

DOCKETED

Docket Number:	15-AFC-02
Project Title:	Mission Rock Energy Center
TN #:	212496
Document Title:	Patricia Kennedy Comments: Proposed Mission Rock Energy Center
Description:	N/A
Filer:	System
Organization:	Patricia Kennedy
Submitter Role:	Public
Submission Date:	7/28/2016 4:10:43 PM
Docketed Date:	7/28/2016

Comment Received From: Patricia Kennedy

Submitted On: 7/28/2016

Docket Number: 15-AFC-02

Proposed Mission Rock Energy Center

After spending a considerable amount of time reading through the Calpine Mission Rock Proposal, the Energy Commission's documents and the letters sent to the Commission for consideration, I find it difficult to believe that this proposal is still under consideration by the California Energy Commission. There are numerous issues that make this project one that should be rejected. Below are some of my concerns, about having this plant built in the greater Santa Paula area. I am a county resident living within 3 miles of the proposed plant, with a direct sight line to then plant itself and the related transmission lines.

The proposed site falls within the 100 and 500 year floodplain of the Santa Clara River defined by FEMA (Federal Emergency Management Agency). Previous flooding events have caused significant damage to resources in the vicinity of the site. This includes destroyed bridges and major damage to the Santa Paula Airport's runway. Raising the construction pad 10 feet does not insure that the plant will be unaffected during an episode of major rainfall and consequent flooding. A further consideration is the extreme danger of electricity potentially being conducted through a river of flood water. Changes in rainfall and resulting flooding due to climate change simply cannot be predicted accurately enough to make building in a flood plain a safe idea.

The proposed site is .3 miles from the Oakridge Fault Line, resulting in the area being geologically unstable. The site is also identified by the USGS (U.S. Geological Survey) as being potentially subject to liquifaction. Because of this, mitigation measures, as defined in the Public Resources Code, Section 2693 (c), will be required. A site map defining the local areas subject to potential liquifaction can be found in the USGS Seismic Hazards Zones maps - Santa Paula quadrangle.

Additionally, Ventura County's air quality exceeds both state and federal air quality standards for ozone according to the Ventura County Air Pollution Control District. The pollutants released by the burning of natural gas at this plant will further contribute to the out of compliance ground level ozone. These elevated levels will increase the risk of significant health issues for Santa Clara River Valley residents, particularly children and the elderly, including an increased risk of pollution related lung diseases such as asthma and emphysema. Because of the location of the plant, it will be very close to "sensitive receptors" which include jail inmates and employees, the students and staff of Briggs School, and Limonera farm workers at their work sites and housing. In the case of the jail, which is only 800 feet from the site, the proposed location violates the minimum 1,500 foot sensitive receptor distance requirement.

Recent natural gas leaks and explosions in the country remind us that they are a reality. Residents of Aliso Canyon are still dealing with the many after effects of the gas leak in their neighborhood. Greater Santa Paula area residents are very familiar with the realities of this type of disaster. We are still dealing with the aftermath of the November 2014 Santa Clara Waste Water (now known as Green Compass Environmental Solutions) chemical explosions and resulting fire which occurred in the same area as the proposed plant site. The explosion site still has not been completely cleaned up and some of the responders to that disaster are still dealing with long term health effects. The fact that the MREC will be storing hazardous waste on site for up to 90 days is of concern. Also of concern is the fact that the MREC will discharge waste water to an adjacent discharge pipe owned by Green Compass. These sites are only about two miles west of Santa Paula city limits. A disaster in this area would not only present a danger to the community, but would also impact Santa Paula fire, police and first responders, as well as the Santa Paula Hospital.

Construction of a gas pipeline and overhead transmission lines, along with the 24/7 lighted facility will have a decidedly negative effect on the scenic value of the Santa Clara River Valley and tourism. The photo documentation of existing visual conditions, from potentially sensitive receptor locations throughout the study area, submitted by Calpine, do not give an accurate picture of the areas to be impacted. The simulation of what the view will look like with MREC in place do not even begin to accurately portray the impact of this project on scenic vistas. Local residents and tourists will be impacted by this eyesore, which will also affect the property values of some in the surrounding area.

The proposed site is also incompatible with the efforts of the Nature Conservancy, in partnership with the State Coastal Conservancy, to establish permanent public ownership of the Santa Clara River Parkway. Both the river corridor and the Ellsworth Barranca contain irreplaceable, invaluable riparian habitat, home to dozens of listed threatened and endangered plant and animal species. In addition to the disruption caused by the actual construction, the light pollution from the 24 hour lit facility will disrupt the cycle of light and dark that governs life sustaining behaviors for both plant and animal species in the area. The noise pollution that this plant will produce is unknown, and Calpine states that several design elements may be necessary to control noise emissions to meet project noise limits. The effects of the added noise and light pollution on wildlife and area residents, other than those immediately adjacent to the plant, have not been evaluated.

