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Rebuttal to Mission Rock Energy Center

Rebuttal to Mission Rock Energy Center (15-AFC-02): CLOMP-F Study May 26 2017

Kit W. Sauer

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To all concerned;

I am a retired International Union of Operating Engineers Foreman with hands-on experience for soil cement installations in Los Angeles County, in the city of Santa Clarita, CA for the purpose of stabilizing the fill slopes adjacent to blue line streams for structural bearing building pads above those streams. Two separate contracts for installations on the north and south banks of San Francisquito Creek and another contract to stabilize the north and south banks of the Santa Clara River in Castaic, CA.

All three contracts had the same end result at stake. To make absolutely sure that the developers investment were totally secure against the probability of either the 100 year flood or a catastrophic occurrence similar to the failure of the St Francis Dam in 1928. The Castaic project was downstream from Castaic Lake and Pyramid Reservoir.

All of these contracts were engineered in a fashion for true slope protection. The load bearing pads were built with "removal and recompaction"™ to specifications for liquefaction, with the slopes over-built at their specified ratios. The slopes were then cut back to allow for the soil cement protection. Not only down "to existing grade" as mentioned on Page 3, of the CLOMR-F report, dated 11-28-2016. But to a depth twelve to fifteen feet below the Thalweg. Then the soil cement was placed, with soils engineers testing at specified increments, at a minimum width of eight feet horizontal, up to pad grade, which generally was ten to twelve feet above the Thalweg. Therefore, in my experience with construction of projects built within the Santa Clara River floodplain, which are very similar in setting to the proposed MREC, erosion control requires extensive engineering investigation, design, site testing, construction quality control, as well as the associated enormous fiscal investment for these steps. The description of the erosion control methods for the MREC do not acknowledge nor propose to incorporate similar necessary erosion control measures.

The project is vulnerable to catastrophic damage in a failure of either or both Santa Felicia Dam (Lake Piru) and Pyramid Lake. What is the flow rate and velocity at the project location under that scenario? What are potential consequences to the MREC building pad and utilities under that scenario? Given the age of the upstream reservoirs and the erosion control measures taken on the recent projects referenced above, it would be prudent for the CEC, during the MREC project review, to determine consequences to the project due to dam failure.

As I understand from MREC (15-AFC-02): CLOMR-F Study, Page 7, 2. Conclusions, Second paragraph, Last sentence;

Alternatively, Sections 5.2.2.1-5.2.2.6 allow for placement of utilities and/or structures at less than one foot "above"™ the base flood elevation (the pad still must be above) "as long as they are flood proofed and designed resistant to hydrostatic, hydrodynamic, and/or impact loads dependent on corresponding velocities" . How are the MREC building pad and utility placement designed for flood proofing under dam failure conditions? The project has a great deal of potential to be damaged by flooding, by erosive river flows, and by catastrophic dam failure. CEC has the responsibility to require every aspect of the project be designed and built safely. During the project review and permitting, incorporating safety measures over and above minimum requirements are absolute necessities, so no threat to the public or watershed resources results.

With this stated, I would ask, given not only the potential of the two reservoirs impacting my previous work upstream in Los Angeles County, and the preventive measures put in place there, that Ventura County would take into consideration the fact that Lake Piru and the Santa Felicia Dam was constructed in 1955. And that the

watershed of the Santa Clara River is roughly 1,634 square miles, 60% of which is in Ventura County alone. It is therefore my opinion that if this installation is to be built, that I, along with the concerns of The Santa Paula Alliance, The Wishtoyo Chumash Foundation and all other entities opposed to the construction, that given the MREC Projects upstream slope is perpendicular to the main flow of the Santa Clara River, it should at the very least, be constructed to the highest standards available to insure that it poses no threat to the watershed it will be impacting and the population downstream. Adequate erosion protection based on fully known site characteristics is crucial to a creating a safe project. I request CEC address the elements in this letter and respond to not only myself, but to all other concerns raised by the Alliance, Wishtoyo, etc.

Sincerely,
Kit W. Sauer