

From: noreply@granicusideas.com
To: [Jimenez, Ann](#); [Neufeld, Darin](#); [Slovick, Mark](#); [De La Rosa, Michael](#)
Subject: New eComment for Zoning Administrator Hearing
Date: Wednesday, August 26, 2020 10:41:13 PM

[SpeakUp](#)

New eComment for Zoning Administrator Hearing

Julia Feliciano submitted a new eComment.

Meeting: Zoning Administrator Hearing

Item: 1. Valley Center Energy Storage; PDS2020-STP-20-011; PDS2020-ER-20-08-005 (R. Ochoa)

eComment: Regarding the threat-zone estimate for toxic vapor clouds: (1) were strong Santa Ana wind conditions included in the calculations that came up with a 17 yd maximum distance? (2) what is considered "short-term exposure" in connection with serious injury (since length of exposure would be from initial exposure to discovery of a potentially unconscious person, to transport to nearest hospital and finally receiving treatment for injuries, which could be a substantial amount of time)?

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From: noreply@granicusideas.com
To: [Jimenez, Ann](#); [Neufeld, Darin](#); [Slovick, Mark](#); [De La Rosa, Michael](#)
Subject: New eComment for Zoning Administrator Hearing
Date: Wednesday, August 26, 2020 9:15:21 PM

[SpeakUp](#)

New eComment for Zoning Administrator Hearing

Matt Matthews submitted a new eComment.

Meeting: Zoning Administrator Hearing

Item: 1. Valley Center Energy Storage; PDS2020-STP-20-011; PDS2020-ER-20-08-005 (R. Ochoa)

eComment: I strongly oppose the Valley Center Lithium Ion Storage Project. Putting a regional sized battery storage site in the Valley Center Village puts an unnecessary fire risk in an already high risk fire area. Dr Matt Matthews equine veterinarian

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From: noreply@granicusideas.com
To: [Jimenez, Ann](#); [Neufeld, Darin](#); [Slovick, Mark](#); [De La Rosa, Michael](#)
Subject: New eComment for Zoning Administrator Hearing
Date: Wednesday, August 26, 2020 8:44:50 PM

[SpeakUp](#)

New eComment for Zoning Administrator Hearing

Nancy Matthews submitted a new eComment.

Meeting: Zoning Administrator Hearing

Item: 1. Valley Center Energy Storage; PDS2020-STP-20-011; PDS2020-ER-20-08-005 (R. Ochoa)

eComment: The Valley Center lithium ion storage facility adds an unacceptable danger to the patients that are present 24/7 at A Cats View Veterinary Hospital. The veterinary hospital is 2500 feet directly west of the proposed site. If a unit catches fire during one our many santa ana wind days, we are in direct line of the toxic emissions. The project yields unacceptable danger to the clinic and our hospitalized patients. De. Nancy Matthews

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Mark Wardlaw
Planning Director
County of San Diego Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Valley Center Energy Storage Project Response to the Valley Center Community Planning Group

Dear Mr. Wardlaw:

We wanted to thank you and the County of San Diego Planning and Development Services Department (PDS) for working with the Valley Center Community Planning Group (CPG) to obtain its advisory determination for our Valley Center Energy Storage Project (Project) at its July 13, 2020 meeting. We look forward to your approval of the Site Plan for this Project.

As the developers, we plan to construct, own, and operate a lithium-ion based battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately 4 hours on an 8.93-acre parcel and associated utility and access easement in Valley Center, San Diego County (County). The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Valley Center Substation via an approximately 0.3-mile underground generation tie line. Ultimately, the purpose of the Project is to reduce the need for carbon-emitting generators during peak times, to improve local energy reliability, provide access to sustainable energy, and help prevent brownouts and blackouts associated with high demand, fire threats and Santa Ana winds.

The need for the Valley Center Energy Storage Project is immediate. As I write this, California is experiencing an energy crisis that has caused rolling blackouts and left many people without electricity. The governor and other state officials have made their wishes clear: “We must work together to find clean, alternative energy sources like battery storage projects to ensure these brownouts and blackouts never happen again.” In fact, Governor Newsom has issued two separate state of emergency proclamations just this week to address the lack of energy resources to deal with a record-breaking heat wave and the multiple wildfires and high winds threatening California communities. The Governor has asked the California Public Utilities Commission (CPUC), the California Energy Commission (CEC) and the California Independent System Operator (CAISO), and the utilities in the State to do what they can to bring new energy resources online as soon as possible. He has also asked these agencies to identify what they are doing to ensure that a crisis like this does not occur in the future.

Among the solutions identified by these agencies is to bring over 3,000 MW of additional energy resources online by 2021. The Valley Center Energy Storage Project is part of that solution. Terra-Gen is finalizing negotiations on a long-term power purchase agreement with a regional utility. Even before this crisis began, multiple utilities have indicated to us that they urgently want

this battery storage project to promote local and regional energy reliability. **Importantly, with our advanced stage of development, this Project is unique in its ability to bring its services online in 2021.**

Energy reliability is a regional and state-wide issue that impacts everyone in San Diego County, including the residents of Valley Center. The heat wave this past week in California affected Valley Center residents directly as they were asked to turn their thermostats up and conserve electricity. The Valley Center Municipal Water District (VCMWD) was asked to run its 3 MW of back-up diesel generators to help prevent outages in the region. Power outages are themselves a safety issue. Without power supply, the VCMWD can't pump water to its customers, including the Valley Center Fire Production District that relies on this water to keep the community safe.

