

CALIFORNIA ENERGY COMMISSION

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California Energy Commission

DOCKETED
12-AFC-02

TN # 68951

DEC 20 2012



Stephen O'Kane
AES Southland, LLC
690 Studebaker Road
Long Beach, CA 90803

December 20, 2012

Regarding: **HUNTINGTON BEACH ENERGY PROJECT (HBEP) (12-AFC-02)**
Staff's Data Requests, 73 through 98

Dear Mr. O'Kane,

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

These data requests, numbered 73 through 98, are being made in the technical areas of Noise, Public Health, Socioeconomics, Soil and Water Resources, Traffic and Transportation, and Visual Resources. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 22, 2013.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at

Sincerely,

A handwritten signature in blue ink that reads "Felicia Miller".

Felicia Miller
Siting Project Manager

Enclosure (Data Request Packet)
cc: Docket (12-AFC-02)

PROOF OF SERVICE (REVISED 10/08/12) FILED WITH
ORIGINAL IN SACRAMENTO ON 12/20/12
DLS

**HUNTINGTON BEACH ENERGY PROJECT
(12-AFC-02)**

Energy Commission Staff's Data Requests 73-98

December 20, 2012

Technical Area: Noise
Author: Edward Brady

Background

The operational requirements and space constraints of the existing HBEP site will require that demolition, construction, operation and decommissioning activities take place concurrently and over a period of eight years. HBEP will generate cumulative noise levels for up to 4 discrete time periods as outlined in **Table DR-73** below:

