

Design Review Committee Comments  
Borealis Battery Energy Storage Project

File: PLP22-0025

Joseph L. Petrillo

1814 Adobe Creek Drive

Petaluma, CA 94954

Zoning

According to the Staff Report, the site is zoned for Land Extensive Agriculture and Scenic Resource. With respect to LEA zoning restriction, the owner (Cline Cellars) has indicated that the site for the battery project “as less conducive to productive crop cultivation” despite the fact it was an organic farm (Green String) and the surrounding environs have major vineyards and are part of the Petaluma Gap AVA. And the owner is in the wine business. The location of the battery storage project is simply inconsistent with the county LEA zoning restriction.

The site is also zoned as a Scenic Resource. The site will “include the battery storage structures and equipment and approximately 1 acre will be separately fenced to contain a new battery storage substation. The substation will contain two main power high voltage transformers up to 30 feet in height and up to six 100-foot-high masts.” In addition, “the project involves approximately ten 100-foot-high new distribution towers and lines running from the onsite substation” and the battery storage enclosures “could be up to 20 feet in height.” How do 20 foot high battery enclosures, 30 foot high transformers and ten 100 foot high new distribution towers and lines fit the Scenic Resource zoning restriction? If these structures are deemed to be ‘scenic’, the county needs to revisit its definition of Scenic Resource. Industrial scale utility projects are not and will never be a ‘scenic resource’. This is patently absurd on its face.

Lastly, the Staff Report includes Policy OSRC-15d “Incorporate energy facility siting policies into the Sonoma County Development Code that would: (3) Allow commercial renewable energy facilities on lands designated for commercial, industrial, resource or public use. Avoid in agricultural areas mapped as Prime, Statewide or Unique Farmlands, and areas designated as Scenic and Biotic Resources. Limit their use to a compatible scale in rural residential, and agricultural areas.” Page 1 of the Staff Report clearly includes “Scenic Resource” as part of the current zoning for the site. What is being proposed for this site is clearly incompatible with the current Scenic Resource zoning restriction.

## Cultural Resources

According to the Staff Report, “the cultural resource report prepared for the project did not find cultural resources on the lease area.” What about the fact that the site abuts a State Historic Park, the Marianno Vallejo Adobe, the last remaining Adobe structure in the US? I have had over 40 years of experience in the energy and environmental industry. I conducted many site selection studies and one of the key siting criteria was proximity to cultural resources. There is no way energy facilities could be sited anywhere near cultural resources like state historic sites let alone right next to them. This is unheard of and a major siting flaw for this project. I am sure the Petaluma Historic Commission will have something to say about this. The Staff needs to revisit this issue.

## Wildfire Risk

According to the Staff Report, “the project site is located in a State Responsibility Area (SRA) and is designated as a High Fire Hazard Severity Zone.” The Staff Report states further that “All construction projects must comply with County Fire Safe Standards (Sonoma County Municipal Code Chapter 13), including but not limited to, installing fire sprinklers in buildings, providing emergency vehicle access, and maintaining a dedicated fire-fighting water supply on-site. In addition, because the project is within an SRA, all future construction onsite will need to comply with State Fire Code standards, which among other items require maintaining and managing vegetation and fuels around buildings and structures.” Does the Petaluma Fire Department, the Sonoma County Fire District and California Department of Forestry and Fire Protection (CAL FIRE) have the training and wherewithal to deal with a serious fire incident at a large lithium ion battery storage facility? Do current codes and standards specifically address fire incidents and accidents associated with utility scale BESS facilities? I believe that there is little or no information or standards on how to deal with a fire at BESS facilities of this scale. Many accidents and malfunctions, including thermal runaway, have occurred at smaller facilities and the track record is not good. What about utility mega-scale BESS facilities where experience is limited and/or non-existent. This is a critical issue for this project that needs to be addressed as part of a comprehensive EIR. Issuing a Mitigated Negative Declaration by Permit Sonoma would be totally irresponsible and could put Petaluma residents and First Responders in potentially dangerous and life threatening situations.

**From:** [David Donnenfield](#)  
**To:** [DesignReview](#)  
**Subject:** Public Comment on Project PLP22-0025  
**Date:** Tuesday, May 2, 2023 11:00:23 PM

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## EXTERNAL

My name is David Donnenfield. My wife and I are residents in Petaluma living at 2125 Falcon Ridge Dr. where the project under review is about a half mile away from my neighborhood. I have read the six-page project description and it's clear that this installation will be a very large and obtrusive industrial site with:

1. six 100-ft. tall "masts" of an unknown purpose
2. a 10-12-ft. tall surrounding wall to "hide" 20-ft. tall battery containers and 30-ft. tall transformers
3. ten 100-ft. tall distribution towers and their electrical lines stretched across Old Adobe Rd. to the PG&E substation
4. two 30-ft. tall electrical transformers
5. the facility's own substation
6. Multiple 20-ft. tall battery containers

- All. of these highly visible and decidedly industrial mechanisms are in a location that is
- A. on the upland slope of Sonoma Mountain and in an area designated as a Scenic Landscape Unit
  - B. in a State Responsibility Area (SRA) and is designated as a High Fire Hazard Severity Zone.
  - C. "encumbered by an open space contract."
  - D. on a map of the lot where a note requires that all utilities be placed underground.

