

Meeting Date: December 10, 2024
Agenda Item No. 30
Distribution Date: December 5, 2024
Batch No. 01

From: [Deborah Howard](#)
To: [FGG, Public Comment](#)
Subject: [External] BESS/ ABSOLUTELY NOT
Date: Monday, December 2, 2024 5:54:19 PM

Dear Sir or Madman,

We don't want BESS period!

It is extremely dangerous in our high fire area especially near our schools and residential neighborhoods with unsuspecting children, students, parents and residents !

Fool us once you did!

Let's put BESS near YOUR home and schools and where YOUR children play!

We don't want BESS period!

Deborah Howard
BONSALL

From: [marybearmary](#)
To: [FGG, Public Comment](#)
Subject: [External] Bess systems and change of planning and land use
Date: Monday, December 2, 2024 8:26:44 PM

I am not sure where you want to change the zoning rules. Does that include Valley Center? Where most residents at the +planning committee did not want this in A72 zoning. Just like you changed the housing unit per acres right down the street from me. Maybe while you are changing all your zoning rules you may want to include being able to keep more than one trailer couch on a property in the unincorporated area also. As many people do, but not me because I was written up by your county code officer for having more than one. Maybe we could dedicate a small portion of your time to address this issue also as I still see more and more properties with more than one trailer on their properties. I would like to be allowed to keep both of my trailers on my property also.

Thank you for your time and consideration on this issue also.
Mary Porter

Sent from my Sprint Tablet.



Citizens for a Better Alpine Community

Battery Energy Storage Systems: Community Concerns & Recommended Best Practices

1 Overview



Two Projects Proposed for Our Small Town

We are a small town of less than 15,000 people. Yet we already have two projects proposed here (less than four miles apart).



There's a Lack of Concern for Our Community

Many of our residents are seniors and/or on a fixed incomes. Where is the concern for their health, safety, and general welfare (or their ability to evacuate rapidly or shelter in place for any length of time?)



Nominal Consideration for Extreme Fire Danger

Our community endured substantial losses during the Cedar Fire, the Viejas Fire, and the West Fire. Why would the County approve bringing in high fire-risk projects to already at-risk communities?



County Must Prioritize People Over Profit (“A County that Works for All”!)

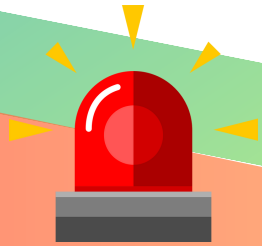
2 Community Concerns



Battery Energy Storage Systems:

Community Concerns & Recommended Best Practices

Citizens for a Better Alpine Community



Public Safety

- Very-high fire risk
- Santa Ana winds/PSPSs
- Lack of Ingress/Egress (escape) requirements
- Sensitive areas (residential, schools, daycares, seniors)
- Lack of resources to shelter in place
- Locales that split/divide emergency-service response
- *Evacuation ingress / egress*



Environmental

- Watershed & Groundwater concerns
- Sensitive Habitat concerns (riparian; Golden Eagle habitat)



Quality of Life

- Lack of ability to get homeowner's insurance (or prohibitive cost)
- Operational noise levels
- Vulnerable populations / Communities of Concern

3 Best-Practice Recommendations



***Citizens
for a Better
Alpine Community***

**Battery
Energy
Storage
Systems:
Community
Concerns &
Recommended
Best Practices**

1 Integrate State Fire-Severity Hazard Maps

From the online meeting on 11/14/2024, it appears there was no consideration at all of the state fire-severity hazard maps.

Integrate FHSZ maps into the County BESS plan

2 Utilize Consistent Land-Use Standards

Follow the same rationale used for the County's recent Climate Action Plan update which implemented Fire Safe Zones (at the BOS meeting on 9/11/24, where Very-high and High-fire Severity Zones were deemed too hazardous to allow new housing).

The same standard should apply to high fire-risk BESS projects in the Backcountry!

3 Limit Projects per Capita and/or Sq. Miles

These are high-risk projects; 'spread the wealth' and limit them per community. The burden (and risk) should be equitably dissipated throughout the entire region (not have two projects four miles apart!)

Best-Practice Recommendations



Battery Energy Storage Systems:

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Citizens for a Better Alpine Community

4 Protect People, Especially the Most Vulnerable Among Us

Do not allow BESS projects near residential communities, nor in areas with vulnerable populations (seniors, daycares, schools, etc.)

Prioritize resident safety by creating 'Sensitive Use Zones'

5 Protect Watersheds & Groundwater

Projects should never be located adjacent to watersheds or groundwater sources. What happens in Alpine CAN affect Southbay.