Table DR-73
HBEP
Concurrent Activities

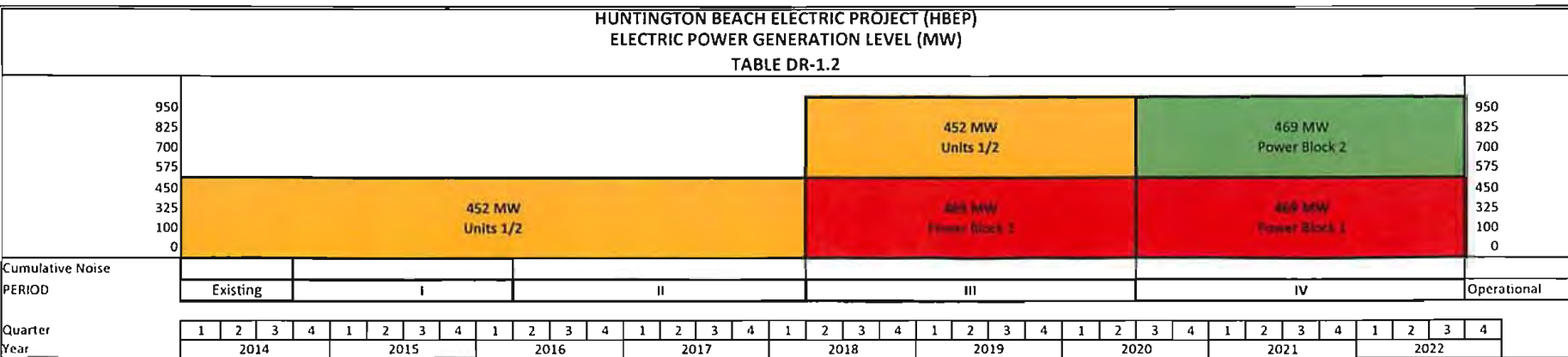
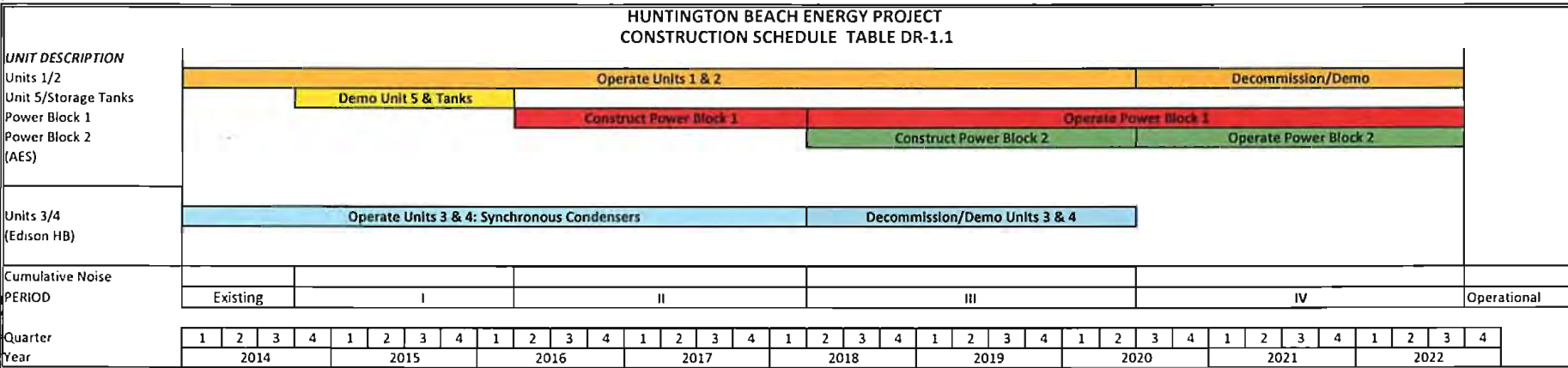
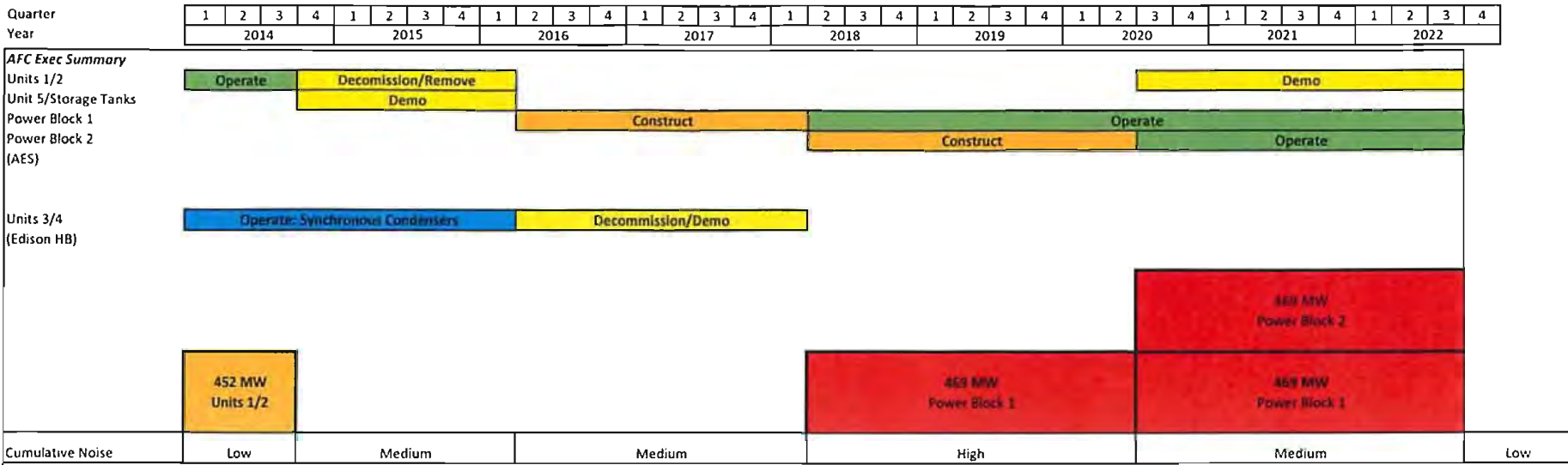
| Period | I | II | III | IV |
|---------------|---------------------------------------|---------------------------------------|----------------------------|----------------------------|
| Units 1 & 2 | Operation | Operation | Operation | Decommission Demolition |
| Units 3 & 4 | Synchronous Condenser Operation | Synchronous Condenser Operation | Decommission Demolition | |
| Unit 5, Tanks | Demolition | | | |
| Power Block 1 | | Construction | Operation | Operation |
| Power Block 2 | | | Construction | Operation |

In order to evaluate the cumulative impacts of noise with multiple and concurrent activities, staff has determined that additional analysis is required and needs the following information:

Data Request

73. Please provide a noise analysis for each of the periods described above in **Table DR-73** above, showing the resultant noise levels at noise sensitive receptors M-1 through M-4. Please provide the results in terms of L_{eq} , L_{10} , L_{50} , L_{90} , L_{min} , and L_{max} .

