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True emission from HECA

Additional submitted attachment is included below.

RE: HECA 08 AFC 8A July 22, 2014

In order for the CEC to know the true emissions liability of this project, calculations should include the emissions generated from the importation of the additional coal consumed by this new HECA project. This should include interstate emissions from hauling, loading and offloading from the source point. (the mine) These are emissions that would not be generated if the HECA permit were denied.

If the calculations to arrive at a net benefit include benefits such as power sent to the grid and consumed outside of Buttonwillow area, the emissions generated outside of Buttonwillow area should also be included in the calculation. I believe currently its calculated only from Wasco.

Also included should be the loss of CO2 sequestration resulting from crops not grown from the 7500 acre feet of water diverted from farms and consumed by HECA.

Just a thought...

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