



R. Rex Parris Mayor
Ronald D. Smith Vice Mayor
Ken Mann Council Member
Sherry Marquez Council Member
Ed Sileo Council Member
Mark V. Bozigian City Manager

September 5, 2008

California Energy Commission
John Kessler, Project Manager
1516 9th Street, MS-15
Sacramento, CA 95814

DOCKET	
08-AFC-9	
DATE	SEP 05 2008
RECD.	SEP 05 2008

Re: Palmdale Hybrid Power Project, Application for Certification (08-AFC-9)

Dear Mr. John Kessler,

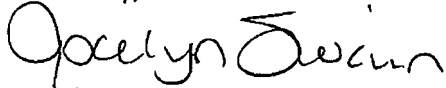
The City of Lancaster appreciates the opportunity to provide input on the Application for Certification for the Palmdale Hybrid Power Project and offers the following comments for consideration.

1. The related projects list identified on pages 5.1-2 and 5.1-3 appears to be incomplete. Only two projects were identified within the City of Lancaster. However, there are many other projects within the three mile radius within the City of Lancaster that are currently undergoing review. Information regarding related projects was provided to the consultant working on the application but does not appear to have been incorporated.
2. Appendix C3, Section 2.2 refers to UBC but the current adopted code is the ICC.
3. Although it does not specifically call out anywhere in the document, the City of Lancaster's recycled water system is the proposed backup system for cooling and make-up water. Palmdale should have a will-serve letter from Lancaster for this purpose but they have not requested such.
4. Are the identified parcels for the project site currently annexed into Waterworks 40 for potable water service? Palmdale obtained a letter from the County in which it is agreed that recycled water from the Waterworks distribution system conditionally will be made available. They should also have a will serve letter for the potable water use.
5. The document says they will use recycled water for dust control and implies that it will be used for construction but there will not be a service pipeline near enough to provide the flows they are projecting for construction. At up to 650,000 gallons per day, this is a significant amount of water if potable water supplies are used and would have a detrimental impact on existing water users in Lancaster.
6. The title for 4.2.2.1 includes "... Backup Cooling/Process Water ..." but does not describe or even mention alternatives considered such as deep aquifer groundwater (arsenic contaminated) or the possibility of using the deep aquifer as a ground source reverse heat pump. In fact, in this paragraph says nothing about the backup water.

7. Section 4.3.1 pertaining to cooling technologies alternatives assumes \$200 per acre foot for recycled water. The accompanying Table – using this number – infers that 5,250 acre feet of water will be used annually for cooling and makeup water which is far more than is identified elsewhere in the document. Because of the already severe water supply shortfall in the Valley, and because the recycled water can be recharged to the aquifer for later potable use, the cost per acre foot for recycled water should be the dollar figure associated within purchasing and importing water through the State Water Project. In our situation, the recycled water should be used primarily in substitution for current potable water uses not for new large uses such as this project. This is supported by what is expected to result from the currently underway lawsuit that would limit and allocate groundwater production for municipal and industrial uses to a significantly reduced volume. The recycled water will be needed to offset what is lost through the litigation process.
8. The primary cooling technologies alternatives includes three options but really only compares the two extremes. Table 4-1 should also address the Wet-Dry Hybrid alternative which would use less water – thereby helping the overall Valley water supply situation. There is only a \$535,000 (approx.) difference between the operating costs of the two extremes. The Hybrid cooling system would appear to be superior to either of the extreme options but that cannot be determined in the absence of comparative information.
9. The document says the FAA is interested only if the structures height exceeds 200 feet above the surface. This seems to be inconsistent with what we were being told by the County when e-Solar was first looking at the 60th West and Avenue F site for their smaller profile power generating plant. The City is concerned about the potential for crash into the gas fired combustion turbine generators and the extent such a catastrophe would have on the surrounding properties should the large diameter gas pipeline be ruptured and ignited. The site for this plant is immediately adjacent to the runway from Plant 42 as seen on Figure 2-1 and 2-3b. This seems to be an area of considerable crash hazard.
10. Chapter 5.13 ignores the shared right-of-way along Avenue M and the jurisdictional interest and authority of the City of Lancaster for the northerly half of the street. This section also identifies Sierra Highway and 10th Street West, as well as Avenue M as being primary access routes to the site but it gives no attention to Lancaster's jurisdictional interest concerning the traffic level of service (LOS) as it does to Palmdale's or the LA County planning guidelines.

Please contact me if you have any questions. I can be reached at jswain@cityoflancasterca.org or 661-723-6100.

Sincerely,



Jocelyn Swain

Associate Planner - Environmental