

DOCKETED

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| Docket Number: | 15-AFC-02 |
| Project Title: | Mission Rock Energy Center |
| TN #: | 222385 |
| Document Title: | VENTURA COUNTY WATERSHED PROTECTION DISTRICT's Mission Rock Preliminary Staff Assessment Comments |
| Description: | Watershed Protection District comments on inadequacy of PSA due to potential flooding impacts |
| Filer: | Mike Monasmith |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
| Submission Date: | 1/29/2018 9:47:41 AM |
| Docketed Date: | 1/29/2018 |



VENTURA COUNTY WATERSHED PROTECTION DISTRICT
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Sergio Vargas, Deputy Director – (805) 650-4077

M E M O R A N D U M

DATE: January 26, 2018

TO: Mike Monasmith, Project Manager

FROM: Sergio Vargas, Deputy Director

SUBJECT: Mission Rock Energy Center (15-AFC-02): California Energy Commission
APN: 090-0-190-16
Zone 2
Watershed Protection District Project Number: WC2017- 0082

Pursuant to your request dated November 30, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

1025 Mission Rock Rd. Santa Paula CA

PROJECT DESCRIPTION:

Mission Rock Energy Center, LLC (applicant or project owner), a wholly owned subsidiary of Calpine Corporation, proposes to construct, own, and operate the Mission Rock Energy Center (Mission Rock). Mission Rock would be a power plant with battery units located in Ventura County, California west of Santa Paula near State Route (SR) 126. Mission Rock would include natural gas-fired, simple-cycle combustion turbine electrical generating (CTG) units that would generate up to 275 megawatts (MW), collocated with battery units for electricity storage that can deliver an additional 25 MW/100MWh (25 MW for a period of four hours). Mission Rock would also feature clutch technology to provide voltage support to the grid. The 9.79-acre project site is paved with asphalt and concrete and currently used for storing recreational vehicles and boats. A 2.89-acre area immediately north of the Mission Rock site would be used temporarily for construction worker parking and equipment laydown purposes.

EIR REPORT COMPLETENESS:

INCOMPLETE - from our area of concern.

WATERSHED PROTECTION DISTRICT COMMENTS:

Comments from Advanced Planning Section:

In the submitted November 30, 2017 “Request for Comments on the Preliminary Staff Assessment for the Proposed Mission Rock Energy Center (15-AFC-02)” Flood Hazards – the report accurately described potentially significant impacts due to Flood Hazards. Page (4.2-37), and (4.11-26 through 30) Although recognized the impacts to flooding conditions primarily from the Santa Clara River flood source, the report failed to adequately discuss or recognize the need for mitigation due to the proposed placement of up to 10 feet of fill on the site and refers to impacts as Less than Significant on to **external flood impacts**. Based on the information provided, there are two impacts the project has yet to address as result of proposed fill in the floodplain and they are as follows: the channel flood flow and velocity are being increased, and the storage volume in the floodplain is being decreased.

Per District Ordinance WP-2, section 202,

“No person shall do or commit or cause to be done or committed any of the following described acts without first obtaining a written permit from the District:

“...(c) Alter the surface of land by construction, excavation, embankment or otherwise, so as to alter the capacity of a watercourse or the characteristics of the flow of water therein....”

Proposed development is altering the characteristics of flow in the channel by the proposed fill in areas of exiting floodplain, project shall include mitigation measures to address impacts to existing channel as result of the proposed fill.

For instance, after full development, the Santa Clara River system will lose flood storage during a 1% flood event. The increased volume in the channel will increase flow velocity, increase erosion changing the characteristics of the flow in the Ventura County Watershed Protection District jurisdictional channel. Please analysis and create a mitigation plan for handling potential impacts of loss in flood storage volume, increase in velocity and erosion.

END OF TEXT