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FORMAL LETTER OF OPPOSITION

Wild Stallion Battery Energy Storage System Project

Proposed 200 MW / 800 MWh Battery Energy Storage Facility • Surprise, Arizona

August 12, 2026

Mayor Kevin Sartor and Members of the Surprise City Council
City of Surprise, Arizona

RE: Formal Opposition to the Wild Stallion Battery Energy Storage System Project

Dear Mayor Sartor and Members of the Surprise City Council:

I am writing on behalf of the Nadaburg Unified School District 81 Governing Board to express my strong opposition to the proposed Wild Stallion Battery Energy Storage System Project and to respectfully urge the Surprise City Council to reject the rezoning and other approvals necessary to permit this industrial-scale battery storage facility at the proposed location.

This opposition is not based upon a rejection of renewable energy, battery storage, or improvements to Arizona's electrical grid. Battery energy storage can play an important role in modern energy infrastructure. The question before the City, however, should not simply be whether battery storage is useful. The question is whether an 800-megawatt-hour industrial battery installation belongs on this particular site, in an area designated for neighborhood development, adjacent to a wash and wildlife corridor, and within a rapidly developing portion of Surprise.

The Applicant's Own Proposal Establishes the Scale and Land-Use Conflict

According to the August 4, 2026, Wild Stallion BESS Concept Review Narrative, Wild Stallion Energy Storage LLC, a wholly owned subsidiary of BayWa r.e. Development LLC, proposes a 200-megawatt (MW) / 800-megawatt-hour (MWh) battery energy storage system within the City of Surprise. The applicant identifies a 28.168-acre site consisting of APNs 503-80-018C, 503-80-018D, and 503-80-018F. The site directly abuts West Deer Valley Road and is approximately 1.5 miles west of the Waste Management Northwest Regional Landfill. This landfill site was recently on fire for several days and a battery storage facility would exponentially increase the risks to our community.

The same proposal states that the site is currently undeveloped, zoned Traditional Neighborhood Development (TND), and located within the Neighborhood Character Area of the City's 2040 General Plan. The applicant acknowledges that Neighborhood Character Areas are primarily intended for residential use. An industrial-scale energy storage installation of this magnitude is fundamentally different from the neighborhood-oriented development for which this land has been planned.

Utility-Scale Lithium-Ion Battery Failures Can Create Severe Hazards

Lithium-ion battery systems can experience thermal runaway, a self-heating failure process that can generate intense heat, combustible gases, fire, and—in some circumstances—explosion or propagation to adjacent cells or modules. The U.S. Environmental Protection Agency specifically identifies fire suppression, harmful emissions, and environmental cleanup as significant considerations for communities hosting battery energy storage systems. EPA notes that lithium battery fires can be difficult to extinguish and may reignite hours or days later, that fires can release harmful gases posing risks to nearby residents and first responders, and that damaged batteries require specialized cleanup and disposal procedures. [1]

Peer-reviewed research published in Scientific Reports measured toxic fluoride gas emissions from commercial lithium-ion battery fires and found that substantial amounts of hydrogen fluoride (HF) can be produced. The researchers concluded that fluoride-gas emissions can pose a serious toxic threat and are important to risk assessment, particularly for large lithium-ion battery packs. [2]

The Centers for Disease Control and Prevention identifies hydrogen fluoride as a hazardous chemical capable of causing serious injury through inhalation and other exposure routes, including severe respiratory effects. [3]

Surprise Has Already Experienced a Serious BESS Explosion

This concern is not hypothetical for the West Valley. On April 19, 2019, the Arizona Public Service McMicken battery facility in Surprise experienced a thermal event followed by a catastrophic failure that injured first responders. APS's investigation documented cascading thermal runaway and the accumulation of flammable gases as central elements of the incident. [4]

The McMicken system was rated at approximately 2 MW / 2 MWh. Wild Stallion proposes 800 MWh of energy storage—400 times the nameplate energy capacity of that earlier system. This comparison does not mean a Wild Stallion incident would be 400 times larger or 400 times more dangerous; modern systems use compartmentalization, monitoring, and other safeguards intended to reduce propagation. It does, however, demonstrate the extraordinary quantity of stored energy proposed at this site and why conservative siting, independent engineering review, and robust emergency planning are essential.