As recognized by the California Energy Commission, “California’s rapidly evolving energy landscape and aggressive carbon reduction goals are increasing the need for energy storage technologies. Energy storage is an important tool to help integrate increasing amounts of solar and wind electricity generation into the grid. While growing use of renewable generation is essential to meeting the state’s greenhouse gas emission reduction goals, the variability of solar and wind can quickly result in rapid ramps up and down in energy availability. Energy storage can help address this issue, for example, by storing renewable generation when production exceeds demand and then reinjecting it into the system when supply is short.” See https://www.energy.ca.gov/sites/default/files/2019-12/energy_storage_ada.pdf.

The July 13th CPG Meeting outcome and the Chair’s letter are misleading about the Project’s risks and overlook its many benefits. On July 13, 2020 the Project was presented to the CPG, which voted eleven to three not to recommend approval the Project. The Chair of the CPG, Delores Chavez Harmes, notified staff planners of the results of the CPG meeting by letter on July 30, 2020. We believe the Chair and several other members of the CPG presented information at the July 13th meeting that was incorrect and incomplete, which could have tilted votes against the Project. In particular, the CPG members were told that the Chair had not received the application information (when in fact she had) and were also told the Valley Center Fire Protection District had not approved the Project’s Site Plan, Hazards Consequence Analysis (HCA), and Wildfire Fire Protection Plan when, in fact, the VCFPD had reviewed and accepted these plans and reports for application submittal. Chair Harmes’ July 30th letter also contains opinions that go beyond comments made by the CPG at the advisory meeting, incorporating new data and assertions of fact that were not made at the meeting. For this reason, the CPG’s written recommendation for the Project does not adhere to Board Policy I-1, which requires that the written recommendation include “comments made by the group” during the public meeting using County Form #534. Instead, it appears that the letter inappropriately reflects the Chair’s personal lens on the Project.

In her letter, the Chair included a number of allegations about the lack of safety of the Project, allegations which we dispute. **Most importantly, we lay out for you in this letter key reasons why the**

Valley Center Energy Storage Project is an important and safe Project for the community, San Diego County and the State.

Terra-Gen is a responsible, experienced power generation facility operator: Terra-Gen is an experienced power generation facility operator with significant expertise in the planning and implementation of health and safety protocols and practices for energy projects in the State of California. We currently operate over 2000 MW of renewable energy assets within the State and have an excellent safety record. For every facility we operate, Terra-Gen implements Operational Plans, Emergency Response Protocols and other health and safety measures to ensure our projects are safe. At our flagship Tehachapi 1 Energy Storage Project, a 77 MW lithium-ion based energy storage project in Kern County, we prepared an Emergency Response Plan in close coordination with the Kern County Fire Department, much in the same way we have commenced close coordination with the Valley Center Fire Protection District for this Project. We have excellent relationships with the municipalities where our projects operate and we encourage the VCCPG and other community leaders to reach out to Kern County where many of our projects are located, to confirm the reputation of our company.

The Valley Center Energy Storage Project is safe. Any product or project that generates, transfers, and/or consumes energy involves hazards, risks, and mitigation techniques to address the hazards and risks. Energy storage is no different in this regard and can be deployed in a safe, responsible way using the proper design and operational oversight. Utility-scale lithium-ion-based energy storage facilities are safe, particularly when the equipment has been rigorously tested and when the facilities are designed and operated safely and efficiently. In fact, utility-scale lithium-ion battery storage technology has evolved significantly, not only in its cost-effective and efficient ability to store electricity, but also in the evolution of state-of-the-art fire and safety design, equipment and operational practices and protocols. These new safety features have been adopted by the industry via the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems (ESS) established in 2019 that requires rigorous equipment testing and establishes safety requirements for design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary ESS. NFPA 855 establishes new codes, regulations and guidelines for fire and safety at utility scale battery storage facilities and it is being adopted not only in California, but across the country and internationally. The Valley Center Energy Storage Project will meet or exceed the requirements of NFPA 855, the newly adopted 2019 California Fire Code, and the San Diego County Fire Code in order to ensure the safe design, construction and operation of the Project.

Multiple layers of protection are built into the Project design first prevent and control thermal runaway at the module level: The energy storage codes and standards described above are designed to prevent thermal runaway from occurring and minimize the risks of thermal runaway while establishing multiple levels of defense or safety to prevent the propagation of such an event. The Valley Center Energy Storage Project defines these safety features as multiple layers of safety and protection.

First layer of safety at the battery module: The first level of safety in the design is at the module level. At the module level, thermal barrier protections are installed between cells and modules to control heat propagation. Each Module is independently controlled and monitored, so that, in the unlikely event the conditions of a battery unit during operations exceed safe operating parameters, that battery unit is shut down and isolated from the rest of the system. Those protections mitigate and control thermal runaway at the module level.

Second layer of safety at the BESS enclosure: The second level of safety in Project design is the at the BESS enclosure and system level. Battery sub-modules, constructed of cells are located in modules or racks, with each rack equipped with additional thermal barriers for safety, and installed within BESS enclosures. The Project's enclosures will be non-walk-in enclosures, accessed from outside via cabinet doors. Each enclosure is fire-resistant and designed to isolate a thermal event within the enclosure. The enclosure is also equipped with integrated battery heat/fire and safety management systems, including electrical and mechanical controls and monitors, ventilation systems, HVAC, fire alarm detection and heat management systems, so that, in the unlikely event of thermal runaway, it can be isolated and controlled at the rack and at the enclosure level.

