



TETRA TECH EC, INC.

**DOCKET**

**11-AFC-3**

DATE JUN 12 2012

RECD. JUN 12 2012

June 12, 2012

Eric Solorio, Project Manager  
California Energy Commission  
Docket No. 11-AFC-3  
1516 9<sup>th</sup> St.  
Sacramento, CA 95814

**Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Response to Sunset Greens HOA Intervenor Data Requests, 18, 28, 38, and 48**

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulations, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the Response to Response to Sunset Greens HOA Intervenor Data Requests, 18, 28, 38, and 48. The remaining data requests were addressed in our 20-day initial response to these data requests docketed on June 1, 2012. The Quail Brush generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California.

The topics addressed in this letter include the following:

- Traffic and Transportation
- Visual Resources
- Socioeconomics
- Other Areas

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980.3653.

Sincerely,

Constance E. Farmer  
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix  
John Collins, Cogentrix  
Rick Neff, Cogentrix  
Proof of Service List

TETRA TECH EC, INC.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION  
FOR THE *QUAIL BRUSH GENERATION PROJECT*

DOCKET NO. 11-AFC-03

PROOF OF SERVICE  
(Revised 6/6/2012)

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**INTERESTED AGENCIES**

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## DECLARATION OF SERVICE

I, Constance Farmer, declare that on June 12, 2012, I served and filed a copy of the Quail Brush Generation Project (11-AFC-03) Response to Response to Sunset Greens Intervenor Data Requests, 18, 28, 38, and 48. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [<http://www.energy.ca.gov/sitingcases/quailbrush/index.html>].

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

***(Check all that Apply)***

**For service to all other parties:**

- Served electronically to all e-mail addresses on the Proof of Service list;
- Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

**AND**

**For filing with the Docket Unit at the Energy Commission:**

- by sending an electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

**CALIFORNIA ENERGY COMMISSION – DOCKET UNIT**  
Attn: Docket No. 11-AFC-3  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512 [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

***OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:***

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission  
Michael J. Levy, Chief Counsel  
1516 Ninth Street MS-14  
Sacramento, CA 95814  
[mlevy@energy.state.ca.us](mailto:mlevy@energy.state.ca.us)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



## Background: General Objections to the Proposed Plant

18. Please state with precision within 25 feet where the natural gas pipeline lateral may be located within the City of Santee.

**Response:**

The 8-inch natural gas lateral to the Quail Brush facility will tap into the existing 20-inch natural gas main at the existing SDG&E gas yard located 200 feet east of the intersection of Mast Boulevard and West Hills Parkway. From the tap location, the lateral will cross Mast Boulevard away from the City of Santee. The tap, appurtenances and pipeline within the City of Santee will be permitted, constructed and owned by SDG&E. The natural gas pipeline ROW is shown on Figure 2.1-3 of the AFC, at a scale that is within the 25-foot level of accuracy requested.

## Traffic and Transportation

28. How will the engines and the tanks be delivered to the site?

**Response:**

As described in the AFC, "Equipment, materials, and other deliveries to and from the construction site will primarily use Interstates I-5 and I-15, SR 52, Mast Boulevard, and Sycamore Landfill Road for ingress/egress to the Project site during construction." (AFC Section 4.4 Transportation, page 4.4-12).

"Typically, all haul truck weights will be within Caltrans dimensional and weight limits. Concrete trucks are typically under the 80,000 pound gross weight limit (usually 35 to 38 tons fully loaded gross weight). The exception would be the 11 generator sets that each weigh 296,200 pounds. Weight and/or oversize permits will be required for delivery of the generator sets. If necessary, each generator set could be broken up into the engine at 217,000 pounds and the generator at 79,200 pounds for shipping." (AFC Section 4.4 Transportation, page 4.4-13).

Large tanks will be constructed on site (welded or bolted). Their components will be delivered in typical haul trucks within Caltrans dimensional and weight limits.

The delivery of the 11 generator sets will be scheduled to accommodate the immediate placement on their foundations. This delivery is currently anticipated to occur during weeks 4 to 9 of the constructions schedule (AFC Section 4.4 Transportation, page 4.4-13.v).