Prevent projects from being located near ALL water sources

6 Protect Sensitive Habitats

One of the proposed projects in Alpine abuts riparian habitat. The second one affects Golden Eagle habitat. The County must lead efforts to preserve these critical sensitive habitats in accordance with its Sustainable Land Use Framework. *This means NO high-risk projects.*

Create 'Sensitive Habitat Exclusion Zones'

Best-Practice Recommendations



Citizens for a Better Alpine Community

Battery Energy Storage Systems: Community Concerns & Recommended Best Practices

- 7 Use 'Worst-Case Scenario' Plume Modeling**

The online presentation on 11/14/24 stated that plume modeling would be based upon 'typical' wind patterns. Backcountry wind models vary widely depending on the season.

Plume modeling must be conducted for worst-case scenarios based upon historical data (e.g. Cedar Fire wind conditions)
- 8 Mandate Highest Level of Fire Defense**

These projects should absolutely be vaulted underground in concrete bunkers, where they could be easily extinguished should thermal runaway occur. Money is not more important than health and safety (or air quality in the event of toxic smoke.)

Prioritize People Over Profit!
- 9 Only Allow Projects at Locales with at Least Two Points of Egress for ALL Residents**

One Proposed Site (Sequan Truck Trail) would potentially trap about 40 residents if a fire occurred during a Santa Ana wind event.

*All proposed sites **MUST** have two-points of egress available.*

Best-Practice Recommendations



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Battery Energy Storage Systems: Community Concerns & Recommended Best Practices

10 Full & Timely Pre-notice to Communities

These projects should not come as a surprise to affected communities.

Require a one-year pre-notice period to affected communities from all potential applicants

11 Document (& Make Publicly Available) All Safety Incidents and Responses

Transparency is key to maintaining public trust and accountability. Document all safety incidents and make those records publicly available. Also monitor and publish noise level readings from these often very-loud projects.

Record & Publish Safety Incidents & Noise-level Data Metrics

12 Mandatory \$10 Million Mitigation Bond

Require applicants to secure a \$10 million liability bond as a mitigation measure. Communities should not have to worry about being made whole in the event of a very foreseeable disaster

13. Add Dispersion Modeling as an Approval-Process Determinant

Source: Draft of 'Best-Practices Report' from Jensen Hughes
pdf pg. 46 (of 95)

“It is recommended that dispersion modeling be provided as part of the design process in order to create guidance for the emergency response plan especially for the sites that are in the vicinity of vulnerable populations.

However, dispersion modeling is not recommended to be used as a determination for project approval.

Some guidance for best practices for dispersion modeling of "BESS fires is provided in Appendix B”

Dispersion modeling must be included as an approval determinant!



4

List of Best-Practice Recommendations

Citizens for a Better Alpine Community



**Battery
Energy
Storage
Systems:
Community
Concerns &
Recommended
Best Practices**

1. ***Integrate State Fire-Severity Hazard Maps***
2. ***Utilize Consistent Land-Use Standards (Fire Safe C.A.P.)***
3. ***Limit Projects per capita or per Square Miles***
4. ***Protect People, Especially the Most Vulnerable***
5. ***Protect Watersheds & Groundwater***
(va 'Sensitive Use' zones)
(prohibit placement near ALL water sources)
6. ***Protect Sensitive Habitats*** (via 'Sensitive Habitat' Exclusion Zones)
7. ***Require 'Worst-Case Scenario' Plume Modeling for ALL Project Approvals***
8. ***Mandate Highest Level of Fire Defense (People over Profit)***
9. ***Only Allow Projects at Locales with at Least Two Points of Egress for ALL Residents***
10. ***Give Full & Timely Pre-notice to Communities***
11. ***Document (& Make Publicly Available) All Safety Incidents, as Well as Noise-level Data Metrics***
12. ***Require a \$10 Million Bond as a Mitigation Measure for the Affected Community Any BESS is Placed in.***
13. ***Add Dispersion Modeling as an Approval Determinant***

