APPENDIX A

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program.	Rulemaking 05-12-013 (Filed December 15, 2005)
Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 06-02-013 (Filed February 16, 2006)

ASSIGNED COMMISSIONER'S RULING ADDRESSING ELECTRIC RELIABILITY NEEDS IN SOUTHERN CALIFORNIA FOR SUMMER 2007

1. Summary

In the captioned dockets and in other pending proceedings, this Commission is working with partners including the California Independent System Operator (CAISO), the California Energy Commission (CEC), regulated entities, and other stakeholders to develop and enhance the electric infrastructure so that it meets California's growing need for reliable, cost-effective, and environmentally sound electric service. Significant progress has been achieved since the electric market disruptions of 2000-2001, and the procedural steps needed to maintain this progress are well under way.

In light of recent events, I find it is necessary to take additional action. The heat storm that hit California in July 2006, and the surprising growth in electricity demand throughout the state that had become evident even before the heat storm, have exposed certain vulnerabilities in the electric generation and

transmission infrastructure that require immediate attention to assure reliability in 2007, particularly in parts of southern California. Accordingly, as set forth in more detail below, I direct Southern California Edison Company (SCE) to expand its Air Conditioning Cycling Program (ACCP, also referred to as Summer Discount Plans) to target an additional 300 megawatts (MW) of program capacity for the summer 2007 season. In addition, SCE should pursue the development and installation of up to 250 MW of black-start, dispatchable generation capacity within its service territory for summer 2007 operation. In connection with this added generation capacity, I invite SCE to file an advice letter to establish a memorandum account in which it would record the acquisition and installation costs.

2. Background

In the captioned rulemaking dockets and in predecessor proceedings initiated in the wake of the energy crisis of 2000-2001, this Commission has established policies for procurement of electric generation by investor-owned utilities (IOUs) and by other load-serving entities (LSEs) subject to the Commission's jurisdiction.[1] Throughout these proceedings, a fundamental goal of the Commission has been assuring that Californians served by these LSEs receive reliable electric service through cost-effective, environmentally sound, sustainable, and competitive procurement of electric generation capacity. Key elements of this procurement regime include the following:

[1] The Commission has found that the service territories of the three largest electric IOUs in California account for approximately 80% of California's electricity usage.

- The California Energy Action Plan (EAP II), which establishes a preferred loading order of resources, beginning with energy efficiency and demand response.
- Review and approval of the IOUs' Long Term Procurement Plans (LTPPs) in conjunction with the CEC's demand forecast.
- Establishment of Resource Adequacy (RA) procurement obligations whereby each jurisdictional LSE must acquire the resources needed to serve its own customer load plus a 15%-17% planning reserve margin.

3. Discussion

I am confident that the adopted procurement regime, described above, is successfully meeting California's electric system needs and will continue to do so. I recognize, however, that the LTPP and RA programs are still under development and that the adopted program elements have not been in place for sufficient time to bear full fruit. Despite the Commission's ongoing efforts to assure that adequate operating resources are made available to the CAISO at the times and places the CAISO needs those resources for electric grid operations, it is critical that we continually monitor system developments and be prepared to act as necessary.

Last month's heat storm, and the evident and surprising growth in demand that had occurred even before the heat storm, give rise to the need for further action. The CAISO's assessment for the summer of 2006 indicated that it could handle a demand in excess of 48,000 MW, close to what demand was forecasted to be under extreme temperatures that materialize once every

10 years, with limited to no impact on firm load customers.[2] However, the CAISO reports, the peak demand during that heat wave was 51,000 MW, well above any of the scenarios it had assumed in its assessment.[3] As the CAISO notes, that was over 12% higher than last year's record, 6% higher than the worst case scenario the CAISO analyzed in its assessment, and 38% higher than the peak demand of the crisis year 2001; it represents the demand forecasted not to appear until five years from now.[4] Across the CAISO's service area, weighted average temperatures ranged between 106 and 110 degrees Fahrenheit on various days, something California and the West have not experienced in recent history; these temperatures were higher than anything recorded in the 30-year history of the temperature models used by the CAISO.[5] Also, staff informs me, the demand forecasts used to plan for resource needs in California may not have fully incorporated the impacts of recent population growth in the warmer inland areas of California.

The good news for California is that the right policies were put in place in recent years, and all parties pulled together during the recent heat storm with the result that the CAISO was able to meet the resulting reliability challenge. Looking ahead to next summer, however, I am persuaded that additional steps should be taken now to assure reliability. While there is no way at this time to determine whether the unusually high temperatures experienced this summer in

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[2] *See* Prepared Statement of Yakout Mansour, President and Chief Executive Officer of CAISO, before the California State Senate Committee Governmental Organizations, dated August 9, 2006. The statement is available at the CAISO's website.

[3] *Id.*

[4] *Id.*

[5] *Id.*

California and much of the nation are the product of global climate change trends, it is prudent to go forward with the expectation that a repeat of this summer's experience, and/or a continuation of the unexpectedly high growth in overall demand, are possible in 2007. The CAISO advises that the situation is particularly severe in southern California.[6] Recognizing that time does not allow for development of large new projects between now and next summer, the CAISO recommends that the Commission take steps to direct IOUs to develop

> ... a combination of quick-start generation and demand response opportunities that can be developed over the next six to twelve months to increase available supply at the peak hours and enhance grid reliability.[7]

Accordingly, in response to critical near-term needs in southern California that have been recently identified by the CAISO, I take the following actions.

First, consistent with the preference to be accorded to demand response programs under EAP II, I direct SCE to target an additional 300 MW of ACCP program capacity for the summer 2007 season. SCE is directed to determine if shifting existing demand response funds can cover the costs of the additional 300 MWs or if additional funds (incremental to those previously approved in D.06-03-024) are necessary. SCE is directed to provide this information to the Commission via the process outlined in A.05-06-006, *et al.*[8]

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[6] *See* letter from Yakout Mansour, President and Chief Executive Officer of CAISO, dated August 9, 2006. A copy of the letter is attached to this ruling.

[7] *Id.*

[8] On August 9, 2006 I issued an Assigned Commissioner Ruling in A.05-06-006, *et al.*, directing the IOUs to submit proposals August 30, 2006 to expand their existing demand response programs.

