

## DOCKETED

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*Comment Received From: Mary Ann Krause, AICP*

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## **Problems with Mission Rock Road Alternative Site**

Mary Ann Krause, AICP

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Date: April 1, 2016

To: California Public Utilities Commission

Re: 15-AFC-01

Submitted via email

Dear Commissioners:

I am writing out of concern for the proposed siting of power plants in Ventura County. While the proposed Puente location has major challenges, so do the alternative sites. I have the following specific concerns about the alternative sites in general, and the Mission Rock Road site specifically:

All of the proposed alternative sites are in low income communities of color, namely Oxnard and Santa Paula. Our Ventura County Public Health Department has produced a report showing that children raised in zip codes in Oxnard and Santa Paula have among the lowest life expectancies in the County. These children already have significant exposure to pollution from industry and agriculture. Increasing that exposure worsens an already serious health risk. Since Energy Commission documents indicate that the power generated by a new plant needs to reach the Moorpark station, generating the power closer to Moorpark would result in lower loss of power during transmission, and would also reduce these potential new social justice impacts.

The proposed Mission Rock Road site is in the 100-year flood plain of the Santa Clara River, which is a largely free-flowing watercourse. Levees are strongly discouraged on this river, due to upstream and downstream impacts on existing improvements, as well as impacts on habitat and wildlife. The current use of the power plant site is RV storage, which is an acceptable flood plain use, since there are generally several daysâ€™ warning that the river will flood, and the RVs can be moved out of danger. Unfortunately, a power plant cannot be moved and could sustain severe damage. A recent case in point involving another piece of infrastructure: in 2005 the Santa Paula Airport runway and tie-downs (situated on a bluff overlooking the Santa Clara River), sustained significant damage. The airport was closed for months until the federal government appropriated funds to do emergency repairs and a contractor could be hired to do the work.

The Santa Clara River is home to sensitive, threatened and endangered species. The Nature Conservancy, in cooperation with several other resource agencies and nonprofits, has been actively restoring long stretches of this river, including the stretch adjacent the power plant site, returning it to natural conditions and improving habitat for native birds and wildlife. Thousands of dollars and thousands of hours of volunteer labor have gone into this effort, with substantial results.

The Mission Rock Road site is in an unincorporated County area that has long been neglected by the County, and that neglect has the possibility of negatively impacting power plant operations. The County of Ventura is the permitting authority for uses that exist in this area, but the County has, by almost anyone's measurement, done a very poor job of enforcing conditions imposed on those uses. An important case in point is the Santa Clara Waste Water (SCWW) operation that resulted in an explosion in November of 2014, just a few hundred feet from the proposed power plant site. This event resulted in many injuries, some resulting in permanent disability, and criminal charges against many people in the SCWW operation. Had the proposed power plant been operating during that event, employees would have been forced to evacuate and remain offsite for several days to a week, and some of them likely would have added to the dozens of casualties that were treated at local hospitals for breathing and other problems. Would the employees have been able to do an immediate shutdown of the plant, without further employee injuries? While Santa Clara Waste Water is not currently operating, its permit has not been revoked. It is an unfortunate, and hopefully, extreme example of the types of operations that have been permitted by the County in this area, but which receive little oversight.

Reliability is generally a top priority in power plant permitting. External factors such as adjacent noxious uses and the flood plain location are threats to the reliability of a plant on Mission Rock Road, and should be considered fatal flaws for this site. Additionally, there are very strong social justice concerns that must not be allowed to expand. Please remove the Mission Rock Road site, or request that it be removed, from the list of Alternative sites.

Sincerely,

Mary Ann Krause, AICP

Former Mayor and Councilmember, City of Santa Paula 2002-2006

Former Deputy to County Supervisor Kathy I. Long 1997-2000