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DOCKET	
09-AFC-3	
DATE	DEC 07 2010
RECD.	DEC 07 2010

December 7, 2010

Mr. Craig Hoffman
Project Manager
California Energy Commission
1516 Ninth Street, MS 15
Sacramento, CA 95814-5512

Subject: Mariposa Energy Project (09-AFC-03)
Responses to Staff Assessment Workshop Request for Data

Dear Mr. Hoffman,

Per a request from California Energy Commission (CEC) Staff during the Staff Assessment (SA) workshop on November 29, 2010, Mariposa Energy is providing the following clarifications regarding the selection and representativeness of the meteorological data selected for use in the Mariposa Energy Project (MEP) dispersion modeling assessment. The following bullets summarize the main points discussed below:

- The criteria pollutant dispersion modeling completed by Mariposa Energy was based on meteorological data collected at the Patterson Pass monitoring station. The former Patterson Pass monitoring station was located adjacent to Patterson Pass Road, south of Interstate 205. This location is approximately five miles southeast of MEP and less than 0.5 miles south of the Mountain House Community Services District (MHCSD) Local Agency Formation Commission (LAFCO) boundary.
- The human health risk assessment completed by Mariposa Energy was also based on the Patterson Pass meteorological data
- An assessment of meteorological representativeness has been conducted for the Patterson Pass meteorological data based on guidance published by the United States Environmental Protection Agency (EPA) and Bay Area Air Quality Management District (BAAQMD)
- Local airport and wind developer meteorological data wind roses support the selection of the Patterson Pass meteorological data
- The human health risk assessment completed by the BAAQMD was based on the most conservative combination of meteorological parameters and resulted in modeled impacts less than the Office of Environmental Health Hazard Assessment (OEHHA) and the California Air Resources Board (ARB) significance criteria
- AERMOD, and the meteorological preprocessor AERMET, is an EPA-approved regulatory model which has been validated for use in terrain similar to the area surrounding the Mariposa Energy Project

Meteorological Data Used for the MEP Dispersion Modeling Assessment

Mariposa Energy conducted a search for appropriate and representative meteorological data in consultation with the Bay Area Air Quality Management District (BAAQMD) during the preparation of the MEP dispersion modeling protocol. Based on this search, it was determined that the Patterson Pass wind speed, wind direction, and temperature data would be the most representative data available. The selection of this meteorological station is also consistent with the selection for the East Altamont Energy Center (EAEC) Application for Certification (AFC). Therefore, four years of data available from the Patterson Pass site were used to predict criteria pollutant concentrations and comparisons were made to the state and federal ambient air quality standards.

As noted by the CEC staff during the SA workshop, the meteorological data used for comparing the maximum predicted 1-hour NO_2 impact concentration to the Federal 1-hour NO_2 standard were based on three years of meteorological data near Tracy, CA. Mariposa Energy understands that the alternative site was selected in order to correlate the meteorological data with measured concentrations of ozone and NO_2 at the Tracy airport monitoring station.

The human health risk assessment submitted by Mariposa Energy was also conducted using the Patterson Pass meteorological data set. The potential health impacts were assessed for all existing and planned residential areas within a 6 mile radius of the proposed MEP site, which includes all future Mountain House residential areas within the LAFCO boundary[1]. Based on this analysis, it was determined that the predicted impacts were less than the significance levels established by OEHHA and ARB at all receptor locations. [2]

Available Data in the Vicinity of MEP

Because meteorological data are collected for a variety of applications, the objectives for each monitoring program are generally tailored to each application. For example, wind developers typically install monitoring equipment at approximately 30 to 50 meters above grade to determine wind speeds at wind generator heights. For airports, elevated wind speeds at the runway would potentially create more of a hazard to pilots than calm conditions. Therefore, a “calm” hour may be defined as any hour with an average wind speed less than 2 to 4 meters per second rather than the starting threshold of the instrument. The quality and data completeness objectives may also vary depending on the application. Therefore, although other non-regulatory meteorological data collected in the vicinity of MEP may meet the quality, completeness, precision, and accuracy requirements for use in regulatory applications[3], the Patterson Pass meteorological data was given preference over

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[1] See Figure 5.5-1 of the MEP AFC Appendix 5.5A for a representation of the area covered by the human health risk assessment and sensitive receptors included in the analysis

[2] Predicted health impacts are presented in Section 5.9 of the Mariposa Energy Project Application for Certification.