## Visual Resources

35. Considering that there will be substantial alteration of the site, the project would be replacing pristine open space, additional light and background light will be added to the night, what is the basis for concluding that the viewpoint in Table 4.5-1 Project Sight Visibility is "low"? Who made such an assessment or conclusion?

**Response:**

In the AFC, the site is listed as natural in appearance, not pristine, due to numerous adjacent industrial features. (AFC Section 4.5 Visual, page 4.5-2). The Project would have additional night lighting but with mitigation such as shielded lights, the addition should not

exceed what is currently present in the adjacent landscape. As described in Section 4.5.1.1 of the AFC, "Existing night lighting in the area is scattered and generally limited to exterior lights at residences. The few major sources of night lighting in the region include residents in the Mission View Estates and the City of Santee, which is visible and noticeable from the Project and surrounding area." The only area listed as having low visibility in table 4.5-1 is the grasslands section of the MTRP resulting from this viewpoint having screened foreground views of the Project. The local topography around Viewpoint 2 and existing vegetation will obstruct clear or full views of the Project components (AFC Section 4.5.1.1).

As explained in the AFC, Project site visibility relates to whether and how the Project will be seen from a particular location. The visibility determination takes into account the distance from the viewpoint to the project site, the expected effect of that distance on the viewer's ability to notice Project components and whether the views are open and unobstructed, partially screened or blocked. AFC Section 4.5 Visual, page 4.5-5. The only Viewpoint listed as having low visibility in Table 4.5-1 is the grasslands section of the MTRP at Viewpoint 2. This determination results from this viewpoint having screened foreground views of the Project. The local topography around Viewpoint 2 and existing vegetation will obstruct clear or full views of the Project components. This conclusion was made by the primary visual analysts Robert Evans and Chris Lawson, who prepared the Visual Resource section of the AFC.

36. Who is the expert if any, retained to evaluate visual resources? Has that person or business ever been retained and performed a visual resources assessment or evaluation in any other form before May 10, 2012 in any application before the CEC? If so, please state for each such service, if any visual impairment to visual resources has ever been found in any case, project or application before the CEC and if so what application.

**Response:**

As stated in the AFC, Chris Lawson and Robert Evans of Tetra Tech EC, Inc. were the visual resource experts who prepared the Visual Resources section of the AFC (AFC Section 5.1). Mr. Lawson's experience with visual resource analysis spans 25 years and includes assessment of hydroelectric, wind energy, thermal energy and transportation projects. He has prepared or supervised visual resource documentation for many federal license applications and applications to multiple state licensing or siting bodies. Robert Evans has six years of experience conducting various visual resource studies in the Western United States. In addition to the visual analysis for the Quail Brush Project, Mr. Evans has worked on three previous AFC filings, of which one has been approved by the CEC and one has been accepted as complete and data adequate by the CEC. Bob Evans has worked on the Marsh Landing Generating Station (2008-AFC-03), Hydrogen Energy California Project (08-AFC-8), and the Willow Pass Generating Station (08-AFC-6). For the Hydrogen Energy California Project (08-AFC-8) there were significant impacts to KOP #1.

38. For each of the tank or tanks of water, fuel, lubricating oils and other liquid storage tanks state:
- a. Capacity of each;

- b. Dimensions of each;
- c. How such tanks would be transported to the site.

**Response:**

The capacity and dimensions of all tanks for the facility are shown in AFC Figure 2.3-1 and provided below. Method of delivery is discussed above in the response to Data Request 28 above.

