

**DOCKETED**

<b>Docket Number:</b>	22-SPPE-01
<b>Project Title:</b>	Bowers Backup Generating Facility
<b>TN #:</b>	249857
<b>Document Title:</b>	Josh Montemayor Comments - Cumulative impact of adjacent backup generating facilities
<b>Description:</b>	N/A
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<b>Organization:</b>	Josh Montemayor
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*Comment Received From: Josh Montemayor*  
*Submitted On: 4/24/2023*  
*Docket Number: 22-SPPE-01*

**Cumulative impact of adjacent backup generating facilities**

Attachment: "Cumulative\_Impact\_Adjacent\_Facilities.pdf"

*Additional submitted attachment is included below.*

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24th April 2023

To: Ms. Ann Crisp  
Senior Environmental Planner  
California Energy Commission (CEC)

**Re: Cumulative impact of adjacent backup generating facilities**

Dear Ms. Crisp,

I would like to express my concern about the cumulative impact of approving adjacent backup generating facilities.

Late last year, the CEC approved a Small Power Plant Exemption (SPPE) for the “CA3 (Vantage) Backup Generating Facility” - a 96MW capable facility consisting of forty-four (44) diesel fired generators. Now, on the adjacent lot, there is a proposal to develop the “Bowers Backup Generating Facility” - a 72MW capable facility consisting of thirty-two (32) diesel fired generators.

Together, that would be a total of seventy-six (76) diesel fired generators producing up to 168MW. Keep in mind, these 2 sites are next to each other. To the neighboring residential community, it's the cumulative impact of these 2 sites together that are of concern. Had a single SPPE been filed for a 168MW / 76 generator facility, that would likely have exceeded what an SPPE is meant to cover (up to 100MW). However, this is essentially what approving 2 small power plant projects next to each other equates to.

As highlighted by the Air District's (BAAQMD) letter on the Docket dated 3/10/2023, this project is in an area already impacted by air pollution. On top of that, there is the recently approved CA3 facility on the adjacent lot.

I hope you will consider the aggregate impact of all these factors to the neighboring residents when assessing the latest SPPE proposal.

Sincerely,

Josh Montemayor  
Resident, Bracher Park community