[3] As outlined in the EPA “Meteorological Monitoring Guidelines for Regulatory Modeling Applications” and the “Guidelines on Air Quality Models”, 40 CFR Part 5, Appendix W.

the other data source options since it was collected by the San Joaquin Valley Air Pollution Control District for regulatory applications within the District.

Although Mariposa Energy selected the Patterson Pass meteorological data, several wind roses published in the Byron Airport Master Plan[4] (Attachment 1) and the Buena Vista EIR [5] [6](Attachment 2) are included for comparison. While the wind roses show some variation in the distribution of winds compared to the Patterson Pass wind rose, the predominant wind pattern for all four wind roses are from the southwest. While the Patterson Pass wind rose has a higher occurrence of westerly winds, this would potentially result in a more conservative estimate of long term concentrations in the Mountain House community compared to the other meteorological data locations because of MEP's location relative to Mountain House. Therefore, the data from the airport and wind developer sites support the selection of the Patterson Pass meteorological data.

Other local meteorological data sources were also suggested during the SA workshop. In response to these suggestions, Mariposa Energy requested available data from Mr. Morgan Groover, MHCSD, as well as, the Tracy Fire Department. The Tracy Fire Department confirmed that they do not collect meteorological data at Station 98 in Mountain House and no data has been received from Mr. Groover at this time. Therefore, Mariposa Energy is not aware of any other available meteorological data set that would be preferential to the Patterson Pass data.

Representativeness of the Patterson Pass Data Set

Prior to using the meteorological data collected at an offsite monitoring station, EPA recommends the completion of an analysis to determine if the meteorological data collected is representative of the project site. Additionally, BAAQMD recommends a comparison of surface characteristic between the meteorological station and the proposed project site to determine representativeness. Therefore, Mariposa Energy conducted an assessment of the Patterson Pass location. The modeling protocol included in Appendix 5.1D of the MEP AFC, presents the detailed representativeness analysis conducted for this site[7].

As described in the modeling protocol, the proposed MEP site is located approximately 5 miles northwest of the Patterson Pass location (37.7381N, 121.5344W). The topography surrounding each site is generally flat with low, rolling hills. The terrain between the proposed site and the Patterson Pass site is generally flat and there are no complex or elevated terrain features between the two locations. The elevation above mean sea level is also similar for the two locations.

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[4] Leigh Fisher Associates, 2005. "Byron Airport Master Plan, Final Report". Prepared for the Contra Costa County Public Works Department, Concord, CA. June

[5] RAM Associates, 2004. Wake Loss Effect Studies, Commissioned by G3 Energy. June 30.

[6] Edward F. McCarthy and Associates, 2003. Wake Loss Effect Studies, Commissioned by Northwind Energy. December.

[7] CH2MHILL, 2009. Mariposa Energy Facility Dispersion Modeling Protocol. Appendix D to the Application for Certification for the Mariposa Energy Project. June.

In addition to determining the representativeness of the general features surrounding each location, the mid-day albedo, daytime Bowen ratio, and surface roughness lengths at each location were also examined.[8] The sectors and surface characteristics used for the Patterson Pass meteorological data were defined by BAAQMD. The surface roughness lengths for the project site were determined by land use types displayed in USGS land use maps and the values derived from the *AERMET User's Guide*[9] and the AERSURFACE pre-processor (version 08009).

