
Docket Number: 26-OPT-02

Letter to CEC from Ban Lithium BESS Santa Cruz

Please see attached letter for full comment. Thank you.

Additional submitted attachment is included below.

October 26, 2026

Eric Veerkamp

Project Manger

California Energy Commission

715 P Street, MS-40

Sacramento, CA 95814

RE: Seahawk Battery Energy Storage System; Docket 26-OPT-02

Dear Mr. Veerkamp:

Ban Lithium BESS is a grassroots organization in Santa Cruz county founded in March 2025 after the January 2025 BESS fire occurred at the Vistra energy facility located in Moss Landing only a few miles from Santa Cruz county. Since the plume from that fire was not bound by county lines, many Santa Cruz county residents, their land and animals experienced negative health effects from this disaster. Many of those injured from the January 2025 BESS fire are seeking restitution through the courts. In addition, this group was formed to prevent Santa Cruz county residents from having a similar negative health experience from any future BESS fires.

Unfortunately, we re-experienced the trauma and toxin exposure from the January 2025 fire when fully charged batteries at the same facility ignited again on Friday, September 18, 2026 creating another toxic plume. In addition, during this clean-up process even more fires are possible and even expected.

After the January 2025 Vistra BESS fire in Moss Landing, we learned that Santa Cruz county supervisors were hastily approving a BESS ordinance in order to advance the application, development and construction of proposed BESS facilities at various locations in the county with the first BESS proposal occurring at 90 Minto Road in Watsonville.

Ban Lithium BESS has attended numerous Board of Supervisor meetings as well as other county and community meetings to inform our elected and non-elected officials of an apparent lack of information and forethought about the construction of a lithium BESS facility at this location in Santa Cruz county. (Please see the enclosed "Alarming Truths" document for a small sample of research that we have presented to local officials.) However, the information we presented based on research, existing law and common sense fell on deaf ears and we even encountered resistance to the facts we presented.

One example is the argument that the batteries proposed for 90 Minto Road would be LFP chemistry instead of NMC chemistry like the Moss Landing BESS and thus the LFP would be "safer". However, LFP is no safer than NMC. In fact, it can release ten times as much Hydrogen Fluoride and it also releases Hydrogen Cyanide along with various other hazardous and environmental contaminants. The only difference is that once thermal runaway begins, LFP batteries don't reach their ignition point until they reach a temperature roughly 158 degrees higher than NMC's ignition point. In reality, that layer of "safety" means

nothing more than having **a couple of extra seconds** to escape from an LFP battery experiencing unpreventable, unstoppable thermal runaway. All in all, both NMC and LFP can go from normal operating temps of 70 degrees Fahrenheit to 2000+ degrees Fahrenheit in less than 20 seconds. A 158-degree difference gives you **fractions of a second** more time before the flames start showing.

In addition, LFP batteries also generate hydrogen gas and because of that, the LFP batteries are prone to explosion which pose a threat not only to neighboring households on Minto Road near the proposed BESS, but also to emergency responders. Lastly, it's also important to note that the toxic smoke and gasses begin releasing well before the ignition point is reached. Thus, toxins are released prior to ignition and thermal runaway.

We are hopeful that you and the CEC will carefully consider our request so that the CEC **rejects** Seahawk's application for this proposed lithium BESS at 90 Minto Road based on the following facts.

A BESS is Not a Permitted Use in the County's Ordinance

The County Code, section 13.10.140 prohibits the construction of structures or the establishment of a new use of land that does not conform with the uses permitted in the zoning district or is authorized as a discretionary use. (Please see Alene Taber's letter to the CEC dated July 1, 2026 for further discussion on this issue). Thus, if the CEC approves this project, the CEC would be violating an existing Santa Cruz county ordinance.

The Project Violates Measure J

In 1978, Santa Cruz county voters approved Measure J which mandates preservation of agricultural land. Further, the local initiative power is guaranteed by the California Constitution. (Please see Alene Taber's letter to the CEC dated July 1, 2026 for further discussion on this issue). Thus, if the CEC approves this project, the CEC would be violating Measure J and the California Constitution.

Further, the California Department of Conservation found that between 1984 and 2018, California lost 1.605 million acres of farmland which averages to around 47,000 acres per year. Indeed, California cannot afford to lose more farmland. The price of food has already increased at an alarming rate over the last few years. Losing more farmland would only guarantee the cost of food would continue to increase. Thus, creating more hardship on all Californians and increasing the risk that more and more Californians would become food insecure.

The Project Would be Located near Densely Populated Neighborhoods and Near Sensitive Ecological

Habitats

Within 2 miles of 90 Minto Road, there are 28,450 residents who are mostly Hispanic working-class people. Of those people, 3,010 live with disabilities and 4,221 are already on government assistance. There are 6,985 children from age 0-14 years old, and there are 4,580 people over the age of 65. There are 12 schools, 11 childcare centers and 2 eldercare facilities nearby.

