

DOCKETED

Docket Number:	15-AFC-02
Project Title:	Mission Rock Energy Center
TN #:	212505
Document Title:	Susan Caughey Comments on Mission Rock Energy Center's application
Description:	N/A
Filer:	Susan Caughey
Organization:	Susan Caughey
Submitter Role:	Public
Submission Date:	7/29/2016 10:25:38 AM
Docketed Date:	7/29/2016

To: California Energy Commission

From: Susan Caughey

Re: Mission Rock Energy Center,

Docket number 15-AFC-2

There are three issues I'd like to address: visibility, water and legal liability.

Regarding visibility, Ventura County has one of the most restrictive land use regulations in the United States which is intended to preserve its green space. The beauty of the Santa Clara river valley is greatly valued by everyone here. The Mission Rock industrial area is grandfathered from these regulations and can be developed. It is an anomaly that we have to live with. Its compensating factor is that it is largely low profile and much of it is obscured by the surrounding orchards.

However, the proposed plant dwarfs the buildings there. The plan calls for a water storage tank and five stacks all to be sixty feet high. Sixty feet is the height of a six story building. But further, to mitigate the 100 year flood plain regulations, Calpine has said that it will raise the level of the site up to ten feet with fill. That would make the stacks and water tank seventy feet high instead of sixty. Seven stories high.

Calpine should revise its Visibility study to consider the seventy foot high structures. The additional height also raises more concerns for air traffic at the Santa Paula airport.

Additionally, the Commission or Ventura County should require Calpine to install story poles at the site. Story poles are poles erected to show the outline of the project for view assessment. Poles set at the actual height and corners of the structures, joined at the top by ribbons of orange netting, demonstrate the height and volume of the proposed structures. If poles are not practical then cranes can be used. Story poles are commonly required by many California communities when new developments are under consideration.

The story poles allow everyone to see and judge the actual impact of the proposed development. Story poles would be beneficial to Calpine as they would prove that they are right about the minimal visual effect on the environment. Or not.

Unfortunately 200 foot high towers marching across our valley are impossible to hide. They will be a permanent scare on this beautiful valley.

My second concern is the water required for this project. Calpine plans to take its process water from Limoneira's citrus packing plant and sewage treatment facility.

I'm a little confused about how it will get this water. The plan layout shows the process water supply line extending westerly from the site whereas Limoneira's packing plant and sewage treatment facilities are to the north. Clarification of this will be appreciated, especially since Limoneira's sewage treatment facility is less than 50 feet from my property line and its packing house about 500 ft away.

More importantly, I am concerned that this recycled water is currently being used to irrigate Limoneira's orchards and fields. It has a permit from Ventura County to do so. Once this water is diverted to the MREC it will no longer be available for irrigation and Limoneira will tap other resources to irrigate its crops and thousands of trees. That water will clearly have to come from wells, further drawing down our groundwater and aquifer. No one should think that this waste water is currently being wasted. It is not, and the diversion will have consequences for us all.

Finally, I am concerned that the Mission Rock Energy Center is organized as an LLC—limited liability company. As such, Calpine is shielded from MREC's debts and liabilities. Calpine tells us how socially and environmentally responsible it is yet it hides behind a legal shield which insulates it from legal responsibility for any mishap that might occur at MREC. If nothing else, the last two decades have shown us that disasters that could never happen do in fact happen. Calpine, more than anyone, knows the risks in operating a power plant. The fact that it has chosen the LLC legal form in itself shows us that there are risks too large for Calpine to accept for itself. It has made the corporate decision that it does not want to be responsible for those risks.

If Mission Rock's application is approved the Commission should, at the least, require it to obtain and maintain a general liability insurance policy covering all occurrences in an amount not less than a hundred million dollars.

Respectfully submitted.

Susan Caughey

July 29, 2016