



October 4, 2007

Mr. Paul C. Richins, Jr., Manager
California Energy Commission
Environmental Office
Energy Facilities Siting Division
1516 Ninth Street
Sacramento, CA 95814-5512

SAN GABRIEL GENERATING STATION (07-AFC-2) AT 8996 ETIWANDA AVE.
CITY FILE NO.: DRC2007-00357

Dear Mr. Richins:

The Planning Department appreciates the opportunity to review the proposed San Gabriel Generating Station and provide comments and responses to your letter dated August 1, 2007. Following are the City's comments regarding potential impacts and issues related to land use, traffic and transportation, visual resources, cultural resources, and fire safety.

Land Use

The subject project site is located in the Heavy Industrial District (Subarea 15) as denoted by the Rancho Cucamonga Development Code. In Subarea 15, heavy utility uses/facilities may be permitted subject to a conditional use permit (CUP). Given that the existing facility was constructed prior to City incorporation no CUP is available. Whenever a preexisting use that would normally require a use permit is expanded and/or significantly modified, the City requires a new use permit and compliance with City development standards to the greatest extent feasible. This would be the case for the proposed 696-megawatt (MW) power plant project at the subject site, provided the City of Rancho Cucamonga is the permitting agency.

In addition to a new CUP, a variance to exceed the height limit of the district would also be required. The addition of 2 boiler stacks (up to 150.5 feet in height) requires a variance. Approval of a variance would be based on the ability of the City to make the requisite findings.

Traffic and Transportation (Jon Gillespie) 909-477-2740, ext. 4051

A review of the Traffic and Transportation (Chapter 7.10) portion of the Application for Certification (AFC) was conducted by the City Traffic Engineer with the following comments:

- Stated working hours for this facility will be 6:00 AM to 6:00 PM. According to Table 7.10-7, half of the workers will arrive between 6:00 AM and 7:00 AM, and half will arrive between 7:00 AM and 8:00 AM. City staff believes that a split starting time work schedule for

construction projects is impractical and difficult at best to enforce. What happens if the contractor decides to have all of his workers start at 7:00 AM and assumed traffic conditions worsen?

- During the 5 months of construction when the workforce is at 1,014 workers, what happens when they all decide to leave the site at the same time to go to lunch? Will the contractor have a staggered lunch break? How will this be enforced? Traffic impacts at lunch time were not considered in the report.
- The study assumes that there will be 19 delivery trucks during the AM peak hours. How was this determined? There are several large buildings on site that will need to be demolished and removed. How many tons of materials will need to be removed? How many tons of gravel, asphalt, concrete and steel will be needed to construct the project? How many tons of concrete will be needed to pour the foundation for the new building, and how long is this expected to take? Will construction workers need more than 19 truck loads of concrete per day when they are pouring the building foundation? The City believes the number of trucks trips is an unrealistically low assumption since typical construction projects commence at a specific time with the vast majority of workers being on site and ready to work. Is there any further information to substantiate and justify the foregoing assumption regarding truck trips?
- The proposed parking lot for the construction on site will be located approximately 5,000 feet from Etiwanda Avenue with only one point of access. The result is comparable to a 5,000 ft long driveway and/or cul-de-sac, even if only for a temporary time frame. Typically, the maximum length of a "cul-de-sac" is 600-feet, and 300-feet for Industrial areas. Consultation with the Rancho Cucamonga Fire Department is imperative to resolve and/or mitigate any potential life safety and access issues. Was consideration given to opening an access to 6th Street, west of the project site? Can an emergency access point be provided to 6th Street, west of the project site?
- Etiwanda Avenue has a posted speed limit of 55 mph. According to Figure 7.10-8, during the PM peak hour there will be a total of 1,549 vehicles traveling northbound and southbound on Etiwanda Avenue, and 436 vehicles exiting 6th Street, eastbound onto Etiwanda Avenue. According to Figure 4C-4 Warrant 3, Peak Hour (70% Factor) of the Federal Manual of Traffic Control Devices (see attached), a traffic signal is warranted when the speed on the major street is greater than 40 mph, the traffic volume on the major street is greater than 1300 vehicles per hour and the traffic volume on the minor street is greater than 100 vehicles per hour. All conditions have been met and therefore a traffic signal is warranted at this intersection.
- According to the traffic study, there will be 589 northbound left turns at the intersection of Etiwanda Avenue and 6th Street during the AM peak hours. There will also be 611 opposing southbound through vehicles. It is not realistic to expect that 589 vehicles can safely make a "permissive" left turn against 611 opposing through vehicles during the AM peak hours. According to Chapter 9-01.3 of the Caltrans Traffic Manual, protected left turn arrows are warranted when the cross product of left turns versus opposing through traffic exceeds 100,000 (589 times 611 = 359,879). This amount is 3.5 times the minimum warrant for a traffic signal with a protected left turn arrow. Therefore, a traffic signal with a protected left turn arrow for the northbound left turn movement is warranted at this intersection during the AM peak traffic hours.