Huntington Beach Energy Project
Construction Schedule 11/30/2012



Technical Area: Public Health
Author: Huei-An (Ann) Chu, PhD

CONSTRUCTION HEALTH RISK ASSESSMENT

Background

In Applicant's Data Adequacy Supplement, a screening construction health risk assessment for diesel particulate matter was conducted to assess the potential impacts associated with diesel emissions during the construction and demolition activities at HBEP. The results of the analysis are contained in the revised AFC Section 5.9, Public Health, and Appendix 5.9B. This screening health risk assessment was conducted based on the annual average emissions of diesel particulate matter (PM). The incremental increases in cancer risk were estimated by multiplying the predicted annual diesel PM concentration by the Office of Environmental Health Hazard Assessment (OEHHA) inhalation unit risk factor of $3.0E-04 (\mu\text{g}/\text{m}^3)^{-1}$ and adjusting the predicted results to a 9-year exposure duration to more closely reflect the exposure duration associated with construction activities (OEHHA, 2003, p. 8-3). The cancer unit risk value for the assumed 9-year exposure is $3.857E-5^1 (\mu\text{g}/\text{m}^3)^{-1}$ when interpolated from the unit risk value for a 70-year exposure. Based on applicant's analysis, the predicted incremental increases in cancer risk at the Maximally Exposed Individual Resident (MEIR) and Maximally Exposed Individual Worker (MEIW) associated with construction activities are 9.2 in a million and 3.9 in a million, respectively.

Data requests 74 and 75 were requested verbally at the Data Response Workshop held on November 14, 2012.

Data Requests

74. In Table 5.98.1, the construction period screening level risk at Point of Maximum Impact (PMI) is 41.5 in a million (listed as $4.15E+1$ per million in the table). Any result greater than 10 in a million is potentially significant and needs to be evaluated further. Please explain why the applicant did not evaluate this significant result and discuss how the applicant intends to use mitigation measures to reduce the cancer risk to a level of less than significant during construction.
75. Please refine the construction period health risk assessment at PMI sufficiently to reduce impacts to less than significant or apply sufficient mitigation measures to reduce the risks to less than 10 in a million and redo the health risk assessment analysis.
76. If the results of any health risk assessment results in a health risk of greater than 10 in a million, please provide a map containing health risk isopleths, including an isopleth showing the risk value of 10 in a million.
77. The applicant conducted a simple interpolation¹ to get the cancer unit risk for a 9-year exposure (i.e. $3.857E-5 (\mu\text{g}/\text{m}^3)^{-1}$). However, by following the method described in the Air Resources Board's (ARB's) Hotspots Analysis Reporting Program (HARP)

¹ The cancer unit risk for a 9-year exposure was calculated using the following interpolation formula:
The cancer unit risk for a 9-year exposure = The cancer unit risk for a 70-year exposure \times 9 years/70 years Adjustment Factor = $3 \times 10^{-4} \times 0.129 = 3.857 \times 10^{-5}$.

How-To Guide, under Topic 8: How to Perform Health Analyses Using a Ground-Level Concentration, Part B: Performing a Stochastic Risk Analysis for a Single Receptor Without A Dispersion Analysis, staff obtained a higher cancer unit risk than the value reported by the applicant, resulting in higher predicted incremental increases in cancer risk at the maximally exposed individual residence (MEIR) and above the significance level. Staff believes it is more reasonable to use the methodology following the ARB's HARP How-To Guide than the simple interpolation approach used by the applicant. Please provide a revised analysis using the ARB's HARP How-to Guide or provide evidence to justify usage of the simple interpolation method rather than the ARB's HARP method to determine the cancer unit risk for a 9-year exposure from the one for a 70-year exposure.

Technical Area: Socioeconomics
Author: Aaron Nousaine

ECONOMIC IMPACTS ANALYSIS

Background

The HBEP AFC presents estimates of the employment and labor income effects of the proposed project generated using the IMPLAN economic impact software. To assess the reliability of the reported economic impact estimates, staff requires a complete project budget for demolition, construction, and operation, as well as a clear explanation of the assumptions and input values used in the IMPLAN economic model. Where appropriate, the applicant may submit this information with a request for confidentiality.

Data Requests

78. Please provide a complete project budget for demolition, construction and operation that identifies all major expenditures on labor, equipment, and materials. In particular, staff is interested in costs associated with facilities demolition and construction versus the purchase and installation costs associated with the natural gas power blocks (e.g. fired engines and associated systems). Labor cost estimates should include associated employment numbers reported in job-years.² Where possible, please differentiate expenditures based on project phase, including the demolition of unit 5 and the east fuel oil storage tank, construction of block 1, demolition of units 3 and 4, construction of block 2, and demolition of units 1 and 2. Also, identify and rationalize what percent each line-item expenditure would be made within Orange County and within the Los Angeles Metropolitan Statistical Area (MSA).
79. Please provide a complete description of the input values and other assumptions used in the IMPLAN economic model for demolition, construction, and operation. Completeness will be evaluated based on staff's ability to recreate the applicant's findings using the information provided. This should include, at minimum, identification of the applicable event types, IMPLAN industry sectors, model input values (i.e. total industry sales, employment, employee compensation, proprietor income), event years, and local purchase percentages. Also, please identify the vintage and geographic extent of the IMPLAN data used in the analysis.