Dimensions and Capacities of On-Site Tanks

Tank Description	Diameter (feet)	Height (feet)	Capacity (gallons)
Urea Tank	13	22	20,000
Used Oil Tank	10	20	10,000
New Oil Tank	10	20	10,000
Domestic Water Tank	10	20	10,000
Fire Water Tank	60	30	600,000
Maintenance Oil Tank	8	16	6,000

## Socioeconomics

40. Will the Applicant agree to redo the Socio-Economic section based upon 2010 Census data?

**Response:**

Although income and poverty data were not available at the time the AFC was completed, these data are now available from the U.S. Census Bureau as presented in the revised table shown below, along with percent change in the data from the 2000 Census presented in the AFC. Median household income data is not directly comparable because the data is based on “dollars” for the year it is presented and is adjusted for inflation. There are 6 census tracts with increases in the poverty level that are greater than 5 percent over the 2000 Census level. Of these, one is located within a mile of the Project site on the Naval Air Station property (census tract 94), and one (census tract 96.04) is located approximately 4 miles south/southeast of the Project site, with the remaining tracts located at the edge of the 6-mile radius area.

The basis and purpose of the Environmental Justice analysis is explained in Section 4.6.4 of the AFC. The Environmental Justice analysis presented in the AFC addresses the potential for the project to disproportionately affect minority and low income populations (AFC Section 4.6.4). In accordance with USEPA and CEQ Guidelines, this analysis uses Census data on

race and ethnicity, income, and poverty to assess potential environmental justice concerns (AFC Section 4.6.4.2). As stated in the AFC, the “U.S. Census Bureau defines poverty area as a census tract or other area where at least 20 percent of the residents are below the poverty level (U.S. Census Bureau 2011d).” (AFC page 4.6-22). Consequently, the 2010 Census data presented below in revised Table 4.6-6, do not change the outcome of the analysis presented in the AFC Section 4.6. The 2010 data show that while there are increases in some tracts, only three of the tracts within 6 miles of the Project have poverty levels above 20 percent. These three census tracts are not in the vicinity of the project and all of them are located near the edge of the 6-mile radius. In addition, the percent of population below the Poverty Level in a census tract is not the only criterion considered for a presumption of the existence of an environmental justice issue. Evaluating whether a proposed action has the potential to have disproportionately high and adverse impacts on minority and/or low income populations typically involves: (1) identifying any potential high and adverse environmental or human health impacts, (2) identifying any minority or low income communities within the potential high and adverse impact areas, and (3) examining the spatial distribution of any minority or low income communities to determine if they would be disproportionately affected by these impacts. Based on the 2000 data the AFC (Section 4.6.4.2) concluded that, “While the preceding analysis identified the potential presence of minority or low income communities within 6 miles of the Project, construction and operations of the Project are not expected to result in significant adverse environmental and human health impacts to these populations or to communities of interest, such as construction employees who would be employed on the Project site.” This assessment remains valid based upon the 2010 Census data.

**Table 4.6-6 (revised) Income and Poverty, 2010**

Geographic Area	Median Household Income (\$) <sup>1</sup>	% Change (2000 to 2010)	Percent of State Average	Change (2000 to 2010)	Percent of Population Below the Poverty Level	Change (2000 to 2010)
City of Santee	68,189	27%	112%	-1	6.30%	0.90
City of San Diego	62,480	37%	103%	7	14.10%	-0.50
San Diego County	63,069	34%	104%	5	14.80%	2.40
California	60,883	28%	100%	0	13.70%	-0.30
<b>Census Tracts within a 6-mile Radius</b>						
Census Tract 94	35,500	-8%	58%	-24	16.30%	9.90
Census Tract 95.02	68,150	16%	112%	-13	6.60%	3.60
Census Tract 95.04	165,764	22%	272%	-16	6.70%	4.70
Census Tract 95.05	93,750	23%	154%	-9	4.40%	2.20
Census Tract 95.06	97,052	52%	159%	23	2.60%	-3.00
Census Tract 95.07	83,085	20%	136%	-11	4.90%	2.60
Census Tract 95.09	72,849	24%	120%	-5	11.30%	3.30
Census Tract 96.02	53,017	27%	87%	-2	9.80%	4.10
Census Tract 96.04	60,956	21%	100%	-7	15.80%	10.20
Census Tract 97.03	72,875	43%	120%	12	4.50%	-0.70