- In the opinion of City staff, Table 7.10-14 of the study is incorrect. It should be modified to show that a traffic signal at the intersection of Etiwanda Avenue and 6th Street is warranted during construction for both the AM and PM peak hours.
- Section 7.10.4 Mitigation Measures should be amended to include the installation of a traffic signal at the intersection of Etiwanda Avenue and 6th Street in order to mitigate the impacts due to construction traffic from this project.

Visual Resources

While the location of the power plant and its ultimate approval is not within our scope of authority to control, it is nonetheless within our community and should be constructed to the highest standard achievable, as we ask of all our residential and corporate residents. Projects under the jurisdiction of the City of Rancho Cucamonga are required to comply with the following design standards to ensure the proper integration of the project within the surrounding context and to upgrade the appearance of the existing facility to the greatest extent possible. Given the prominence and scope of the proposed utility facility within the City, the incorporation of the following design standards is highly recommended:

- Construct decorative perimeter wall(s) and add substantive landscaping (trees, shrubs groundcovers) along Etiwanda Avenue and 6th Street to provide visual relief along the street and screen views directly into the heart of the facility.
- Construct 30 parking stalls and parking lot illumination and landscaping to City parking lot standards.
- Remove any chain link fencing and replace with tubular steel fence and landscaping for screening purposes.
- Add landscaping (5-10 percent) around the interior of the site where possible to mitigate large expanses of hardscape and structures.
- Upgrade the architecture of the control building to meet City Design Standards for Industrial District projects.
- Provide Etiwanda Avenue and 6th Street frontage right-of-way improvements to the satisfaction of the City Engineer.
- The City concurs with the additional mitigation measures listed in 7.11.4 of the AFC.

Cultural Resources

The Planning Department concurs with the Cultural Resources analysis and the proposed mitigation measures. As such, we find the cultural resources analysis to be adequate with potential impacts being sufficiently addressed.

Fire Safety Issues

In addition the abovementioned land use entitlements, the proposed project under City review would also require approval by the Building & Safety and Fire Departments. Each Department has their respective development review criteria/process/requirements and as such seeks to incorporate specific modifications to plans and operational conditions as appropriate and address concerns from their respective disciplines.

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Since the Rancho Cucamonga Fire Department will be the first responder to fire and life safety incidents, we highly recommend early consultation with the Fire Construction Services Unit to identify and mitigate any potential risks/concerns, such as compliance with water supply/fire protection, access, storage and/or use of hazardous materials, and possible confined space rescue operations. As noted above, one significant issue identified above is the inappropriate access to the site both during construction and after full operation commences at the facility. Fire Marshall Robert Ball and Senior Plans Examiner Moises Eskenazi are the appropriate persons to contact regarding this project. They can be reached by calling 909-477-2770.

Should you have any questions or if we can be of further assistance, please feel free to contact me at (909) 477-2750, Monday through Thursday from 7 a.m. to 6 p.m.

Sincerely,

COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION

James R. Troyer, AICP
Planning Director

JT:MD/DG/ls

c: Jack Lam, AICP, City Manager
Mahdi Aluzri, Deputy City Manager
Corky Nicholson, Assistant Planning Director
Jon Gillespie, Traffic Engineer
Robert Ball, Fire Marshall