² One job-year is the equivalent of one full-time job held for a period of one year. For example, this could equal one full-time job held for 12 months, two full-time jobs held for six months, three full-time jobs held for four months, or two half-time jobs held for one-year, and so on.

Technical Area: Soil & Water Resources
Author: Mike Conway

Background

Section 5.14.1.2.2 states that “wastewater generated during HBEP construction will include ... water from excavation dewatering during construction (if dewatering is required). Depending on the chemical quality of these wastewaters, they could be classified as hazardous or nonhazardous.”

The Phase I ESA states that “Groundwater underlying the site is known to be impacted by metals, VOCs and 1,4-dioxane. Groundwater is monitored as part of on-going subsurface investigations regarding former Southern California Edison operations at the site including former operation of waste-water retention basins. These investigations are currently overseen by the Department of Toxic Substances Control. The presence of groundwater contamination represents a *Recognized Environmental Condition* in connection with the site.”

Staff is concerned that pumping of contaminated groundwater could result in significant impacts to on and offsite water resources or sensitive environmental receptors. The applicant did not provide a discussion of how contaminated groundwater would be discharged, what volumes may be expected, and how hazardous it could be to the environment.

Data Requests

80. Please provide an estimate of the range of dewatering volumes necessary during demolition or construction of the proposed HBEP.

81. Please provide information showing what the estimated hazardous chemical concentrations would be in the groundwater generated from dewatering.

82. Please discuss whether the groundwater dewatering could result in movement of contaminated groundwater offsite and impact groundwater quality or other sensitive receptors such as salt marsh habitat.

83. Please discuss whether dewatering could further degrade groundwater quality on-site.

84. Please discuss whether the applicant has coordinated with the appropriate state or local agency that would otherwise regulate the groundwater pumping and discharge if not for the in-lieu permit authority of the Energy Commission.

85. Please explain where hazardous water could be accepted for disposal.

86. Please explain where non-hazardous water could be accepted for disposal (offsite), or discharged (onsite).

Technical Area: Traffic and Transportation
Author: Jonathan Fong

PLUME VELOCITY ANALYSIS

Background

Staff plans to perform a plume velocity modeling analysis for the gas turbines and air cooled condensers. Staff requires operating information of the air cooled condensers to complete this analysis.

Data Request

87. Please summarize the operating conditions for the air cooled condensers, including heat rejection, exhaust temperature, and exhaust velocity. Please provide values to complete the table, and additional data as necessary for staff to determine how the heat rejection load varies with ambient conditions and also determine at what ambient conditions air cooled condenser cells may be shut down, and for staff to model the thermal plume. The ambient conditions included in this table correspond to those in AFC Table 5.1 B.2 for gas turbines.

| Parameter | Air Cooled Condenser | | | | | |
|------------------------------|----------------------|----|--------|----|-------|----|
| | Number of Cells | | | | | |
| Cell Height | | | | | | |
| Cell Diameter | | | | | | |
| Ambient Temperature | 32°F | | 65.8°F | | 110°F | |
| Ambient Relative Humidity | 86.72% | | 58.32% | | 7.95% | |
| Duct Firing | Yes | No | Yes | No | Yes | No |
| Number of Cells in Operation | | | | | | |
| Heat Rejection (MW/hr) | | | | | | |
| Exhaust Temperature (°F) | | | | | | |
| Exhaust Velocity (ft/s) | | | | | | |
| Exhaust Flow Rate (lb/hr) | | | | | | |

The AFC Traffic and Transportation provides no discussion of potential plume impacts or analysis of plume velocity, heat dispersal, or other plume characteristics that might contribute to low altitude turbulence. Analyses of the velocity, shape, and dispersal of the exhaust plumes are necessary for staff to determine the potential impact of plumes generated by the HBEP on aircraft flying in the immediate vicinity of the project. City-owned light aircraft are regularly observed flying at low altitude in the vicinity of the project and may be affected by exhaust plumes generated by the project.

HEAVY HAUL ROUTE OVERNIGHT PARKING

Background

The AFC Traffic and Transportation analysis states the HBEP would require heavy/oversized components which would be transported by truck from the Port of Long Beach to the AES Alamitos Generating Station (AGS) off-site construction laydown area, and then transported to HBEP as depicted on AFC Figure 5.12-3 (Heavy Haul Route). (Pages 5.12-1, 2 and 5.12-13). The Heavy Haul Transportation Survey Summary (Appendix 5.12B) indicates that the potential route would require a two-night move.

