

**DOCKETED**

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<b>Project Title:</b>	Compass Energy Storage Project
<b>TN #:</b>	259870
<b>Document Title:</b>	Cathleen Pryor Comments - Vehicles and loads that are too heavy to cross railway tracks
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*Comment Received From: Cathleen Pryor  
Submitted On: 11/3/2024  
Docket Number: 24-OPT-02*

## **Vehicles and loads that are too heavy to cross railway tracks**

Dear CEC,

As Amtrak and the LOSSAN Rail Corridor Agency pointed out in their submission, there would be too much travel over the train tracks with heavy loads. The weight of 1100 fully-loaded galvanized steel containers on heavy trucks crossing the railway lines to get to this proposed facility would damage the rail tracks, plus there will be a parade of cement trucks fully-loaded with rotating wet cement crossing over these tracks. It will take many truckloads to pave over 13 acres of land and the trucks will have to go back and forth to reload.

The developer is planning on replacing exhausted battery packs and continuing to use the galvanized steel containers. The developer told us about 20% of the batteries will fail by the 8-10 year mark (the equivalent of 220 containers of Lithium batteries), then presumably all will be exhausted over the next 5-10 years. No one really knows. But they intend to replace the used battery packs with new ones. New battery packs on heavy trucks will have to pass over the rail lines and the old ones which may still weigh the same as new ones will have to be transported back over the rail lines to be disposed of somehow. No one really has a solution to the disposal problem.

The other problem is galvanized steel rusts when it is exposed to salt air. This location is only a few miles from Doheny Harbor and will be exposed to salt air, salt air rain, and salt air fog. The rusting containers may not be usable in 10 or 15 years. One article I read advised distancing galvanized steel at least 50 miles from the ocean to protect it from the corrosive salt air (You can paint it inside and out every year, but that is not the plan). The rusty containers will be clearly visible from the 25 mile Colinas Bluff Trail. And rust creates holes in the container which will allow the natural plant and animal debris to settle inside the container creating another fire hazard. These containers are not hermetically sealed in the first place. And, we would prefer containers made in California or, at least, in the United States to ensure those are well-made and properly inspected. This location is definitely unsuitable for this facility to be built and maintained but we would fully support a remote location.

If the State would consider underwriting the cost of transmission lines, this project would be desirable and profitable in another location. We need these facilities up and down the 101 and 5 freeways to allow electric vehicles to make long distance trips. I will recommend this to our Governor and Public Utilities Commission. I understand they are looking for incentives to motivate building the BESS facilities, please join me. This would spur huge development and locate the facilities in a safe location.

*Additional submitted attachment is included below.*



October 31, 2024

Ms. Renee Longman  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

Via: [efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-OPT-02](https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-OPT-02)

Subject: Compass Energy Storage Project – San Juan Capistrano - Docket Number 24-OPT-02

Dear Ms. Longman:

National Railroad Passenger Corporation (Amtrak) and the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Agency (Agency) appreciates the opportunity to comment on the Compass Energy Storage Project in the City of San Juan Capistrano, Orange County. The LOSSAN Agency manages the *Pacific Surfliner* intercity passenger rail service that runs on the railroad line adjacent to the project site. Amtrak is our partner and operator for the service. Amtrak and the LOSSAN Agency would like to share concerns about the project and risks that this facility may pose to the railroad.

Amtrak and the LOSSAN Agency jointly share concerns related to the geometrics of the crossing design. The proposed facility is in an area where the service operates at 90 miles per hour. We both have significant reservations related to the anticipated increase in large industrial vehicles utilizing this crossing in the proposal. Large industrial vehicles at grade crossings pose a significant and realized risk that has resulted in derailments of Amtrak trains and the loss of lives onboard the trains. In the interest of both rail and public safety, we jointly do not support this proposal.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeanne Cantu".

Jeanne Cantu  
VP California  
Amtrak

A handwritten signature in blue ink, appearing to read "Jason Jewell".

Jason Jewell  
Managing Director  
LOSSAN Agency

c: Justin Meko, Amtrak  
Chris Orlando, LOSSAN Agency  
James Campbell, LOSSAN Agency  
Jennifer Bergener, OCTA