Second, I direct SCE to pursue new utility-owned generation that can be online in time for summer 2007. I take this action out of concern that SCE's current, ongoing Request for Offer (RFO) process may not be completed in time for summer 2007 needs. As I noted earlier, competitive IOU procurement processes are key elements of the Commission's procurement regime. As it goes forward with its RFO, SCE should not reduce the amount of capacity it contracts for through the RFO due to development of generation specified in this ruling. Additionally, SCE should promptly evaluate any offers of resources similar to those covered in this ruling that may be online by August 1, 2007. Should SCE consider any such offers potentially viable, it should make best efforts to reach agreement with the bidders and file a request for contract approval with the Commission by November 15, 2006. The Commission will target action on any such requests not later than January, 2007. Offers considered by SCE but not deemed August 1-capable, and offers SCE is unable to reach agreement on before November 15, 2006, should continue to follow the schedules and procedures laid out in the RFO. I would expect contracts filed by SCE pursuant to this section to contain financial guarantees of operation on or before August 1, 2007.

To avoid undue impacts on the ongoing RFO process, SCE should pursue development of not more than five non-RFO generation units. Such units should be black-start capable and dispatchable, and should bring collateral benefits to SCE's transmission and distribution system as well as the CAISO grid.

It does not appear possible for SCE to develop and for the Commission to consider proposals for ratemaking treatment of the costs of developing and installing the utility-owned generation described above prior to the time such generation would be installed. Accordingly, I invite SCE to file an advice letter to establish a memorandum account to record the acquisition and installation

costs of such generation facilities. Because of the urgent need for capacity for summer 2007 and the unusual steps being taken in this ruling, SCE may choose in its later rate application to request, and the Commission may wish to consider, for resources built pursuant to this ruling, different ratemaking treatment than that established in D.06-07-029 for utility-owned resources.

In this ruling I have focused on actions that are to be undertaken by SCE in light of the CAISO's stated concern about reliability in southern California. As a precaution to assure reliability throughout the service territories of all of the IOUs, I will direct Pacific Gas and Electric Company and San Diego Gas & Electric Company to submit reports in the LTPP proceeding addressing the need for similar actions in their territories, particularly with respect to air conditioning cycling.

This ruling is being issued in R.05-12-013 and R.06-02-013 because of the related subject matter; however, these proceedings are not consolidated.

IT IS RULED that:

1. In order to address and resolve potential resource inadequacies that could affect reliability in southern California in the summer of 2007, Southern California Edison Company (SCE) is directed to take necessary steps to expand its demand response programs and to develop black-start, dispatchable resources in accordance with the foregoing discussion.

2. Not later than 15 days from the date of this ruling, Pacific Gas and Electric Company and San Diego Gas & Electric Company shall file reports in Rulemaking 06-02-013 addressing the need for actions in their territories similar to those addressed in this ruling with respect to SCE, particularly with respect to air conditioning cycling.

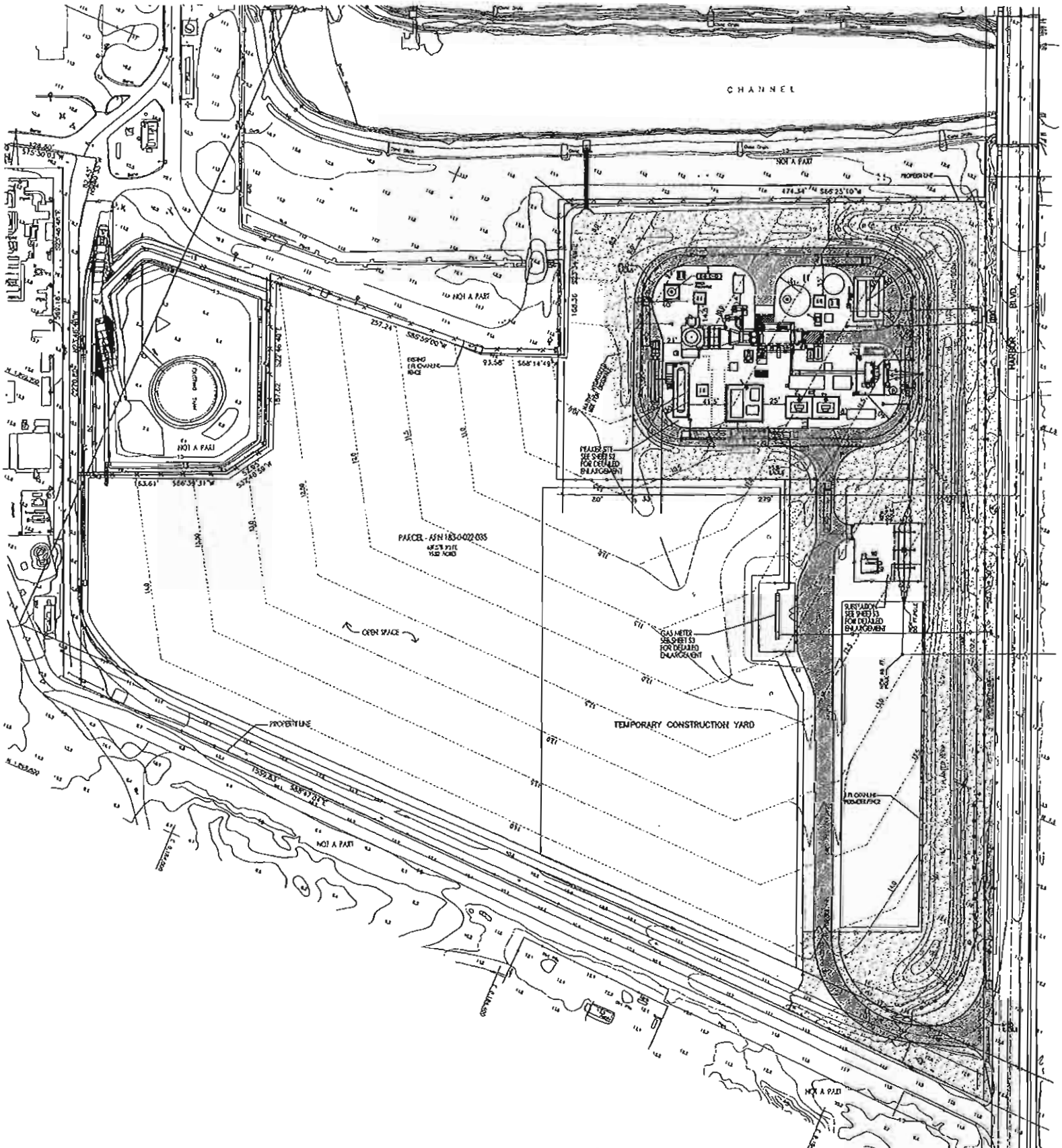
3. In addition to the service lists in the captioned dockets, a copy of this ruling shall also be served on the service list in Application (A.) 05-06-006, A.05-06-008, and A.05-06-017.