Third layer of safety at the site level: The third level of safety in Project design is a the site level, where adequate separation between BESS enclosures, separation from other equipment and separation from neighboring receptors (residences, commercial operations, etc.) are integrated into Project design pursuant to the local fire code, the California Fire Code and NFPA 855 standards and guidelines. These standards also call for such safety design elements as adequate setbacks from property lines, adequate fire apparatus (vehicle) access road design and other site design safety elements. It is worth pointing out that, pursuant to our approved Wildfire Fire Protection Plan, the wildfire risk on the Project site is defined as low, and is in fact lower than site without the Project.

Final layer of safety through safe operation: Finally, the Project will prepare and implement an Operations Plan in close and continued consultation with VCFPD and the other appropriate health and safety authorities having jurisdiction. This Operation Plan will identify the necessary emergency response protocols with first responders, communications protocols, and on-going training and communications for, with and between the VCFPD and the Project O&M staff in order to ensure safe and reliable operations.

The July 30th letter contains misleading information about explosions at “numerous facilities”:

Chair Harmes' July 30th letter inaccurately referenced explosions at “numerous facilities” without a proper explanation of the context of those accidents. The fact is that the risk of fire or thermal runaway at utility scale energy storage projects, like our Project, although not non-existent, is low. In the U.S. over 1000 MW of energy storage capacity has been installed through 2019, with nearly a quarter of that in California. The few events that have occurred have been contained at the

enclosure level and in all cases, except for one, have not resulted in injury. According to Ken Boyce, a Principal Engineer at UL LLC, an internationally-recognized product testing laboratory, lithium-ion battery cells fail at a rate of only around one in every 12 million (S&P Global 2019). Events that have caused a battery unit to exceed its safe operating temperature are caused either by faulty and/or improperly installed equipment, or improperly managed projects where the battery cells are allowed to operate outside of their safety operating thresholds.

The only documented explosion at a utility-scale lithium-ion based battery storage project to date has been the April 2019 event in Surprise, Arizona, which the Chair references in her letter. In that event, faulty equipment resulted in thermal runaway that had propagated to multiple modules, but was contained within a single rack (BESS enclosures contain multiple racks), and within a single enclosure. The explosion occurred after the thermal temperatures within the enclosure had begun to dissipate and first responders decided to open the enclosure doors before confirming that the conditions within the enclosure were safe to do so. It is recognized throughout the industry that this explosion and the injuries to the four first responders were preventable and occurred because the facility did not have proper fire and safety plans, training and procedures approved by and coordinated with the local fire authority. A properly designed emergency response plan (see our final layer of safety discussed above) would have prevented the battery enclosure doors from being opened by first responders without confirmation of system conditions and prevented injury. Since the Arizona fire, the new National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems has been published that requires rigorous equipment testing and establishes safety requirements for design, construction, installation, commissioning, operation, maintenance, and decommissioning of stationary ESS.

Chair Harmes' July 30th letter also references numerous explosions at other facilities (referencing Vermont, Hawaii and South Korea). In Vermont and Hawaii, no explosions occurred, and the Vermont reference appears to be a reference to a lithium-ion battery located commercial building not a utility scale BESS facility with its multiple layers of protection and controls. These events were controlled by first responders. The vast majority of fires or thermal runaway events have occurred in South Korea. Industry assessments indicate that there is a lack of fire and safety regulation, requirements and practices endemic in that country. Importantly, in the few instances of thermal runaway at utility scale energy storage facilities, none have propagated beyond the enclosure the modules were housed and none posed a significant danger to the greater community.

The Project's studies show no significant hazards risk. Regarding the concern raised in the July 30th letter about release of hydrogen fluoride (particularly during a Santa Ana wind event), we addressed this potential risk in the Project's Hazards Consequence Analysis (HCA) submitted to the County in April 2020. The HCA, which was prepared by a Senior Technical Specialist at Haley & Aldrich and peer-reviewed by a Project Engineer at Stantec, modeled the release of hydrogen fluoride and other potential hazards during a thermal runaway/fire event in nighttime conditions, daytime conditions, as well as Santa Ana wind conditions. Using the most conservative modeling

conditions, the maximum distance toxic gases resulting from a thermal runaway event would travel is 51 feet (Haley & Aldrich 2020). Considering the Project is set back 30 feet from the property boundary, this would result in toxic gases traveling up to a maximum of 21 feet beyond the property line. There are no sensitive receptors (residences, commercial building, etc.) within that distance from the Project's enclosures. The Project's Operational Plan and Hazards Materials Business Plan (HMBP) will establish how the Project will address any potential hazardous substance from entering the environment in the event of a spill or fire.

