AUSTIN AREA FIREWISE ALLIANCE

November 18, 2026

Mariana Krueger, Chair
Members of the Environmental Commission
City of Austin

RE: Wildfire Risk Associated with the Cosmos Data Center – 6801 River Place Boulevard – Agenda Item 4, Recommendation 20261118-004

Dear Chair Krueger and Members of the Environmental Commission:

On behalf of the Austin Area Firewise Alliance (AAFA), I am writing to express our profound concerns regarding the potential wildfire risks associated with the development and operation of the COSMOS Data Center at the former 3M campus on River Place Boulevard. We are deeply concerned that a facility of this nature and scale may be fundamentally incompatible with the surrounding wildfire-prone landscapes and the City's commitment to reducing wildfire risk.

AAFA represents 43 Firewise communities across the Austin area and works closely with public agencies, community organizations, and residents to reduce wildfire risk and improve community resilience. Consistent with our mission, our comments are focused exclusively on wildfire risk and its potential consequences.

Compatibility with the Surrounding Landscape

The Balcones Canyonlands Preserve (BCP) and surrounding communities constitute one of the areas of greatest wildfire concern identified through the Austin/Travis County Community Wildfire Protection Plan (CWPP). Data available through the Texas A&M Forest Service's Texas Wildfire Risk Explorer identify extensive landscapes to the east, south, and west of the proposed data center as having elevated levels of burn probability and wildfire exposure.

The introduction of a large-scale industrial operation with multiple potential sources of wildfire ignition into this environment is deeply concerning.

For years, the City of Austin, Travis County, and their community partners have invested considerable resources in reducing wildfire risk across this landscape. Homeowners have been encouraged to harden their homes, establish defensible space, reduce hazardous fuels, and invest in community-wide wildfire preparedness. Many neighboring communities have undertaken these responsibilities through the Firewise USA program.

It would be fundamentally inconsistent with these efforts to permit a major new industrial operation that could materially increase the probability of a catastrophic wildfire.

While considerable attention has appropriately been devoted to protecting homes and other structures from wildfires originating in surrounding wildlands, we must be equally concerned about the potential for a wildfire to originate within the data center campus or its supporting infrastructure and spread into the surrounding landscape.

Potential Sources of Wildfire Ignition

The development and operation of the COSMOS Data Center present several significant wildfire concerns:

- **Electrical infrastructure.** High-voltage transmission lines, substations, transformers, and other electrical infrastructure necessary to support the facility represent potential sources of wildfire ignition. We need only recall the devastating 2011 Steiner Ranch wildfire, which originated from electrical power lines just a few miles from the proposed data center.
- **Battery systems.** The proposed installation of 23 outdoor battery cabinets raises serious questions regarding battery chemistry, thermal runaway, fire propagation, suppression capabilities, and the potential for a battery fire to ignite surrounding vegetation.
- **Backup power generation.** The potential future installation of emergency generators and associated fuel storage infrastructure introduces additional ignition hazards that warrant careful consideration.
- **Construction activities.** Welding, cutting, grinding, and other construction activities represent potential ignition sources, especially during periods of drought, high winds, and low relative humidity.

The cumulative wildfire risk associated with these activities and systems must be evaluated in the context of the surrounding landscape, rather than simply as a series of engineering or fire code compliance issues confined to the property itself.

Potential Consequences of a Catastrophic Wildfire

A wildfire originating at the data center or its supporting infrastructure could have devastating consequences extending well beyond the immediate vicinity of the facility.

Thousands of homes could potentially be exposed. The area's challenging topography, limited transportation network, and reliance on critical evacuation corridors, including RM 2222, could significantly complicate emergency response and evacuation.

A major wildfire could also destroy extensive areas of protected habitat within the Balcones Canyonlands Preserve, undermine decades of public investment in conservation, and threaten the ecological resources that the Balcones Canyonlands Conservation Plan was established to protect.

Of particular concern is the proximity of the facility and surrounding wildfire-prone landscapes to Lake Austin and Lake Travis, which together provide the source water for the City of Austin's drinking water supply.

