

DOCKETED

Docket Number:	12-AFC-03
Project Title:	Redondo Beach Energy Project
TN #:	200515
Document Title:	Jim Light Comments: Inaccurate/Misleading Statements by AES Supporters
Description:	N/A
Filer:	System
Organization:	Jim Light
Submitter Role:	Public
Submission Date:	9/18/2013 8:04:13 AM
Docketed Date:	9/18/2013

Comment Received From: Jim Light

Submitted On: 9/18/2013

Docket Number: 12-AFC-03

Inaccurate/Misleading Statements by AES Supporters

To the CEC Commissioners considering AES' application for a new plant in Redondo Beach:

My house does not have a view of the power plant and it is over a mile south – not upwind of the plant. I have no vested interest or conflict in deriving my position on the power plant.

I oppose a new power plant at the Redondo Beach site because of its negative fiscal, health, and environmental impacts combined with the evidence that power from this site is neither needed nor effective in meeting future power needs – even with San Onofre retired.

Upon reading the comments supporting a new AES power plant there are a number of misrepresentations that warrant correction:

- 1) At least one of the commenters is a paid consultant of AES who passed himself off as a mere resident without revealing his obvious conflict of interest.
- 2) Many proponents state that opponents are a vocal minority. The recent Measure A vote on rezoning the power plant for uses other than a power plant narrowly failed by just 258 votes out of nearly 13,000 total votes. At the very worst this shows the town is divided over the power plant, hardly the mere “vocal minority” some proponents have misconstrued. However, if you examine the stated opposition to Measure A it becomes clear that the vote is low water mark of power plant opposition. None of the ads from AES stated we need the power; rather, they all centered around the negative impacts of proposed park zoning and the mix of uses in Measure A, the unsubstantiated claims of fiscal impacts, and the repeated threat of an AES lawsuit that would bankrupt the city. Clearly many residents voted against Measure A not because they support a new power plant but rather due to the fears promulgated this shameless, unsubstantiated \$500K campaign by AES. The City Council voted to oppose a new power plant as they understand most residents and voters would prefer it gone altogether.
- 3) The Chamber and labor proponents of the new power plant inaccurately state the new power plant would benefit the city revenues. This is contradicted by studies conducted by the city and the current tax laws of Redondo. Any development would garner some short term increases in city revenues... but the long term revenue impact of a power plant is poor. AES contributes less than \$400K to city revenues each year for 52 acres of waterfront property. This is the poorest return for any 52 acres in the city. Redondo does not charge the plant Utility Users Tax. So running the plant more will not increase revenues. On top of that, City studies and reports demonstrate that the power plant has a significant blighting impact on the harbor area. The reports show that residential and commercial property values are depressed by 40% and harbor area business revenues grew at just 1/10th of 1 percent of the growth rate experienced in other areas of the city. The reports conclude the impact is due to the power plant and deem it the “major blighting influence” in the harbor area. But Commissioners need not rely on a City of Redondo report - just look at an aerial view of the site. What other beach city in the South Bay has mini-storage and a top soil businesses just two blocks from the beach? The negative fiscal impacts of the power plant are blatantly obvious to anyone driving through the area. In the end, the new plant will employ just 21 people, a 58% decrease in employment from the current plant. The power plant negatively impacts property values and business and city revenues.
- 4) Many of the supporters state the new plant will run cleaner. While this may be true, the new plant will run more based on AES' application and their testimony to Redondo Beach City Council. Based on the lowest run rate

projected by AES, the new plant will increase particulate pollution by more than 12 tons each year OVER what the current plan has produced in recent years. But even more damning, a city report concludes that siting a plant at the Redondo site over AES sites at Alamitos and/or Huntington represents more overall pollution to the LA basin as the Redondo site is not as effective at meeting the projected needs caused by the retirement of San Onofre. In other words, to meet the demands caused by the San Onofre shutdown, a plant at the Redondo site would have to run at higher capacity than one at Alamitos or Huntington due to line loss. And this higher capacity run rate equates to more pollution overall in the LA basin than is required.

5) Many proponents cite the need for power without any substantiation. California Coastal Conservancy, ISO, and City of Redondo studies all show these statements are inaccurate and that in fact power is not needed from the Redondo site at all through as far as the ISO has projected – 2022. And as we see each year, the ISO needs assessments are substantially downgraded over time proving their methods are over conservative. Three new power plants have come on line this year in the LA basin further reducing any requirement for a plant at Redondo. Numbers from your agency have shown that through June 2013, the AES plant at Redondo has produced a less than 0.05% of its capacity. This is the lowest six month number reported in the CEC database for this plant. Clearly, this plant is not required for grid reliability.

AES is getting greedy and they have waged a huge, deceptive public campaign to garner resident support. Their plan eliminates any real land buffer between their new plant and the high density residential, office, and commercial development just east of their property line – the direction of the prevailing winds. Their report inaccurately understates Redondo noise regulations and still predicts they may not be able to meet them. AES only commits to do what is “feasible” to try to correct any violations after the plant is built. “Feasible” is a very subjective measure. I sincerely doubt they would agree to shut down or move their new plant if they discover they exceed noise ordinances after it is built. Other than their motive to reuse most of their land for other monetary gain, why would AES eliminate what little buffer their small, tightly surrounded property could provide? In fact, their plan to add development to this site will only move incompatible uses closer to the plant and further eliminate buffer between the plant and commercial, recreational, office and residential land uses. AES’ plan is more impactful than their current site configuration. This is pure greed on AES’ part at the expense of Redondo residents, visitors, and businesses.

AES’ environmental analyses conveniently ignore more environmentally sound alternatives at their other sites. And AES’ air pollution analysis ignores photographic evidence that the plume from the current stacks (which are about 100 feet higher than their proposed plant’s stacks) still blow downward into local neighborhoods during normal onshore wind conditions.

When one considers all the evidence – the documented impacts; the small site completely and tightly surrounded by high density residential, office, commercial, and recreational uses on ALL sides; the reduction of any buffer represented by their current plan; the low run rate even without San Onofre; the corroborating state and city analyses demonstrating the plant is not needed; the availability of better and more effective sites with less overall environmental and fiscal impact; and the recent completion of three brand new gas fire dpower plants - it is clear that the only reasonable decision is to deny AES’ application.

As our representatives, I beg each Commissioner consider the overwhelming evidence available that shows this site is not the right place for a new power plant and deny AES’ application. Alternative AES sites are available that are far more effective in serving projected future power needs with far less environmental and fiscal impact. By any objective measure, this is the wrong place to approve a new power plant.

Respectfully,

Jim Light
Redondo Resident