Data Request

88. Please identify potential overnight parking areas for the heavy haul equipment and submit documentation allowing heavy/oversized load parking at these areas.

DEMOLITION HEAVY HAUL

Background

The AFC Traffic and Transportation analysis identifies heavy/oversized loads for project construction, but makes no mention of anticipated heavy/oversized loads associated with the demolition and removal of the existing equipment.

Data Request

89. Please clarify if any heavy/oversized loads are required as part of the demolition phase of the project. If heavy/oversized loads are required for demolition, please identify the expected number of loads and expected routes.

ALTERNATE HEAVY HAUL ROUTES

Background

Project construction is estimated to require 112 heavy/oversized loads with approximately 3 loads on any given night. (HBEP Data Responses Set 1A). The AFC anticipates these loads would be dispersed throughout the project construction/demolition phase which is expected to occur from 2014 through 2022. Energy Commission staff is concerned that the route would require extensive utility work through constrained intersections in heavily traveled beach communities.

Data Requests

90. Please identify alternate laydown areas located in the vicinity of the project area of sufficient size to accommodate the 16-acre laydown area which was the required acreage size at the AGS site.

91. Please provide an analysis of alternate delivery methods for the required heavy/ oversized loads. Attached with this data request is a rendering of an alternate delivery method proposed for the El Segundo Redevelopment Project, although never implemented by the applicant.

EXISTING CONDITIONS AT INTERSECTIONS

Background

The AFC Traffic and Transportation analysis studied the following intersections in the project area to determine existing PM peak hour conditions (AFC, Section 5.12.1.3.2):

- Beach Boulevard and Pacific Coast Highway (PCH) (signalized)
- Newland Street and PCH (signalized)
- Newland Street and Hamilton Avenue (signalized)
- Brookhurst Street and PCH (signalized)

The Highway Capacity Manual (HCM) was used to determine the intersection Level of Service (LOS) and is summarized in Table 5.12-5.

The City of Huntington Beach recent traffic study indicates the AM peak hour is a critical period of traffic at the studied intersections. The City requests the traffic AM peak hour should be included as part of the analysis (City of Huntington Beach- Beach Boulevard and Edinger Avenue Corridor Specific Plan- Traffic Study, August 2009) (City of Huntington Beach Letter, 12-6-2012, Comment #7, TN #68804).

The City submitted a letter to Energy Commission staff requesting that the intersection analysis should include Magnolia Street and PCH. (City of Huntington Beach Letter, 12-6-2012, Comment #8, TN #68804). Energy Commission staff agrees that the Magnolia/PCH intersection should be included as part of the analysis. The City of Huntington Beach Circulation Element in the General Plan identifies Magnolia Street as a Primary Arterial and one of the primary north/south streets from the San Diego (I-405) Freeway which provides regional access to the City of Huntington Beach.

