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Opposition of Battery Energy Storage System - Docket # 24-OPT-02

Please reference the attached PDF entitled "2024.11.17 BESS Opposition Letter - Carissa".

Additional submitted attachment is included below.

November 17, 2024

California Energy Commission
Docket Number: 24-OPT-02
Project Title: Compass Energy Storage Project

RE: Opposition to Proposed Compass Energy Storage Project (24-OPT-02)

Dear California Energy Commissioners:

As a concerned resident of the City of Laguna Niguel, I am writing to express my strong opposition to the proposed battery energy storage system (BESS) facility. The project applicant, Compass Energy Storage LLC, has proposed to construct, own, and operate an approximately 250-megawatt BESS facility on a 13-acre project site along the northern portion of the City of San Juan Capistrano immediately adjacent to the eastern border of Laguna Niguel. The project site, which is less than 1,500 feet from many residential neighborhoods in Laguna Niguel, is confined within a designated general open space hillside surrounded by native plants and significant vegetation, brush, and two recreational nature trails. This close proximity to residential areas heightens the potential risk to the community. The proposed location of Compass Energy Storage's project site poses significant and immediate wildfire risks, toxic atmospheric areas, and exacerbates the state's homeowner's insurance crisis.

The BESS facility would be composed of lithium iron phosphate batteries, which are extremely dangerous, if they overheat, causing the batteries to ignite. Lithium battery fires burn hotter and faster than other fires and cannot be easily extinguished. Lithium batteries can reignite twenty-one (21) days after extinguishing the fire, presenting a long-lasting and persistent threat. In the article "How safe are lithium iron phosphate batteries?" published on April 10, 2024, by Marija Maisch in PV Magazine, the author highlights that lithium iron phosphate batteries pose a great flammability hazard and emit high toxicity levels.[1] Should the lithium batteries overheat and ignite, the proposed project site's natural vegetation, steep terrain, and surrounding landscape pose a significant and immediate fire threat. In addition to the heightened risk of wildfires, the proposed BESS project site presents significant public health and safety, environmental, and economic risks.

Lithium batteries emit toxic gases within seconds of igniting, leading to public health and safety risks caused by the toxic air pollution. Any fire, regardless of size, generates a significant risk for our first responders' and communities' health, should this project be approved. Should first responders quickly extinguish a lithium battery fire, they and the community would be exposed to hazardous toxic gases, which can cause severe debilitating health and safety impacts. If the fire is not readily extinguished, the toxic gases emitted would generate an even greater significant public health and safety risk for the surrounding communities. In the article "Review of gas emissions from lithium-ion battery thermal runaway failure – Considering toxic and flammable compounds"

[1] "How Safe Are Lithium Iron Phosphate Batteries?" *PV Magazine*, 10 Apr. 2024, www.pv-magazine.com/2024/04/10/how-safe-are-lithium-iron-phosphate-batteries/. Accessed 17 Nov. 2024.

published on May 15, 2024, by various authors in Journal of Energy Storage, the authors identify common lithium battery off-gas components, hazards, and exposure limits, which include, but are not limited to, headaches, dizziness, confusion, loss of consciousness, asphyxiation, respiratory irritation, damage to organs, severe skin burns, serious eye damage, and damage to fertility or the unborn child. It is also very toxic to aquatic life with long lasting effects and is an extremely flammable liquid and vapor and may intensify the fire.[2]

Additionally, any water or fire extinguishing compounds used to combat the fire will become easily contaminated with heavy metals and absorbed into the region's soil, adversely impacting the local ecosystem and population. The project's close proximity to the Oso and Arroyo Creek waterbed further exacerbates potential water quality issues, contaminating the San Juan Creek Watershed, which flows directly into the Pacific Ocean.

In the past ten years, there have been twenty-three (23) wildfires within a five-mile radius of the proposed project site. Given the nature of lithium battery fires, firefighters are forced to take a containment approach. Should a fire break containment, all nearby homes and businesses would be in immediate fire danger. The imminent fire risk posed by the BESS facility threatens residents' safety and further aggravates the state's homeowner's insurance crisis, making it even more problematic for residents to obtain adequate homeowner's insurance policies, compounding the already dire situation. In the article "How California's Homeowners Insurance Crisis Is Affecting Brokers" published on July 23, 2024, by Don Jergler in Insurance Journal, the author discusses the growing homeowner's insurance crisis in California. The crisis is attributed to wildfire losses, leading to increased premiums and limited coverage options.[3]

I strongly urge the California Energy Commission to carefully and fully consider these adverse fire, public health and safety, environmental, and economic risks as it evaluates Compass Energy Storage's proposed project. The health and safety of California residents should always take precedence over any potential benefits proposed by this project. I respectfully request that the California Energy Commission reject this project application and unequivocally prioritize public safety and community quality of life.

Sincerely,

Carissa La Torre

Carissa La Torre
Laguna Niguel Resident

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[2] Bugryniec, Peter J., et al. "Review of Gas Emissions from Lithium-Ion Battery Thermal Runaway Failure – Considering Toxic and Flammable Compounds." *Journal of Energy Storage*, vol. 87, 2024, 111288, https://doi.org/10.1016/j.est.2024.111288. *Science Direct*, ISSN 2352-152X, (https://www.sciencedirect.com/science/article/pii/S2352152X24008739). Accessed 17 Nov. 2024.

[3] "California Homeowners Insurance Crisis: Brokers Struggle with Rising Costs and Limited Options." *Insurance Journal*, 23 July 2024, www.insurancejournal.com/news/west/2024/07/23/785223.htm. Accessed 17 Nov. 2024.