Based on the results of the representativeness assessment, which was reviewed and approved by the BAAQMD and CEC, it was concluded that the meteorological data from the Patterson Pass station would be representative of the meteorological conditions at the project site.

Use of Screening Met Data for the BAAQMD Health Risk Assessment

The BAAQMD human health risk assessment was conducted using screening meteorological data, which represents the most conservative combinations of wind speed, direction, and stability parameters possible in any geographical location. As noted in the BAAQMD's Final Determination of Compliance[10], the predicted impacts using the most conservative combination of meteorological parameters (i.e., screening meteorological data) would still be below the significance levels established by OEHHA and ARB. Therefore, the impacts would be below the significance levels independent of the meteorological monitoring station selected.

Discussion of the Validation Studies Conducted for the AERMOD Dispersion Modeling System

Lastly, AERMOD is an advanced plume model that incorporates updated treatments of the boundary layer theory, understanding of turbulence and dispersion, and includes handling of terrain interactions. AERMOD has undergone an extensive number of validation studies both in the development stage in the early 1990's and since its adoption as a preferred short-range (less than 50 kilometers) regulatory model in 2006. Many of these studies are found on the US EPA Support Center for Regulatory Atmospheric Modeling (SCRAM) website[11]. These studies have been performed for a number of physical and land use conditions including rural, urban, complex terrain, flat terrain, with and without building downwash and so forth. The studies generally emit trace gases in known quantities from a specific air emission source and then measure the concentrations at locations downwind of the source. AERMOD is then used to predict the concentrations at receptors collocated with the monitors.

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[8] Parameters defined in the Mariposa Energy Facility Dispersion Modeling Protocol (see footnote 8)

[9] EPA. 2004. "AERMET User's Guide". November.

[10] Bay Area Air Quality Management District (BAAQMD), 2010. "Final Determination of Compliance for the Mariposa Energy Project". November.

[11] EPA SCRAM website address: http://www.epa.gov/scram001/

A summary of several of the studies conducted during the validation of the AERMOD model, along with a general description of the parameters used within the model, are presented in *AERMOD: Latest Features and Evaluation Results*[12]. The results presented in this report suggest that AERMOD has a tendency to produce conservative results for areas of complex and hilly terrain for short-term averages (i.e., 1- and 24-hour averages). Therefore, information presented in this report and other literature available on the EPA SCRAM website reaffirms that AERMOD was developed for evaluation of impacts in complex terrain similar to the area surrounding MEP and that the model is capable of evaluating the influence of vertical mixing and turbulence on the predicted concentrations within 50 kilometers of the source.

If you have any questions regarding the information presented in this letter, please contact me at (916) 286-0270.

Regards,

CH2MHILL

Jerry Salamy
Principal Project Manager

Attachments

C: Bo Buchynsky/MEP
CEC Proof-of-Service

[12] Environmental Protection Agency, 2003: AERMOD: Latest Features and Evaluation Results. EPA Publication No. EPA-454/R-03-003. Office of Air Quality Planning & Standards, Research Triangle Park, NC.

Attachment 1 - Byron Airport Master Plan Wind Rose

THE PREPARATION OF THESE DRAWINGS WAS FINANCED IN PART THROUGH A PLANNING GRANT FROM THE FEDERAL AVIATION ADMINISTRATION (FAA) AS PROVIDED UNDER SECTION 505 OF THE AIRPORT AND AIRWAY IMPROVEMENT ACT OF 1982. THE CONTENTS DO NOT NECESSARILY REFLECT THE VIEWS OR POLICY OF THE FAA. ACCEPTANCE OF THIS REPORT BY THE FAA DOES NOT IN ANYWAY CONSTITUTE A COMMITMENT ON THE PART OF THE UNITED STATES TO PARTICIPATE IN ANY DEVELOPMENT DEPICTED HEREIN, NOR DOES IT INDICATE THAT THE PROPOSED DEVELOPMENT IS ENVIRONMENTALLY ACCEPTABLE IN ACCORDANCE WITH APPROPRIATE PUBLIC LAW.

