

## DOCKETED

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## **NOISE and ALTERNATIVES**

1) Current analysis of the proposed AES plant in Redondo does not address the Redondo noise ordinance that lowers the dB threshold when the sound is a vibration or steady noise over an extended period of time. In these instances, which certainly a running power plant would represent, all noise standards are decreased by 5dB. It would seem from the published analyses, that the projected noise would exceed this lowered threshold. The close proximity to offices, hotel rooms, senior housing demands a conservative assessment of the projected generated noise against Redondo limits. Prudence would dictate that the CEC consider a wider buffer between the eastern property line and the new power plant.

2) The no power plant alternative seems to have been pencil whipped. AES in its own statements during Measure B clearly stated that power generation is not needed from this site in order to meet grid reliability requirements. AES stated other plants at other locations could meet the future need. The CEC should revisit and more thoroughly assess the no project alternative.

3) The moratorium on power plant development and the ordinance change banning power plants that is in the process of being approved should drive the requirement for a needs assessment. While the community has not settled on zoning to replace the power plant, there is a clear record that the community intends to repurpose this site without any power plant provision. In 2004 the City attempted to rezone the property as a Coastal Reserve which would phase out power plant uses. But residents opposed that because the future uses were not specified. In 2005 the residents generated two visions for the area in a city funded and led process. Neither vision included a power plant. Measure G passed in Redondo because it added "parks" as an allowed use on the AES site and made any power plant refurbishment or rebuild a "conditional use". Measure A, which rezoned the power plant site for park and commercial use was only narrowly defeated. This defeat was due to law suit threats by AES and SCE and a \$600K campaign funded entirely by AES. Measure B lost because it was viewed by residents as a money grab by AES, too much development, and not enough public amenities. One thing clear in all the proceedings since 2004, is that the residents of Redondo do not want a new power plant. So the CEC should do a needs assessment based on the moratorium, the demonstrated will of the people, the current zoning that requires a conditional use approval, the stated opposition by the city council by resolution, and the emergency ordinance prohibiting a new plant in process.