Dated August 15, 2006, at San Francisco, California.

/s/ MICHAEL R. PEEVEY

Michael R. Peevey
Assigned Commissioner

APPENDIX B



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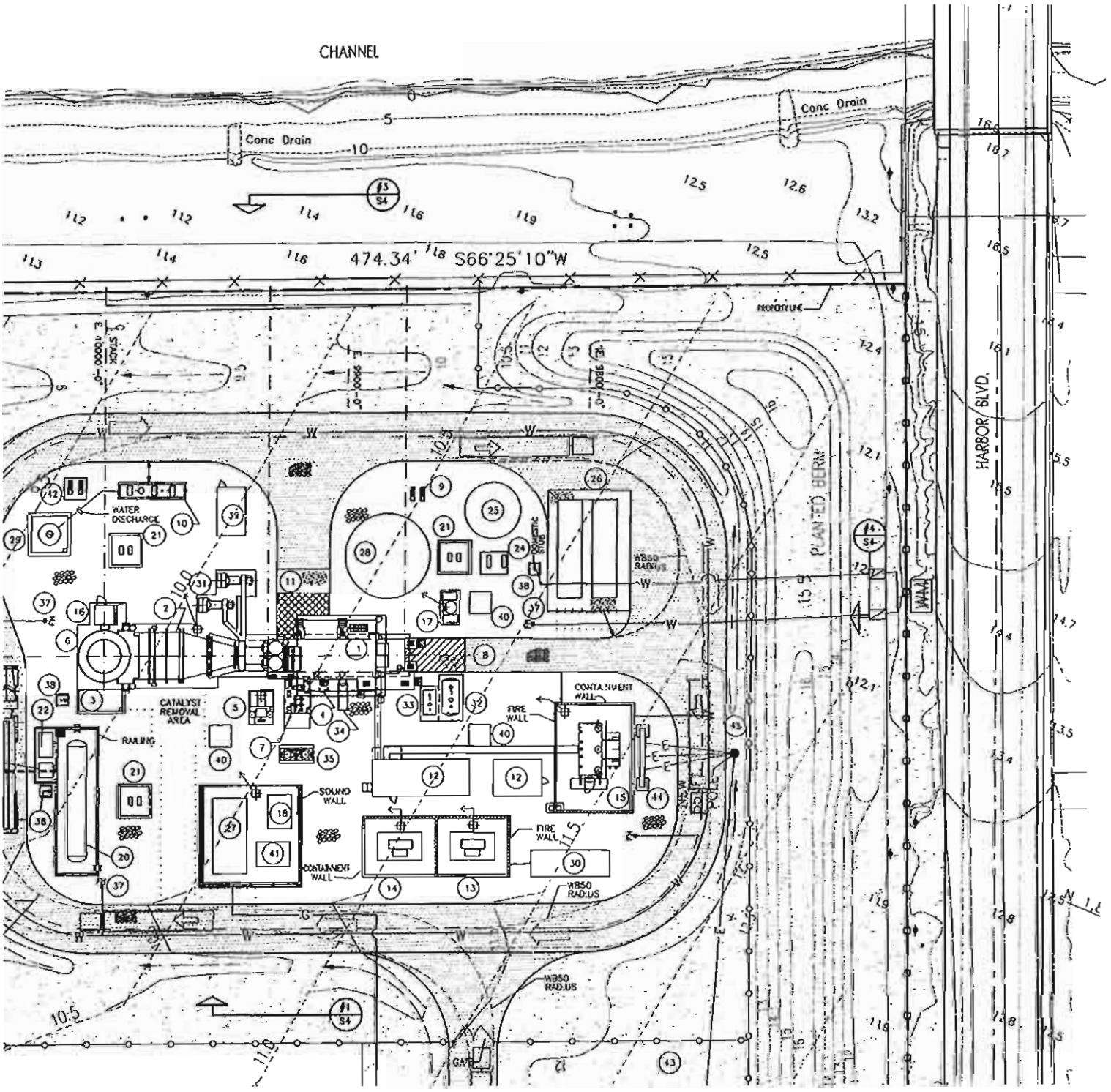
251 N. HARBOR BLVD., OXNARD, CALIFORNIA



LEGEND:

- GRAVEL
- ASPHALT
- CONCRETE
- EXISTING FENCE
- NEW 8 FT. CHAINLINK FENCE
- AREA DRAINS DRAIN LINE TO OIL/WATER SEPERATOR

