

## DOCKETED

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*Comment Received From: Richard Allen Rudman*

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**In Re: Mission Rock Peaker Plant (MREC)**

*Additional submitted attachment is included below.*

March 29, 2016

In Re: Mission Rock Peaker Plant (MREC)

## I. The Case For Building the Plant is Incomplete and Flawed

1. The case being made to build the Mission Rock Peaker Plant has serious deficiencies that must be corrected before an intelligent decision can be made on going forth with this project. Making matters worse, based on what is known now, a rigorous review of the environmental impact calls into question the wisdom of locating such a plant in what is predominately a small agricultural and residential community with the potential to become a valuable County asset as a tourist destination.

## II. A Catalog of the Submission's Deficiencies

1. There is nothing in the present submission showing the precise location and design of the proposed new gas line to SoCal Gas, the new high tension connection to Edison and the new pipeline to the Limoneira recycled water plant. These "missing links" must be clearly shown in the submission in order to properly assess the health, environment, architectural and aesthetic impact to those in and near the proposed project site, not to mention impact on property values.
2. The affected public needs to know where these lines pass over public/private land, what right-of-ways will be impacted and what permissions must be obtained. The plans should show if these lines are proposed to be above ground, underground, or some combination. A 3-D walk-through visual must be a required as an addition to the submission to indicate the height above ground for each above ground project element on and off the property.
3. The proponent must clearly indicate all the details of the proposed connection to the water discharge pipeline formerly used by the Santa Clara Waste Water company. This critical information has to date not been clearly shown on any submission.

4. The public does not yet know if any agency has certified the use of such pipeline for use by the Mission Rock Energy project, information key to making an informed decision.
5. Proponent must create a diagram showing the relation of the proposed plant to the Santa Clara River. A submission must also be added detailing what precautions will be put in place to prevent river contamination by chemical contaminants or debris of any sort during construction and ongoing.
6. A serious deficiency in the submission is that there is no simulation showing the view of the plant at night from Route 126 and Foothill road, cited in the APC. Those in and near the proposed plant with view property are concerned about light pollution that would adversely impact property values, not to mention resident's enjoyment of views of the hillsides and night skies.
7. The calculation for particulate matter must be shown using a base of just the days which the plant will be operating and not averaged over 365 days a year. We know this calculation cannot be made until the percent peaking is negotiated, but the project cannot be approved without truthfully and completely nailing down the particulate matter calculation that is now seriously skewed by yearly averaging.
8. As alluded to above, the entire project must be presented as a 3-D simulation with walk-through capability so that the proposed plant can be viewed from any angle, day or night.
9. This proposal bid is "speculative" and must be put on hold until the proposed project can be analyzed pursuant to a real energy need.

Respectfully submitted,

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