

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-AFC-01
<b>Project Title:</b>	Pecho Energy Storage Center
<b>TN #:</b>	243451
<b>Document Title:</b>	Coastal San Luis Resource Conservation District Comments - on Pecho Energy Storage Center
<b>Description:</b>	N/A
<b>Filer:</b>	Jackie Crabb
<b>Organization:</b>	Coastal San Luis Resource Conservation District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	6/6/2022 4:04:00 PM
<b>Docketed Date:</b>	6/6/2022



## Coastal San Luis Resource Conservation District

1203 Main Street, Suite B, Morro Bay, CA 93442  
805-772-4391 | [www.coastalrcd.org](http://www.coastalrcd.org)

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June 6, 2022

Ms. Lisa Worrall, Project Manager  
California Energy Commission  
Docket No. **21-AFC-01**  
715 P Street  
Sacramento, CA. 95814-5512

### **RE: Comment on Gem and Pecho Joint Proposed Decision by the Coastal San Luis Resource Conservation District**

Dear Ms Worrall:

The Coastal San Luis Resource Conservation District (CSLRCD) has certain concerns over the proposed Pecho Energy Storage Project, proposed for the Chorro Valley near Morro Bay in San Luis Obispo County, California. We believe that these concerns are relevant to the mission of CSLRCD, and they must be properly addressed for the project to move forward. The concerns fall broadly into four categories: setting; flood hazard; loss of prime agricultural land; and property interest of nearby CSLRCD property. Each is addressed below:

**Setting:** The Chorro Valley is an agricultural area, known for its rural character and high scenic value. This value has been recognized by the California Coastal Commission, which has indicated that non-agricultural uses such as the Pecho facility are not appropriate in such a setting. The project sponsors must provide a convincing explanation for why the proposed facility is appropriate in this location and how such use is consistent with the stated goals of the voter-mandated policies of the Coastal Commission.

**Flood Hazard:** The Pecho facility is proposed to be located on the floor of the Chorro Valley, alongside an important coastal stream known as Chorro Creek. This waterway has been known to periodically flood, sometimes in great volume, filling the entire bottomland with water for days. The proposed facility will need to be protected against such flood events, either through construction of levees or by raising the entire site above identified flood levels. This will exacerbate flood potential both upstream and downstream of the site by displacing the storm flow holding capacity of the site. This includes the nearby CSLRCD property downstream of the site. The project sponsors must address this issue and propose satisfactory solutions to this potential transfer of flood potential to neighboring properties.

**Loss of Prime Agricultural Land:** The Pecho project, if approved, will apparently result in the excavation of some 880,000 cubic yards of rock from a site deep underground. The preliminary plan for this material seems to be that it will be stockpiled on the property either temporarily or permanently. This cubic yardage is enough to cover 545 acres of land one foot deep in the excavated material, or to cover 110 acres of land five feet deep. If stockpiled on-site, this material will forever end the high quality nature of the site as Class I and II agricultural

land. Furthermore, this is coastal agricultural land, especially prized for its ability to be farmed all year long with high-value truck crops. Such loss cannot be easily mitigated, but the project sponsors must provide some reasonable mitigation for this loss, however difficult that may be.

**CSLRCD Property Interest and Rights:** CSLRCD is owner and manager of a 130 acre property downstream of the proposed project site. In a letter dated March 14, 2022 (attached), CSLRCD indicated that the property was purchased using Federal grant monies, for the purposes of wetland restoration and storm flow attenuation, and legal agreement enforce those purposes. The Pecho project proposes to cross the property with a new set of power lines. We were never consulted about this aspect of the project, and we find it inconsistent with our purposes and goals for the property. Also, as noted above, the property would be affected in unknown ways by the construction of this facility, particularly as regards flood potential. We therefore request that alternative routes for the power lines from the Pecho site be identified and selected, and a detailed description of the impacts of the changes in storm flow characteristics that would result from the project be addressed.

Regardless of whether the Pecho project is determined to be exempt from the NOI process or not, the project has many significant impacts upon a sensitive and highly valued environmental, ecological, and scenic resource of San Luis Obispo County and indeed of the entire State of California. The concerns described above must be studied and addressed satisfactorily. Thank you for your attention to those concerns.

Sincerely,



Jackie Crabb, District Manager for  
Neil Havlik, PhD., President, Board of Directors

Attachment: Letter of March 14, 2022, from CSLRCD to CEC



## Coastal San Luis Resource Conservation District

1203 Main Street, Suite B, Morro Bay, CA 93442  
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March 14, 2022

Ms. Lisa Worrall, Project Manager  
California Energy Commission  
Docket Unit, MS-4  
Docket No. **21AFC-01**  
715 P Street  
Sacramento, CA 95814-5512

RE: Pecho Energy Storage Center project  
Application for Certification  
2284 Adobe Road  
County of San Luis Obispo unincorporated area

The Coastal San Luis Resource Conservation District (CSLRCD), a special district of the State of California, is the owner of a 128 acre property locally known as Chorro Flats and is located along Quintana Road and South Bay Boulevard, just east of the City of Morro Bay.

Chorro Flats was purchased with public funds in 1991 for the purpose of wetland restoration, continued agriculture, and storm flow and sediment attenuation. The United States Department of Agriculture Natural Resource Conservation Service (NRCS) holds two perpetual restrictive wetland easements covering approximately 83 acres of the Chorro Flats site.

The Pecho Energy Storage Center project proposes, among other matters, to construct a high-voltage transmission line parallel to two existing lines crossing the Chorro Flats property. The existing lines are on utility easements that predate the purchase of the property by CSLRCD. Portions of both utility easements cross portions of the wetland easements. Any new line would need to be on a new, separate utility easement. This may require subordination of the existing wetland easements, and would need to demonstrate a compelling public need for that alignment.

We believe that any new transmission lines would be inimical to the purposes for which the property was purchased, and problematic for any future wetland expansion that our District might wish to undertake at the site. For these reasons we strongly urge that an alternative route for the proposed power line be considered.

Thank you for the opportunity to provide this information and consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Neil Havlik".

Neil Havlik, President, Board of Directors  
Coastal San Luis Resource Conservation District