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CALIFORNIA ENERGY COMMISSION
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SACRAMENTO, CA 95814-5512
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June 25, 2014

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

Regarding: **ALAMITOS ENERGY CENTER (13-AFC-01)**
DATA REQUESTS SET 2 (Nos. 64-68)

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.

This set of Data Requests (Nos. 64-68) is being made in the technical area of Land Use, and a combined Traffic and Transportation/Worker Safety/Fire Protection. Written responses to the enclosed data requests are due to the Energy Commission staff on or before July 25, 2014.

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 request. 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 (916) 654-5191.

Sincerely,

Original signed by:
Keith Winstead, Siting Project Manager
Siting, Transmission and Environmental
Protection Division

Enclosure (Data Request Packet)
cc: Docket (13-AFC-01)

ALAMITOS ENERGY CENTER
(13-AFC-01)

Energy Commission Staff's Data Requests Set 2 (Nos. 64-68)

June 25, 2014

Technical Area: Land Use
Author: Michael C. Baron

BACKGROUND: LAND USE

While preparing a list of projects to include in a cumulative impacts analysis for the Preliminary Staff Assessment (PSA) for the AEC, staff learned that AES has filed a permit application with the City of Long Beach for a power storage facility adjacent to the AEC project site. From what staff understands, the proposed project is a building (approximately 283,000 gross square feet) that would house a power storage facility using batteries. So that staff can provide accurate information in the PSA and consider the project along with other projects in the cumulative impacts analysis, please provide the following.

DATA REQUESTS

64. Please provide the project name, project description, specific project location, current status, process under which the project is being reviewed/permitted and estimated dates and duration of construction.

Technical Areas: Traffic and Transportation and Worker Safety/Fire Protection
Authors: Jonathan Fong and Alvin Greenberg

BACKGROUND:

The project, as currently proposed, has only one ingress/egress road for site access. This one access point (the main gate off of Studebaker Road) will be the only point where all vehicles and equipment of all sizes and type planned to be used for demolition, construction, and operations will travel through when entering or leaving the site. Since at least one of the laydown areas being proposed is at the southern end of the site, movement from the main gate at the northern end to the southern laydown area will necessarily have to go through the project site.

Staff has several questions about the level of traffic and movement of cars, trucks, heavy construction and demolition equipment, and hazardous materials tankers and trucks through the site during the 10-year period where demolition and construction will occur simultaneously at an active power plant. The site is unique in that it is restricted by the surrounding environment of roads and waterways and thus does not have the ability to expand beyond its present boundaries in order to provide an easy and safe flow of vehicles into, through, or around the site. Access to laydown areas at other power plant construction sites are usually direct from a road; travel though an active power plant site is not usually required. Additionally, the paved paths though this site are not straight but instead jog at regular intervals to avoid existing structures or water inlets and the turns are tight. Staff has concern as to how large trucks carrying large equipment (e.g., turbines) will make their way through the site. Staff is also unclear about exactly where all construction laydown areas will be located, the access into and out of those laydown areas, the use of those laydown areas for storage (however temporary) of construction equipment and materials for the Huntington Beach Energy Project (HBEP), and how the flow of equipment and vehicles will be arranged and controlled throughout the project site.

Staff is concerned with the high volume of oversize truck trips generated by HBEP construction through the operational Alamitos Generating Station (AGS) site. The HBEP applicant's responses to staff data requests indicated that during the demolition and construction period for HBEP, approximately 112 oversize trips would occur from the laydown area at AGS to the HBEP site. (HBEP 2012a- Stoel Rives LLP (tn 68366), Huntington Beach Energy Project (12-AFC-02) Applicant's Responses to Staff's Data Requests, Set 1A (#1-72), November 2012.)

The movement and volume of vehicles and equipment through the project site may result in an unsafe and even dangerous work environment as well as impact the ability of emergency response vehicles to traverse the paved interior roads of the site rapidly and safely during this extended 10-year period. An active power plant should have clear and unfettered access to all locations for the workers and having to "dodge" numerous trucks and heavy equipment on a daily basis raises the risk of collisions and other accidents. This places all workers at an increased risk of injury.

Therefore, staff needs additional information on the construction parking and laydown areas, their locations, uses, duration of use, and travel routes to and from these areas, routes through

the entire site, and alternative routes into, out of, and through the site in order to be able to complete its assessment of the potential for impacts to on-site worker safety and emergency response and off-site traffic and transportation. A second access devoted to emergency response vehicles should be required and staff would like to explore the use of that second access point during demolition and construction to reduce at least some of the traffic that will flow through the entire site from the main gate in the north to the south laydown area. Staff wishes to explore the possibility of providing a second access at the southern end which would allow direct access to the south laydown area.

Additionally, the proposed route for the delivery of hazardous materials during the construction period goes right by the Rosie the Riveter Charter School, an active trade school onsite. The Energy Commission has in the past, at several power plant sites, required the use of alternative routes - for the transportation of bulk liquid or gaseous hazardous materials - that do not travel by schools, hospitals, or other similar sensitive receptor locations. If that is not possible due to other factors (e.g., lack of other roads in a remote area), the Energy Commission has required time-of-day restrictions on deliveries to avoid times when school is in session or when school buses are coming or going. The Energy Commission has also required in certain circumstances when weather is a factor (e.g., heavy fog conditions) escort vehicles or a prohibition of delivery during those weather conditions. Because staff is aware that the school also operates after-hours and thus time-of-day scheduling may prove to be problematic, staff would prefer to have deliveries of bulk liquid hazardous materials occur via a different access point. And if this were accomplished, staff would recommend that all hazardous materials deliveries use that second access point so as to remove any possibility that any hazardous materials spill near the school would impact the students and teachers. (Staff has modeled a potential accident and resultant spill of 19% aqueous ammonia from a tanker while making a turn from Studebaker Road into the main gate and found that the Energy Commission's level of concern of 75 ppm ammonia would indeed be exceeded at the school.)

DATA REQUESTS

65. Please provide a discussion and map of all planned construction parking and laydown areas, their locations, uses, duration of use, alternative routes to and from these areas, and alternative routes through the entire site.

66. Please identify potential alternate routes for any deliveries to the designated laydown area south of the AEC site (including those deliveries designated for the HBEP or any hazardous materials that will be used at the AEC during the construction/demolition period) which avoids the main AEC entrance on Studebaker Road and discuss their feasibility.

67. Please identify the potential and feasibility for a new signalized intersection on Westminster Blvd west of the San Gabriel River along the Plains American Tank Farm property. Please also discuss if additional roadway improvements may be necessary (i.e. left turn pocket eastbound on Westminster Blvd.) as part of the City of Long Beach Public Works Standard Plans.

68. Please discuss the feasibility of a revised Traffic Control Plan (TCP) that would require that all aqueous ammonia deliveries for the AEC project and all deliveries for the HBEP use I-405 (N) to Seal Beach (S) to Westminster Blvd (W), and then entering the Plains American Tank Farm laydown area via a new driveway constructed to City of Long Beach standards.
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