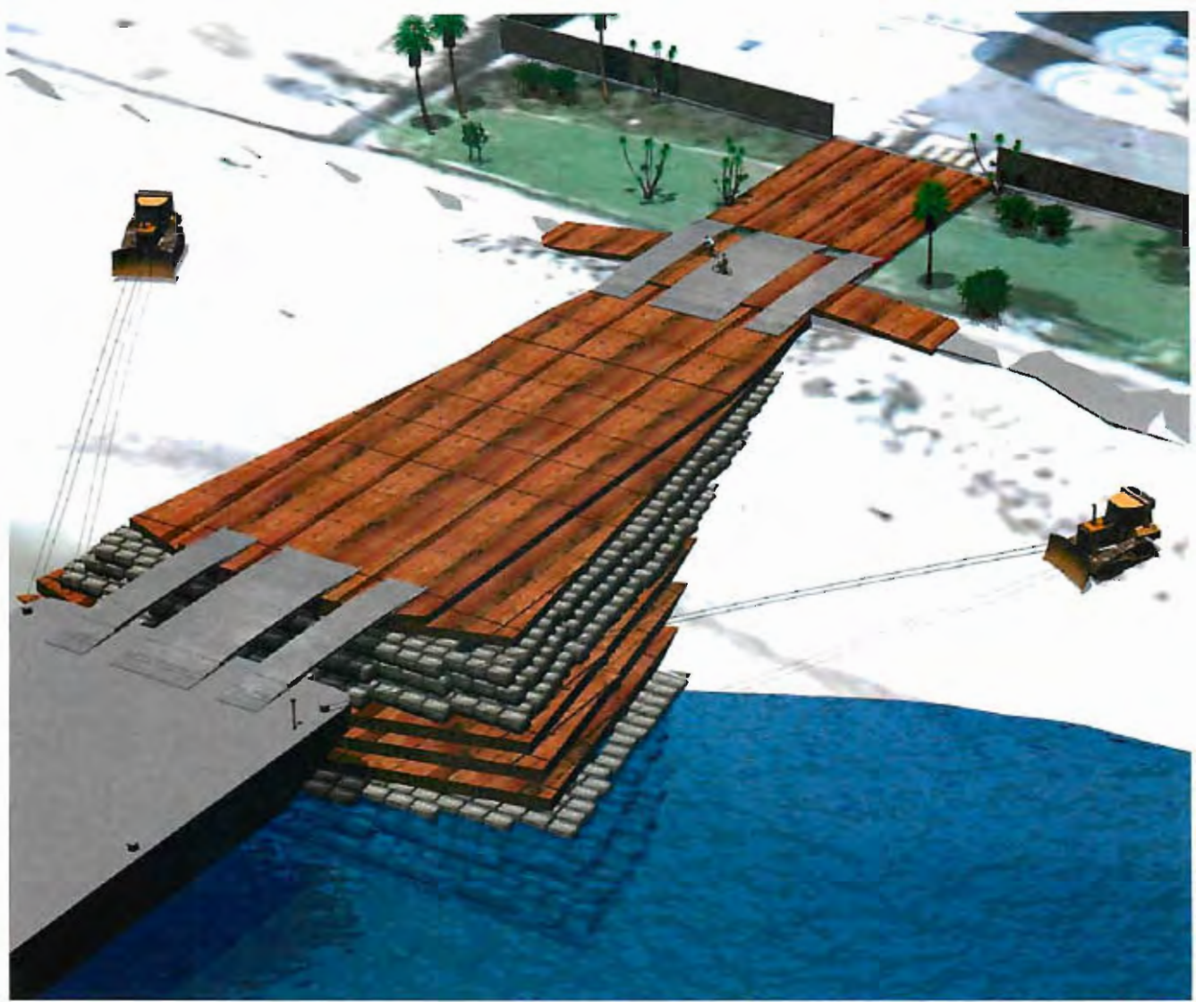
The City conducted an LOS Analysis and determined the PM peak hour average control delay at Beach Boulevard/PCH, Newland Street/PCH, and Brookhurst Street/PCH are 25.5, 16.9, and 31.2 seconds, respectively (City of Huntington Beach- Beach Boulevard and Edinger Avenue Corridor Specific Plan- Traffic Study, August 2009) (City of Huntington Beach Letter, 12-6-2012, Comment #9, TN #68804).

Data Requests

92. Please include the AM peak hour in the intersection analysis and amend the Existing Intersection LOS Summary Table 5.12-5 and the Construction Intersection LOS Summary Table 5.12-8.

93. Please include PCH and Magnolia Street in the intersection analysis and amend Table 5.12-5 as reflected in the City of Huntington Beach LOS analysis.

94. Please provide data worksheets and calculations for the existing intersection conditions analysis and clarification of the discrepancy between the PM Peak Hour Delays of the studied intersections in Table 5.12-5 of the AFC and the PM Peak Hour Delay in the Huntington Beach Traffic study.



Technical Area: Visual Resources
Author: Jeanine Hinde

Background

Section 5.13.1.4 of the AFC, "Sensitive Viewing Areas and Key Observation Points," describes selection of five key observation points (KOPs) based on a viewshed analysis to identify where project facilities could be visible from areas of high visual sensitivity. Viewer concern is described as high for scenic areas or travel corridors. As discussed in the AFC, other factors considered in an assessment of existing visual conditions include visibility of an object (e.g., the HBEP site), number of viewers, and duration of view.

The City of Huntington Beach General Plan designates the segment of the Pacific Coast Highway (PCH) through its planning area as a "major urban scenic corridor." The Circulation Element of the City's General Plan includes policies on maintaining and enhancing the visual quality and scenic views along designated scenic corridors (City of Huntington Beach 1996a). The Urban Design Element includes objectives and policies to avoid visual impairment of the City's coastal corridors and entry nodes (City of Huntington Beach 1996b).

Section 5.12.1.1.2 of the AFC, "Pacific Coast Highway (State Highway 1)," states that "traffic volumes along PCH in the vicinity of the HBEP site average from 33,000 to 42,000 vehicles per day." Similar to the existing Huntington Beach Generating Station, the proposed project would be highly visible from the PCH for southbound and northbound motorists. Staff observes that the AFC does not include a KOP from anywhere along the PCH to represent views for motorists from this coastal highway. Considering the high traffic volume and predicted high viewer concern for views along the coast, a view from the PCH is necessary to adequately assess the potential effects of the proposed project on visual resources.