The Valley Center Fire Protection District has publicly acknowledged the Project's close coordination and planning with the VCFPD to date. The July 30th letter states that the local fire chief and fire marshal revealed "reservations on this project's impact on safety to our community". Both the VCFPD Fire Marshall and the County Fire Chief refuted this assertion in a subsequent newspaper article. According to a July 22, 2020 *Valley Road Runner* article, Fire Marshal Jim Davidson acknowledged the Project's close coordination with the VCFPD and confirmed that the Project has received all the approvals required by San Diego County for the Project application, specifically, approval of the Wildfire Fire Protection Plan, the Hazards Consequence Analysis and the fire and safety elements included in the Plot Plan. In a *Valley Road Runner* article dated August 4th, 2020, Chief Joe Napier is reported as responding to the Chair's letter on the Project stating "Fire Marshal Davidson's article was spot on. The Fire Department has had individual members of the Planning Group call and ask questions to get a better idea for themselves of the scope and possible impact of this project to the community. If their takeaway was the District had reservations on this project it may be from the perspective that we are still waiting for the long process to be completed before we receive all of the answers related to hazard mitigation of a battery storage facility in our community. I don't see a conflict, I see an opportunity for the Valley Center Community Planning Board, San Diego County Planning and the Valley Center Fire Protection District to come together and provide an information session about County and Fire District processes and the many steps it takes to the final project approval." (Valley Center Road Runner 2020b).

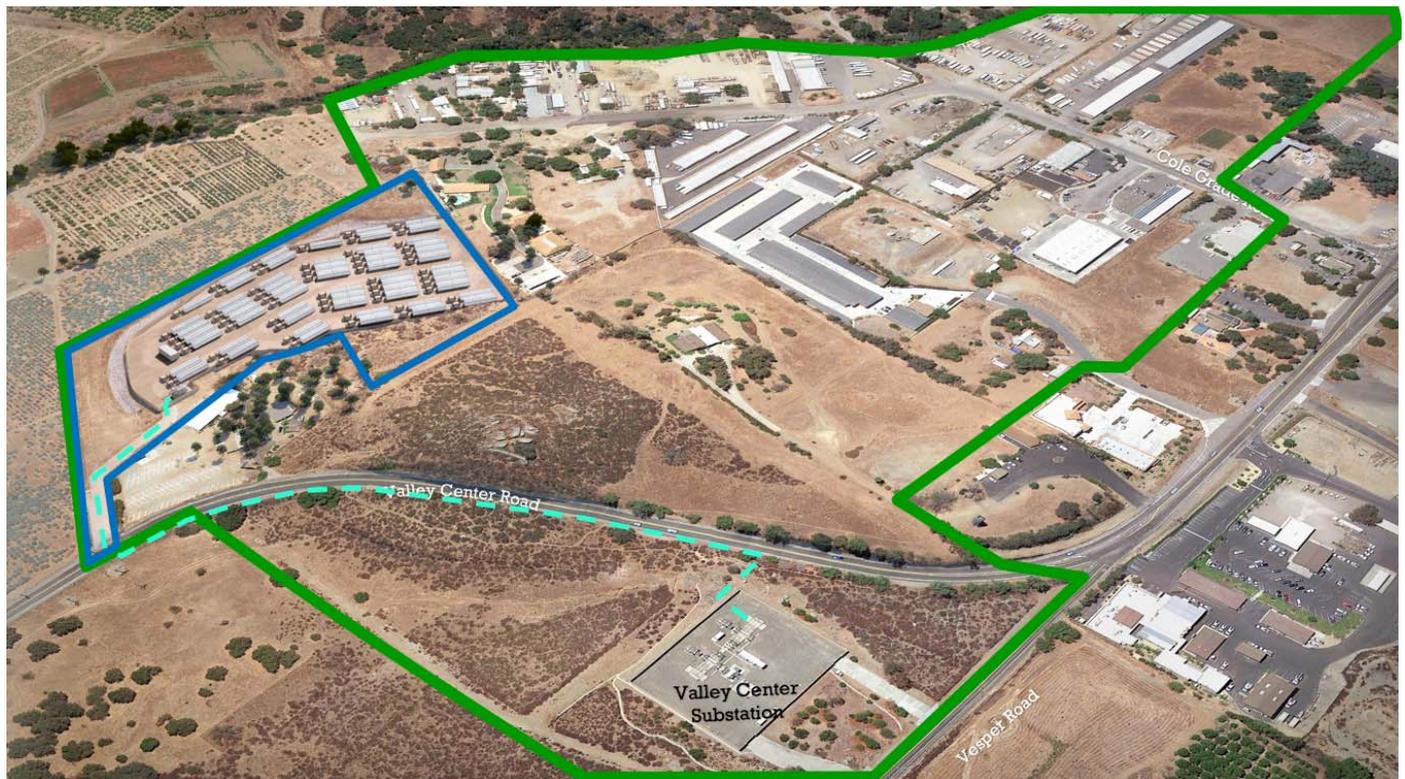
There is virtually no industrial project that has zero fire risk; however, fire risk can be managed and mitigated and that is what will be done for this Project. The Project complies with the County's zoning regulations, which envisions industrial development on this property. It is fully consistent with Valley Center Design Guidelines for industrial projects. The Project is permitted by right under the zoning code and is consistent with the General Plan and the applicable design guidelines. I respectfully request that the Project Site Plan be approved pursuant to Sections 7158 and 7160 of the Zoning Code.

The Project will create local jobs during the COVID-19 pandemic and economically benefit the local community and region. As a critical infrastructure project, construction of the Project will provide vital local jobs at a critical time when the economy is in need of economic stimulation due to the COVID-19 pandemic. Project construction is estimated to add approximately \$40 million to the

local area from labor, sales taxes and other value added through the use of local business and services. The Project will provide approximately \$250,000/year in local property taxes as well. Also, the Project will fund its share of the Valley Center Fire Protection District's operations. Finally, battery storage stores inexpensive (often surplus) renewable energy produced during the middle of the day and displaces more expensive (often gas-fired) generation that would otherwise be dispatched in the evenings.

