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Cc: <u>FGG, Public Comment</u>

Subject: [External] ENHANCING CLEARING AND BRUSH MANAGEMENT EFFORTS TO REDUCE WILDFIRE RISK (PLEASE

INCLUDE WITH AGENDA #17 DOCS)

Date: Thursday, January 23, 2025 9:12:39 AM

Hi Supervisors,

As you say, The threat of wildfires is now year-round, driven by such things as EV's, BESS, and environmentalists focussing on decarbonization rather than things that actually are toxic as well as greenhouse gas producers, like plastics.

BESS and EV's have too many risks.

Pretty much all batteries are flammable to some degree as is gasoline or hydrogen. 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.

Moreover, lithium fires run 2 to 4 times as hot as wood fires so you can kiss goodbye to all your metal rings or heirlooms if you're in one, and the fire can melt your car, or probably human remains (the LA 1-7-2025 experience.)

And I saw a CNN study on the 10 cities with the most understaffed fire departments. San Diego ranked lower than LA.

And with all the extra carbon dioxide put off by wildfires caused or prolonged by EV's and BESS, is zero-sum decarbonization even practical or worth it?

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 and now in Moss Landing caught fire despite having 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.

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 Last September: " 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 facilites (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, 2024 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.

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 in East County west of the desert 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' we heard off 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?

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 pentaflouride 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 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.

Respectfully,

Paul Henkin