STACK

STACK

TURBINE/ SCR/ STACK

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SOUTHERN CALIFORNIA EDISON COMPANY
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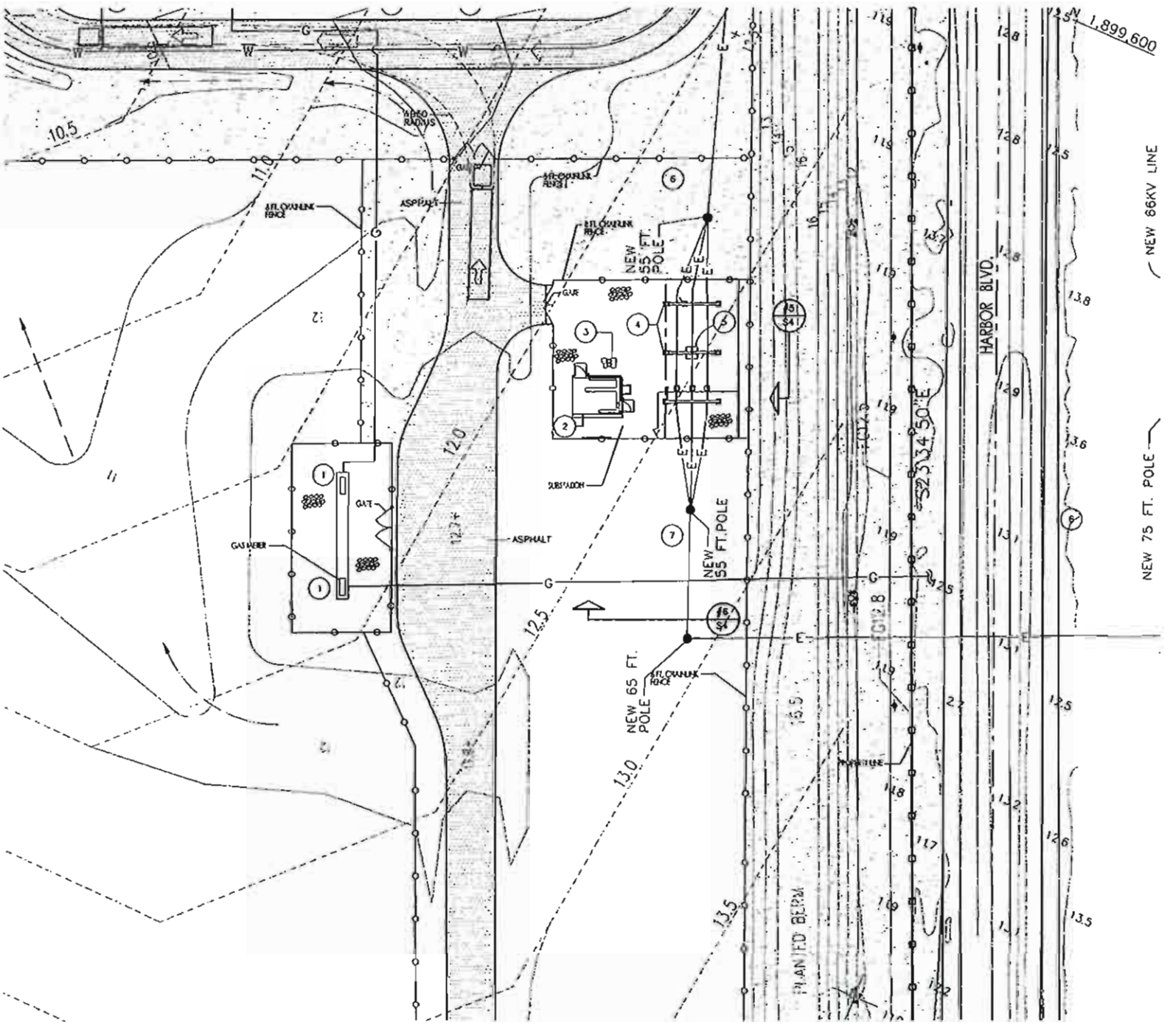

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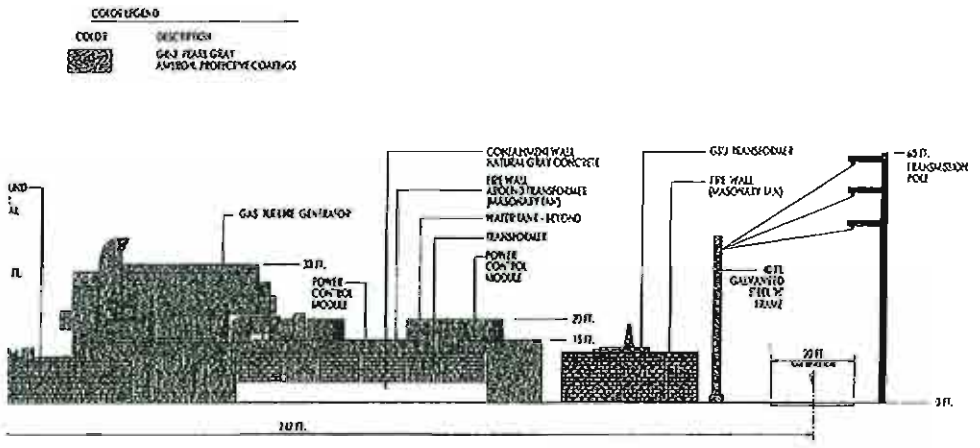

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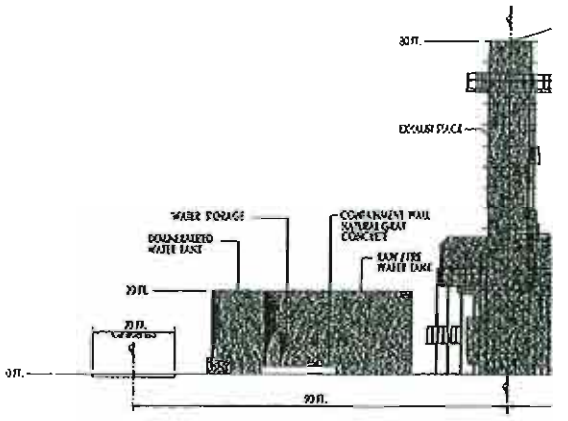

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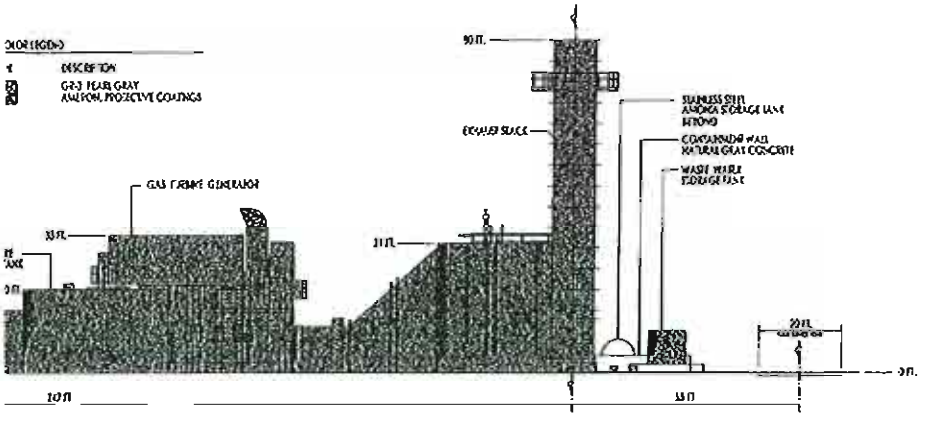