Critical Safety and Environmental Studies Have Not Yet Been Submitted

The Concept Review Narrative itself shows that essential safety information remains unresolved. The applicant lists a Hazardous Materials Impact Analysis, Hazardous Materials Management Plan, Hazardous Materials Inventory Statement, noise study, 24/7 monitoring report, commissioning plan, decommissioning plan, Traffic Impact Analysis, and Environmental Inventory Plan and Report among materials it anticipates submitting later.

The applicant also asks City staff whether the Fire Department will require two ingress/egress points and whether additional fire-specific requirements apply. These are not minor administrative details. They bear directly on whether this particular location is appropriate for an 800 MWh BESS installation and whether residents and first responders can be adequately protected.

Children and Older Adults Require Particular Consideration

A major battery incident can produce smoke, fine particulate matter, and hazardous decomposition products. EPA recognizes that children and older adults are among populations at increased risk from smoke exposure. Children are

more vulnerable in part because their lungs are still developing, while older adults are more likely to have heart, lung, and other conditions that can increase susceptibility to particulate pollution. [5]

This makes prudent siting especially important in a growing community. Emergency planning cannot be treated as a substitute for land-use planning. The most protective approach is to avoid placing a high-consequence industrial use where a foreseeable incident could require residents—including children, older adults, and medically vulnerable people—to shelter in place or evacuate.

Recent BESS Fires Demonstrate Real-World Evacuation and Cleanup Consequences

The January 2025 fire at the Moss Landing battery storage facility in California provides a recent example of the consequences a major BESS incident can impose on a surrounding community. EPA reports that the incident resulted in evacuation of approximately 1,200 residents and required extensive agency involvement, environmental monitoring, damaged-battery management, and cleanup oversight. [6]

It is also important to state the complete record: EPA reported that its air monitoring around the Moss Landing incident did not identify hydrogen fluoride or particulate concentrations above applicable health-based screening levels in the surrounding community. [7] That fact does not erase the land-use implications of the incident. A major BESS fire can still result in evacuation, emergency-response deployment, specialized environmental monitoring, prolonged site management, and significant disruption even when off-site monitoring does not ultimately show a health-standard exceedance.

The Proposed Location Raises Environmental and Wildlife Concerns

The applicant's own materials identify the Trilby Wash wildlife corridor and propose a 75-foot setback from the FEMA regulatory floodway. The Concept Review Narrative asks City staff to confirm whether this approach is acceptable and whether portions of the wash setback may be graded. The preliminary plans also identify an existing wash, FEMA floodplain, and FEMA regulatory floodway in connection with the site.

A desert wash is not simply vacant land. Washes provide stormwater conveyance, wildlife movement, and habitat functions. Construction, grading, access roads, fencing, lighting, electrical infrastructure, and long-term industrial operations can affect habitat connectivity and wildlife behavior even when the core battery equipment does not physically occupy the wash.

Emergency conditions add another layer of concern. EPA's response materials for Moss Landing describe the need to manage damaged batteries and stormwater so that contaminants do not migrate off site. [8] A proposed facility next to a wash and floodplain therefore warrants a conservative, site-specific containment analysis before any zoning approval is granted.

The Design Is Still Preliminary

The concept drawings identify 148 BESS units plus 22 augmentation BESS units, along with 74 inverters plus 11 augmentation inverters, for a four-hour, 800 MWh / 200 MW system. Yet the drawings expressly state that the site improvement plan is preliminary and subject to revision and that the BESS vendor, model, and quantities are subject to change upon final design.

The drawings further state that they are intended for informational purposes only and should not be considered final or authoritative for construction, fabrication, or related activities. They acknowledge that the drawings may not be complete, accurate, or suitable for construction or submittals. It is difficult to conclude that the full risk has been mitigated when the final equipment configuration and supporting safety analyses remain incomplete.

Arizona's Extreme Heat Deserves Site-Specific Analysis

The preliminary engineering documents identify an annual cooling design temperature of 111°F. Surprise routinely experiences prolonged periods of extreme heat. Because battery temperature management is fundamental to safe operation, the City should require an independent engineering evaluation addressing extreme Arizona conditions, including prolonged heat waves, cooling-system failure, grid outages, equipment degradation, and credible compound-failure scenarios.

Manufacturer certifications and compliance with general standards are important, but they should not substitute for a site-specific analysis of how this particular 800 MWh installation will perform during the most severe reasonably foreseeable conditions over its operating life.

This Is Ultimately a Land-Use Decision

Battery storage can provide real grid benefits. But those benefits do not require the City of Surprise to approve every battery facility at every proposed location. The City's responsibility is to determine whether this use is compatible with this site, this area's long-range land-use plan, nearby residents, emergency-response capabilities, and the natural environment.