AIRPORT LAYOUT PLAN

BYRON AIRPORT - CONTRA COSTA COUNTY, CALIFORNIA

DECEMBER 2004

AIRPORT DATA

		EXISTING	ULTIMATE
AIRPORT SERVICE LEVEL (NPIAS)		GENERAL UTILITY II OR GENERAL AVIATION	SAME
ICAO IDENTIFIER CODE		C83	SAME
AIRPORT REFERENCE POINT (A)	LATITUDE (NORTH)	37° 49' 42.429"	37° 49' 40.18"
	LONGITUDE (WEST)	121° 37' 32.959"	121° 37' 27.01"
AIRPORT ELEVATION (ABOVE MEAN SEA LEVEL)		76'	SAME
TAXIWAY WIDTH		35'	50'
MEAN MAX. TEMP. (HOTTEST MONTH)		95° F (July)	SAME
GPS APPROACH ESTABLISHED		YES	SAME
AIRPORT ACREAGE	FEE SIMPLE	1,307	SAME
	EASEMENT	0	1,720
AIRCRAFT SPACES (Approximate)	Based/Transient Tiedowns	34	60
	T-Hangars/Portables	104	210
	Executive/Corporate Hangars	0	35
	FBO Area	0	(a)
	Box Hangars	0	10

(a) It is assumed that FBO aircraft spaces will be provided in the hangar and tiedown areas.

NOTES

(A) Existing runway end coordinates obtained from latest NOAA Airport Obstruction Chart (AOC), surveyed March 1996, published May 1997. Horizontal information in geographic coordinates (latitude and longitude), North America Datum of 1983 (NAD83). Vertical information in feet above mean sea level (MSL), National Geodetic Vertical Datum of 1929 (NGVD29). To convert elevations from NGVD29 to North America Vertical Datum of 1988 (NAVD88) equivalent, add 2.4 feet.

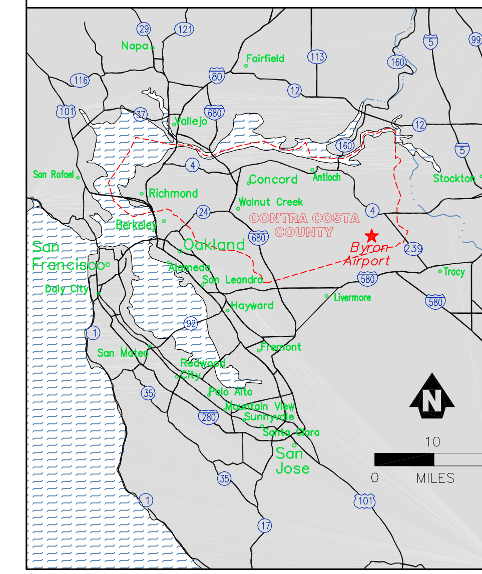
ALP AutoCAD files based in State Plane Coordinate System (SPCS), California Zone 3, U.S. Survey feet, NAD83. CORPSCON conversion utility used to convert between geographic coordinates and SPCS, and to calculate future coordinates.

