

## DOCKETED

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<b>Project Title:</b>	Hydrogen Energy Center Application for Certification Amendment
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*Comment Received From: Marion Vargas*

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## **HECA Application Concerns: Response to Traffic Study Technical Memorandum (Revision 2) dated August 1, 2013**

3209 La Cresta Drive

Bakersfield, CA 93305

August 11, 2013

Mr. John Heiser

California Energy Commission

1516 9th Street (MS-40)

Sacramento, CA 95814-5512

Re: HECA Application/Response to Traffic Study Technical Memorandum (Revision 2) dated August 1, 2013

Dear Mr. Heiser,

In reviewing the Traffic Study submitted by the applicant's representative on August 1, 2013, I was concerned to read information that is contrary to what is stated on the HECA website:

<http://hydrogenenergycalifornia.com/factsheets> on the "Economic Benefits of the HECA Project".

On page 33, in Section 4.2 , Project Operation Trip Generation, the Traffic Study states: "During Project operations, 154 workers are anticipated to access the site on a daily basis..." This number is repeated in Tables 4-2 and 4-3, indicating that this would generate a maximum of 308 twoway trips.

Referencing the Fact Sheet from the HECA website, Economic Benefits of the HECA Project, it lists: "200 permanent jobs at the Project site during operation". Two hundred employees would generate 400 two way trips, not the 308 indicated! Whatever the number is, it should be the same on the traffic study and the website. Can your staff request a clarification?

It is not realistic to assume that workers will necessarily carpool to the work site. However, this is exactly what the Traffic Study that was prepared by the applicant's representative does on page 32 in Section 4.1 and in Table 4-1. In the fine print, under Notes: "1. Note that 2.0 passenger occupancy per vehicle was assumed to account for the carpooling of approximately 2,461 workers conservatively analyzed during the peak construction month, yielding 1,230 vehicles for the construction workers..."

What is there to substantiate that the 2,461 construction workers will be amenable to carpooling? Is there any data in the general population or that of construction workers showing that they actually do car pool to that extent? This does not seem to be a realistic nor truthful analysis.

Thank you for the work that you and your staff are doing to carefully review the HECA Project application and its claims. It has been touted as a good thing for California, but just saying that does not make it so. The negative impacts of the project are immense and mitigation cannot sufficiently ameliorate those effects.

Sincerely,

Marion D. Vargas