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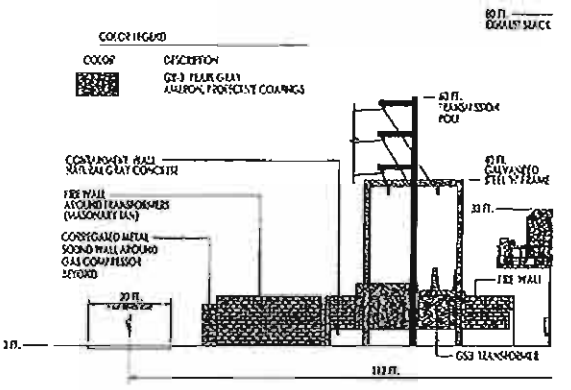

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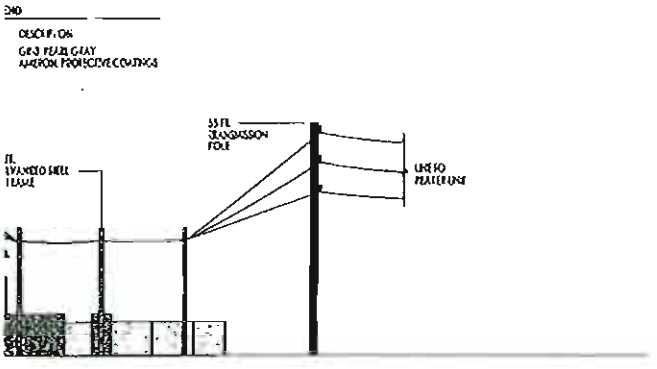

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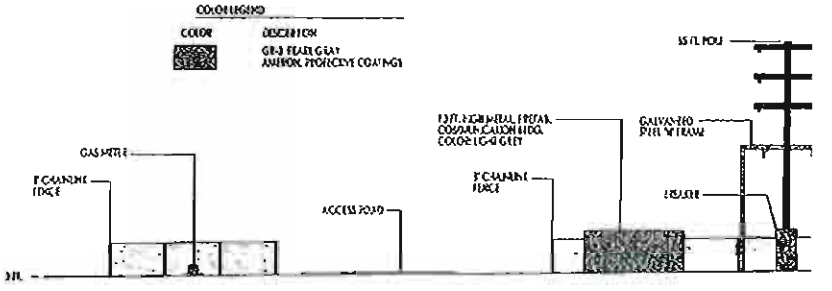

6 SOUTH ELEVATION SI

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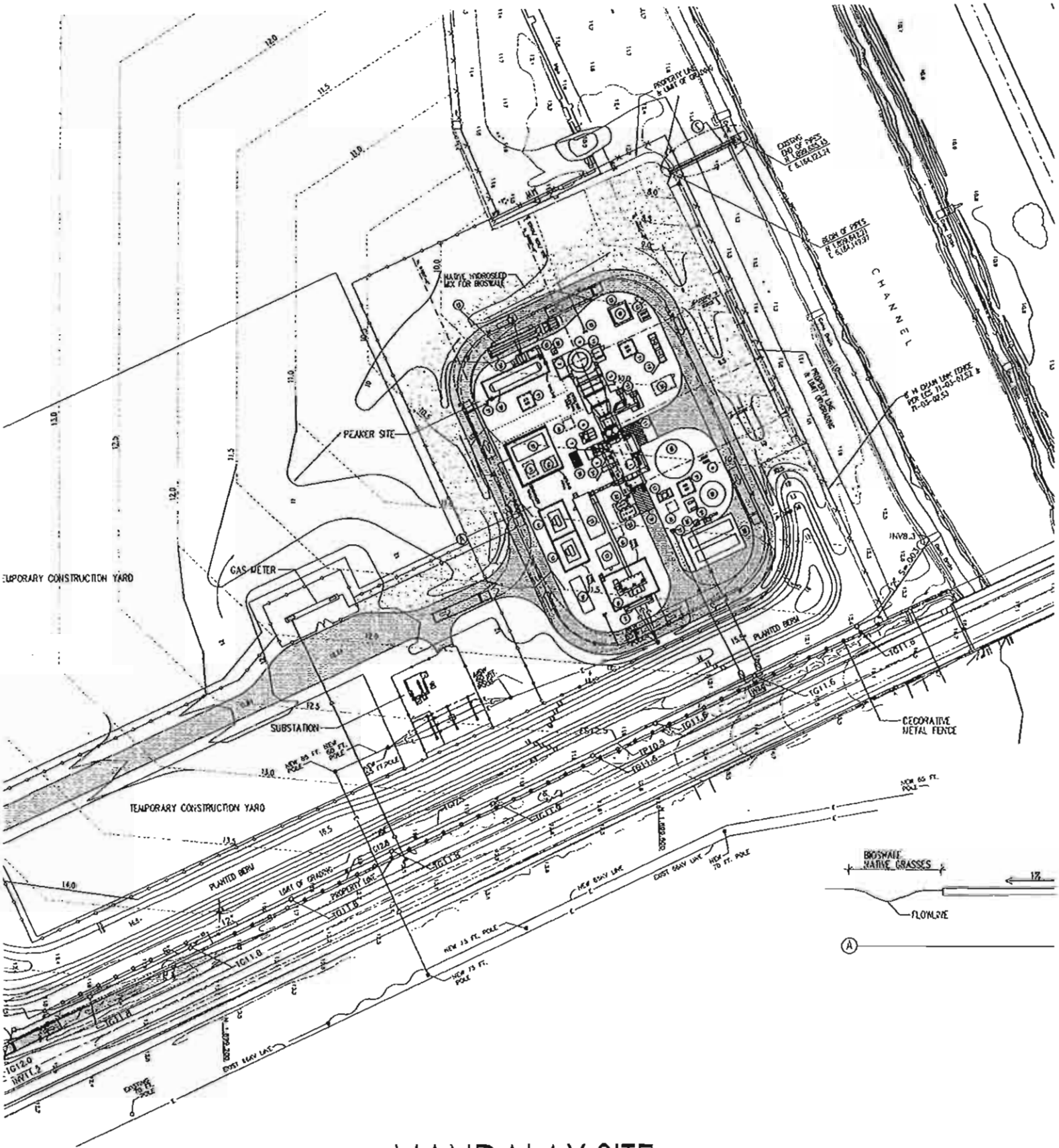

