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COMMENTS AND RESPONSES
to
East Road Storage Project
Initial Study/Mitigated Negative Declaration



CALIFORNIA
ENERGY COMMISSION
Gavin Newsom, Governor

December 2023
Docket Number 23-ERDD-07

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Initial Study/Mitigated Negative Declaration

(Docket Number 23-ERDD-07)

Lead Agency

California Energy Commission



1 Introduction to Comments and Responses

At the request of the California Energy Commission, Aspen Environmental Group (Aspen) has prepared a response to the comments that were received on the Public Draft of the East Road Storage Project Initial Study.

1.1 Organization of this Document

The document is organized as follows:

Section 1. Introduction to Comments and Responses

Section 2. Comment Letters

Section 3. Responses to All Comments

1.2 List of Comments Received

During the public review period of the East Road Storage Project Initial Study/Mitigated Negative Declaration (IS/MND) four comment letters were received. Table 1 lists the persons that submitted comments on the IS/MND arranged in the order received by Dockets. It is important to note that only the substantive comments raised on the merits of the environmental analysis are identified, numbered, and responded to, while comments such as those related to the commenter’s interest in or opinions about the project, or a summary of the project itself were noted but not included.

Table 1. Comments Received on the East Road Storage Project IS/MND

Comment Set	Commenter	Date	Docket Number
A	Richard McGehee	11-27-23	253313
B	Quail Ridge Vineyards	11-27-23	253315
C	Kenneth Budrow	11-27-23	253319
D	Todd Brothers Vineyards	11-27-23	253321

2 Comment Letters

All comment letters received during the public comment period are included herein.

A. Comments Received from Richard McGehee

*Submitted On: 11/27/2023 11:11:46 AM
Docket Number: 23-ERDD-07*

East Road Storage

I am not in favor of this project. The PGE power plant is in a residential area and very close to our house. I hear noise from it at all times. I don't believe this storage unit has been researched enough. We don't know if this is detrimental to health, because no environmental review has been done.

A-1

B. Comments Received from Quail Ridge Vineyards

*Submitted On: 11/27/2023 12:41:13 PM
Docket Number: 23-ERDD-07*

Disapprove Project

A letter was submitted by Mr. Ken Budrow stating facts that we agree to.

B-1

C. Comments Received from Kenneth Budrow

*Submitted On: 11/27/2023 2:45:32 PM
Docket Number: 23-ERDD-07*

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?

C-1

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

C-2

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?

C-2
con't

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?

C-3

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.

C-4

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 is 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 is 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.

C-5

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?

C-6

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

C-7

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

C-8

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."

C-9

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.

C-10

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?

C-11

East Road Storage Project

Initial Study

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

C-12

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.

C-13

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?

C-14

5.18.2 Environmental Impacts, page 5.18-7

C-15

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."

C-16

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?

C-17

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

Respectfully,

Kenneth Budrow

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

D. Comments Received from Shawna Todd for Todd Brothers Vineyards

Submitted On: 11/27/2023 3:22:58 PM

Docket Number: 23-ERDD-07

Opposed to Adoption of East Road Storage

Please see attached document of opposition

Additional submitted attachment is included below.

November 27, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 23-ERDD-07
715 P Street
Sacramento, CA 95814

To Whom It May Concern:

I am writing in **opposition** of the adoption of this mitigated negative declaration for the East Road Storage (CEC-500-2023-055-D).

I am a partner owner of property located at 7201 East Road, Redwood Valley, CA which is very near the proposed site. Our property is both residential and farmland.

To our knowledge no effort had been made to contact the surrounding residents about this adoption prior to the recent receiving of the letter titled: NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION.

D-1

Let me ask: Would you want to have this next to your home? We have many concerns about this project moving forward. The impact on the environment which is all encompassing of many effects, as well as the maintenance of the proposed site for fire hazards. Poor grass and weed control has been a regular occurrence. The proposal for noise control does not seem adequate and we fear that the lighting will shine further than stated. As good neighbors one must not create a nuisance that is unfavorable to the well-being and safety of those living in the surrounding area.

D-2

Please reconsider this adoption. It will highly impact our neighborhood in a negative manner and therefore we state once again that we are in opposition.

Sincerely,
Shawna Todd, Partner
Todd Brothers Vineyards
7201 East Road
Redwood Valley, CA 95470

Mailing:
PO Box 195
Redwood Valley, Ca 95470

3 Responses to All Comments

Responses to Comment Set A – Richard McGehee

A-1 The commenter’s concern about the Project’s impact on health is noted.