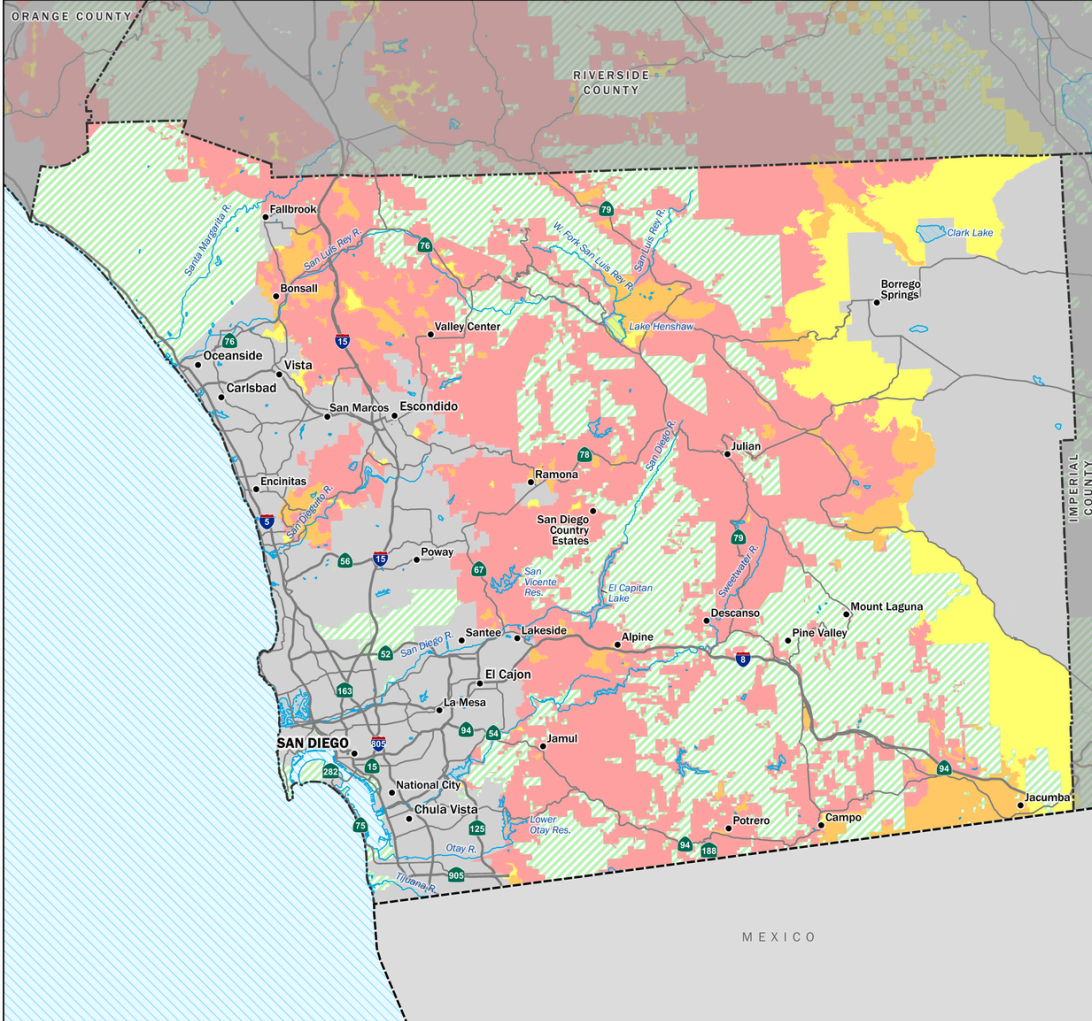
State Fire-Hazard Severity Map for San Diego County

SAN DIEGO COUNTY



State Responsibility Area Fire Hazard Severity Zones

June 15, 2023

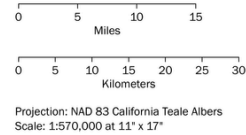


Fire Hazard Severity Zones in State Responsibility Area (SRA)

| | |
|-----------|---------------|
| Very High | 855,162 Acres |
| High | 128,089 Acres |
| Moderate | 183,380 Acres |

Fire Protection Responsibility Areas (non-SRA)

| |
|-----------------------------------|
| Federal Responsibility Area (FRA) |
| Local Responsibility Area (LRA) |
| Waterbody |



Public Resources Code 4201-4204 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map fire hazard within State Responsibility Areas (SRA) based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. These zones, referred to as Fire Hazard Severity Zones (FHSZ), classify a wildland zone as Moderate, High, or Very High fire hazard based on the average hazard across the area included in the zone.

Access PDF versions of the maps at <https://osfm.fire.ca.gov/fhsz-maps>. For more information, please visit the Frequently Asked Questions document for the 2023 Fire Hazard Severity Zones at <https://osfm.fire.ca.gov/fhsz> or scan the QR code at right. If you have further questions, please call 916-633-7655 or email FHSZcomments@fire.ca.gov.



Scan or click the QR code for more information and to visit the interactive FHSZ viewer.

