CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

August 10, 2012

Lieutenant Tom Donnelly
Uniform Division, Executive Officer
Huntington Beach Police Department
2000 Main Street
Huntington Beach, CA 92648

RE: Potential Law Enforcement Needs for the Proposed Huntington Beach Energy Project (HBEP) (12-AFC-2)

Dear Lieutenant Donnelly,

AES Southland Development, LLC. (the applicant) is seeking a license from the California Energy Commission to construct and operate a power generation facility in Huntington Beach, Orange County, California. The Huntington Beach Energy Project (HBEP or proposed project) is proposed on the site of the existing and operating AES Huntington Beach Generating Station, replacing the existing power plant with a natural gas-fired, combined-cycle, air-cooled, 939-megawatt (MW) electrical generating facility (HBEP). The existing power plant currently has four operating steam generating units (Units 1, 2, 3, and 4). Units 3 and 4 are owned by Edison Mission Huntington Beach, LLC., and operated under contract by the applicant. Units 3 and 4 are scheduled to be permanently retired from service by November 2012 as a separate action from the proposed project. They are scheduled for demolition after construction of the first of the two proposed HBEP power blocks. The duration of project demolition and construction is estimated to be 7.5 years, beginning in the fourth quarter of 2014 with proposed project completion in the fourth quarter of 2024.

To assess impacts of the proposed project on law enforcement, Energy Commission staff requests information on existing law enforcement resources and services in the project area and the estimated need for additional services if the project is approved. A form is provided as an attachment to this letter with data needs and questions highlighted. Key characteristics of the applicant's proposed project that are considered applicable to law enforcement response needs assessment are briefly summarized on the form.

From our review of the project's Application for Certification (AFC), we understand the project site is within the jurisdiction of the City of Huntington Beach Police Station and the estimated response time to the project site in case of an emergency would average six minutes. The single police station, serving as headquarters, is approximately 3.5 miles from the project site. The police department shares jurisdiction with the California Highway Patrol (CHP) for portions of Beach Boulevard (State Route 39) and Pacific Coast Highway within the City of Huntington Beach. The CHP is the primary law

enforcement agency for the 405 Freeway on the eastern boundary of the city plus State highways and roads.

The project applicant's entire Application For Certification (AFC) is available on the Energy Commission's website at: http://www.energy.ca.gov/sitingcases/huntington_beach_energy/documents/index.html. Section 5.10 Socioeconomics would be the most pertinent section to review, as well as Section 5.12 Traffic and Transportation and Section 5.16 Worker Health and Safety. These sections are in Volume 1 of the AFC.

Please provide your responses to the needs assessment form and include any comments you may have regarding law enforcement services for the proposed project by December 6, 2012. Send your responses to my attention (my contact information is below). Thank you in advance for your time and assistance.

Sincerely,

Lisa Worrall

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Enclosures:
Local Law Enforcement Needs Assessment Form
Map showing the approximate location of the project site (from the AFC)
Map showing the location of the construction parking areas (from the AFC)
Construction workforce (peak month by craft and phase) (created from the AFC)

cc. Felicia Miller, California Energy Commission Project Manager
Amanda Stennick, Planner III/Supervisor

