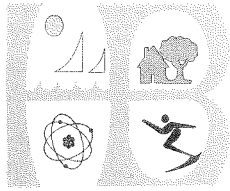


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June 26, 2014

Ms. Felicia Miller
California Energy Commission
Siting Project Manager
1516 Ninth Street,
Sacramento, CA 95814

**SUBJECT: CITY OF HUNTINGTON BEACH COMMENTS REGARDING
FINAL STAFF ASSESSMENT FOR
HUNTINGTON BEACH ENERGY PROJECT
DOCKET NO. 12-AFC-02**

Dear Ms Miller:

In a letter dated June 6, 2014, the California Energy Commission requested the City of Huntington Beach to conduct a review of the Final Staff Assessment (FSA) for the proposed Huntington Beach Energy Project. We appreciate the opportunity to review the FSA. The proposed project is a request to replace the existing AES power generating station with a natural gas-fired, combined cycle, air-cooled, 939-megawatt (MW) electrical generating facility on the 28.6 acre facility. HBEP would consist of two independently operating, three-on-one, combined-cycle gas turbine power blocks. Each power block will consist of three natural gas-fired combustion turbine generators, three supplemental fired heat recovery steam generators, one steam turbine generator, an air-cooled condenser, and related ancillary equipment. The City's comments on the FSA are as follows:

Hazardous Materials and Handling:

1. Although the FSA indicates that the proposed project will comply with LORS, the Fire Department requires verification that City Specification 401 Minimum Standards for Fire Apparatus Access will be met.

Noise:

1. It remains unclear whether the proposed construction hours are beyond the City's limitations on construction activities. The City of Huntington Beach Municipal Code Section 8.40.090 and typical conditions of approval on development projects limit construction hours to the following: Construction shall be limited to Monday – Saturday 7:00 AM to 8:00 PM. Construction shall be prohibited Sundays and Federal holidays. The project should comply with LORS in this regard. NOISE-6 appears to address hours for only "heavy equipment

operation and noisy construction work.” The City acknowledges the anticipated need for occasional nighttime activity due to critical construction needs (concrete pours) and mitigation measures should reduce potential impacts to sensitive receptors to the maximum extent feasible. The Proposed Conditions for Certification should be revised to strictly limit nighttime activity and should specify that no construction staging, warm-up activity, arrival of construction workers at off-site parking facilities, on-site, or queuing outside the facility, should begin before 7:00 AM.

2. The City of Huntington Beach uses the industry standard that a less than 3dBA increase in noise levels is generally not discernible to the human ear and therefore results in less-than-significant impacts. Noise increases of more than 3 dBA are considered significant impacts. On Page 4.6-5 and Page 4.6-18, the FSA states that CEC “staff considers an increase of up to 5 dBA to be less-than-significant.” The FSA should analyze and utilize the same standards as the City of Huntington Beach and the Proposed Conditions of Certification should be revised accordingly for Operations at the proposed facility to protect nearby sensitive residential uses from noise impacts.

Traffic and Transportation:

1. Page 4.10.7 – The second column of Table 3 references seconds of delay rather than the volume/capacity ratio (used in ICU methodology) for Level of Service determination.
2. Page 4.10.8 – The first paragraph shall clarify that the intersections analyzed on Pacific Coast Highway also fall under Caltrans jurisdiction and are subject to Caltrans Level of Service criteria.
3. Page 4.10.8 - Correct the City of Huntington Beach General Plan Circulation Element Level of Service standards for the analyzed intersections: LOS C for secondary intersections (Hamilton/Newland), LOS D for principal intersections (PCH/Newland, PCH/Brookhurst, PCH/Magnolia).
4. Page 4.10-10 – Footnote 3 and 4 for Table 4 regarding the AM and PM peak hour is not correct. Footnote 3 should read: “The AM peak hour is between 7:00 AM – 9:00 AM”. Footnote 4 should read: “The PM peak hour is between 4:00 PM – 6:00 PM”.
5. Page 4.10-10 & 11 – Table 5 and Table 6. The City of Huntington Beach uses Intersection Capacity Utilization (ICU) as the methodology for determining the Level of Service at signalized intersections not delay (HCM Methodology). Additionally, the difference between Table 5 and Table 6 is not clear. Both Table 5 and Table 6 are labeled “Affected Intersections: PM Peak Hour Trips and LOS during Peak Construction”. Is Table 5 actually the existing condition (no project) LOS values?
6. Page 4.10-11 – Implementation of TRANS-3 as stated in the first paragraph is not an appropriate measure to mitigate the traffic conditions at Beach Blvd/PCH and Brookhurst/PCH. TRANS-3, as described on page 4.10-23, only mentions construction parking, transportation permits, and emergency access.

7. Page 4.10-13 – First paragraph reads that the project’s construction would result in less than significant impacts to traffic and transportation system, however, on page 4.10-11 Table 6, impacts are identified at two locations. This paragraph shall clarify that measures are recommended to be implemented to bring the identified impacts to a less than significant level.
8. Page 4.10-16 – Cumulative Traffic Impacts. This section only describes how the cumulative projects identified on Table 9 mitigated their traffic related impacts specifically for their individual projects. It is not an actual cumulative analysis. A cumulative analysis involves including the proposed project’s traffic (at some relevant future year) with the cumulative projects traffic to determine what impacts result, and the proposed project’s contributions to any identified impacts. Since (1) the construction traffic is temporary, and (2) the operation of the new facility is not anticipated to generate new vehicle trips (the project after construction will not generate additional trips than what is exists today) is this section relevant? The cumulative traffic analysis that may be considered is cumulative projects + peak construction. For this analysis the peak construction year is needed to determine what cumulative projects to include in the examination.

Thank you for the opportunity to review and provide staff comments on this important project in the City of Huntington Beach. We are committed to participating in the CEC processing of the application to ensure a high quality outcome for the citizens of Huntington Beach. Please do not hesitate to me at 714-536-5596 if you have any questions or need any additional information.

Sincerely,



Jane James
Planning Manger

cc: Fred Wilson, City Manager
Ken Domer, Assistant City Manager
Scott Hess, Director of Planning and Building
Bill Reardon, Fire Battalion Chief
Joe Morelli, Fire Protection Analyst
Debbie DeBow, Principal Civil Engineer
Steve Bogart, Senior Civil Engineer
Darren Sam, Transportation Division
Mark Carnahan, Permit and Plan Check Manager
Kelly Rodriguez, Police Lieutenant
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