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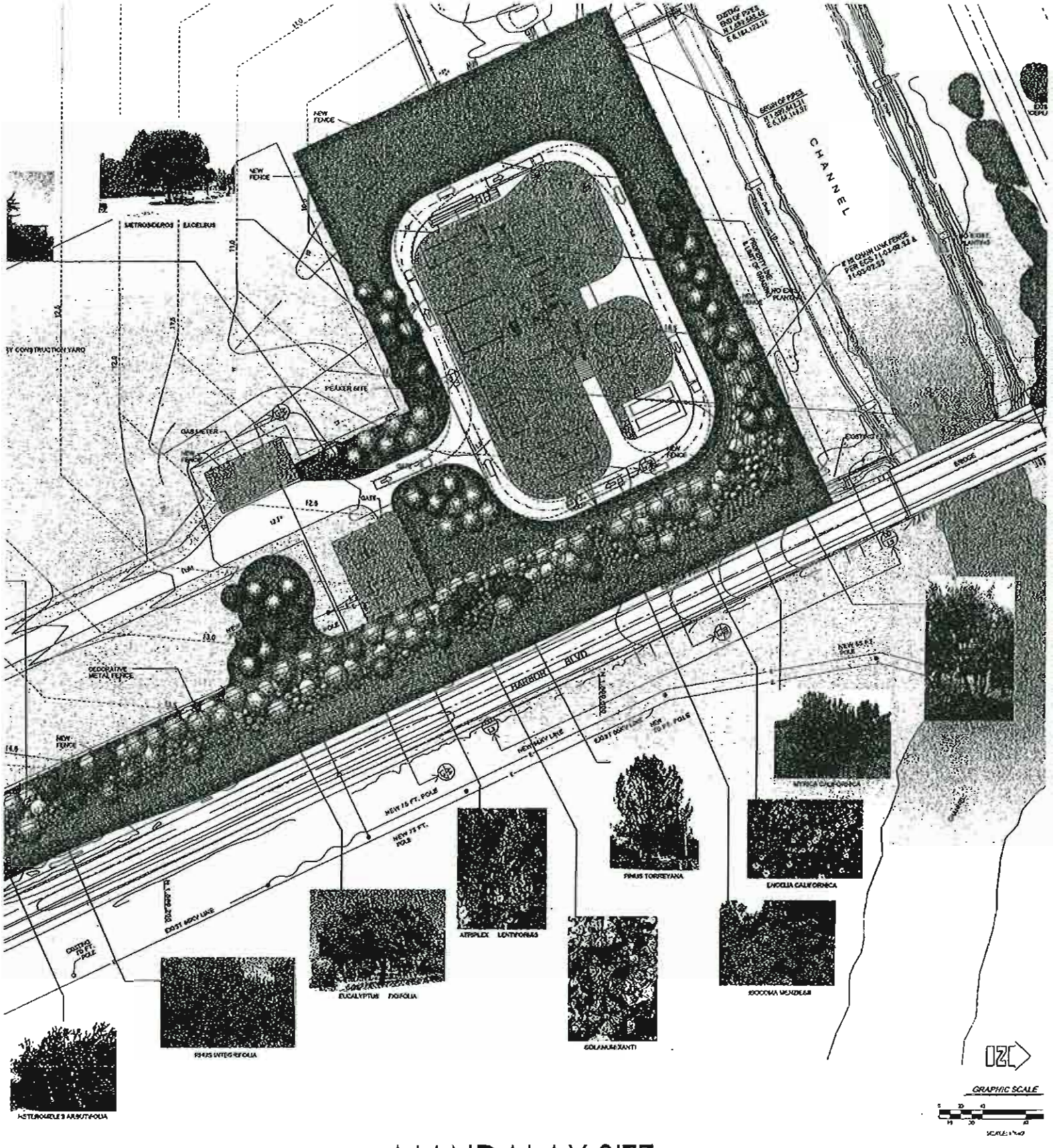

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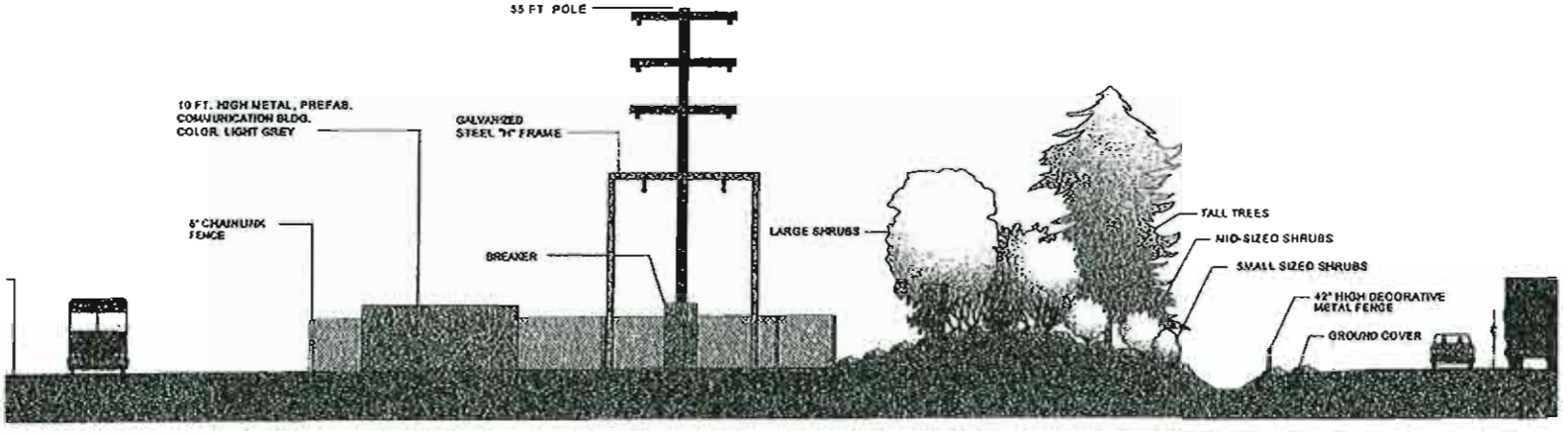