Data Request

95. Please prepare and submit a new KOP from the PCH to evaluate the potential visual effects of the proposed project on highway motorists. As depicted in **Visual Resources – Figure 1** (attached), this KOP should be located to show the clearest possible view of the HBEP site from northbound PCH at Brookhurst Street, which is identified by the City of Huntington Beach as a gateway and entry node to the city. A photograph showing existing visual conditions and a visual simulation should be prepared and submitted for the new KOP in the same format as the other KOPs in the AFC for the proposed project.

Background

Figure 5.13-1b of the AFC, "Project Viewshed," shows the viewpoints, KOP locations, and values (i.e., comparative visibility of proposed HBEP structures) for the project viewshed. An extensive area northwest of the HBEP site is part of a larger area with the highest viewshed value; five or six of the project stacks could potentially be visible from this area, which is developed with residential uses. The elevation increases gradually northwest of the project site and continues to increase beyond the 1-mile visual sphere of influence (VSOI) shown on Figure 5.13-1b to a group of ridgelines. These ridgelines correspond to the lower edge of the "bluff areas" shown in the Coastal Element of the

City's General Plan (City of Huntington Beach 2011, Figure C-17). The Coastal Element includes objectives and policies addressing protection of the scenic and visual qualities of resources, including preservation of public views to and from the bluffs. Staff confirmed during a December 2012 site visit that the Huntington Beach Generating Station is potentially visible from the area northwest of the site. Staff directly observed that the project site is clearly visible from the residential area along Frankfort Avenue near Hill Street, which is about 1½ miles from the HBEP site.

Data Requests

96. Please prepare and submit a new KOP from Frankfort Avenue depicting the potential visual effects of the proposed project on residents northwest of the HBEP site. **Visual Resources – Figure 1** shows a viewpoint from Frankfort Avenue. Staff requests that the selected viewpoint for this KOP show the clearest possible view of the HBEP site from the north side of Frankfort Avenue near Hill Street or the entrance to the Huntington Shorecliffs Mobile Home Park. A photograph showing existing visual conditions and a visual simulation should be prepared and submitted for the new KOP in the same format as the other KOPs in the AFC for the proposed project.

Background

The project applicant submitted a supplemental data response to data request #68 (TN #68849), which includes Figure 5.13-1a R2, "Project Site and Locations of Viewpoints and KOPs," and Figure 5.13-1b R2, "Project Viewshed." Staff intends to use these figures in the preliminary staff assessment, but with an altered VSOI area.

Data Requests

97. Please provide the geographic information system shape files for the corrected versions of Figures 5.13-1a and 5.13-1b.

Background

Section 5.13.4 of the AFC, "Mitigation Measures," states that the proposed project "would slightly increase the overall visual quality. Therefore, the project will not result in a significant visual impact and visual resource mitigation measures are not required for HBEP because the visual impacts are at a less-than-significant level." Staff does not consider this to be a valid conclusion given the location of the proposed HBEP in the Coastal Zone; the high visual sensitivity of the project area in general; and the many local and state laws, ordinances, regulations, and standards (LORS) intended to protect and enhance visual resources in the Coastal Zone. Section 30001.5 of the California Coastal Act of 1976 includes a declaration to "protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources."

Section 5.13.2.5 of the AFC, "Impact Significance," states that "the presence of the Huntington Beach Generating Station is already considered [to] be a visual issue in the Coastal Zone of the City of Huntington Beach. The project will represent a slight improvement over the existing visual quality of the project area ..." This subsection of the AFC concludes that "the project's visual impacts will be generally positive and less than significant." The project applicant's analysis implies that an existing *visual issue* at the project site would persist with construction and operation of HBEP. The visual issue

is the existence of an enormous power plant on the state's coastline in an area that is otherwise primarily developed with residential, recreational, open space, and tourist-oriented uses. No basis is provided in applicable LORS to conclude that a new, visually prominent, electrical power plant would not be subject to requirements to improve visual quality in the Coastal Zone. Slight improvements to visual quality from installation of new, massive equipment with an industrial character would not substitute for implementation of mitigation measures to reduce potential impacts on visual resources and ensure compliance with LORS pertaining to new development in the Coastal Zone.

Staff has reviewed LORS administered by the City of Huntington Beach and preliminarily identified those that are applicable to the proposed project for protection and enhancement of visual resources and the aesthetic environment. Staff has also reviewed the *City of Huntington Beach Comments Regarding Huntington Beach Energy Project* (TN #68804), which states that "the extremely important view of the energy facility from valuable coastal resources requires improvement." City staff agrees that the modern components and new facilities under the proposed project would be a "general improvement," but also states that "it is significant that the four units and two towers are being replaced by two large power blocks and six towers with no additional screening, landscaping, or unique architectural treatment ..."

