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VENTURA COUNTY WATERSHED PROTECTION AGENCY
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
Brian Trushinski – Floodplain Manager (805) 477-1967

M E M O R A N D U M

DATE: April 5, 2016

TO: Mr. Mike Monasmith, Project Manager

FROM: Brian Trushinski, Floodplain Manager

SUBJECT: Mission Rock Energy Center (15-AFC-02): California Energy Commission
1025 Mission Rock Road, Unincorporated Area of Ventura County
APN: 090-0-190-16, 9.79 Acres
Santa Clara River, Zone 2

Pursuant to your request, this office has reviewed the "Request for Agency Participation in the Review of the Mission Rock Energy Center Application for Certification (15-AFC-02)", and offers the following comments relative to floodplain management.

FLOODPLAIN COMMENTS:

The southeasterly half of the subject property is currently mapped in a 'Zone AE' 1% annual chance (100-year) floodplain as determined by the Federal Emergency Management Agency (FEMA). This is evidenced on the effective Flood Insurance Rate Map (FIRM) No.06111C0790E, Panel 0790 of 1275. As per the Ventura County Floodplain Management Ordinance, development that is proposed within the 100-year floodplain is required to comply with certain flood protection standards as conditioned in a Floodplain Development Permit from the County Public Works Agency. The northwesterly portion of the site is mapped in a "Zone X-Shaded" area which is out of the 100-year floodplain and within the 500-year floodplain.

The Project Proponent is hereby advised that the 100-year floodplain limits, flood elevations, and velocities of the Santa Clara River and its main tributaries are currently being studied by FEMA in what is referred to as the Santa Clara Watershed Flood Insurance Study (FIS). The FIS is scheduled to be completed in early 2017 and become effective in the fall of 2017. Based on the latest available technical hydraulic and hydrology modeling and analyses from FEMA, it appears likely that the entire subject property and other surrounding properties will be re-mapped in the 'Zone AE' 100-year floodplain and have higher flooding elevations.

According to the Project Description provided by the California Energy Commission, dated February 11, 2016, the proposed operation would be a natural gas-fired, simple-

cycle power plant comprising five combustion turbine generators (CTG) and with a nominal generating capacity of 255 megawatts. The site would also include the housing of twenty ion battery units for the storage of electricity, providing an additional 25/100 megawatts of nominal capacity for ancillary services. The five GE LM6000 CTGs would be connected to the regional electrical grid through Southern California Edison's Santa Clara Substation via a new 6.6-mile 230-kV transmission line.

Given the significant nature of the proposed operation to both Ventura County and Southern California, District staff considers the plant to be a 'critical facility' and encourages the Project Proponent to plan and develop the site with flood protection as a high design priority. One design option would be for all equipment and utilities, buildings, and other infrastructures to be elevated and flood proofed to a minimum of 1-foot above the anticipated 100-year flood elevation.

A second option would be for the Project Proponent to apply for and obtain a FEMA-approved Conditional Letter of Map Revision Based on Fill (CLOMR-F). A CLOMR-F would need to technically demonstrate that a proposed graded fill pad will elevate all electrical generators and supporting equipment above the future 100-year flood elevation. The graded fill pad must also be designed to minimize scour and surface erosion from floodwaters. The Civil Engineer of Record would need to provide analysis so that there is no adverse impact flooding to adjacent properties from the loss of flood storage that the fill may potentially create. The County Floodplain Manager may require a "No Rise Certificate" to the FEMA designated floodway as part of the Floodplain Development Permit application process. Under this option, the Project would not be able to obtain a Building Permit for improvements until grading fill has been placed and elevations have been certified by the Civil Engineer of Record with the filling of a LOMR-F.

For both options, a County Floodplain Development Permit for commercial/industrial development would be required prior to the issuance of a Grading Permit and/or a Building Permit.

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