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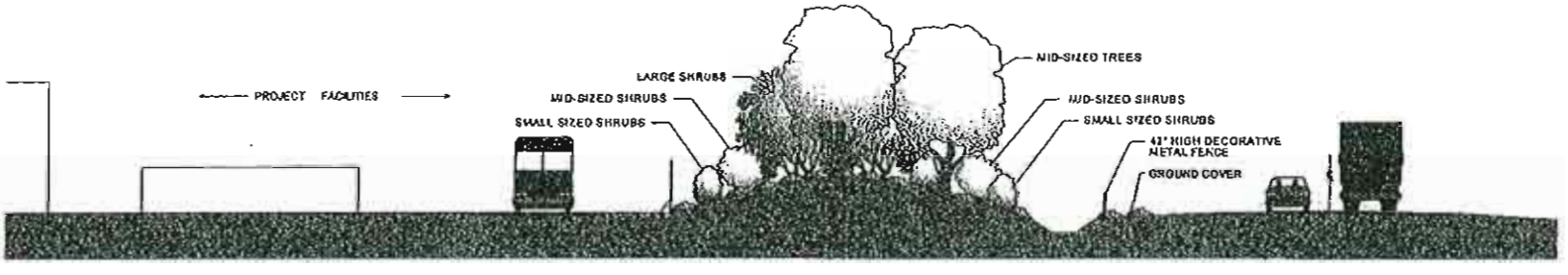

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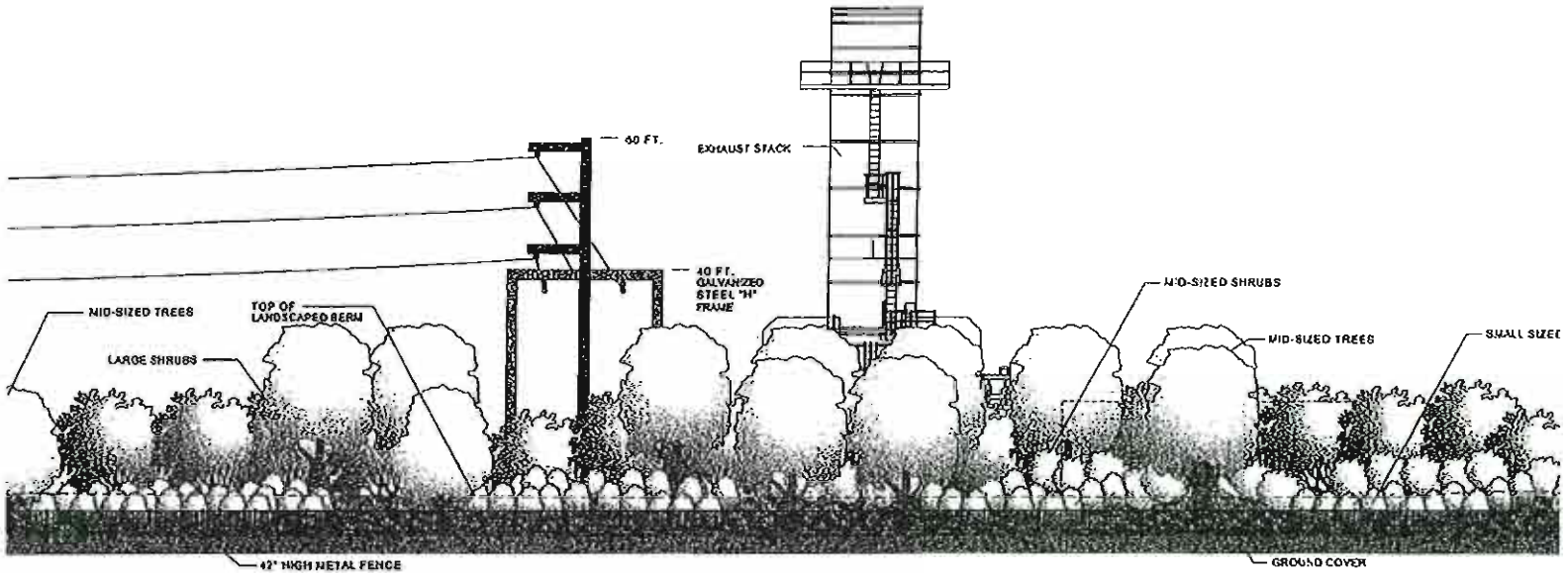