The Project is consistent with the existing utility, commercial and industrial uses in the area. The Project renderings and simulations submitted as part of the application package demonstrate the Project's minimal visual impacts from public viewpoints and its consistency with the existing commercial and industrial uses in the area. The rendering below shows the Project site (blue border), in the context of Valley Center's industrial, commercial and utility-zoned area (green border).

Rendering of the Project within Valley Center's Industrial/Commercial Zone



The Project has been responsibly sited within an industrial zone where this use is permitted by right. The Project is proposed on property located within Valley Center industrial/commercial zone and zoned Medium Impact Industrial (I-2) and identified as General Impact Industrial (M54) use regulation. The Project falls into the category of a "Minor Impact Utility," which is permitted "by

right” in the M54 use regulation. The proposed use is consistent with the County of San Diego’s General Plan and meets all the design standards of the Valley Center Design Guidelines, as unanimously determined by the Valley Center Design Review Board at their July 9, 2020 meeting.

We look forward to your approval of this important project and stand ready to answer any questions.

Sincerely,



Mark Turner
Vice President, Energy Storage Development
Terra-Gen, LLC

References:

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Office of the Governor, Gavin Newsom, August 18th, 2020. Accessed Online: <https://www.gov.ca.gov/2020/08/18/governor-newsom-declares-statewide-emergency-due-to-fires-extreme-weather-conditions-2/>
- As West Coast Faces Historic Heat Wave & Energy Shortages, Governor Newsom Signs Heat Emergency Proclamation to Free Up Energy Capacity*, Office of the Governor, Gavin Newsom, August 17th, 2020. Accessed Online: <https://www.gov.ca.gov/2020/08/17/as-west-coast-faces-historic-heat-wave-energy-shortages-governor-newsom-signs-heat-emergency-proclamation-to-free-up-energy-capacity/>
- First Rolling Blackouts of Season Begin Locally*, Valley Center Road Runner, David Ross, August 20th, 2020. Accessed Online: <https://www.valleycenter.com/articles/first-rolling-blackouts-of-season-begin-locally/>
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Proposed battery storage has “more bites on safety” apple as it moves forward. Valley Road Runner. July 22, 2020. Accessed online: <https://www.valleycenter.com/articles/proposed-battery-storage-has-more-bites-on-safety-apple-as-it-moves-forward/>

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LETICIA PEREZ

SUPERVISOR - FIFTH DISTRICT

August 21, 2020

Mr. Mark Wardlaw, Planning Director
County of San Diego Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Wardlaw:

As the Chairman of the Kern County Board of Supervisors, I am writing to convey my strong support of Terra-Gen, who, under its affiliate, Valley Center ESS, LLC is proposing to build, own and operate the Valley Center Energy Storage Project (STP-20-011, PDS2020-ER-20-08-005) in San Diego County.

Terra-Gen owns and operates over 2000 MW of renewable power generation projects in Kern County. Over the past ten years of operations in Kern County, Terra-Gen has established an exceptional relationship with Kern County and an excellent track record as a responsible, experienced, and safe operator of the Projects it develops, constructs, and operates here. Their planning, compliance, and coordination with our jurisdictional authorities, including the Kern County Fire Department, the Kern County Planning Department, and the Kern County Building Department is exceptional.

Recently, Terra-Gen permitted and constructed the 77 MW Tehachapi Energy Storage Project which is now operating and serving Southern California customers, providing essential energy resiliency services during these critical summer months when much of Southern California is experiencing rolling blackouts. In particular, Terra-Gen coordinated early and often with the Kern County Fire Department and the Kern County Building Department and that project has complied with all State and Local fire, safety and building requirements, including the development and implementation of an Emergency Response Plan in close coordination with the Kern County Fire Department.

Additionally, Terra-Gen has been a valued partner to Kern County, sponsoring and contributing to many projects that benefit the local communities, including solar lighting in the downtown Mojave community, high school scholarship funds, museums and an emergency response vehicle for the Kern County Fire Department. I am also aware that Terra-Gen recently funded a scholarship program for Native American tribal members in eastern San Diego County, related to a project they are developing in that area of your County.

If you have any questions or need more information, please feel free to contact my office at (661) 868-3690.

Sincerely,

A handwritten signature in black ink, appearing to be "Leticia Perez", written over a faint circular stamp.

Supervisor Leticia Perez, Chairman
Kern County Board of Supervisors

From: [John Corley](#)
To: [Jimenez, Ann](#); [Ochoa, Regina](#); [Neufeld, Darin](#)
Subject: Fwd: eComment for VALLEY CENTER ENERGY STORAGE (PDS2020-STP-20-011; PDS2020-ER-20-08-005)
Date: Monday, August 24, 2020 8:31:00 AM

August 24, 2020

Zoning Administrator Hearing
Regular Meeting
August 27, 2020, 8:30 A.M.
County Operations Center
5520 Overland Avenue, San Diego, CA 92123

**AGENDA: VALLEY CENTER ENERGY STORAGE; PDS2020-STP-20-011;
PDS2020-ER-20-08-005 (R.OCHOA)**

Dear Zone Administrator,

I am submitting this letter as an e-comment prior to the Zoning Administrator Hearing scheduled for the Valley Center Energy Storage Project on August 27, 2020. I will be focusing on the Hydrology, Wildfire, and Traffic sections of the 15183 CEQA Exemption Checklist in which I found environmental findings in the Staff Report and/or analysis performed to be peculiar to this project and its site. My letter will highlight new information and discussion since the closure of the 45-day public disclosure period ending August 10, 2020.