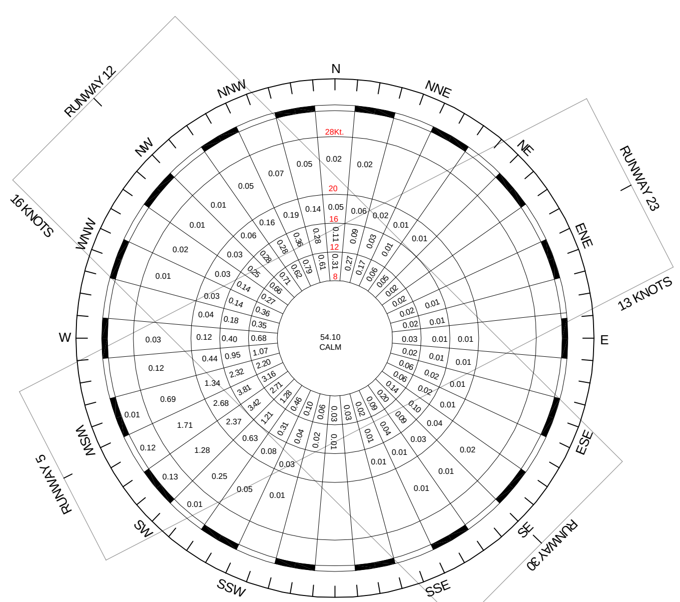
RUNWAY DATA

	RUNWAY 12-30 EXISTING		RUNWAY 12-30 ULTIMATE		RUNWAY 5-23 EXISTING		RUNWAY 5-23 ULTIMATE	
AIRPORT REFERENCE CODE	B-III		SAME		B-II		SAME	
DESIGN AIRCRAFT (MINIMUM 500 OPERATIONS/YEAR)	Med. Twin		SAME		Light Twin		Med. Twin	
PHYSICAL LENGTH AND WIDTH	4,500' x 100'		6,000' x 100'		3,000 x 75'		3,900' x 75'	
EFFECTIVE GRADIENT	0.4%		0.3%		1.0%		0.8%	
ASPHALT PAVEMENT STRENGTH (1000#) S/D/DT	29.5/-/-		30/45/- EST.		29.5/-/-		30/45/- EST.	
RUNWAY/TAXIWAY SURFACE TYPE	ASPHALT		SAME		ASPHALT		SAME	
APPROACH TYPE: FAR PART 77 CATEGORY AND VISIBILITY MINIMUMS	12: VISUAL [B(V)] / 1 MILE (CIRCLING)	30: NONPRECISION [C] / 1 MILE	12: NONPRECISION [D] / ≥ 3/4 MILE	30: PRECISION [PIR] / < 3/4 MILE	5: VISUAL [B(V)] / 1 MILE (CIRCLING)	23: VISUAL [B(V)] / 1 MILE (CIRCLING)	5: SAME / SAME	23: SAME / SAME
RUNWAY MARKINGS	NONPRECISION		PRECISION		VISUAL		SAME	
FAR PART 77 APPROACH SURFACE SLOPE	12: 34:1	30: 34:1	12: SAME	30: 50:1	5: 20:1	23: 20:1	5: SAME	23: SAME
NAVIGATION AIDS	12: NONE	30: PAPI(3.5°);REIL	12: PAPI/REIL	30: SAME + MALSR	5: NONE	23: PAPI(3.5)	5: SAME	23: SAME
RUNWAY END COORDINATES (A)	12	30	12	30	5	23	5	23
LATITUDE (NORTH)	37° 50' 08.491"	37° 49' 36.888"	SAME	37° 49' 26.35"	37° 49' 20.347"	37° 49' 33.727"	SAME	37° 49' 37.74"
LONGITUDE (WEST)	121° 37' 53.513"	121° 37' 14.042"	SAME	121° 37' 00.88"	121° 37' 48.413"	121° 37' 15.051"	SAME	121° 37' 05.04"
ELEVATION (FEET MSL) (LP = LOW POINT, HP = HIGH POINT)	61' HP	46' LP	SAME	42' LP	76' HP	46' LP	SAME	44' LP
TOUCHDOWN ZONE ELEVATION (TDZE) — DEFINED AS HIGH POINT OF THE TOUCHDOWN ZONE, FIRST 3000' OF RUNWAY AVAILABLE FOR LANDING	12: 61' MSL	30: 52' MSL	12: SAME	30: 50' MSL	5: 76' MSL	23: 76' MSL	5: SAME	23: 71' MSL
RUNWAY LIGHTING	MIRL		SAME		MIRL		SAME	
RUNWAY MARKING	NONPRECISION		PRECISION		VISUAL		SAME	
RUNWAY SAFETY AREA WIDTH	500'		SAME		150'		SAME	
RUNWAY SAFETY AREA, LENGTH BEYOND RUNWAY END	12: 430' ON ℄	30: 600'	12: 1000'	30: 1000'	5: 300'	23: 300'	5: SAME	23: SAME
RUNWAY OBJECT FREE AREA WIDTH	800'		SAME		500'		SAME	