Law Enforcement Needs Assessment Form	
Project Characteristics, as Proposed by the Project Applicant	
Type, Location, Size, and Site Access:	Power generating facility proposed on the site of the existing and operating AES Huntington Beach Generating Station (21730 Newland Street) in the City of Huntington Beach, California, north of the intersection of Pacific Coast Highway and Newland Street. Primary site access would be provided from the existing Huntington Beach Generation Station entrance off Newland Street, just north of the intersection with Pacific Coast Highway.
Estimated Schedule:	The duration of project demolition and construction is estimated to be 7.5 years (90 months). If approved, demolition and subsequent construction would begin in the fourth quarter of 2014 and conclude in the fourth quarter of 2024. See Table 5-10B in Appendix 5-10B of Volume 2 of the AFC for a list of the project demolition and construction workforce and schedule.
Construction (Traffic and Work Force):	During the peak construction months 82 and 83 (Aug. & Sept. 2021), the construction workforce would total about 236 individuals. During the peak construction month, the estimated number of construction workers daily trips is 662 and the estimated number of truck trips is 48. Six deliveries are assumed to be made during the morning and evening peak hour. Construction parking would be provided at one on-site parking area and four off-site parking areas with an approximate combined 1,040 parking spaces. The four off-site parking areas are a privately-owned paved site, a privately-owned graded site, a graded Plans All American Tank Farm site, and a City of Huntington Beach parking lot. The construction workers would park west of the Beach Boulevard/Pacific Coast Highway intersection in stalls nearest Pacific Coast Highway. According to the applicant, workers would not park in the stalls nearest the beach, even if no other stalls are available. A shuttle service would be provided to deliver workers to the project site. Assuming a shuttle capacity of 18 to 20 persons, approximately 13 round trips would be generated at the start and end of each workday. Figure 5.12-4 in the AFC (Volume 1) presents the locations of the construction parking areas.
Operation (Staff and Traffic):	The project would employ approximately 33 full-time workers on average during weekdays. The applicant did not estimate the resulting number of vehicle trips during project operation due to the project's potential to generate a low volume of daily trips that would have a relatively minor impact on study area roadways. The plant would employ plant operators, supervisors, administrative staff, mechanics, engineers, chemists, and electricians in three rotating shifts over a 24-hour, 7-day-a week basis.
Security:	The Engineering, Procurement, and Construction (EPC) contractor would provide site security during construction. No security information has been provided in the AFC for plant operations.
Existing Law Enforcement Resources and Services in the Project Area (attach additional paper if more room is needed to answer questions)	
Names and addresses of the facilities (e.g., sheriff substations) serving the project area, and distance of closest dispatch facility to the project site:	
Adopted or desired service standard (e.g., one sworn officer per 1,000 population) applicable to the project site:	
Existing staffing levels for facilities serving the project area (including sworn officers and civilians, totals and per shift):	
Estimated response times to the project site: Priority calls: Non-Priority calls:	
Current projected needs (e.g., facilities and staff) to maintain or meet existing service levels: Additional needs beyond those identified	

Law Enforcement Needs Assessment Form	
above to maintain or meet existing service levels with the project:	
Exchange of general law enforcement responsibilities (e.g., formal and/or informal agreements with local municipalities for provision of services) in the project area:	
Current inventory of specialized equipment (e.g., helicopters or other aircraft):	
Estimated Need for Law Enforcement Services, Equipment, and Facilities (attach additional paper if more room is needed to answer questions)	
Is there a process or formula used by your department to determine the need for additional law enforcement services to serve a new large-scale power plant? Please explain.	
Could the project trigger a need for additional law enforcement services for on-site crimes against persons, theft of materials, and/or vandalism? Please explain. During project construction: During project operation:	
Could increased project-related traffic affect circulation and access on roads near the project site to the extent that an impact to emergency response times might occur? Please explain. During project construction: During project operation:	
Do law enforcement personnel review development site plans for projects to assess potential law enforcement issues (e.g., lighting and other safety factors)? Please explain.	
Are specific measures recommended to reduce the potential for crimes to occur at or near the project site (e.g., specific types of security fencing)? Please explain.	
Please explain any other law enforcement concerns that have not been addressed by this needs assessment form.	
Person Completing This Needs Assessment Form	
Name: Title/Position: Telephone No: E-mail Address:	

