Comment Topic	Percent	Gist
BESS/Safety/Fire	71%	Utility scale lithium-ion batteries present a significant risk of thermal runaway fire and environmental damage.
Environment	22%	• lithium extraction process for batteries is similar to that for fossil fuels • scale of the Project's BESS is on a scale not seen in North America • downwind proximity to a major populated area • construction of Project within flood zone • amount of water used during construction

Wildlife	31%	• impacts to undisturbed land and wildlife • clearing destroys wildlife habitat and causes dust • lake-like appearance of solar panels could injure or kill migratory birds • burrowing owls and prairie dogs could be affected by the Project
Property Values	14%	• project will negatively impact property values • views to above ground transmission lines will " "
Views	10%	• Above ground transmission lines will negatively affect views. • Implementation of the Project will negatively affect views.
Historic/Tourism	3%	• not in keeping with Santa Fe's image as an historic tourist area • concerned that the Project will impact tourism
Decommissioning	1%	disposal of the used panels and batteries

Report

Section 3.8 – Health and Safety of SWCA's EIR Report discussed the proposed facility's battery storage and certain environmental protection measures (EPMs) will be implemented. EPMs include preparing and abiding by a Spill Prevention Control and Countermeasure (SPCC) Plan and adhering to the notification policies contained in 20.6.2.1203 New Mexico Administrative Code (NMAC).

Also, a Hazard Mitigation Analysis (HMA) is to be prepared by Rancho Viejo. The HMA is to include site and product specific fire risk assessment for the construction and maintenance of the facility, specifically the containerized BESS units. The EIR states that the Rancho Viejo Energy Storage solution will achieve UL 9540 certification prior to site commercial operation.

Potential impacts to Water Resources are discussed in Section 3.14.

Potential impacts to wildlife are discussed in Section 3.4 Biological Resources.

The EIR does not analyze the potential impacts on property values.

Potential impacts to Visual Resources are discussed in Section 3.15 and the Rancho Viejo Solar Project Visual Impact Assessment Technical Report. Visual Simulations illustrating the appearance of the proposed project are provided in the technical report.

Potential impacts to cultural and historic resources are discussed in Section 3.5. Potential impacts to visual resources (including tourism/visitors) are discussed in Section 3.15 in terms of change to views/setting and level of contrast.

Decommissioning activities are described in Section 2.1.4.

Feedback

The EIR discusses the UL 9540 certification, but doesn't provide the reader enough detail to fully understand the certification. The EIR could further discuss the certification and how that provides adequate protection from potential fires. The EIR could also discuss in more detail the suppression system and how it works. Further information on, importance of, this certification and suppression system would be helpful to the reader. The EIR also doesn't mention the proposed battery location or its proximity to the adjacent neighborhoods. The proximity of the BESS to communities is important to communicate.

Most public comments were related to fire, safety, health risk, specifically safety and fire hazard associated with lithium battery storage. These comments could be used to shape the content of Section 3.8 of the report. Possible content to be covered in this section:

- summary of public concerns expressed in project meeting
- context of BESS in this environment (site specific dangers, hazards, what should we be concerned about?)
- public safety (and the public's perception of the safety)
- system operation constraints
- importance/value of energy storage
- codes and standards applicable to BESS
- first responder knowledge and behavior
- safe operating limits for battery cells and modules

If the BESS system proposed provides solutions to **thermal runaway propagation** and risks associated with off-gassing, then that should be clearly stated in the EIR. Even if the exact BESS system is not known at this time, the components of the proposal that will address scenarios for extinguishing incipient fires vs ventilation, extinguishing, and cooling thermal runaway fires. Reference similar systems and why they are safe. Comparison of various BESS options. pros and cons, and solutions would be helpful to the reader.

- Rancho Viejo will span and avoid placing structures in ephemeral floodplains and other surface water features, where feasible.
- Collection/lines, cables, and access roads will be designed to minimally intersect the floodplain and will not change the base flood elevation or otherwise affect the floodplain. The placement of poles and structures for overhead collection will minimally intersect the floodplain without affecting the base flood elevation. If practicable, at the end of construction, underground collection cable trenches will be reclaimed to pre-existing contours without affecting the floodplain.

• A prudent approach would not rely on adult Burrowing Owls avoiding construction. Although this is likely, verification that burrows are empty may require additional effort regardless of whether construction occurs during the nesting season. Avoidable take of MBTA-protected birds would potentially be considered a violation of the MBTA.

• The discussion of environmental effects on migratory birds should be clarified to indicate applicant commitments and the intent of APLIC documents, which should also be cited in the reference section. The 2006 APLIC document provides standards that can nearly eliminate the risk of electrocution if properly implemented into project design. The 2012 APLIC document provides guidelines to attempt to minimize bird collision, which can never be completely prevented. Rancho Viejo should commit to designing all facilities to APLIC electrocution standards (i.e., this should be implemented before final design is complete). APLIC collision guidelines should be considered at all stages of project design and operation, although this project does not appear to be sited in an area with a high collision risk.

• The discussion of environmental effects on Bald and Golden Eagles would benefit from additional detail. Golden Eagles typically forage within approximately 5 miles of nest sites, and no suitable nesting habitat appears to be present within 5 miles of the site. However, the report documents that Gunnison's Prairie Dog, a potential prey species for Golden Eagles, are present on the site. Non-nesting Golden Eagles may forage wherever prey animals are encountered. Citizen science (eBird) reports indicate that Golden Eagles are not uncommon in the area surrounding the site. The discussion should clarify that nesting habitat Golden Eagles is absent near the site, but that opportunistic foraging or dispersal could occur. The reviewer agrees with the overall conclusion that impacts to Golden Eagles should not be anticipated from the project.

• Implementation of APLIC 2006 and 2012 guidelines should be committed to in EPMs. Note that APLIC 2006 represents clear standards which should be followed in electrical infrastructure design, while APLIC 2012 represents best practices to attempt to reduce collision, and may be implemented in a manner fitting the project' potential impacts during design and operation.

The assessment concludes that the dark-colored horizontal solar arrays would create a strong degree of change to the existing landscape character, and result in a strong visual contrast when viewed from within the immediate foreground. As distance from the solar arrays increases, perceivable visual contrast would begin to decrease. Also noted in the technical report is the existence of existing transmission lines within the analysis area. The proposed gen-tie line would introduce elements common in the landscape and would be similar in form, line, and color to the existing elements in the landscape.

The Cultural Resource Section does not get into specifics on cultural resources and where on the project area they are located, nor does it sufficiently explain SHPO concurrence with findings and do not avoid all resources based on the maps in the report.

The report indicates that resources were avoided on the western road (with reroute surveys to address) however it appears that the northeast corner of the facility intersects sites (which were said to be avoided), this might be addressed in more specific design documents, but the current map is misleading on 1-3.

The description of decommissioning activities could be expanded to include estimated lifespan of the solar facility and the potential that AES would choose to update the solar facility under a new PPA.