EST. = ESTIMATED

VICINITY MAP





24-HOUR DATA

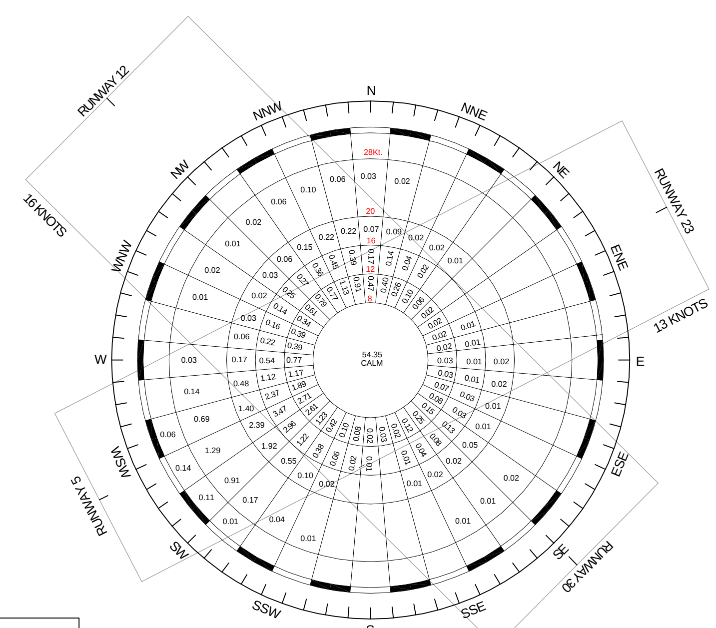
(18,809 Observations)

Runway	Crosswind Component (knots)	12-30: 0	5.0	10.5	13.0	16.0
5-23	0		52.12%	72.46%	80.59%	89.42%
	5.0	77.90%	89.95%			
	10.5	95.41%		99.38%	99.63%	99.77%
	13.0	97.72%			99.81%	99.91%
	16.0					

WIND COVERAGE

March 22, 1990 - April 25, 1991

Source: On-Site Wind Sensor



6:00 A.M. - 10:00 P.M. DATA

(12,533 Observations)

Runway	Crosswind Component (knots)	12-30: 0	5.0	10.5	13.0	16.0
5-23	0		52.80%	74.46%	82.52%	90.95%
	5.0	74.65%	88.44%			
	10.5	94.41%		99.23%	99.58%	99.77%
	13.0	97.25%			99.78%	99.89%
	16.0					

SHEET INDEX

SHEET	DESCRIPTION
1	COVER, INDEX, & DATA
2	AIRPORT LAYOUT DRAWING
3	BUILDING AREA DRAWING
4	LAND USE & AIRPORT PROPERTY DRAWING
5	AIRSPACE DRAWING 1 of 2, CENTRAL AREA
6	AIRSPACE DRAWING 2 of 2, OUTER PORTION OF APPROACH AREA
7	RUNWAY & APPROACH PROFILES
8	INNER PORTION OF APPROACH SURFACE - 5
9	INNER PORTION OF APPROACH SURFACE - 12
10	INNER PORTION OF APPROACH SURFACE - 23
11	INNER PORTION OF APPROACH SURFACE - 30