As described in the Notice of Availability, an Initial Study (IS) was prepared and posted on the CEC webpage. Public health impacts are addressed in both Section 5.3, Air Quality; and Section 5.9, Hazards and Hazardous Materials.

The Air Quality section addressed the potential for criteria pollutants to be emitted by the Project and the exposure of sensitive receptors (such as hospitals, care facilities, etc.) to toxic air contaminants (TACs). The analysis concluded that potential air quality impacts were from short-term, temporary construction activities and that the impacts would be less than significant.

Public Health was also addressed extensively in the Hazards and Hazardous Materials section of the IS. Among other things, this section addressed the potential hazards to the public from the routine transport, use, or disposal of hazardous materials; and hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. It also addressed whether the Project would interfere with an adopted emergency response plan; and whether the Project would expose people or structures to risk of loss from wildland fires (which was also addressed in Section 5.19, Wildfire). It concluded that with the adoption of three mitigation measures, the impacts would be less than significant. The mitigation measures require the installation of hydrogen gas detectors, completion of UL9540A testing of the multi-day energy storage (MDS) battery enclosures, and preparation of an Emergency Response and Emergency Action Plan.

Responses to Comment Set B – Quail Ridge Vineyards

B-1 The commenter’s concurrence with the letter submitted by Mr. Kenneth Budrow is noted.

Responses to Comment Set C – Kenneth Budrow

The commenter’s concerns about the PG&E storage and maintenance yard are noted.

C-1 The commenter expresses concern about the battery system creating heat and hydrogen. These effects were analyzed in Section 5.9 (Hazards and Hazardous Materials). The facility is designed to minimize the potential for these types of adverse effects, including by ensuring the electrolyte remains stationary and contained within the battery cells, having the battery enclosures serve as secondary containment for the electrolyte, and establishing both leak detection and automatic water re-fill systems. Additionally, to further prevent adverse effects, mitigation measures (MM) HAZ-1 and HAZ-2 are proposed. HAZ-1 requires the installation of hydrogen gas detectors and an exhaust fan to keep hydrogen

levels low. If the exhaust fan fails, the battery unit is required to shut down. HAZ--2 requires that the applicant provide documentation that the battery system meets the criteria of the UL95640A test method, which would ensure that the battery system is not subject to thermal runaway. That is, that it would not get hot enough to catch on fire. The units are not allowed to become operational until testing demonstrates they comply with UL standards.

- C-2 The commenter expresses concern about the 10,000-gallon water storage tanks. Regarding the water storage tanks, the Project Description (Section 4.8, p. 4-9) states, "As shown in **Figure 4-3**, both power blocks would include MDS direct current (DC) battery enclosures, related auxiliary enclosures, and water storage tanks." Turning to Figure 4-3 shows that the water storage tanks are located near the center of each power block and are indicated as a blue circle. They are not part of the auxiliary enclosures. They would be water tanks that are fabricated for that purpose. There is no containment system for the water tanks because the unlikely rupture of a 10,000-gallon water tank would not create an emergency condition. As noted on page 4-10, the water storage tanks would contain demineralized water (see also pp. 4-11, 4-14, 5.18-7, 5.18-8, and 5.19-6). The source of the demineralized water to fill and supply these tanks is addressed in Section 5.10 (Hydrology and Water Quality). A specific water purveyor has not yet been selected; however, p. 5.10-13 discussed both the use of surface water and ground-water sources. As stated in the IS, "the purveyor would be subject to and have to comply with the Ukiah Valley Groundwater GSP regulations and requirements and local water regulations." Section 5.18 (Utilities and Service Systems) describes the water delivery system. It states, "Annually, this would equal approximately 60 water truck deliveries. Assuming an average sized water truck with a volume of approximately 5,000 gallons, this would equal approximately 300,000 gallons/year or 0.92 AFY." (page 5.18-8)
- C-3 The commenter expresses concern about the concrete pad under the MDS battery enclosures being able to contain liquid or other material in the case of a leak. The Project Description (Section 4, p. 4-14) states, "The battery enclosures would serve as secondary containment for the electrolyte within the housed batteries. No electrolyte would be released during operation of the system."
- C-4 The commenter seeks clarification about the MDS battery enclosures. The MDS battery enclosures would, from the outside, appear to be metal shipping containers. To prevent rusting the containers would be painted (see pp. 3-1, and 44).
- C-5 The commenter seeks clarification about the installation of sound walls, whether they would be installed or not, and how the noise traveling uphill would be suppressed. The noise estimates provided by the applicant seem to be overly conservative (i.e., louder than expected); it is expected that actual noise levels will be much lower. Nevertheless, the applicant will be required to build a sound wall

unless they can demonstrate that actual noise levels will be less than significant, and a sound wall is not needed to mitigate impacts. MM NOISE-3 states:

“Mitigation shall include the construction of acoustical treatments with concrete masonry unit (CMU) blocks or similar enclosures between the power blocks and the closest residents. If a wall is constructed, it shall be engineered in such a manner as not to impede stormwater flows.

