

July 25, 2024

To: Greg Plucker, Community Development Director Colusa County

From: Jean Terkildsen, Matt Ferrini and Beth Ferrini Katsaris

Re: Proposed Janus Solar and Battery Storage Project

The following written comments are provided to reiterate the verbal comments made by the Ferrini Family at the Public EIR Scoping meeting held on July 11, 2024 at 3:00pm in the Colusa County Board of Supervisors Chambers.

Thank you for your consideration of our comments. We stand in agreement with the decision of the Colusa County Planning Commission and the Colusa County Supervisors in denying the Use Permit for the previous Janus Solar Project. We encourage the office of Colusa County Community Development to seek out and find an alternative site location that can safely and appropriately accommodate an industrial, commercial solar project such as the one proposed by Janus. A project site should never be located in a High Fire Danger Zone. Spring Valley Road lands are in the Williamson Act for a reason, and that is to preserve the agricultural lifestyle of the area.

1. In reading the "Notice of Completion & Environmental Document Transmittal" we reviewed the "Project Issues Discussed in Document" list and agree that the topics of Air Quality, Flooding, Public Services, Soil Erosion, Toxic/Hazardous, Traffic/Circulation, Land Use, Water Quality, Land Use and the Cumulative Effects of the Project should be studied in the EIR.

We request Colusa County, as the Lead Agency, add several important topics to the list of "Project Issues Discussed in Document" list:

- A. Drainage/Absorption
- B. Economic/Jobs
- C. Fiscal
- D. Other: Emergency Management Plan developed with CA Emergency Management Agency.

2. With regard to including the above areas in the EIR we specifically want to see the following issues studied due to the direct, negative impacts the proposed Solar and Battery Storage Project would have on our adjacent ranch and our existing agricultural orchard and livestock operations.

- A. First and foremost, we want to see a complete risk analysis of the **Fire Danger** associated with the Janus Solar and Battery Storage Project plan to locate a BESS, with an on-site substation, in the CA State Fire Marshall designated High Fire Danger Zone located along Spring Valley Road. What would be the impact to insurance policies for neighboring agricultural operations? An alternate site needs to be studied and proposed that is not located in a designated High Fire Danger zone.

- B. **Traffic Issues** - Traffic count studies are not sufficient or adequate.

The dangers and reality that Spring Valley Road is a one way, gravel road with no alternate route available for ingress and egress needs to be acknowledged. This fact should be reason to disqualify the proposed project. The narrowness of the gravel road makes it impossible for emergency vehicles to access locations and residents to evacuate at the same time. No alternate road is available.

The issue of winter flooding needs to be studied as the road has been completely flooded during past winter storms. Siting an 886 acre Commercial Solar Project along Spring Valley Road is not compatible with the existing farming and livestock operations in the area. We

believe the project is detrimental to the health, safety and welfare of the residents in the area and to our economic endeavors.

C. **An alternative to the addition of above ground power poles needs to be analyzed.**

Power poles make aerial applications for farming operations more dangerous and sometimes impossible. The installation of underground power lines needs to be considered in the EIR.

D. **Drainage issues and run-off** need to be extensively studied as to the impact on neighboring orchards.

E. The serious issue of **Dust** creation and its impact on nearby orchards needs to be studied. We suggest UC Davis Farm Advisors be consulted as the application of dust off or watering roads is not sufficient in any way.

F. The EIR needs a much more detailed and comprehensive study of the **fiscal and economic impacts the project could have with regard to neighboring property values** being devalued due to the proximity to the project.

G. The EIR needs to look at the fact that the proposed site is within the Westside Water District boundaries and could receive water from the WSWD when computing the LESA score. The ground on the proposed site is virgin soil and could definitely be put into farming orchards and crops given the advances in irrigation and farming. Since a LESA score is subjective, **a second LESA score should be included in the EIR based on if water were to be contracted by WSWD or the Sites Reservoir Project**, for comparison purposes, rather than simply rule out such use as “speculative” thereby giving the ground a low LESA score.

H. **Fiscal analyses of the costs** to the County and increased costs to local taxpayers for the County to provide services such as road maintenance for the life of the project should be included in the EIR.

I. The EIR must study the **water needs** for the proposed project. Specific numbers for the amount of City of Williams water needed, the costs of the water, and the legality of using public water for a private project need to be analyzed.

J. The EIR must analyze the **Building and Decommissioning Processes and provide a detailed fiscal analysis of the Bonding required in each phase**. Decommissioning, the possibility of early decommissioning and the possibility of abandonment of the project, each need to be analyzed for costs and financial responsibility in order to protect the neighboring ranches and the County.

K. **The issue of building a commercial facility that handles hazardous materials needs to be analyzed in the EIR and a detailed, specific plan for safety must be provided prior the issuing of a Use Permit, not after the Use Permit is issued and before a Building Permit is issued.**

Thank you for the opportunity to request these topics be included in the EIR.

Sincerely,  
Jean Terkildsen  
Matt Ferrini  
Beth Ferrini Katsaris