The State of California and the Department of Forestry and Fire Protection make no representations or warranties regarding the accuracy of data or maps. Neither the State nor the Department shall be liable under any circumstances for any direct, special, incidental or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of data or maps.
Obtain FRAP maps, data, metadata, and publications at <https://frap.fire.ca.gov>.
For more information, please call 916-633-7655 or email FHSZcomments@fire.ca.gov.

Gavin Newsom, Governor, State of California
Wade Crowfoot, Secretary for Natural Resources, California Natural Resources Agency
Daniel Berlant, Acting State Fire Marshal, California Department of Forestry and Fire Protection

Data Sources:
CAL FIRE Fire Hazard Severity Zones (FHSZSRA_23_2)
CAL FIRE State Responsibility Areas (SRA22_2)

Source: CAL FIRE Fire Hazard Severity Zone Maps

Prepared for County of San Diego Board of Supervisors Meeting on 12/10/2024 -- BESS Rules & Development Standards

Mary Davis - November 2024

From: henkinp@earthlink.net
To: [Desmond, Jim](#); [Anderson, Joel](#); [MontgomerySteppe, Monica](#); [Vargas, Nora \(BOS\)](#); [Lawson-Remer, Terra](#)
Cc: [FGG, Public Comment](#); [CV Live Data Robert Johnson](#); [Shandel Menezes \(NBCUniversal\)](#); [NBC 7 San Diego](#); [ABC 10 San Diego](#); [Fox 5 69 San Diego](#); [News Fox Cable Insider](#); [KOGO Carl DeMaio \(Reform California KOGO DeMaio Report\)](#); [KPBS San Diego](#); [KUSI 51 San Diego](#); [La Prensa San Diego](#); [San Diego UT Senior Editor](#); [San Diego UT Community Op Ed](#); [Times of San Diego](#); [Voice of San Diego](#)
Subject: [External] NEW REQUIREMENTS FOR BATTERY ENERGY STORAGE SYSTEM (BESS) PROJECTS (PLEASE INCLUDE WITH DOCUMENTS FOR AGENDA #30)
Date: Thursday, December 5, 2024 8:04:28 AM

Hi Supervisors.

You didn't get my letter with the list of recommendations, so here it is...

I saw an article on MSN that 10 BESS facilities were being proposed or built in wildfire-prone areas like the ones in Escondido, Valley Center, and Otay Mesa, and a few others, that caught fire. In fact, the SDGE facility in Escondido caught fire despite smoke and heat detectors. Technology by itself won't save us. They should have thought of these things first, but the small risks they advertise are rapidly becoming huge risks.

You know the risks and the community best. Please don't give in to the legal or other manipulation.

And by the way, since I live in one of the 10 areas, it's now personal.

A few suggestions:

1. Allow a buffer zone of 1 mile per 75 megawatts away from hospitals, houses, schools, and jails.
2. Consider mandating BESS facilities in non-wildfire prone areas like Borrego Springs, Ocotillo Wells, or zones like near the Salton Sea, the nearby desert areas (maybe even crossing County lines.) In the

alternative, have a policy of approving BESS facilities only in these areas.

3. Ensure that there are at least 2 paved and at least 15-foot-wide evacuation routes within 100 yards of a BESS facility and leading to a major highway, or develop them.

4. Ensure that shelter-in-place facilities every 10 miles.

5. Wind pattern (Plume) modeling must be conducted for worst-case scenarios based upon historical data (e.g. Cedar Fire wind conditions) An online presentation on 11/14/24 stated that plume modeling would be based upon 'typical' wind patterns. Backcountry wind models vary widely depending on the season.

6. Require applicants to secure a \$10 million liability bond as a mitigation measure. Communities should not have to worry about being made whole in the event of a very foreseeable disaster

7. Require a one-year pre-notice period to affected communities within at least a 2 mile radius from the project from all potential applicants. These projects should not come as a surprise to affected communities.

8. Mandate the installation and Frequent (daily?) tests of smoke detectors or heat sensors.

9. Community Liaison and someone from the community not in the BESS or energy biz on the Board of the company managing the system.

10. Medical person on the Board of the company managing the system.

11. Document all safety incidents and make those records publicly

available. Also monitor and publish noise level readings from these often very-loud projects. Transparency is key to maintaining public trust and accountability.

12. Have adequate fire suppression agents onsite, like "F-500 Encapsulator Agent," aqueous vermiculite dispersion (AVD,) or a foam extinguisher containing powdered graphite or sodium carbonate.