If the applicant is able to provide the CEC and its noise consultant with more accurate noise data that demonstrates that the Project will be able to meet the noise constraints 60 days prior to the start of construction, the sound wall would not need to be constructed.”

Sound dissipates over distance from the source. MM NOISE-3 requires post-construction noise measurements be made at the residences along Valley View Drive (near Power Block 1) to the north of the Substation and materials storage yard, and at the residences along East Road (near Power Block 2) to ensure noise levels in L50 terms do not exceed identified thresholds. Since noise measurements will be taken at the closest residences to the Project, residences farther away will have lower sound levels emanating from the Project, regardless of elevation.

MM NOISE-3 also requires:

“Within 15 days of the start of Project operations, the Project applicant shall conduct a 24-hour community noise survey by measuring noise levels at the property line of the residences closest to the power block battery enclosures. The noise measurements shall be conducted during both daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) periods.

If the results from operational noise surveys indicate that the noise level (L50) due to project noise exceeds the noise limits shown above, additional noise reduction measures, such as localized soundproof enclosures or acoustic louvers around the batteries, inverters, or transformers, configured to maximize noise shielding in the direction of residential receptors, and shifting operational hours from late night and early morning hours to daytime hours or operating the plant at a reduced load, when possible, shall be implemented to reduce noise to a level of compliance with these limits. The time permitted to implement additional measures shall be approved by the CEC.”

- C-6 The commenter expresses concern about biological surveys not being conducted prior to construction mobilization. Section 5.4 (Biological Resources) describes in detail the Survey Area and surveys that were conducted as part of the IS. Because wildlife moves, there is also a requirement in MM BIO-2 that pre-construction surveys be performed to ensure that wildlife has not moved onto the site during the time between the initial biological surveys and the start of construction. In addition, MM BIO-3 requires that biological monitors be present during construction to ensure that wildlife is not adversely affected during the construction process.

- C-7 The commenter expresses concern about the Project creating substantial light. The Mendocino County General Plan, Resource Management Element, requires that nighttime lighting be directed downward and kept within the property boundaries. Additionally, the project will be operated as follows,

“For safety and security, minimal lighting would be used for operations. Motion sensitive, directional security lights would be installed to provide adequate illumination at points of ingress/egress. All lighting would be directed downward and shielded to focus illumination on the desired areas only and to minimize light trespass in accordance with applicable County requirements and National Electric Safety Code (NESC) requirements.”

In addition, the commenter asks why no one living in the areas was contacted “about this issue?” Potential project impacts were evaluated using accepted scientific methods. Proper notification of residents was provided, including mailing a Notice of Intent at the beginning of the Public Comment period. The California Environmental Quality Act (CEQA) (the implementation guidelines are found in Title 14, California Code of Regulations, Division 6, Chapter 3, Section 15000 et seq.), requires that the lead agency (in this case the California Energy Commission) provide a “notice of intent to adopt a mitigated negative declaration ... sufficiently prior to adoption by the lead agency ... to allow the public and agencies the review period provided under Section 15105.” Section 15105 states that “the public review period shall not be less than 30 days.” Notice was provided in conformance with these requirements.

- C-8 The commenter expresses concern about hot summers affecting the MDS batteries, the MDS containers, and any emissions. As noted previously in Response C-1, the batteries will not have thermal runaway; therefore, ambient temperatures would not increase fire risk. Section 5.3 (Air Quality) notes on pp. 5.3-8 and -9, “The batteries themselves would not result in any air emissions.”

- C-9 The commenter expresses concern about potential contaminants being emitted by the Project. As noted in Response C-8, the batteries do not have any air emissions. However, there would be air emissions from construction, commissioning, and demolition activities due to fuel used by equipment.

