

DOCKETED

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Comment Received From: Brad Riphagen
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See attached letter

See attached letter
Opposition to Proposed Compass Energy Storage Project (24-OPT-02)

Additional submitted attachment is included below.

July 18, 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, is proposing 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 several 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. The BESS facility would be composed of lithium-iron phosphate batteries, which can be incredibly dangerous if they overheat, causing the battery to catch fire. 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. Should the lithium batteries overheat and catch fire, the proposed project site's natural vegetation, steep terrain and surrounding landscape pose a significant and immediate fire threat.

The greatest fire threat comes during the Santa Ana wind season when high temperatures and low humidity can cause fire to spread rapidly. And fire travels fastest uphill. The proposed site is at the base of a slope with residential structures at the top of the slope. The proposed development would render the homes uninsurable, and the pullback of insurers from that area would likely have a ripple effect throughout the City of Laguna Niguel.

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 exacerbates the state's homeowner's

insurance crisis, making it even more difficult for residents to obtain adequate homeowner's insurance policies, compounding the already dire situation.

In addition to the heightened risk of wildfires, the proposed BESS project site presents significant environmental and public health risks. Lithium batteries emit toxic gases within seconds of igniting, leading to air pollution and public health risks. Any fire, regardless of size generates a significant risk for our first responders' health should this project be approved.

Should first responders quickly extinguish a lithium battery fire, they would be exposed to hazardous toxic gases, which can cause severe debilitating health impacts. If the fire is not readily extinguished, the toxic gases emitted would generate a significant public health risk for the surrounding communities. 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 to the Pacific Ocean just miles away. I understand lithium battery fires are not extinguished with water, but that potable water is used to cool the fire. I'm told the Otay Mesa firefighters used up to one million gallons of water to cool that fire. Forgive me if that statistic is not absolutely correct, but it speaks more to my main point here regarding wastewater runoff. Fire suppression wastewater WILL end up in the creek and ocean, impacting a valuable recreational area of Doheny State Beach and Dana Point Harbor. An environmental impact to the ocean is inevitable and any Environmental Impact Report should not gloss over this risk.

The risk of fire is well documented on the EPRI.org website. And yet the promoters of this storage method are "pleased with the performance of the infrastructure". I guess we just have different standards of measurement. Duh. Just like Alejandro Mayorkas is "pleased with the performance at the border". Regardless of our differing standards, one thing is sure: These facilities should NOT be placed in locations that put citizens and property at high risk. And with the evaporating fire insurance for at-risk areas, this facility will become the newest poster child for the insurance industry to justify further cancellations. The cost to homeowners for maintaining fire insurance is a REAL issue that is falling on deaf ears. This facility will make an already bad situation even worse, and perpetrated by those who profess to represent us in government. Shameful.

The proposed site is also within very close proximity to an active rail line, and the Interstate 5 freeway. An evacuation plan would most likely impact regional circulation. The impact to regional circulation would hamper first responder access to critical medical care, particularly for residents living south of the proposed site who's access to Mission Hospital would be impaired.

I hope the California Energy Commission is not single-minded in its goal of providing energy reserves (i.e. the end justifies the means). Sometimes we can turn our attention away from the repercussions in order to meet stringent man-made goals. I have witnessed first-hand how the wheels of government can turn against the citizens it professes to serve.

The cost of this project will be borne by ratepayers. The placement of such a facility in south Orange County is an expensive alternative. As I recall, the Otay Mesa facility is near the prison, far from residential neighborhoods and schools. I doubt there is a budget for such an item. I suspect you'd be willing to pay whatever it costs. That logic is unfair to ratepayers. I also suspect the goal of providing such a facility is a higher priority than the cost to produce it. The ratepayers deserve greater accountability of their overseers.

In my 69 years as a native Californian, it's been my experience that Californians care more about Nature than they do people. If this project is stopped and relocated elsewhere, my cynicism tells me it will not be for all the valid reasons I've cited, but it will be due to preservation of "invaluable habitat" of the boring bee. My "coexist" bumper sticker is fading from the last time it was needed for the pocket mouse and the gnatcatcher. I'm now a strong supporter of the boring bee if that's what it takes to introduce common sense (and political cover) into this decision. As the Brits would say, "God save the Queen" (bee) !!!

I strongly urge the California Energy Commission to carefully and fully consider these adverse fire, economic, environmental, and public safety risks as they evaluate 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,
Brad Riphagen
Laguna Niguel, CA