13. Chickenwire or other mesh over BESS facilities to reduce the danger from floating embers.

14. Implement an enhancement for those who start BESS wildfires, to include those who knowledgeably situate a BESS facility in a high-risk area (including near civilization) with inadequate precautions. Suggest an extra year for each death and an extra fine to make up for firefighter time and resources.

My latest issue with lithium-ion batteries is the danger to all of us with our normal ways of life:

I wrote a few months ago: "The weather has been noticeably cooler for a few days. You would think that this would help the wildfire control. Yet this morning, the 14th, the three big fires near LA and OC, are still raging virtually uncontained: the Bridge fire at 53K acres, 3% containment; the Airport fire at 23K acres, 9% containment; the Line fire at 38K acres, 25% containment. I think the huge Park fire, which we know was started by an EV, was still burning too.

Temperatures for 9/11 in San Dimas (Bridge fire) got down to the upper 50's; San Bernardino (Line fire) and Rancho Santa Margarita (Airport fire) got down to the 60's.

These fires should be on the way out. It is time, maybe past time, to

study whether EV's and battery storage facilities (BESS) are contributing to the fires' staying power, especially with lithium's ability to spontaneously combust multiple times.

AND THESE FIRES ARE STILL GOING! Depleting our water, costing money, using firefighter resources and lives.

Also, the EV truck fire on Aug. 19 in Placer County took 50K gallons of water to put out – about 4 times what a family of 4 uses each month. So in a water-poor area, flammable EV's and battery storage (BESS) do not make sense.

Pretty much all batteries are flammable to some degree as is gasoline or hydrogen or even donkey crap if handled wrong. What makes lithium-ion batteries so dangerous is their ability to combust spontaneously and at relatively low temperature 248 degrees F (unlike gasoline at 495 degrees F) and the difficulty in putting out these fires. It's the difference between your heirlooms getting discolored, dented, or lost, and being melted.

Another thing that really alarms me is that the BESS companies seem to care about economics more than safety. I saw a KGTV 10 news interview on 11/24/2024 where Jason Anderson, the President of Clean Tech San Diego (a non-profit helping to 'advance' BESS tech) says that despite all the BESS fires at 'older tech' facilities, there are no plans to upgrade or replace them – it would be economically unfeasible (nothing about safety.)

I do not see why these facilities cannot be placed in non-wildfire prone areas like Borrego Springs, Ranchita (I believe) or Ocotillo Wells, or zones like near the Salton Sea, the nearby desert areas (maybe even crossing County lines.)

Another reason to reject BESS placement outside of the coastal zone is that roads in the back-country are not developed enough to handle mass evacuations. Many areas have tiny roads or just one access road which can easily be blocked and trap people and animals. Smaller communities also tend to lack shelter-in-place facilities.

In addition, the insurance cost of homeowners near a BESS facility stands to be canceled or increased in that area, which is fairly discriminatory, especially if you have livestock or agribusiness. Are we all going to have to import our food at a higher price?

Thanks to Jim Desmond at the Board of Supervisors for recognizing the need for BESS safety standards. Hope the measure gets re-introduced ASAP, so we can control these fires BEFORE they happen and not waste resources on controlling them after.

Here's what I wrote about BESS earlier:

BESS in a wildfire zone is the silliest idea I've heard of for a while. Here are some of my thoughts on this:

Lithium – used in EV batteries – unstable metal – causes spontaneous fires, repeat, spontaneous, you can't put out, toxic fumes, mass evacuations, oh, and the fire just reignited draining fire department resources. And the response from the Big-BESS-Biz: 'We got better technology now.' Isn't that what they said about the Titanic?

I would recommend an enhancement or judicial recommendation for those who start BESS wildfires, to include those who knowledgeably situate a BESS facility in a high-risk area (including near

civilization) with inadequate precautions. This should be an extra year for each death and an extra fine to make up for firefighter time and resources.

The Battery Storage (BESS) fire in Otay Mesa burned for about a week. Firemen were monitoring it even longer instead of being elsewhere, and they evacuated people within a mile.

There are proposals for larger BESS facilities in San Marcos and Poway near a major hospitals, school, and residences, within a few hundred yards in San Marcos and 1/2 mile in Poway. Lithium ion batteries put out toxic fumes like phosphorous pentafluoride and are a huge wildfire hazard and would draw away fire dept resources to monitor fire for weeks.

Whoever approves these things (The Board of Supervisors has approved a lot of them) should designate safe areas for these away from houses, schools, and hospitals and wildfire zones, environmentally sensitive areas or water sources which they would pollute.

And I doubt that the Park Service or EPA and all would take it too kindly if the toxics from a BESS fire fell on a national monument after all the years and effort to plan it.

Regards.

Paul Henkin