

## DOCKETED

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*Comment Received From: candice meneghin*

*Submitted On: 4/1/2016*

*Docket Number: 15-AFC-02*

## **Appeal against Mission Rock Energy Center**

Please find our comment in the upload. Thank you, Candice Meneghin

*Additional submitted attachment is included below.*



California Energy Commission Mission Rock Energy Center Proposal, Docket # 15-AFC-02 – April 1, 2016

California Trout  
701 E. Santa Clara St.  
Ventura CA, 93001

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<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=15-AFC-02>

**Re: California Energy Commission Mission Rock Energy Center Proposal, Docket # 15-AFC-02**

To whom it may concern:

California Trout is the Chair and Coordinator of the Santa Clara River Steelhead Coalition whose mission is to protect and restore wild Southern California steelhead (anadromous *Oncorhynchus mykiss*) and its habitat in the Santa Clara River watershed. We are a collaboration of non-profit organizations, government resource agencies, and interested stakeholders that collectively aims to facilitate and advance steelhead recovery by leveraging our efforts, resources and capacity. To that end we prioritize and implement restoration and conservation actions that benefit steelhead throughout the watershed. We also follow progress and of restoration projects, environmental impact statements, and/or pending biological opinions that relate to steelhead.

This comment letter is respectfully submitted by the Santa Clara River Steelhead Coalition (SCRSC) Chair in response to the proposed Mission Rock Energy Center (MREC). The Santa Clara River watershed drains an extensive and biologically rich region at the junction of five of California's 10 identified bioregions. The river is the last major coastal system in southern California that retains much of its natural hydrology and still provides the ecosystem functions necessary to sustain more than 17 federally listed species, including southern Steelhead. The river system provides critical habitat and landscape linkages between these bioregions, including the Sierra Madre and Santa Felicia mountains to the north and Santa Susana-Simi Hills and Santa Monica Mountains to the south. The river basin also supports some of the most valuable agricultural resources in California, as well as water resources for surrounding urban populations. Although the watershed contains extensive natural areas, it was identified as a critically endangered river by American Rivers in 2005 because of urban development and other threats in the region.



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The Southern California steelhead Distinct Population Segment (DPS) was listed as endangered by National Marine Fisheries Service (NMFS) in 1997 (62 FR 43937), with listing of Critical Habitat in 2005 (70 FR 52488) and reaffirmation of listing status in 2006 (71 FR 834). In 2012, NMFS released its Southern California Steelhead Recovery Plan (Recovery Plan) that outlines the actions required before a delisting of the species can occur. The Plan identifies five biogeographic population groups (BPGs) that will require a minimum number of viable populations within each group before delisting can occur. Within each BPG, watersheds are classified based on their intrinsic potential into Core 1, 2, or 3 populations, with Core 1 populations having the highest priority for recovery. The Santa Clara River watershed is one of the largest basins in Southern California that supports anadromous runs of steelhead, and is identified as Core 1 in the Recovery Plan.

In Southern California, CalTrout is focused on the recovery of the federally listed and endangered Southern California steelhead. According to the National Marine Fisheries Service the population of this fish has declined from a high of 46,000 adults to only about 500 today. The protection and recovery of the fish in the Santa Clara River watershed is of particular importance because based on the best and up-to date science the River supported the second largest run of adult steelhead South of San Francisco. A run that is conservatively estimated to have been 9,000 adult fish.

It is of grave concern that the California Energy Commission is proposing the Mission Rock Road Energy Center within the 100 year floodplain and critical steelhead habitat. The Santa Clara River Parkway is a project of the California State Coastal Conservancy, in collaboration with the Nature Conservancy's LA-Ventura Project, Friends of the Santa Clara River, private landowners and local governments, to acquire and restore floodplain land along the lower Santa Clara River for habitat, flood protection, and recreation. The MREC does not align with Santa Clara River Parkway objectives to: a) conserve and restore aquatic and riparian habitat for native species, and the hydrologic and geomorphic processes that create and maintain those habitats; b) provide enhanced flood protection for adjacent private land and public facilities; and c) provide public access and environmental education, including the creation of a continuous public trail system along the length of the Parkway. If anything, the MREC undermines these very goals and has potential to exacerbate existing threats and limiting factors to steelhead recovery.

CalTrout is concerned that the Project will have potentially negative impacts on the Southern California steelhead (*O. mykiss*). Under the federal Endangered Species Act, the Southern



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California steelhead is a “listed,” endangered, Distinct Population Segment (DPS). Because the Energy Commission is exempt from preparing an Environmental Impact Report, negative impacts from the project have not been adequately addressed and/or mitigated.

The goal of CEQA, Public Resources Code Section 21000, is to maintain high-quality environment by requiring that public agencies identify, avoid and mitigate the significant environmental effects of projects where feasible. The environmental analysis may omit and/or downplay the significant impacts to one of the most endangered fish in the nation – the Southern California steelhead *Oncorhynchus mykiss*.

Given the precarious status of the fish and the federal government’s emphasis on its recovery in the Santa Clara River; amongst 16 other federally endangered species, I provide comment to request that the Commission reject and not proceed with this proposal (Docket : 15-AFC-02), or at the very least prepare a full EIR.

CalTrout appreciates the California Energy Commission’s consideration of the foregoing comments. If Commission personnel have any questions regarding these comments, please feel free to contact the undersigned, Candice Meneghin at (310) 890-2834.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Meneghin", written in a cursive style.

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