A minimum setback should not automatically be treated as proof of safety. A zoning setback is a land-use standard—not a scientific guarantee that smoke, an evacuation area, emergency-response activity, noise, or environmental effects can never extend beyond that distance.

Good technology does not make every location a good location.

Requested Action

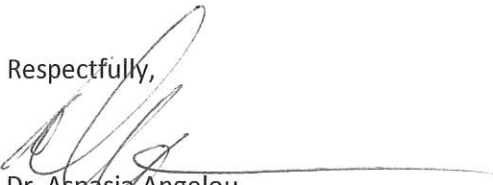
For these reasons, I respectfully request that the Surprise City Council deny the Wild Stallion BESS rezoning and oppose development of the project at the proposed location.

At an absolute minimum, no approval should occur until the City has received and independently reviewed a complete hazardous-material consequence analysis; thermal-runaway and fire-propagation testing for the exact battery system proposed; worst-case toxic-plume dispersion modeling using local meteorological conditions; an independent fire and explosion risk assessment; an evacuation and shelter-in-place analysis; fire-department response and water-supply analysis; a complete environmental and wildlife assessment addressing Trilby Wash; stormwater and contaminated-firewater containment plans; extreme-heat and cooling-failure analysis; final noise analysis; decommissioning and financial-assurance requirements; and an alternatives analysis evaluating appropriately designated industrial sites.

The burden should remain on the applicant to demonstrate—not merely assert—that the proposed location protects the public. Surprise has already experienced a serious BESS incident within its community. The City now has the benefit of that history, more mature safety standards, and substantially improved knowledge regarding thermal runaway, gas generation, emergency response, and environmental management.

I respectfully urge the Surprise City Council to protect residents, children, older adults, first responders, wildlife, and the long-term integrity of this growing area by rejecting the Wild Stallion Battery Energy Storage System Project at this location.

Respectfully,



Dr. Aspasia Angelou

Superintendent

Research and Supporting Sources

1. U.S. Environmental Protection Agency — Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response

<https://www.epa.gov/electronics-batteries-management/battery-energy-storage-systems-main-considerations-safe>

2. Larsson, F., Andersson, P., Blomqvist, P., et al. — “Toxic fluoride gas emissions from lithium-ion battery fires,” Scientific Reports 7, 10018 (2017)

<https://www.nature.com/articles/s41598-017-09784-z>

3. Centers for Disease Control and Prevention — Hydrogen Fluoride: Chemical Emergency Fact Sheet

<https://www.cdc.gov/chemical-emergencies/chemical-fact-sheets/hydrogen-fluoride.html>

4. Arizona Public Service — McMicken Battery Energy Storage System Investigation

<https://www.aps.com/en/About/Our-Company/Newsroom/Articles/Equipment-failure-at-McMicken-Battery-Facility>

5. U.S. Environmental Protection Agency — Who Is at Increased Risk of Health Effects from Wildfire Smoke Exposure?

<https://www.epa.gov/wildfire-smoke-course/who-increased-risk-health-effects-wildfire-smoke-exposure>

6. U.S. Environmental Protection Agency — Moss Landing Vistra Battery Fire Response

<https://www.epa.gov/ca/moss-landing-vistra-battery-fire>

7. U.S. Environmental Protection Agency — Air Monitoring Results Near Moss Landing Vistra Battery Fire

<https://www.epa.gov/newsreleases/epa-air-monitoring-results-near-moss-landing-vistra-battery-fire-not-exceeding-health>

8. U.S. Environmental Protection Agency — Moss Landing: Preventing Contamination from Moving Off Site During Rain

<https://www.epa.gov/ca/ongoing-work-how-will-you-prevent-contamination-moving-site-when-it-rains>

9. U.S. Department of Energy — Final Environmental Assessment, Battery Energy Storage Project (Arizona)

<https://www.energy.gov/nepa/articles/doeea-2123-final-environmental-assessment>

Project Document Reviewed

Wild Stallion Battery Energy Storage System Project — City of Surprise Concept Review Meeting, Wild Stallion Energy Storage LLC, August 4, 2026.

Key proposal details reviewed include the 200 MW / 800 MWh capacity, 28.168-acre parcel area, Traditional Neighborhood Development zoning, Neighborhood Character Area designation, proposed Trilby Wash/FEMA floodway setback, preliminary equipment quantities, and the applicant's list of anticipated hazardous-material, noise, monitoring, traffic, and environmental studies.