Calpine proposes to purchase up to 170 acre feet of recycled water from the Limoneira Company. This is water that should be going back into the Santa Clara River Groundwater basin. Given the extended and ongoing drought conditions in California it is important to not lose water that would normally replenish the groundwater here. Unless otherwise designated by the Los Angeles Regional Water Quality Control Board (RWQBC), all groundwater is considered suitable for municipal, domestic, and agricultural use. Agriculture in the greenbelt area surrounding the proposed site is currently threatened by the possibility of water restrictions due to the ongoing drought. Careful use of our water resources is essential to the survival of area agriculture.

Further, the project area falls within an area designated for limited agricultural use by the county SOAR Initiative (Save Our Open Space and Agricultural Resources) and parts of the project will impact prime agricultural land. The proposed generator tie line corridor will include construction of conductor support structures with excavation of pads and footings, as well as stringing facilities. Existing access roads to the proposed tower pad localities will need to be extended short distances. The line will pass through row crop agricultural areas for 1.6 miles, as well as through some tree farming operations.

The proposed project is also located within the boundaries of the Santa Clara River Rural Historic District. All properties that were found to be eligible for listing on the National Register of historic places in the surveys conducted by the Ventura County Cultural Heritage Board were also determined to be Structures of Merit under the Ventura County Cultural Heritage Ordinance. This designation constitutes a "local register of historical resources" for the purpose of the California Environmental Quality Act (CA Code Regs., tit 14, 15064.5 (a). Consequently these resources should be regarded as historical resources pursuant to CEQA (Pub. resources Code, 21084.1 - SBRA, 1966).

The class G non-towered Santa Paula Airport, which has close to 100,000 flight operations per year, is located just east of the proposed site. FAR (Federal Airport Regulations) 91.199 - Minimum Safe Altitudes dictates height restrictions for flights in class G airspace. It is possible that a pilot could be flying as low as 200 feet above ground level under a cloud layer when approaching the airport, with power structures at the same height. In the past few years there have been three fatalities caused by planes striking standard height power lines. With the addition of additional lines in the area pilots will be at increased risk. The possibility of a hazard for overflight caused by the exhaust plume from the energy center needs to be considered as well.

Executive order 12898 created a Federal Environmental Justice program to address environmental justice in minority

and low income populations. Fair treatment, under this policy, means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportional share of the negative environmental consequences resulting from industrial, municipal and commercial operations.

The Santa Clara River Valley is made up of a large percentage of low income families, including a higher than average number of Latinos and immigrants. The area has been targeted in the past with the placement of the Todd Road Jail and the Toland Landfill, both just outside of city limits in county greenbelt areas, and both having negative impacts on the greater Santa Paula community. These two facilities serve the entire County of Ventura and beyond, as jail inmates and trucks hauling refuse are brought to the facilities from throughout the county and neighboring counties, but it is Santa Paula that is directly impacted. Adding this peaker plant clearly places a disproportional share of the negative environmental consequences resulting from industrial and commercial operations on Santa Paula area residents, rather than more equally distributing projects of this nature throughout the areas that they serve. Sections 5.10.1 (Affected Environment) and 5.10.2 (Environmental Analysis) play down this impact by providing data for all of Ventura County, with the exception of the education sections, rather than using data specific to Santa Paula. Under expenditures Calpine states that tax revenues comprised approximately 26 percent of the City of Santa Paula's General Fund Revenues. Mr. Weinberg stated, when addressing the City Council and citizens of Santa Paula in March, that the energy plant would generate \$3,000,000 per year in annual property taxes for the project. This figure is meaningless for Santa Paula, as the taxes collected will go to the county, not the to city.

Finally, in Senate Bill 350, the State of California mandates that 50 percent of retail electricity sales will come from renewable energy resources by 2050. We have viable renewable energy resources now that are replacing fossil fuel options. California cannot afford to take a step backwards by investing in more non-renewable technology. By requiring renewable energy as we move forward it will be possible to both meet the State's mandate and to begin to protect our communities from the increasing toxic pollution generated by gas based plants.

Thank you for your consideration of these important issues regarding the Mission Rock Energy Center proposal.
Patricia Kennedy