

DOCKETED

Docket Number:	13-AFC-01
Project Title:	Alamitos Energy Center
TN #:	212781
Document Title:	Dave Shukla Comments: Forward Progress
Description:	N/A
Filer:	System
Organization:	Dave Shukla
Submitter Role:	Other Interested Person
Submission Date:	8/12/2016 4:58:09 PM
Docketed Date:	8/12/2016

Comment Received From: Dave Shukla

Submitted On: 8/12/2016

Docket Number: 13-AFC-01

Forward Progress

Friday, August 12, 2016

To All Whom It May Concern,

I write after having attended most of the public workshop on 8/9/16. That has heretofore been my only engagement with the current process. Having grown up in the shadow of what is currently the Alamitos Generating Station (AGS), it is heartening to know that this process is moving forward, and promises to yield a cleaner, more efficient, and steadily reliable complex for electricity generation, storage, and transmission.

That said, I wish to bring up a number of points.

First Point, as one of the homes used for noise monitoring to determine a baseline back in 2011, I personally am in favor of increased noise monitoring to better establish the baselines of background noise - particularly in conjunction with other public works and infrastructure projects in the area active at night and at day.

I do not think the collected 2011 data adequately reflects current ambient and generated noise, nor concerns tri-level and multi-story home owners in the University Park Estates neighborhood and elsewhere have about operations noise, given how much louder sounds are for them generally on above-ground levels. As you may know, the OCTA expansion of the 405 south of Long Beach has impacted Studebaker Rd. significantly, including at night, in recent years.

As such, I have been in contact with AES staff regarding future noise monitoring from our backyard, for either longer durations or multiple periods than the one straight week recorded in August of 2011. For instance, multiple periods of 24/hrs /day for 14 days straight, or even 28 days straight - to gather sufficient data, better establish a baseline, and provide greater insight into how newly proposed facilities perform comparatively. In addition, I support Ivan Roson's proposal to add a noise monitoring station to the south of the current AGS in the Island Village sub-division. I respectfully suggest that CEC Staff preparing the Final Staff Assessment of the Application for Certification on the Alamitos Energy Center incorporate new data and findings from an expanded and up-to-date measurement set. This brings us to:

Second Point. Noise is a real concern. Especially if an expedited construction schedule is set to begin in early 2017. Night construction activities, especially concrete pouring, will have a noticeable and demonstrable effect on nearby neighborhoods. I respectfully suggest that Staff re-evaluate how optimistic their assessment is of these impacts - most of which in the Preliminary Staff Assessment assumes the most modern equipment and techniques, and the most aggressive of noise abatement efforts. In an expedited on compressed construction timeline, these assumptions may not obtain.

Third Point, there are real concerns with the public health impacts on nearby neighborhoods in the demolition of current facilities and their replacement with newly constructed alternative systems. While the public health and safety parameters of the rebuild are currently subject to an MOU between AES and City of Long Beach, I strongly suggest that Staff disseminate guidelines or best practices gleaned from previous similar conversions (should they exist), or outright develop a set of recommendations, so that interested persons have a reasonable expectation of what the rebuild activities themselves add to the air, water, wetlands, etc., in which residents live.

Fourth Point, I am in complete agreement with the Memo by Eric Zahn of Tidal Influence (in docket) of the need for greater study and measurement of local wetlands species in and around the project site. More generally, the wetlands are a treasure local residents are loathe to compromise a single square foot of, and every effort in landscaping, visuals, etc., in the final project plan should reflect a strong commitment to our unique eco-tone here on the county line.

Fifth Point, I respectfully suggest that Staff retain the requirement stated in the PSA that the applicant and its proposal take direction from the current City of Long Beach process around SEADIP/SEASP. For those of us involved in that process, there has been a lack of knowledge around how changes at the AGS will impact our efforts to prepare Southeast L.B. for the next 30 years. I believe the project can meet its funding and construction timeline beginning in early 2017 by incorporating the input of the public where area planning and power plant conversion planning overlap. I respectfully suggest that CEC Staff contact City of Long Beach Planning Division staff to ascertain how best to proceed. Even if that means renewing the discussion on what kind of mix of battery storage vs. natural gas-based generation should be included in the project.

By way of conclusion, please note that each and every day that a newer, cleaner facility such as the proposed AEC is in operation is a better day for GHG abatement and our state and national responsibilities for climate stabilization than the existing AGS. It will therefore be a great day when ground is broken on the new project. But if, and only if, the environmental cost of converting the facility is recouped by the gains in terms of emissions reduction and mitigation, water savings, environmental performance, and quality of life. Negative impacts, or chronic problems resulting from a rushed or incomplete construction, including the proposed demolition of existing units in 2021 and after once the core of the AEC is completed, especially those which negate the gains of a new facility, will not be acceptable.

Thank you for reading,
Dave Shukla