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*Comment Received From: Cathleen Pryor  
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## **Recent fires have demonstrated the need for a better fire suppression plan**

The recent Southern California fires have demonstrated the difficulty of suppressing wildfires. The fire departments were limited by the availability of water and first responders. To suppress the fire from one container of lithium batteries, the San Diego County fire department used 50 million gallons of water. There are 1100 containers planned for this project. (The fire department only uses potable water (drinking water) which drains the available drinking water for the public.)

To suppress fires, the developers told us the plan was going to include two fire hydrants to cover all 13 acres of containers. This is obviously inadequate and anyone can see the neighborhoods will be at risk. Even if they increase the fire hydrants to a hundred, how many acres can a fire hydrant cover? How long are the hoses at the site? Or is Compass assuming the fire department equips the fire trucks with hoses of sufficient length they could suppress a fire involving several containers in 13 acres? Because the most current strategy uses water to douse the neighboring containers to suppress the spread of fire by reducing the heat absorbed by neighboring containers but not address the fire inside a particular container, this means the stream of water has to cover a much wider area. More water is required.

If this project is located in a remote area, the difficulty of restraining the fire is the same but neighborhoods are not threatened. Additionally, once the embers started flying, the homes are so close, they would catch fire. That obvious scenario would divert the firefighters to the neighborhoods, further draining water resources and increasing the likelihood more containers would ignite. The choice between letting the battery facility burn or rescuing the children from the schools nearby, the seniors in assisted living facilities or dementia care, and the residents is no choice at all. The facility would burn, releasing toxic gas, smoke and embers. The 5 freeway is only a few hundred feet away and the flow of smoke would be unobstructed. The freeway would have to be closed. Additional firetrucks and emergency vehicles would not have free access to the site and the area. The roads are not adequate for all this traffic and large vehicles would need bulldozers just like the ones that had to be used to clear roads recently. A mass evacuation would be required with little or no notice.

This location is unacceptable for a BESS facility. Please deny this permit and consider posting a page to your website advising all developers you will not consider any BESS facility applications in this valley. You do not have the time to grind through the permit process for a facility that will not be permitted due to the location and proximity of the densely populated areas and a major freeway. The CEC does not have unlimited time and permits can be denied as soon as the documentation shows the plan is poorly developed and the location unacceptable. The CEC is not required to find every reason a facility should be denied a permit when the location is unacceptable.

California has millions of acres in remote areas. Please advise the developers to submit permits for locations that are not close to major freeways, densely populated areas and only accessible by city streets. The CEC can set reasonable guidelines and avoid wasting their time with every developer who wants to take advantage of the streamlined process. Additionally, the remote areas have need of development and would be perfect for these BESS facilities. The CEC can help our impoverished communities with their expertise and staff to ensure a good plan is approved expeditiously. Enough is enough. Californians support the hard-working CEC and do not want their time wasted. The denial of the permit by the historic, well-run city of San Juan Capistrano should make the CEC skeptical of approving this permit from the very beginning. As the documentation from agencies and the public objecting to this permit thus far prove, this permit should be denied without spending more money on it. This location is unacceptable for BESS facilities and no future BESS applications will be considered. Other green energy facilities might be fine. And I recommend the CEC can rely on the opinion of any of our well-run cities to screen out unacceptable locations.