Section 5.13.5.1.1 of the AFC, "California Coastal Act," cites Section 30251 of the law, which states, in part: "*Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.*"

Energy Commission staff is addressing the environmental effects of expanding, retooling, and modernizing other existing, decades-old power plants in the state's coastal areas, including the El Segundo Power Redevelopment Project (00-AFC-14) along the Santa Monica Bay coastline. Approved visual resources conditions of certification for that project have included preparation of a Comprehensive Visual Enhancement Plan to address architectural treatment, landscape plantings, surface treatment, lighting, and other measures to enhance public views of the facility. The project applicant has not yet proposed any mitigation measures to restore or enhance visual quality at the HBEP site, and assuming none are needed would be inconsistent with the intent of applicable state and local LORS. Staff needs to determine what mitigation measures may be feasible to reduce visual impacts of the HBEP site and achieve consistency with LORS.

Data Requests

98. Please prepare and submit a concept for a visual enhancement plan consistent with LORS for protection and enhancement of visual and aesthetic resources. The conceptual plan should include, at a minimum, proposals for screening facilities from public viewing areas (e.g., Huntington State Beach, the PCH, and Magnolia Marsh) during project construction and operation and improving views of project features and structures. Please discuss potential colors, methods, and architectural screening concepts that could achieve a degree of visual harmony with the proposed project's location in the Coastal Zone. Staff requests that the conceptual plan

address these potential site and facility improvements for screening and enhancing public views of the site:

- A. Screening of the HBEP site during project construction phases, including suggested screening materials and heights of screening fences.
- B. Permanent decorative wall to replace the chain-link fence along the HBEP site perimeter, including suggested construction materials and wall height.³
- C. Potential locations to enhance existing landscape plantings and install new plantings.
- D. Potential alternatives to painting power plant structures, "flat gray," as specified in Table 5.13-1. The visual quality of bulky, geometric industrial-type structures is not necessarily improved by painting the conglomerated structures in the same continuous color of flat gray. The visibility of such structures would not necessarily be reduced.
- E. Architectural screening of all prominent industrial equipment that would be visible from public viewing areas, including suggestions for types of screening that could be available to enhance the visual appearance of the equipment (e.g., panels, unique metal screen or mesh façade, louvers, etc.).

Sources

- City of Huntington Beach 1996a — *City of Huntington Beach General Plan. Circulation Element*. Pages III-CE-26 to 30. Available:
<<http://www.huntingtonbeachca.gov/Government/Departments/Planning/gp/index.cfm>>. Accessed November 30, 2012.
- 1996b — *City of Huntington Beach General Plan. Urban Design Element*. Pages II-UD-3 to 7, 9, 10, 15, 16, and 27. Available:
<<http://www.huntingtonbeachca.gov/Government/Departments/Planning/gp/index.cfm>>. Accessed November 28, 2012.
- 2011 — *City of Huntington Beach General Plan. Coastal Element*. Adopted by the Huntington Beach City Council November 15, 1999; certified by the California Coastal Commission June 14, 2001; became effective November 13, 2001; reflects amendments through October 26, 2011. Pages IV-C-64, 67, 69, 80 to 82, 118 to 122, 131, and 135. Available:
<<http://www.huntingtonbeachca.gov/Government/Departments/Planning/gp/index.cfm>>. Accessed November 28, 2012.

³ Because of the multi-year construction phases that would be required for HBEP, installation of a permanent or semi-permanent visual screening wall could be necessary prior to site mobilization along portions of the site boundary near visually sensitive land uses (e.g., Magnolia Marsh).

VISUAL RESOURCES - FIGURE 1
Huntington Beach Energy Project - New Key Observation Points



VISUAL RESOURCES



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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**APPLICATION FOR CERTIFICATION FOR THE
HUNTINGTON BEACH ENERGY PROJECT**

Docket No. 12-AFC-02
(Revised 10/08/12)

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DECLARATION OF SERVICE

I, Diane L. Scott declare that on December 20, 2012, I served and filed a copy of the attached HUNTINGTON BEACH ENERGY PROJECT (HBEP) (12-AFC-02) Staff's Data Requests, 73 through 98, dated December 20, 2012. 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/huntington_beach_energy/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 marked **"hard copy required"** or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

- by sending one 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. 12-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

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
michael.levy@energy.ca.gov

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.



Diane L. Scott, *Project Assistant*
Siting, Transmission and Environmental Protection Division