As recent wildfire events in Colorado have demonstrated, the consequences of a catastrophic wildfire do not end when the fire is extinguished. Wildfire burn scars are highly susceptible to erosion, flash flooding, and debris flows. Subsequent rainfall can transport enormous quantities of sediment, ash, organic matter, and debris into streams, rivers, and reservoirs.

Following Colorado's 2020 Cameron Peak Fire, post-fire runoff caused severe degradation of water quality in the Cache la Poudre River, forcing water treatment facilities to suspend raw water intake operations for extended periods.

A comparable event in the watersheds surrounding Lake Austin or Lake Travis could have profound consequences for the reliability of Austin's drinking water supply, potentially affecting more than one million people and imposing substantial costs on Austin Water and its customers.

The potential consequences of a wildfire originating at this facility must therefore be considered not only in terms of residential exposure and habitat loss, but also in terms of the security and resilience of critical regional infrastructure.

Recommendations to the Environmental Commission

AAFA strongly supports the provisions of proposed Recommendation 20261118-004 calling for the implementation of a Firewise Strategy and additional training and equipment for Austin Fire Department personnel. However, we believe these provisions fall well short of what is necessary to address the magnitude of the potential wildfire risk associated with this project.

A Firewise Strategy is not a substitute for a comprehensive assessment of whether a large-scale industrial facility is compatible with the wildfire-prone landscape in which it is located.

AAFA urges the Environmental Commission to recommend that City Council:

1. **Reevaluate the suitability of the site.** Direct the City Manager to comprehensively evaluate whether the development and operation of a large-scale data center at this location are consistent with the City's wildfire risk reduction objectives and the Austin/Travis County CWPP.
2. **Require an independent wildfire risk assessment.** Require a comprehensive, site-specific and landscape-scale wildfire risk assessment that evaluates potential ignition sources, fire spread, ember transport, impacts on neighboring communities and the BCP, evacuation challenges, and post-wildfire watershed impacts. The assessment should evaluate the full anticipated buildout of the facility, rather than simply its initial phase.
3. **Evaluate threats to Austin's drinking water supply.** Direct Austin Water, the Watershed Protection Department, and the Austin Fire Department, in consultation with the Lower Colorado River Authority, to assess the potential consequences of a catastrophic wildfire in the surrounding watersheds for source water quality and the continuity of drinking water treatment operations.
4. **Establish a comprehensive wildfire mitigation framework.** Should the project be permitted to proceed, require enforceable measures addressing campus-wide defensible space, electrical infrastructure hardening, battery fire prevention and response, extreme fire weather operating restrictions, emergency response capabilities, evacuation planning, and ongoing compliance.
5. **Withhold further discretionary approvals.** To the fullest extent permitted by law, withhold additional permits, discretionary approvals, and commitments of utility service necessary for the project to proceed or expand until these assessments have been completed, publicly reviewed, and their findings adequately addressed.

6. **Oppose the project if wildfire risks cannot be adequately mitigated.** If the assessment determines that the development and operation of the facility would materially increase wildfire risk to surrounding communities, protected lands, or critical water supply infrastructure, and that such risks cannot be adequately mitigated, the City should exercise all available legal and regulatory authority to prevent the project from proceeding at this location.

Conclusion

The Austin Area Firewise Alliance is deeply skeptical that a data center of this nature and scale represents an appropriate land use at this particular location.

The question before the City should not simply be how to accommodate this facility while attempting to mitigate its wildfire risks. Rather, the fundamental question should be whether the City should permit an industrial operation of this magnitude in a landscape where the consequences of a single wildfire ignition could be catastrophic.

The burden should rest with the developer to demonstrate that the facility can be constructed and operated without materially increasing wildfire risk to surrounding communities, the Balcones Canyonlands Preserve, and Austin's critical water supply infrastructure.

Absent such a demonstration, AAFA believes the City should oppose the development and operation of the COSMOS Data Center at this location.

We appreciate the Environmental Commission's attention to this important issue and urge the Commission to give the potential wildfire consequences of this project the highest level of consideration in its recommendations to City Council.

Respectfully,

Fred Richardson
President
Austin Area Firewise Alliance
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