HYDROLOGY

Floodplain Analysis performed by Kimley-Horn concluded the floodplain associated with the Key Canyon Creek flows through the site, but in an isolated channel versus the previously predicted swath. Because of this, the Project would be required to obtain a CLOMR/LOMR as a Project condition of approval pursuant to FEMA to ensure no impacts would occur. Now look at the 15183 Checklist for 10(j): Place within a 100-year flood hazard area structures which would impede or redirect flood flows? See the Staff response below:

- 10(†) (j) The GPU EIR concluded this impact to be less than significant with mitigation. As previously discussed in response 10(e) and 10(f), the Project would be conditioned to obtain a CLOMR and LOMR as Project conditions of approval pursuant to FEMA. As part of this review, the Project would be required to ensure that structures are placed at least one foot above the floodplain elevations. Additionally, as the basin is providing flood control as well, the basin would also be subject to the requirements identified within the Hydraulic Design Manual which requires 1-foot of freeboard when passing the 100-year storm event. ***Therefore, the Project would place structures within a 100-year flood hazard area which would impede or redirect flood flows.***

Also in the Hazard Consequences Analysis by Haley & Aldrich, Inc., under section 1.4.1, it talks about construction ***Phase 2 – Installation of remaining battery storage enclosures and associated civil, electrical and structural features placed within the floodplain; includes features, such as pad-mounted switchgear, step-up transformer(s), and a control center enclosure, that could be considered “encroachment” within the floodplain.*** Now that we established the fact that the Project would indeed place structures within the new calculated 100-year floodplain on site, I want to show portions of the Staff responses from the Staff Report to my comment letters from August 3, 2020 and August 6, 2020 which seems to contradict the 15183 Checklist for 10(j).

B1. To address this, the Project would be constructed in two phases: the first phase would be constructed in the portion of the Project site outside the currently depicted floodplain. The second phase would be constructed after FEMA has confirmed that the floodplain, as currently depicted, should be revised. ***No Project structures will be located within the revised, narrow, channelized floodplain and there would be no direct risk of exposing Project structures to flooding hazards.***

As discussed in the 15183 Checklist and further described within Floodplain Analysis, dated (as shown on the front cover directly below Mr. Lucera’s stamp) April 21, 2020, the updated floodplain data resulting from the Project’s modeling shows that the floodplain is actually a narrow isolated channel through the Project site, rather than the current large swath as depicted on FEMA’s maps. ***No structures associated with the Project would be located within the revised, channelized floodplain.***

B2. The commenter is correct that Westwood Professional Services assumed that a LOMR would be obtained by Kimley-Horn on behalf of the Developer to revise the FIRM covering the Project site, ***resulting in the conclusion that the Project battery enclosure would not be placed in the floodplain.***

B3. The sections highlighted from SDG&E’s environmental analysis show that SDG&E planned to develop the underground transmission line and access road within the 100- year floodplain, but no above-ground structures would be placed within the floodplain. The Developer will be following this protocol through application for a LOMR to revise the floodplain to reflect actual floodplain conditions, which based on modeling, show only an isolated channel traveling through the Project site. ***With the proposed design, no Project structures would be located in a floodplain, and there would be no direct risk of exposing structures to flooding hazards.***

B4. In response, and as described above, extensive study and design has occurred over several years to design the Project as proposed. Specifically, and consistent with the commenter’s recommendation, ***the Project will not place structures within the floodplain and, therefore, design recommendations similar to placing Project features at a height of at least 12 inches above the potential high-water level is not required.***

B5. As mentioned in comments B1, B3, and B4, obtaining a CLOMR/LOMR would revise the currently depicted floodplain to reflect the updated modeled floodplain, which is an isolated channel traveling through the Project site. ***With these revisions, no Project structures would be placed in the floodplain and there would be no direct risk of exposing structures to flooding hazards.***

D1. Regardless, and as discussed in response to comments B1, B3, and B4, the Developer is seeking a CLOMR/LOMR that would revise the floodplain to reflect an isolated channel traveling through the Project site. **With these map revisions, no structures associated with the Project would be placed in the floodplain and there would be no direct risk of exposing structures to flooding hazards.**

D2. The MJHMP is not enforceable or codified. Regardless, the Project is consistent with MJHMP Goal 9. **As discussed above, the Project, will not place structures within a floodplain and is neither in conflict with adopted policies to discourage growth in flood-prone areas nor would prevent the County from adopting further policies to do so.**

D3. As discussed in response to comments B1 through B5, the CLOMR/LOMR process would revise the Project's FIRM to reflect the current floodplain according to updated modeling data, which shows that the actual floodplain is an isolated channel through the Project site. This revision reflects a greatly reduced flood risk to the Project site. **The Developer will also comply with the County Floodplain Management Plan, Grading Ordinance, and Floodplain Damage Prevention Ordinance, particularly by placing structures outside of the floodplain, as revised.**

I provided in my comment letter SDG&E documentation that clearly showed how they avoided any floodplains, including this one, when siting their electric substation nearby. Staff believes that the developer Terra-Gen is following the same criteria by obtaining a CLOMR/LOMR and with their proposed design, no Project structures would be in the floodplain which we now know is false. Staff also gave their opinion that SDG&E wrote their site selection procedures based on the understanding that going through FEMA's CLOMR/LOMR process to revise the floodplain "could be costly and time intensive". I contend that since it is classified as a Critical Facility, higher standards apply and SDG&E didn't want to put the safety of people and infrastructure at risk to the potential of flooding. Maybe we should ask a Project Developer with SDG&E to fully explain their methodology when it comes to flooding? The structures that Terra-Gen wants to place in the revised floodplain would be the most vital parts of their Critical Facility. They would be the Battery Step-Up Transformer and a Power Distribution Center which houses energy management systems, communications/SCADA equipment, and other electrical equipment along with the underground gen-tie connection to the facility. SCADA stands for Supervisory Control and Data Acquisition or what communicates to the facility remotely.

