

Janus Solar EIR Comment

July 25, 2024

Submitted to:

Greg Plucker, Community Development Director
County of Colusa Community Development Department
1213 Market Street
Colusa, CA 95932

Submitted by: Williams Landowners: Stephen Marsh, Karan Marsh, Annamarie Louie, Antoinette Marsh, Vernetta Marsh, Leslie Marsh

This letter is to document our continued opposition of the proposed Industrial Janus Solar Facility at Spring Valley Rd (SVR) and Walnut Rd in Williams, CA, County of Colusa. Following are our general concerns:

Property Taxes:

Please explain how/how often each of the following items will be taxable, i.e., one-time or for the life of the operation? And if assets are considered Appreciable?

- Ownership - has the project site been leased or purchased? If neither, what is the plan?
- Battery Energy Storage (BES): Will the BES be a taxable AND appreciable structure?
- Panels should be taxed for life until they are removed
- Bad scenario-taxes for first 5 years then for whatever reason, panels are not generating what they thought, or design is obsolete. Income for county needs to continue until panels are gone On-site Sub Station
- Power Lines - To/from the road to the industrial complex? How will these lines be taxed?
- Will energy generated off site be stored locally in the BES on site? If so, how will the offsite generated electricity be taxed when sold or when it re-enters the electric grid.

Financing:

Who pays for the construction and maintenance? The last Solar facility proposal did not address who (or what fund) will be used during the development. Are you expecting the County to pay or will the Developer absorb all construction material and labor costs?

Income:

- guaranteed not dependent on profit or power generation.
- Could be an also but not a solely
- Explain scenario if company goes bankrupt and leaves panels and then county is getting no income. Bond will only cover so much and for so long.

Water:

- How many gallons of water estimated to be used for the construction and
- How many gallons are estimated to be used during operation?
- What type of water, i.e., potable, grey, drinking? Where will water be sourced?
- What is water transport conditions (how) and schedule (how often)? Explain
- If water is coming from the City of Williams, what purchase and transport agreement will be in place?

Fire:

- The local fire department should have a fire plan for dealing with solar facilities and the BES prior to permit approval. This plan should include a signed and enforceable mutual aid or automatic aid.
- What extinguishing systems will be available on day 1, on site?
- Should an emergency require evacuation from the proposed site, we anticipate increased bottlenecks at SVR exit and Walnut Rd with such a proposal which will impact our SPV neighbors negatively.
- SPV is in the High Fire Hazard Severity Zone based on the CALFIRE maps. Should a proposal be approved and if CalFire's risk changes, impacts would likely be felt with canceled fire insurance policies, and or increased premiums. How will you accommodate such changes?
- The Williams fire station is not equipped to adequately respond to a major fire incident in such proposed facilities. What fees from the applicant are to be provided for emergency services training to respond to the site once needed?
- How would a disaster at the facility impact its rural neighbors? There are no safeguards within the proposal to safeguard its residential rural and suburban neighbors from potential disasters.
- Why is the project selecting BES lithium rather than sodium batteries? Provide evidence to demonstrate which is the safer element.
- requires...as adequate roadways, utilities, and other public service infrastructure become available and wildfire hazards are mitigated as required by an approved Fire Safe Plan.

Power Lines:

- Will lines be on county property, or will they require an easement over private property?
- Provide evidence PGE has permitted, approved or confirmed their ability to absorb that generation of power. PGE acknowledging your project is not sufficient.

Construction:

- Define the percentage of union project construction workers compared to verified residents (who have resided in Colusa County for over 12 consecutive months).
- The project must adhere to the established July 32, 2012, Colusa General Plan. Any plan revision draft should not be the final decision maker on any elements of the proposed project.

Road maintenance SPV and Walnut roads:

1. Explain who pays for, who provides maintenance for, and how often, on primary roads. During construction and throughout operations.

- a. The impact to the roads will be way beyond regular traffic during construction.
- b. The impact will be much worse during bad weather
- c. Residents and locals know to keep off or cut back on transit on non-paved roads during bad weather. Construction will continue during rainy weather.

LAND USE Protection and conservation of existing communities and rural centers
Will the land use permit grazing under the panels or not?

NATURAL LANDSCAPE FEATURES Maintain the characteristic natural landscape features unique to each area of the County.

EXISTING COMMUNITY IDENTITY Maintain and enhance the character of existing rural and urban communities, emphasizing both the natural setting and built design elements which contribute to the quality of life, economic health, and community pride of County residents.

1. We see the Proposal going against keeping rural as rural as established by this General Plan goal.
2. Residents have moved to this rural suburb for its peace and quiet, as our family did back in the 1900s. Permitting such an industrial facility defeats the rural community identity.
3. We, and our neighbors will see an increase in light, dust and noise pollution and operation of night events.
4. How long is construction planned? How many days per week, hours? Dust suppression?

Many thanks for your consideration and review of our comments opposing this proposal.

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