What is left to say other than, "Are you kidding me?" How many assaults on our landscape does this project need to log before it's obvious to the most unfeeling that this industrial site doesn't belong where it's being sited? It couldn't be more inappropriate. It will be ugly. It will be obtrusive. It will violate the intent of the Scenic Landscape Unit designation. It will be a fire hazard (just ask PG&E what a good idea it is to string high tension wires in a high wind corridor). There is even a note on a map of the parcel requiring all utilities be placed underground. I can think of two good reasons why that's a requirement: minimize the danger of fire from a downed power line and to hide the industrial nature of such a large and instrument-intensive installation.

In addition, there will be maintenance roads, vehicles and equipment. Of course, the developers will claim to hide this industrial site from view with a wall that is 10-12-ft. tall. But with containers as high as 20 ft., transformers as high as 30 ft., and 100 ft. towers and masts, I have my doubts that the wall will do much to obscure equipment that towers above it. This is clearly a ridiculous proposal and it promises to mar the most beautiful and iconic backdrop surrounding Petaluma: Sonoma Mountain. This is just unconscionable, and the people proposing to locate the project where they do should be ashamed of themselves for threatening to destroy something so precious and irreplaceable as our landscape and our viewscape. Nobody wants to live next to an industrial site at the expense of that which makes our area and our town unique and cherished.

Please reject siting this project where it is being proposed.

Sincerely,  
David Donnenfield  
Suzan Hahn, D.D.S.

*David Donnenfield  
2125 Falcon Ridge Dr.  
Petaluma, CA 94954  
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*"We need a planet where human life and natural life is the default. We do not  
jeopardize other living species' ability to be on the planet.  
— Ken Holmen, International Director, Norwegian Polar Institute*

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**From:** [Colleen King](#)  
**To:** [DesignReview](#)  
**Subject:** File No.: PLP22-0025  
**Date:** Tuesday, May 2, 2023 11:12:02 PM

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## EXTERNAL

### Borealis Lithium Ion Battery Storage Project County Design Review Committee Staff Report

I am a Petaluma resident member of the *Citizens for Battery Transparency* group. This group was established to make sure that two proposed utility scale lithium-ion Battery Energy Storage Systems (BESS) are required by the County to prepare a comprehensive Environmental Impact Report under the California Environmental Quality Act (CEQA). The proposed sites for these BESS projects are located very close to residential areas, Casa Grande High School, apartment complexes, a Kaiser Permanente Medical Facility, Route 116 and Hwy 101, the historic Mariano Vallejo Adobe, and only a few miles from downtown Petaluma. These two projects will represent one of the largest lithium ion battery storage facilities in the world and cost hundreds of millions of dollars.

We have previously sent you an Information Circular that included a summary of potential serious safety and environmental issues associated with lithium ion battery storage projects. Accidents have occurred at many smaller facilities in the US, UK, China, South Korea and Australia over the past few years. This rush to build the mega-scale BESS projects in proximity to population centers needs to be put on hold until siting and safety criteria are established by state, county and local regulatory agencies.

The reason for this email is that the county (Permit Sonoma) has published a Design Review Committee Staff Report for one of these projects - the Borealis Project - and requested public comments.

In addition to our concerns of the siting of this proposed BESS abutting a State Historic Park, the Mariano Vallejo Adobe and the building of Industrial scale utility projects on a site zoned as a "Scenic Resource, I have the following comments:

1. This area is a scenic drive for tourists and citizens. It is every bit as beautiful as driving Hwy. 12. Large Water Tanks and an industrial scale utility project will destroy the scenic hills viewed by all who drive this road on the way to and from Sonoma.
2. This site is also designated as a high wild fire area. In the last two large fires, I.e. Tubbs Fire, etc., experienced in our area, we could see the flames at the top of these hills. We also experienced an escaped fire in this area last fall. If a wild fire should reach this BESS site, it could be very dangerous, not only for First Responders and the historical Mariano Vallejo Adobe, but also for the residential neighborhoods that may have to all evacuate at the same time with only a few road options that will be

quickly overwhelmed. Also the toxic smoke will be harmful to the citizens and could interfere with the airport that have incoming planes or obstruct emergency fire helicopters/planes from assisting in the fire fighting.

Additionally, if the fire jumps Adobe Road and travels to the proposed BESS site on Freitas Rd., then it could quickly become a catastrophic situation.

Would there be a sufficient water supply available for even one of these sites, much less both of these sites engulfed by fire simultaneously? These are not air fires and take massive amounts of water to extinguish and explosions can occur.

Sincerely,

Colleen King  
1166 River Pine Circle  
Petaluma, CA 94954

*Citizens for Battery Transparency*

Sent from my iPad

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