WILDFIRE

A Wildland Fire Protection Plan (FPP) was prepared for the Project by Santa Margarita Consulting, LLC and approved by the VCFPD. In the FPP, they refer to the 8-foot tall vinyl or a similar solid fence that will be flush to the ground with the appearance of paneled wood that would surround the Project site. The Valley Center DRB approved this type of fencing. The consultant referenced the vinyl fencing three times in the FPP as part of the fire protection against wildland fires. This is peculiar and inconsistent to FEMA Landscape Fences and Walls (Home Builder's Guide to Construction in Wildfire Zones P-737 Technical Fact Sheet No. 14.) They describe plastic (vinyl) fences as more fire-resistant, more durable, and often stronger than wood fences, **but plastic (vinyl) can melt in a wildfire from temperatures that are below the maximum a wildfire can generate.** FEMA describes concrete, stone, and

masonry fences and walls as noncombustible and can act as a barrier to a wildfire by deflecting flames away from a building (structure), but the passage of airborne embers and firebrands will not be significantly altered. These materials are the most effective at minimizing the potential of damage to a building (structure) from a wildfire.

If consultants use the most conservative estimations and worst case scenarios in their analysis, why then are we settling for vinyl fencing in a high fire hazard severity zone that according to FEMA can melt in a wildfire? This substantial new information about the vinyl fencing possibly melting and spreading a wildfire changes the impacts to the Project site, and also offsite due to the fact that some residents live in close proximity. Fire danger was the number one concern of the VCCPG and residents against this Project. I recommend a reevaluation of the Project's vinyl security fencing around the site and/or a modification to the Site Plan to change the fencing type to a concrete, stone, or masonry type 8-foot wall similar ironically enough to the SDG&E substation that the developer wants to connect to nearby. This would have to be reapproved by the DRB which shouldn't be a problem since they approved the SDG&E wall years before.

On page 21 in the FPP under section 4.3 Water Supply, the consultant describes a residential fire hydrant 400 feet east of the Project site access along Valley Center Road. They also state that since water should not be the first extinguishing agent used, ***this FPP does not recommend the placement of a new hydrant at the driveway.*** The assumption that can be made is that the consultant was referring to a thermal event in a BESS container but didn't articulate that. Regardless, the fire hydrant would be needed on site for the fire department to use water to provide additional cooling and to prevent fires from spreading. This FPP non-recommendation of a new hydrant totally contradicts the Hazard Consequences Analysis which states a fire hydrant will be located at or near the site entrance or the actual STP which shows that as a Project improvement. This is yet another example of inconsistencies in the FPP, though approved by the VCFPD, that questions their analysis and mitigation measures pertaining to section 19-Wildfire of the 15183 CEQA Exemption Checklist.

TRAFFIC

Analysis was performed addressing the estimated haul trips during the Project site grading and construction of the access road including construction worker trips. What was not mentioned at all in the Staff Report is the trenching that would be involved from the Project site access easement, across/under Valley Center Road, to the existing SDG&E substation to the north for the 0.3 mile gen-tie line connection option the developer would decide on. Possible traffic hazards could result on Valley Center Road during this construction phase with slow-moving, heavy equipment being in front of the site entrance and along both sides of the road. There is no discussion of a traffic control plan to be included as part of this Project to address this temporary construction traffic as well as trenching activities across Valley Center Road. I would assume trenching for the gen-tie line underground across two-lane Valley Center Road would cause lane restrictions and traffic delays. How many days would it take to trench and repave the road? Valley Center Road is a main thoroughfare not only for the residents but also for the busloads going to and from the Casinos from around San Diego County. Also this could impact emergency evacuation plans through the area during this phase. ***I believe this would be considered Impact Not Identified in the 15183 CEQA Exemption Checklist for 17(d) for Transportation and Traffic.***

I would like to take this opportunity to thank you and the entire Staff for continuing to work hard serving the public during these unprecedented times. Valley Center Energy Storage Project should not qualify for an exemption from further environmental review. If anything, this letter proves more analysis and time needs to take place for this Project to move forward. Thank you for your consideration.

Sincerely,

John J. Corley

From: [John Corley](#)
To: [Ochoa, Regina](#); [Neufeld, Darin](#); [Jimenez, Ann](#)
Subject: Fwd: Valley Center Energy Storage Project
Date: Tuesday, August 25, 2020 11:55:26 AM

Hi Regina,

I want to add this email string below as part of the admin record for the upcoming meeting.
Note - I never got a reply back from Terra-Gen.

