

From: William M. Paparian
Sent: Sunday, June 21, 2026 1:24 AM
To: PublicComment-AutoResponse; PWPcommunications; Reyes, David; cityclerk
Cc: Bill Paparian
Subject: 6/22/26 Agenda Item AR 5 – Glenarm Battery Energy Storage System (BESS) Project

[!] **CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you *know* the content is safe. Report phish using the Phish Alert Button (PAB). For more information about the PAB view article "KB0011474" on the DoIT portal.

To: Honorable Mayor Victor Gordo and Members of the Pasadena City Council
Re: Agenda Item AR 5 – Glenarm Battery Energy Storage System (BESS) Project (June 22, 2026)

Dear Mayor Gordo and Council Members,

As a longtime Pasadena resident and former Mayor committed to both our city's clean energy goals and public safety, I respectfully request that the City Council direct staff to prepare additional environmental and fiscal analysis before awarding the construction contract or proceeding further with the Glenarm BESS project.

While I support Pasadena's 100% carbon-free electricity target by 2030, the current Mitigated Negative Declaration (MND) leaves important gaps. Substantial evidence supports a "fair argument" under CEQA that the project may result in significant environmental effects,

warranting a full Environmental Impact Report (EIR) or supplemental review. **Key Areas**

Needing Further Study
1. Thermal Runaway, Fire, and Toxic Emissions Risks

Even with LFP chemistry and NFPA 855 compliance, thermal runaway events remain possible. The 2025 Moss Landing incident demonstrated rapid escalation and toxic plumes. Deferring critical details to a post-approval Emergency Response Plan (MM HAZ-1) is inadequate for proper CEQA analysis.

2. Proximity to Sensitive Receptors

The facility is only ~455 feet from Blair High School and Middle School and adjacent to the SR-110 freeway. Detailed toxic plume modeling, school district coordination protocols, and emergency response capacity for a chemical fire have not been fully evaluated.

3. Lifecycle and End-of-Life Impacts

The review under-analyzes battery replacement, decommissioning, and recycling. Utility-scale LFP systems can generate significant hazardous waste burdens, with recycling often resulting in net costs rather than credits.

Fiscal Concerns for Ratepayers The project carries substantial long-term financial obligations that deserve full transparency:

- A ~\$55.3 million contract for design, construction, ownership, and operation.
- Ongoing capacity payments over 15 years.
- A City purchase option of approximately \$47.1 million.
- A \$9.66 million state grant that offsets only a portion of costs.

Industry analyses indicate decommissioning and recycling costs for similar systems can equal 5.9% of capital costs or \$8,000–\$15,000 per MWh. For this 100 MWh project, that could mean millions in future liabilities. These costs are not fully quantified or reserved for in current documents. Ratepayers could face higher bills if these obligations are not planned for now. **Requested Actions** I urge the Council to:

1. Direct preparation of a full EIR (or focused supplemental analysis) addressing fire risk modeling, emergency planning with Pasadena Unified School District, lifecycle impacts, and cumulative effects.
2. Commission an independent third-party lifecycle cost and safety review.
3. Delay final contract award until the above analyses are completed and publicly presented.
4. Ensure full transparency of all long-term ratepayer costs.

Pasadena's reputation for responsible governance is one of our greatest assets. Taking the time for thorough review now will protect public safety, safeguard ratepayers, and build stronger community support for our energy transition.

Thank you for your consideration.

Sincerely,

William Papanian

Former Mayor of Pasadena