“The mobile sources would be a mix of diesel-powered off-road construction equipment types, including: cranes, dozers, graders, excavators, loaders, and welders. On-road mobile sources would include diesel and gasoline-powered vehicles for linework and trucks for deliveries of concrete, water, and other materials. Outside of the work site, construction, commissioning and demolition traffic would cause exhaust emissions from the trucks and other vehicles used by crews, materials, and equipment to access the work site.” (page 5.3-7)

However, the analysis concludes:

“Construction, commissioning and demolition of the Project would not result in a cumulatively considerable net increase of any criteria pollutants for which the region is in nonattainment, and the construction and demolition-related emissions would not substantially contribute to any air quality violation. This impact would be less than significant.” (page 5.3-8)

- C-10 The commenter expresses frustration that more effort is focused on biological resources than on people living near the Project. The analysis of all project impacts was comprehensive. The Biological Resources section is 43 pages long, the Cultural and Tribal Cultural Resources section is 32 pages long; whereas, the remaining pages of the 260-page IS are focused on addressing potential impacts on people.
- C-11 The commenter is concerned about the life of the Project continuing beyond five years. As noted by the commenter, the Project would be used for five years and may be extended beyond that timeframe. No specific criteria are set forth to determine under what conditions the Project would continue. The Project Description states, “The estimated life of the Project would be approximately five years; however, the facility could stay online past the initial five-year period if commercially optimal to continue operation.” If the Project is operating efficiently and adding to the stability of the power grid, PG&E has the option of continuing to use it. Yet, once the Project has completed its purpose, it would be decommissioned and the electrical connections to the PG&E substation would be terminated. However, continued operation of the Project would not change the CEQA analysis because for CEQA purposes—other than temporary construction impacts—all Project impacts are analyzed as if the Project were permanent.
- C-12 The commenter is concerned about the source of water, the type of water, and distance it would be transported. As noted previously in Response C-2, a water purveyor has not been selected to provide demineralized water to the Project. With an estimated 60 water deliveries per year, or a little more than one per week, the distance travelled would be less than significant. As noted in Section 5.17 (Transportation),
- “Section 3.3 of the SB 743 Regional Baseline Study outlines recommendations for screening criteria for smaller projects. The study states that the project may be presumed to cause a less-than-significant VMT impact without further study if the project generates less than 640 VMT per day and is consistent with the jurisdiction’s general plan and the Regional Transportation Plan.”
- C-13 The commenter expresses concern with the Project creating a substantial temporary or permanent increase in ambient noise levels. See Response C-5. In addition to those mitigation measures, MM NOISE-2 provides a Noise Complaint Process where local residents can file a complaint and a report of the investigation into the complaint is required to be filed with the Energy Commission.

- C-14 The commenter expressed concern about housing supply estimates in Table 5.14-3. The purpose of the Population and Housing section is to determine if a project would adversely affect the community as a result of construction or operational workers relocating to the area. That section concluded that due to the short construction period (six to nine months) it is unlikely that any of the 5 to 10 construction workers would relocate to the area. Similarly, since there would not be a fulltime operational workforce, it is unlikely that the two to three people handling operations would locate to the area. Regardless, Table 5.14-3 notes that Ukiah, located about 9 miles south of Redwood Valley, has a 5.6 percent vacancy rate. Or, of the 6,980 housing units in town, about 390 are vacant. More than enough for those wishing to relocate closer to the Project.
- C-15 The commenter seeks clarification as to what is being referred to by the word "City" in the sentence "The Project would contribute to the stability of the City's power grid, by storing energy." The confusion is understandable. The sentence would be clearer, and more accurate, if the word "city" were removed from the sentence. The Project would add stability to the power grid being served by the Mendocino Substation, not just nearby communities. As stated in Section 5.6 (Energy and Energy Resources), "The Mendocino Substation is part of the PG&E power network and a Local Capacity Area Substation. The substation is part of the PG&E North Bay Division serving the North Coast/North Bay." (page 5.6-1)
- C-16 The commenter again expresses concern about the noise from the Project. Please see Responses C-5 and C-13.
- C-17 The commenter again expresses concern about not being contacted during the preparation of the IS. Please see Response C-7.

The commenter also summarizes concerns about the Project and asks the rhetorical question, why would PG&E comply with the conditions for this Project when it did not do so for its storage facility. Although PG&E is a partner in this Project, the conditions and mitigation measures set forth in the IS do not apply to PG&E, they apply to the applicant that is constructing the Project and their compliance will be overseen by the California Energy Commission.

Responses to Comment Set D – Todd Brothers Vineyards

- D-1 The commenter's concern about efforts to contact the surrounding residents is noted. Please see Response C-7.
- D-2 The commenter combines several concerns into this one paragraph. They include a concern for maintenance of the site for fire hazards. The potential for the project to create a fire hazard is addressed in Responses A-1, C-1, and C-8. Concerns about noise are addressed in Responses C-5 and C-13. Concerns about lighting are addressed in Response C-7.