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Kenneth Budrow Comments

Additional submitted attachment is included below.

California Energy Commission

Docket Unit, MS-4

Docket No. 23-ERDD-07

715 P Street

Sacramento, CA 95814

I received your "NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION" for the East Road Storage (CEC- 500-2023-055-D). This is a Pacific Gas and Electric Co. proposed project located in Redwood Valley, California.

This letter is written to you opposing the adoption of this mitigated negative declaration.

I own the residential property at 7601 East Road, Redwood Valley, California. The distance from this proposed project to my property is approximately 425 feet. There are many other residential properties that are much closer to this project than mine.

History of the Pacific Gas & Electric property:

August 25, 2020: Pacific Gas and Electric (PG&E) submitted an application to the County of Mendocino to construct an equipment and materials storage area at 7475 East Road, Redwood Valley, CA. Mendocino County staff report dated September 15, 2020, indicated that the Environmental Determination was "Categorically Exempt from the provisions of CEQA pursuant to Section 15303, Class 3 of Article 19 of the California Environmental Quality Act Guidelines." No environmental review was ever done on the project.

This was even though the location for the project was surrounded by residences, some as close as 150 feet. The purpose of this storage area was, according to the staff report, "... to facilitate 'Essential Services' necessary to support Pacific Gas & Electric (PG&E's) staging of employees and equipment to address expected responses to wildfire and Public Safety Power Shut-Off (PSPS) events within the unincorporated Mendocino County."

On September 15, 2020, the Mendocino County Zoning Administrator, Julia Acker-Krog, approved the project subject to "recommended conditions." Two of those conditions were:

Condition 4 (four): "The proposed project will not constitute a nuisance or be detrimental to health, safety, peace, morals, comfort or general welfare of persons residing or working or passing through the neighborhood of the proposed facility,"

Condition 14 (fourteen): "all external lighting shall be shielded and downcast to prohibit light from being cast beyond the property boundaries. Outdoor lighting shall be turned off at 7:00 p.m. in the evenings and not be turned back on until after 6:00 a.m. in the morning. Security lighting would be exempt from this requirement; however any exterior lighting installed on the property shall utilize motion-sensor activation. All lighting along the property boundaries shall be set back a minimum of 20 feet from all property lines and remain downcast."

The work that has been done, and is still ongoing, on the site has proven to be a nuisance to those that live near the site. The noise and light from the site is detrimental to the health and causes disturbances of the peace. The lighting has continued to shine far beyond the property and shines into the houses of those living nearby. There are loud noises coming from the property during hours when most are trying to sleep. The noises from this storage facility frequently wake the neighbors. PG&E has failed to keep the property free of fire danger by not keeping the grass and weeds around the storage facility mowed. The party living at 7500 East Road was worried about the height and density of the vegetation. She contacted PG&E and requested that the property be mowed along East Road. PG&E did not mow the property. The party from 7500 East Road took it upon herself to hire a person to mow the weeds and brush. So much for the fire safety concerns from PG&E.

To the best of my knowledge, and others that live in the area near the storage facility, neither PG&E nor the County of Mendocino made any effort to give any notice of the storage facility project or make any contact with us prior to approving the project.

Now about the "NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION" , CEC- 500-2023-055-D.

The California Energy Commission document concerning the INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION was found at their web site

<https://www.energy.ca.gov/sites/default/files/2023-10/cec-500-2023-055-d.pdf>). Under the heading: "ENVIRONMENTAL DETERMINATION", In Section 2.2 of this document is a paragraph that reads:

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent.

A MITIGATED NEGATIVE DECLARATION will be prepared.

It seems that even the person/people that prepared this document have concerns about this project having a possible "significant effect on the environment." But they still chose to bypass a complete environmental impact study and propose a MITIGATED NEGATIVE DECLARATION.

On page 4-4 of this document, Section 4, PROJECT DESCRIPTION, it says that during the operation of the battery system, heat will be generated. Enough heat that it will require a forced air thermal management system to remove the heat. It also says that the batteries will create hydrogen while generating. I recall that a German Dirigible that contain hydrogen was landing at Lakehurst, New Jersey, caught on fires and caused a massive loss of life. How can we be sure that hydrogen will not collect somewhere and cause a problem? Because a fan is supposed to prevent this? What if a fan fails? And the sensor to report a fan failure also fails?

In Section 4, PROJECT DESCRIPTION, it talks about the battery enclosures that would be constructed of modified shipping containers. There would be two "blocks" of these battery enclosures with each block containing 64 MDS battery enclosures. Each of these power blocks would have 16 auxiliary enclosures which would "look like" shipping containers. One of these auxiliary enclosures in each block would be

used to store a "10,000-gallon water storage tank." What would these auxiliary enclosures be made of? Would the auxiliary enclosure be capable of containing the "10,000-gallons" of water if the tank was somehow ruptured? Are these water tanks to contain tap water, a water-based alkaline solution, or demineralized water? Where is this water to fill and supply these tanks coming from and how is it to be transported?

I read that these enclosures would be resting on concrete pads? If they are placed on concrete pads, would the pads be able contain any liquid or other material in case of a leak?

The battery enclosures are modified shipping containers. Are they made of metal? Could they be subject to rusting? I ask because the batteries planned for installation use rust to generate power.