APPROVAL

SUBMITTED BY: COUNTY OF CONTRA COSTA	FAA APPROVAL BLOCK
APPROVED: ____________ DATE	

Prepared By

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Prepared For

CONTRA COSTA COUNTY AIRPORTS
CONTRA COSTA COUNTY

Airport Layout Plan Set

BYRON AIRPORT
500 EAGLE COURT
BYRON, CALIFORNIA

Issue Log

DATE	REVISION DESCRIPTION
12/16/2004	FAA REVIEW
03/18/2005	FAA APPROVAL

Drawing Title

COVER, INDEX, & DATA

Attachment 2a - Buena Vista EIR Wind Rose

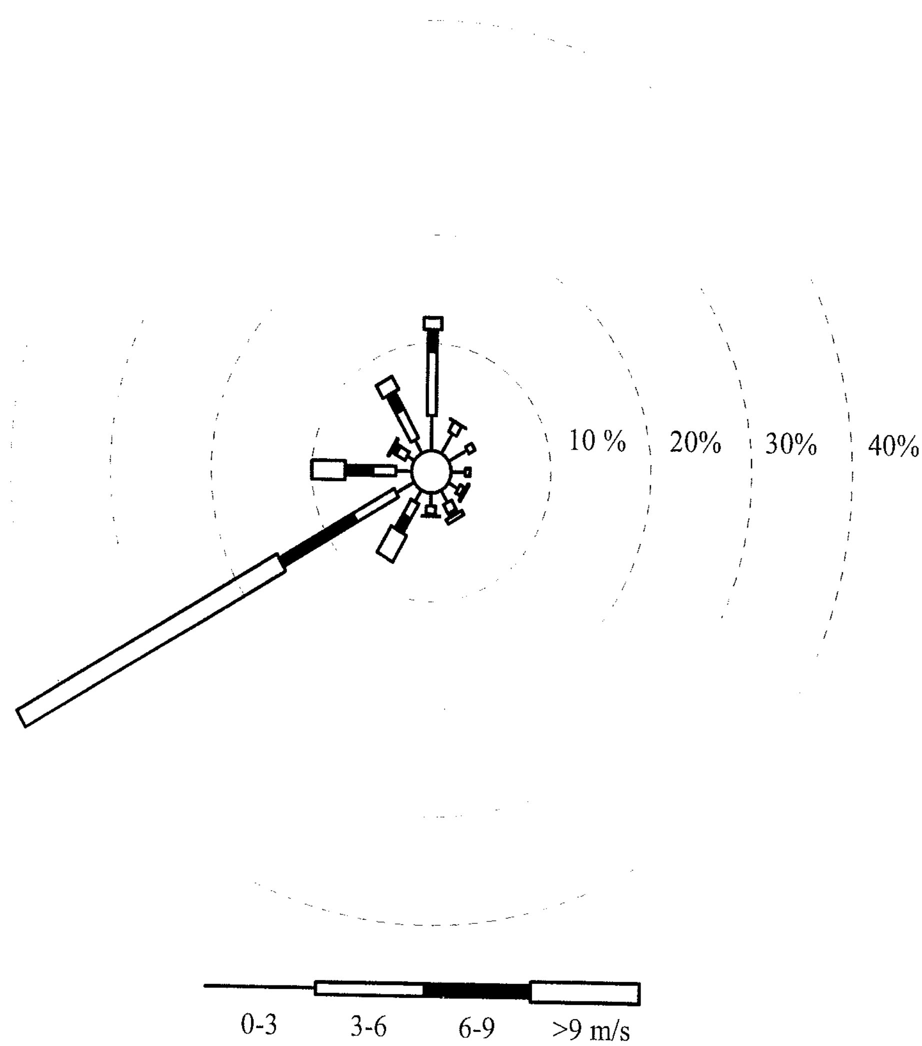

Figure 2 **Predicted long-term annual wind rose at Mast BV11**

Attachment 2b - Buena Vista EIR Wind Rose

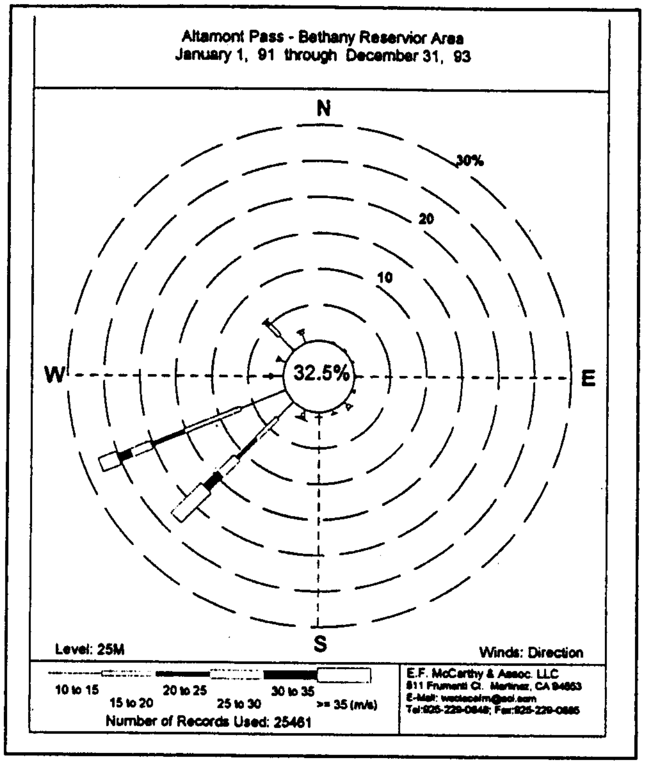

Figure 2 – Wind Rose for the Altamont Pass - Bethany Reservoir Area. The Telescoping Bars Indicate The Frequency of Occurrence of Wind Direction and Various Wind Speed Categories. The Number in the Center of the Figure, 32.5%, is the Percentage of Hourly Wind Speed Values Lower Than the Minimum Wind Speed Category Value of 5 mph.

Technical Approach

Wind turbines extract energy from the wind and a wind speed deficit zone or wake zone develops behind a wind turbine. This wake zone is typically characterized by lower wind speeds, higher wind speed turbulence, and higher wind direction turbulence. The wake zone eventually dissipates at a distance downwind from the individual turbine or a row of turbines. This downwind distance is a complex function of the operating characteristics of the turbine, the ambient turbulence in the wind, the downwind distance, the crosswind spacing, and the topography of the site. Typically the closer the spacing of the turbines, both the crosswind spacing and the downwind spacing, the greater the wake impacts. In discussing wake zones and turbine spacing, distances are typically normalized by the rotor diameter (RD) of the wind turbine.

A wind turbine wake study was conducted in the summer of 1987 at an Altamont Pass wind plant. The wind speed deficits, turbulence, and power deficits from an array of wind turbines was calculated. A total of nine different test configurations ranging from one row of turbines to several rows of turbines for downwind spacing of 7 RD to 34 RD and cross wind spacing of 1.3 RD and 2.7 RD are evaluated. These results were presented by Baker and McCarthy (1997) at the American Wind Energy Association (AWEA) annual meeting in 1997. The results generated

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE *MARIPOSA ENERGY PROJECT* (MEP)

Docket No. 09-AFC-3

PROOF OF SERVICE
(Revised 10/20/2010)

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*indicates change

DECLARATION OF SERVICE

I, Mary Finn, declare that on December 7, 2010, 2010, I served and filed copies of the attached Mariposa Energy Project (09-AFC-03) Responses to Staff Assessment Workshop Request for Data. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:
[http://www.energy.ca.gov/sitingcases/mariposa/index.html].
The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(*Check all that Apply*)

FOR SERVICE TO ALL OTHER PARTIES:

__x__ sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery;

____ by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses NOT marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

__x__ sending an original paper copy, mailed and emailed respectively, to the address below (*preferred method*);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 09-AFC-3
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

____
Mary Finn