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100% Incompatible: Power Plant Next Door to Nature Preserve, Building in the Floodplain

The proposed MREC location is extremely incompatible with the thousands of adjoining acres owned by The Nature Conservancy. That land has been purchased with millions of taxpayer dollars in partnership with the State Coastal Conservancy for permanent public ownership as the Santa Clara River Parkway. The Parkway goals are expressly designed to achieve floodplain preservation, natural resources conservation and future public recreation. Additional millions of public funds and years of effort have been expended on the property performing plant and animal habitat restoration and the results have been highly successful. The first major welcome center for the Santa Clara River Parkway is planned at the property entrance at Mission Rock Road tentatively within the next few years. There is no possibility that an industrial power facility will be compatible with the natural resources setting and the long term goals of the lands held for the Santa Clara River Parkway.

The river corridor contains irreplaceable, invaluable riparian habitat, part of the last 3-5% left statewide, and is home to dozens of listed, threatened and endangered plant and animal species. The Santa Clara River has been named as a priceless resource by every imaginable entity, from the Army Corps of Engineers to the County agencies, to prominent local officials and residents that live in the watershed. The Watershed Coalition Ventura County Santa Clara River (WCVC-SCR) Committee, attended by an extensive and widely varying group of stakeholders for over 10 years, has established goals and objectives for River management as follows (www.scrwatershed.org):

[The WCVC-SCR Committee] envision a Santa Clara River system that:
â€¢ Allows for natural river processes, to the maximum extent feasible, including permitting the river to freely meander within its floodplain and to accommodate flows within the natural range of variation.
â€¢ Allows for the preservation and protection of existing and future sustainable uses in the watershed including cultural, agricultural, and educational activities, low impact recreation, scientific studies, and aesthetic and spiritual enjoyment.
â€¢ Emphasizes environmentally sensitive flood management that allows for a functional floodplain while minimizing damage to life and property
â€¢ Maintains biodiversity through matrix of native aquatic, riparian, and upland habitat with minimal habitat fragmentation and barriers, with emphasis on enhancing recovery of species of conservation concern.
â€¢ Is unimpaired by pollution or invasive non-native species.
â€¢ Is managed by cooperating public entities, private landowners, and organizations working toward the common vision.
â€¢ Supplies water for agriculture, groundwater recharge, and habitat maintenance.

Absence of communication of the project proceedings to the WCVC-SCR Committee is a major failure by CEC. No further action should be taken until the project is fully disclosed and adequate time is given to that group for discussion and comment. Four months duration is requested for presentation to and response receipt by WCVC-SCR Committee.

Siting the MREC in the 100-yr floodplain is completely contrary to every national, regional, and local policy. The number one solution to protecting structures from flooding is to NOT BUILD IN THE FLOODPLAIN. It is a matter of when, not if, flood protection is destined to fail since that protection will only meet the selected design storm standard, such as the 100-year or 500-year storm event.

Past storm data is becoming less reliable as a measure of future storm data due to climate change and flood protection computations do not stand up to current meteorological events. Every few years catastrophic flooding occurs because storms are greater than projected or the selected design storm standard was exceeded. Therefore even using the best data available to provide flood protection to this facility contains a high level of risk.

The high level of risk associated with flood protection for the MERC sited within the 100-yr floodplain is unacceptable. The plant will be affected, damaged or shut down due to unpredictable flood damage. Greater than normal costs will be incurred for repair, replacement and restart. More severe costs, including possible loss of human life, must be considered simply due to the extreme danger of electricity potentially being conducted through a river of flood water.

The greater, more extreme rains predicted due to climate change will undoubtedly produce higher required flood protection elevations in the near future. Allowing a critical facility such as electrical power source in a flood plain with protection based on uncertain, upward trending flood flow data is an irresponsible decision.

These comments have been prepared on behalf of the Sierra Club Los Padres Chapter, Santa Clara River committee chair. Additional comments may be forthcoming from other Sierra Club entities.

Thank you very much.