Thanks,

John

----- Forwarded message -----

From: **John Corley** <jjelrocl@gmail.com>
Date: Thu, Aug 20, 2020 at 8:25 AM
Subject: Re: Valley Center Energy Storage Project
To: Mark Turner <MTurner@terra-gen.com>

Hi Mark,

Hope all is well with you. I appreciate you reaching out to me to discuss your Project. I am curious though, did you also reach out to the owners of Socalta, the property adjacent to your site after August 10, 2020? They seem to me to be more concerned about the merits of your Project.

Best,

John

On Wed, Aug 19, 2020 at 5:35 PM Mark Turner <MTurner@terra-gen.com> wrote:

Hello Mr. Corley,

This is Mark Turner from Terra-Gen. I reviewed your comment letters to the County regarding the Valley Center Energy Storage Project and thought I should reach out to you and offer an opportunity for the two of us to discuss your concerns and the merits of the Project. Please let me know if you are interested. I can be reached at 916-835-8119. Thank you John.

Regards,

Mark

Mark Turner

Terra-Gen, LLC | Vice President, Energy Storage Development
11455 El Camino Real, Suite 160 | San Diego, CA 92130
916-835-8119 (mobile)

From: [John Corley](#)
To: [Ochoa, Regina](#); [Neufeld, Darin](#); [Jimenez, Ann](#)
Subject: Fwd: Valley Center Energy Storage Project
Date: Wednesday, August 26, 2020 3:41:53 PM
Attachments: [image003.jpg](#)

Hello Regina,

I want to be as transparent as possible. Please include this as part of the admin record for tomorrow.

Thanks,

John

----- Forwarded message -----

From: **Mark Turner** <MTurner@terra-gen.com>
Date: Tue, Aug 25, 2020 at 4:48 PM
Subject: RE: Valley Center Energy Storage Project
To: jyelroc1@gmail.com <jyelroc1@gmail.com>
Cc: Ochoa, Regina <Regina.Ochoa@sdcounty.ca.gov>

Hello John,

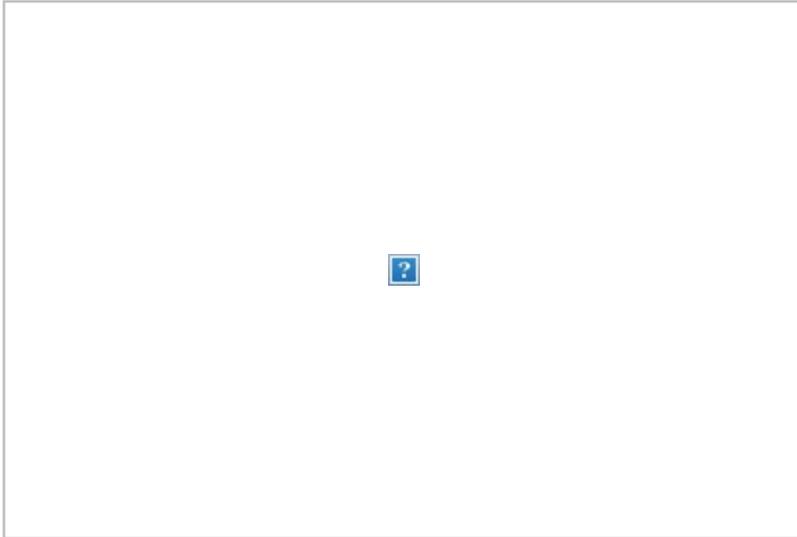
I have indeed reached out to SoCalta. I first introduced the Project to SoCalta in or around March of last year. We've had multiple conversations about the project since then and I've just recently spoken with Rani last week.

John, the reason I am reaching out to you is more directly related to your interests in the Project. You made it clear in the July 13th VCCPG meeting that your primary motive for opposition is that you want to develop a competing battery storage project on your site (below), located adjacent to the substation. While we believe the Valley Center Storage Project is an excellent and appropriate location for battery storage, there is value in your property due to its location adjacent to the substation, not likely for the purposes of storage development, that I am interested in discussing with you. That would be the purpose of the call if you are interested. Please let me know. Thank you.

Regards,

Mark

916-835-8119



From: John Corley <jyelroc1@gmail.com>
Sent: Tuesday, August 25, 2020 3:35 PM
To: Mark Turner <MTurner@terra-gen.com>
Cc: Ochoa, Regina <Regina.Ochoa@sdcounty.ca.gov>
Subject: Re: Valley Center Energy Storage Project

Hi Mark,

I just wanted to know if you singled me out only or genuinely reached out to others also. I take it you did not. I am sure at this point there is not much you can say to change my opinion of your Project and specifically your site, nothing personal.

Thanks,

John

On Tue, Aug 25, 2020 at 1:21 PM Mark Turner <MTurner@terra-gen.com> wrote:

Hello John,

Following up on our the e-mail below. Did you wish to connect with me? I interpreted your e-mail to suggest that maybe Socalta would be interested in speaking with me, but you did not indicate that you were interested. I remain available and can be reached at 916-835-8119 or we can schedule a call.

Thank you,

Mark

91-835-8119

From: John Corley <jyelrocl@gmail.com>
Sent: Thursday, August 20, 2020 8:25 AM
To: Mark Turner <MTurner@terra-gen.com>
Subject: Re: Valley Center Energy Storage Project

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Regards,

Mark

Mark Turner

Terra-Gen, LLC | Vice President, Energy Storage Development
11455 El Camino Real, Suite 160 | San Diego, CA 92130
916-835-8119 (mobile)