Noise. The document indicates that due to anticipated noise a sound wall "may" be installed between the proposed blocks and "the nearest residences." At another place in the report it says the noise level from the operation of fans is anticipated to be of such an intense volume that it will require "a sound wall using acoustical treatments with concrete masonry unit (CMU) blocks or similar enclosures." There is currently noise coming from the storage facility at this site that disturbs neighbors hundreds of yards from the location. There are people living 250 feet to 1,000 feet away, and uphill from the PG&E property, that clearly hear noise generated at the storage facility. And the reports says that the sound barriers "may be installed." How will the noise that will be traveling uphill be suppressed? It sounds like this will have an environmental impact. At another place in this report it indicates that there will be foundations for the battery enclosures and sound walls. Which of these are accurate? But PG&E wants to use MITIGATED NEGATIVE DECLARATION.

4.9.3 Why would PG&E wait just prior to construction mobilization to perform biological surveys. Why is that not part of the environmental review process?

Section 5, Environmental Setting, Environmental Impacts and Mitigation, 5.1 Aesthetics

Under Aesthetics, Item d. "Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area." The report indicates there would be "Less than Significant Impact" from light." PG&E has for the last two (2) years had excessive light emitted from their Storage facility currently in the same location as this proposed project. It has been necessary to install blackout blinds to stop the light invading several rooms in the residence located approximately 400 away. This does not seem accurate. Those living in the area should be contacted about this issue. Why no contact?

5.3.1 Environmental Setting, Air Basin

One sentence in this portion of the report reads: "The climate in Mendocino County is mild and temperate, with cool, wet winters and warm, dry summers." Anyone that lives in Redwood Valley will tell you that a portion of this statement is not correct. The summers in Redwood Valley are not "warm" and dry. The summers are very hot and dry. This difference may, just maybe, affect this project because of increased heat, especially inside of the "modified shipping containers. The report talks about the need for fans to cool the atmosphere in the containers. How will the difference between "warm" and "very hot" affect the batteries, the containers, and any emissions?

Another portion in this section of the report talks about Toxic Air Contaminants and Sensitive Receptors. A sentence in the paragraph headed "Sensitive Receptors" points out that there are residences that are only 150 feet to 250 feet, or more, from the site. There is no mention of the potential contaminants being emitted from this project. Nor is there any denial of contaminants. There will no doubt be heavy equipment there using diesel fuel. The report indicates that any impact from heavy equipment used "would be less than significant."

The report uses 39 pages to discuss the potential impact this project will have on all manners of wildlife. If only that much attention could be directed toward human beings who will have to live near this project, and their existence.

In numerous locations on this document, it talks about the Construction, Operation, and Demolition of this project. The document says that this proposed project would be used for five years and then adds that it "may" be extended beyond the five years. It appears this project is planned to continue longer than five years. What circumstances would allow the project to be extended beyond those five years?

East Road Storage Project

Initial Study

5.10 Hydrology and Water Quality, Operation, P. 5.10-13 – 5.10-14

The document indicates that water would be transported to the project in the amount of approximately 300,000 gallons/year. It also says water would likely be sourced from a local or regional commercial purveyor. If this water is tap water, it might be available from a local water source. If a drought situation were to return, then water would again be scarce in the Ukiah basin. If the water to be transported is a water-based alkaline solution, or demineralized water, where would it come from? How far would it have to be transported?

5.13 NOISE

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Regarding this question the report is marked Less than significant with mitigation incorporated. In real life PG&E has already shown that the noise level requirements required in their storage facility means little to nothing to them. It is violated frequently and neighbors a thousand feet away are disturbed by the noise. How would this project, once in operation, be different? The noise may not be significant if you do not live near the location, but it has been, and still is, a problem for those nearby. One loud noise during a time when people are sleeping can be enough to wake a person. Maybe those that live nearby should be interviewed to learn how frequently this happens.

Table 5.14-3. Housing Supply Estimates in the Project Area

This table shows housing and vacancy rates for several locations in Mendocino County. The table does not show any housing or vacancy rates for the project area of Redwood Valley. Why show statistics for 20, 60, 80 miles away?

5.18.2 Environmental Impacts, page 5.18-7

Under the heading Electric Power, Natural Gas, or Telecommunications Facilities is a sentence that reads: "The Project would contribute to the stability of the City's power grid, by storing energy." Does the use of the word "City's" refer to the city nearest the project, the City of Ukiah? The city of Ukiah has it's own electrical system. Or does "City's refer to the area known as Redwood Valley?

5.20 Mandatory Findings of Significance

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Section 5.13, Noise: "... the installation of a sound wall and other measures will ensure that operational noise levels would comply with applicable maximum noise thresholds and would not elevate the existing ambient noise levels at the nearest residences."

As I noted earlier, a sound wall will not stop noise from traveling upward over the wall to residences that are located at elevations well above this project. Noise from the current storage facility lot currently disturbs those that reside about the property as well as those that reside at the same elevation.

I feel strongly that this project has not been examined thoroughly enough to allow it to proceed with a "MITIGATED NEGATIVE DECLARATION." Any project that has the potential to disrupt the peace, be detrimental to health, or create discomfort, should include contact with those that might be affected. The person/people that created this document obviously used information from prior writings of others and made no effort to contact those that live, and work, in the area around this project. If such contact had been made, they would have learned that the noise and lighting from the PG&E storage facility currently located at this site is problematic. PG&E has not complied with the conditions of approval that were outlined by the County of Mendocino for their current storage facility located at this same site. Why would PG&E suddenly decide to comply with the regulations for this energy storage project when it has not done so on the existing storage facility on the same property?

I request that the California Energy Commission not adopt this Mitigated Negative Declaration.

Respectfully,

Kenneth Budrow

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