

Response to Comment Letter I4

Kevin Keane

- I4-1** The commenter states he is a resident of Boulevard, approximately 10 miles from the project site. The commenter is also very concerned about the wildfire hazard from the batteries in the Project. In response, Section 2.12, Wildfire, of the Draft EIR analyzes potential wildfire impacts that may be caused by development of the Proposed Project, including the battery energy storage system. With implementation of mitigation measure **M-WF-1** (Fire Protection Plan) and **M-WF-3** (Fire Protection and Mitigation Agreement), the Proposed Project’s wildfire hazard impacts would be less than significant. See Response to Comment I4-2 for additional information pertaining to the analysis of wildfire hazards and the Project’s battery storage facilities.
- I4-2** The commenter states that according to the Draft EIR, the Project will involve a large battery storage facility using Lithium-Ion batteries. The commenter then states that despite the assurances in Section 2.12, Lithium-Ion batteries are a major fire hazard and should not be installed in wildfire-prone areas. In response, Section 2.12, Wildfire, of the Draft EIR analyzes the wildfire hazard impacts of the Proposed Project, including the battery energy storage system. Specifically, Section 2.12.3.2 explains the potential hazards associated with battery energy storage systems are primarily associated with the possibility of thermal runaway (similar to overheating) occurring from a malfunctioning or damaged battery. The Draft EIR further explains that new battery technologies have minimized the occurrence of thermal runaway through a system of protections. As described in the Draft EIR, the battery energy storage system would include multiple levels of protection, including the following: (1) be contained within an enclosed structure; separated from other containers by 10 feet; (2) include an integrated heat and fire detection and suppression system and air conditioning system, a basic interior sprinkler system with several sprinkler heads for coverage, and an external dry standpipe for fire fighters to connect to and pump water; and (3) monitored through a SCADA control system, which could power down the batteries. The analysis in Section 2.12 of the Draft EIR concludes that while the Proposed Project has been designed to minimize the risk of fire hazards to the extent feasible and will have minimal occupation during operation, the Proposed Project does propose new electrical equipment that could exacerbate wildfire risks. Therefore, the Proposed Project’s operational-related impacts would be potentially significant. Implementation of mitigation measures **M-WF-1** (Fire Protection Plan) and **M-WF-3** (Fire Protection and Mitigation Agreement) would reduce the impacts to less than significant.

Volume II – Individual Responses to Comments

- I4-3** The commenter lists four examples of fire-prone Lithium-battery devices, including electric vehicles, cell phones, aircrafts, and a dive boat. In response, please refer to Section 2.12.3.2 of the Draft EIR for a discussion of the batteries proposed to be used in the Project’s battery energy storage system. Please also refer to Response to Comment I4-2. The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- I4-4** The commenter states a possible mitigation would be using a different, less fire-prone battery technology such as Iron-Phosphate, Saltwater, NiCad or even lead. In response, as discussed in Response to Comment I4-2, the Draft EIR includes a discussion of the batteries proposed to be used in the Proposed Project and analyzes potential wildfire impacts that may be caused by the battery energy storage system. The Draft EIR concludes that these impacts would be less than significant with implementation of mitigation measures **M-WF-1** and **M-WF-3**. Accordingly, no further mitigation is required.
- I4-5** The commenter states “please don’t put Lithium batteries in our backyard!” The comment does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.