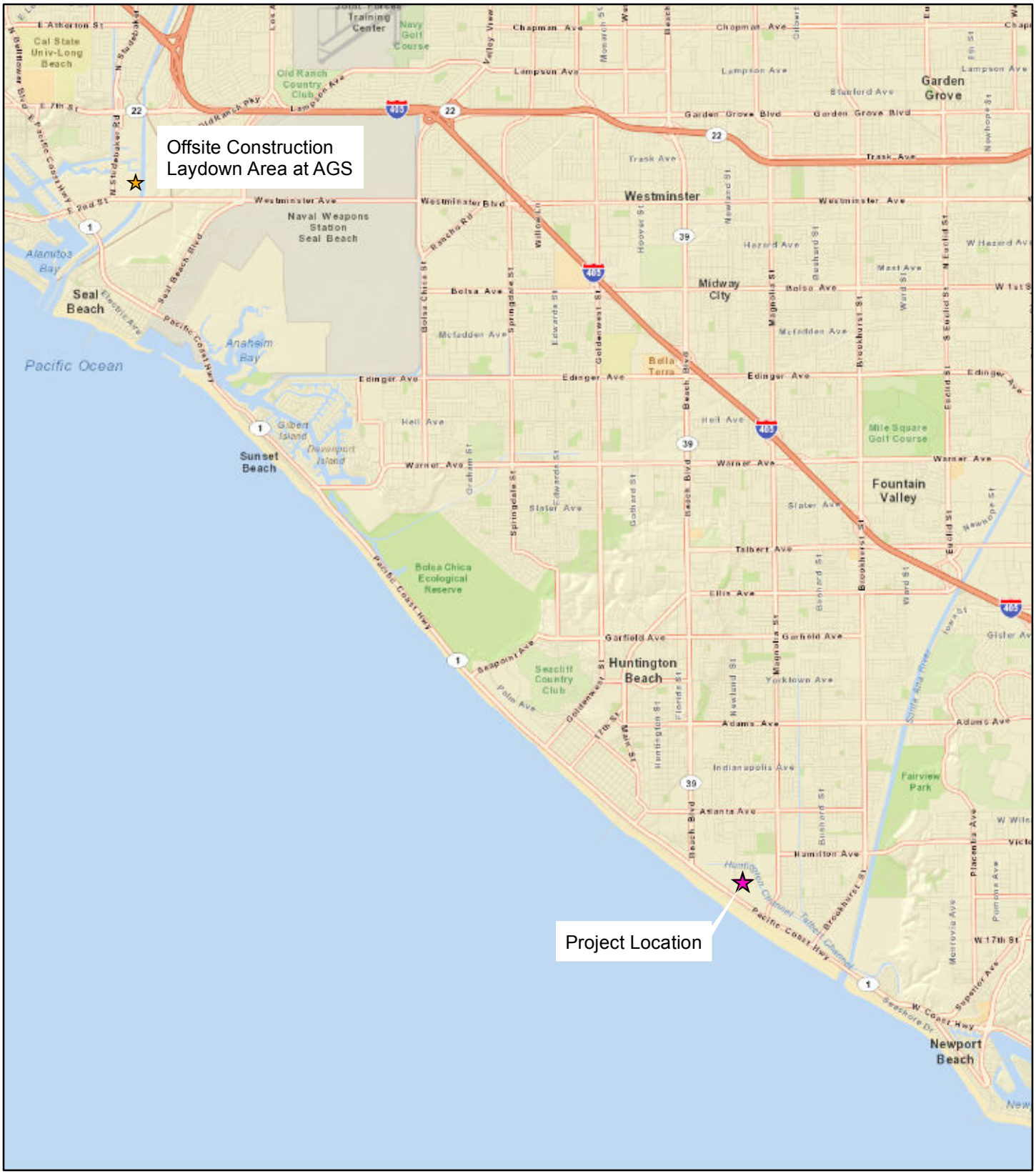

FIGURE 1.1-2
Regional Location Map
AES Huntington Beach Energy Project
Huntington Beach, California

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Legend

- AES Huntington Beach Generating Station
- AES Huntington Beach Energy Project
- Onsite Construction Parking
- Offsite Construction Parking
- Construction Parking Shuttle Route

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FIGURE 5.12-4
HBEP Construction Parking Areas
AES Huntington Beach Energy Project
Huntington Beach, California

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		HBEP Construction Workforce Needs- Peak Month by Phase				
		Demo Peaker & Tank Area	**Construct Block 1**	**Construct Block 2**	**Demo Units 1 & 2**	**Construct Bldg 33 & 34 Control Bldg & Maintenance**
Peak Month		June 2015	April 2017	Aug & Sept 2021	March 2023	July 2024
Piling Crew[1]						
Carpenter			20	25	20	8
Laborer		30	25	30	8	10
Teamster		8	8	8		4
Electrician			16	25	3	10
Ironworker			25	12	3	
Millwright			8	6	4	
Boilermaker		4	20	15		
Plumber			10	14		4
Pipefitter			12	12		
Insulation Worker			8	8	2	4
Operating Engineer		3	15	15	3	2
Oiler/ Mechanic		2	4	4	2	2
Cement Finisher			8	12		
Roofer			6	8		
Sheet Metal Worker			8	8		6
Sprinkler Fitters			6	8		5
Painters			6	6		6
Sheetrockers						6
I & C - Control Rom						8
Total	Craft	47	205	216	45	75
	Supervision	4	25	20	5	4
	Workforce	51	230	236	50	79

Notes: [1]Piling crew not needed during peak month for each phase. Piling crew needed for construction of block 1 (Feb to July 2015- 10 workers per month), block 2 (April to June 2020- 10 workers per month), and building 33 & 34 (August to September 2020- 6 workers per month).
Source: HBEP AFC, Appendix 5.10B, Table 5.10B.