Additionally, the area near the proposed BESS is considered to be a Disadvantaged Community, and placing

the proposed BESS with currently known risks and hazards of toxic thermal runaway and possible explosions would violate the Environmental Justice guidelines of the CEC and the Santa Cruz County General Plan definition.

Minto Road is near Pinto Lake and College Lake which are sensitive ecological habitats for many animal and plant species. A fire at this proposed location would create a toxic disturbance to the people, plants and animals living there. Please see the attached map illustrating the proposed BESS location near densely populated neighborhoods and ecological habitats.

Even if there is no fire, there would be chronic noise, toxic chemical offgasing, and an increase in EMFS from the BESS which would negatively affect residents and ecological habitats. Thus, placing a BESS so close to residents, schools, childcare, eldercare and sensitive ecological habitats is environmentally and socially unjust. Therefore, the CEC cannot approve this controversial project at 90 Minto Road.

There would be no Safe Evacuation for the People who Live and Work In this Area

Traffic at Minto Road and Green Valley Road is already at full capacity. Indeed, PG&E has already begun an upgrade to its substation located near 90 Minto Road. Since PG&E is bringing in large equipment to this substation, one lane of the road has been shut down further congesting these busy two-lane country roads.

When a fire occurs at this proposed location, emergency personnel and their very large equipment will need to come to the site as quickly as possible while residents will need to evacuate as quickly as possible. The existing road infrastructure at 90 Minto Road and Green Valley Road is not even close to supporting this type of traffic movement.

There are no proper evacuation venues

Further complicating any emergency evacuation is the fact that the county's primary evacuation center is the County Fairgrounds just minutes from Minto Road. In the likely event of an emergency, the Fairgrounds would not be an appropriate place to evacuate because it would be too close to the BESS and any related plume from its fire.

Conclusion

If the CEC approves this proposed BESS at 90 Minto Road in Watsonville, the CEC would be violating existing law and the California Constitution, removing valuable farmland creating even more food insecurity for Californians and creating a dangerous situation for the residents, and ecological habitats near this location. Because of this, the CEC must reject Seahawk's application for this proposed BESS.

Thank you for carefully considering this information.
Respectfully,

By: Carl A.

By

Robert

Export

Ludo Santos

Stacy

Banos

Mayen Coun

pe Varetype

Bars

и

qu

Ban Lithium BESS

Enclosures

ай

Cc:

Senator John Laird

Assemblymember Robert Rivas

Assemblymember Gail Pellerin

Assemblymember Dawn Addis

Supervisor Manu Koenig

Supervisor Kimberly De Serpa

Supervisor Justin Cummings

Supervisor Felipe Hernandez

Supervisor Monica Martinez

Supervisor-elect Tony Nunez

Battalion Chief Mike Urbani

The City of Capitola

The City of Santa Cruz

The City of Scotts Valley

The City of Watsonville

Santa Cruz Sentinel

The Pajaronian

Time Publishing Group

Press Banner

Good Times

Lookout Santa Cruz

ALARMING TRUTHS: The *HAZARDS* of Current BESS (Battery Energy Storage Systems)

COMMON FAILURES

International research shows that fires & explosions at Lithium-Based BESS facilities keep happening, in spite of current protective systems. Many, often common, factors lead to thermal runaway (catching fire), including battery aging; battery manufacturing defects; over-charging or over-discharging; mechanical abuses that may happen in packaging the

batteries, assembling them into modules, and installing them; maintaining the batteries on racks; thermal abuse (overheating, overcooling); and even external events that may happen in proximity to the BESS.

*Journal of Energy Chemistry. Volume 92, May 2024
https://www.sciencedirect.com/science/article/pii/S2095495624000482?ref=pdf_download&fr=RR-2&rr=941bcbe95b7fdbcc

Other research shows that a high percentage--50%--of risks for thermal runaway are due to BESS system defects such as coolant leakage due to deformed flange plates; defective valves; loose pipe connections; malfunctioning tem- perature, smoke, & gas sensors; audible & visual alarms due to internal misfiring; structural deformation; poor wiring & cabling; grounding mechanism defects; water ingress; etc.

*Clean Energy Associates. Most Common Battery Energy Storage System Manufacturing Defects. 2024
https://www.cea3.com/cea-blog/most-common-bess-manufacturing-defects-of-2024

MISLEADING CLAIMS OF SAFETY

BESS industry sources claim that LFP (Lithium Iron Phosphate) batteries (the kind planned for the BESS at 90 Minto Road, Watsonville, CA) are safer than NMC (Nickel Manganese Cobalt) batteries (the kind that burned at Moss Land- ing). But that is "an oversimplified view," according to a 2024 review of flammability & toxicity hazards of different bat- tery chemistries. LFP batteries are a greater flammability hazard and show greater toxicity than NMC, depending on relative state of charge (SOC). LFP is more toxic at lower SOC (State of Charge) respective to themselves; and LFP off-gas has a greater flammability hazard.