Census Tract 97.04	86,472	32%	142%	3	4.90%	0.30
Census Tract 97.05	90,625	34%	149%	6	3.70%	0.90
Census Tract 97.06	99,556	42%	164%	15	8.20%	4.60
Census Tract 98.01	69,881	27%	115%	-2	4.00%	-4.90
Census Tract 98.02	60,151	20%	99%	-7	8.00%	0.00
Census Tract 98.04	70,729	9%	116%	-22	4.50%	-0.20
Census Tract 98.05	80,459	25%	132%	-4	6.60%	2.70
Census Tract 148.03	42,432	28%	70%	0	11.30%	0.70
Census Tract 148.04	54,107	26%	89%	-2	9.10%	-0.60
Census Tract 150	48,095	9%	79%	-15	21.60%	13.60
Census Tract 151	64,551	30%	106%	0	6.80%	1.00
Census Tract 158.01	26,218	15%	43%	-6	33.20%	14.70
Census Tract 160	74,886	63%	123%	25	15.70%	7.90
Census Tract 161	77,413	57%	127%	22	5.40%	-0.50
Census Tract 162.01	86,250	35%	142%	6%	6.10%	-0.80
Census Tract 162.02	42,832	20%	70%	-6	7.00%	-3.90
Census Tract 163.02	39,848	22%	65%	-4	32.60%	10.50
Census Tract 165.02	39,350	11%	65%	-10	19.60%	3.50
Census Tract 166.05	58,934	27%	97%	-2	6.40%	3.40
Census Tract 166.06	73,400	18%	121%	-11	7.70%	4.40
Census Tract 166.07	74,256	24%	122%	-6	6.20%	0.80
Census Tract 166.08	97,561	55%	160%	26	3.70%	-0.20
Census Tract 166.09	76,851	23%	126%	-7	6.90%	0.30
Census Tract 166.12	88,990	35%	146%	6	4.00%	-0.70
Census Tract 166.13	75,825	42%	125%	12	4.00%	0.90
Census Tract 166.14	88,990	49%	146%	19	4.00%	1.20
Census Tract 166.15	75,825	31%	125%	2	4.00%	-1.60
Census Tract 166.16	66,642	44%	109%	11	8.40%	-0.20
Census Tract 166.17	77,063	133%	127%	57	5.20%	-4.40
Census Tract 167.01	52,095	6%	86%	-18	11.40%	4.30
Census Tract 169.01	38,879	-27%	64%	-49	5.00%	0.90
Census Tract 170.22	64,353	-14%	106%	-53	7.20%	4.50
Census Tract 170.44	70,887	-20%	116%	-73	3.20%	2.00
Census Tract 170.45	101,982	-19%	168%	-100	3.90%	1.40
Census Tract 170.46	128,393	21%	211%	-14	1.80%	0.20
Census Tract 170.47	144,904	50%	238%	32	1.10%	-0.60

<sup>1</sup> Median incomes are presented in 2010 dollars unadjusted for inflation.

Source: U.S. Census Bureau 2010

42. Will the Applicant agree that the poverty rate in Census Tract 166.06 is great than it was in 1999?

**Response:**

As indicated in Quail Brush's initial response to Data Request SG41 docketed on June 1, 2012 and Quail Brush's response to Data Request 40 above, subsequent to the preparation of the AFC, the Census Bureau released data from the 2010 Census on income and poverty at the Census tract level. These data indicate that the poverty rate in Census Tract 166.06 has increased from 3.3 percent to 7.7 percent. It is noted that poverty rates have generally increased across the entire analysis area – in some cases to a much greater degree.

## Other Areas

48. Please provide a copy of the 2009 Request for Offers cited in Applicant's Application section 2.1, page 2-1.

**Response:**

SDG&E's 2009 Request for Offers (RFO) is attached as Appendix A to the Prepared Direct Testimony of San Diego Gas & Electric Company in Support of Application for Authority to Enter Into Purchase Power Agreements with Escondido Energy Center, Pio Pico Energy Center and Quail Brush Power dated May 19, 2011 filed in connection with docket number A.11-05-023 and available at <http://sdge.com/node/466> and <http://sdge.com/sites/default/files/regulatory/Testimony.pdf>.

## References

U.S. Census Bureau. 2010. U.S. Census Bureau American Fact Finder. Available at: <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>. Accessed May 29, 2012.