*Journal of Energy Storage. Volume 87, March 2024
https://www.sciencedirect.com/science/article/pii/S2352152X24008739?ref=pdf_download&fr=RR-2&rr=912a086e6fdd67f0

MEDICAL RESEARCHER URGES: STOP Lithium-Ion BESS!

Based on his March 19, 2025 literature review* of the National Library of Medicine, examining over 200 citations of Lithium-Ion Battery thermal runaway & 65 citations of Lithium Battery fires, researcher Dr. David Gelmont of the Uni- versity of Southern CA Keck School of Medicine recommends: *"pause all construction of BESS based on Lithium- Ion NMC (Nickel Manganese Cobalt) and LFP (Lithium Iron Phosphate) until further information regarding potential short and long-term health effects are investigated," and "build (BESS) which are non-Lithium-*Ion *or* LFP *based which are proven to be non-fire/toxic prone and are away from populated areas."* *Potential Medical Consequences of Lithium Ion Electric Battery Fire. March 19, 2025 https://www.stoplithiumbessinsantacruz.org/_files/ugd/4cc561_f229aa4a97074344ab16635894ccb29c.pdf

WE AREN'T EQUIPPED TO DEAL WITH LITHIUM BATTERY FIRES

Survey of research* in peer-reviewed scientific journals (2015-2025), shows that LFP Lithium-Ion batteries are highly dangerous, when on fire cannot be extinguished with water or flame retardants, spontaneously reignite, and that "first responders are entirely unequipped to deal with these catastrophic events."

*LFP Batteries Are Dangerous, Say Research Scientists. Calvin Luther Martin PhD Feb. 24, 2025
Synopsis of five research articles from peer-reviewed science journals
https://app.box.com/s/u2byp59221ivurmmqrls57ixp98x6dvw/file/1858129598382

DEADLY "FOREVER CHEMICALS" in Lithium-Ion Batteries

PFAS* (polyfluoroalkyl substances), internationally recognized, dangerous toxins that are now prohibited & highly regulated worldwide, are released during manufacturing, use, & disposal of Lithium-Ion batteries.

*The Dirty Side of Green Energy: Lithium-Ion Batteries as a Source of PFAS in the Environment / Research Square, July 2023
https://www.researchgate.net/publication/372839627_The_dirty_side_of_clean_energy_Lithium ion batteries_as_a_source_of_P-FAS_in_the_environment

Schools, Homes, Elder Care, Churches and Water Near the Proposed Seahawk Battery Storage Site

Proposed 200 MW/800 MWh battery energy storage system 90 Minto Rd, Watsonville (APN 051-101-77) CEC docket 26-OPT-02



Distances are straight-line, from the nearest edge of the facility footprint traced from the applicant's site plan (sheet C-2.0, rev. 07/02/25), placed on the map by matching the plan's parcel lines to County parcel 051-101-77 (fit error about 9 ft), to the nearest edge of each school's grounds, church parcel, residential parcel or lake, or to the listed location of each elder-care facility. The 2-mile impact zone is a 2-mile radius drawn from the site's center. Residential parcels = County Assessor use codes 020-049; counts are parcels, not housing units. Sources: Imagery: Santa Cruz County 2025 aerial imagery. Santa Cruz County GIS (parcels, school properties, assessor land use, affordable rental housing, lakes and streams from USGS NHD, groundwater recharge areas; churches = Assessor use code 710); CA Dept. of Education, California Public Schools 2025-26 (enrollment); CA Dept. of Social Services, licensed Residential Care Facilities for the Elderly; CA Dept. of Public Health, licensed skilled-nursing facilities; Pajaro Valley Water Management Agency College Lake project (treatment plant at 76 Holohan Rd, measured to its County address point); CEC docket 26-OPT-02. Data retrieved 2026-10-16.

13

schools with grounds inside the 2-mile impact zone

4,619

students enrolled at the 11 public & charter schools (CDE 2025-26)

3,050 ft

to the nearest school: Amesti Elementary

295 **ft**

to the nearest residential parcel

302

residential parcels within 1/2 mile of the site

514 ft

to College Lake

3,300 ft

to the nearest County-mapped groundwater recharge area

15

churches inside the 2-mile impact zone (nearest 3,720 ft)

5

elder-care facilities inside the 2-mile impact zone (121 beds); 1 more within 2 mi of the footprint edge

Proposed Seahawk BESS (project footprint)

Project parcel (APN 051-101-77)

Schools

School grounds

Residential parcels

Affordable housing complexes

Elder-care facilities

\+ Churches

Lakes and ponds

Water-supply treatment plant (PVWMA)

Groundwater recharge areas (County) 2-mile impact zone