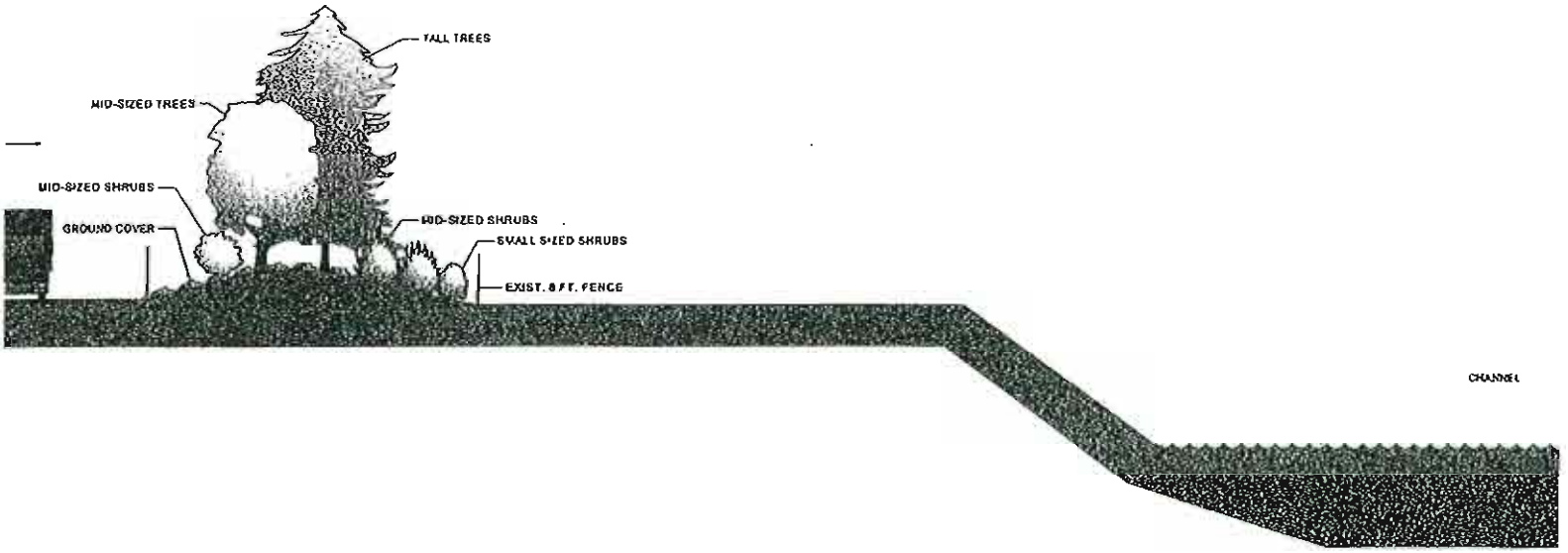

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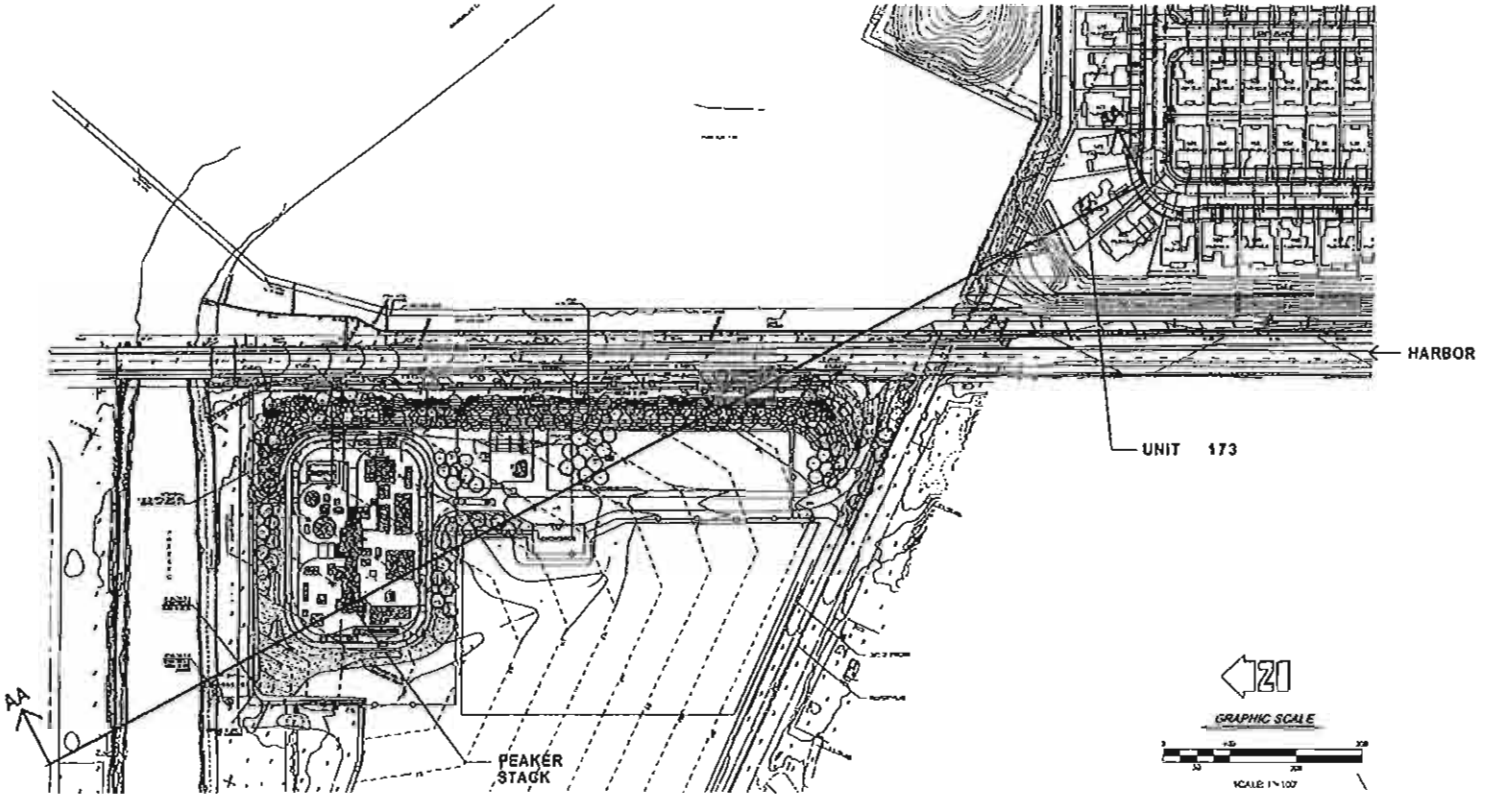

PROJECT SITE PLAN WITH NEIGHBORING DEVELOPMENT
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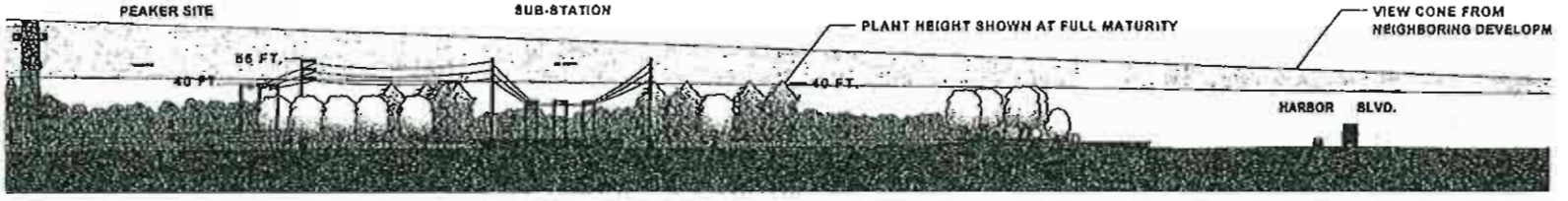

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MANDALAY SITE

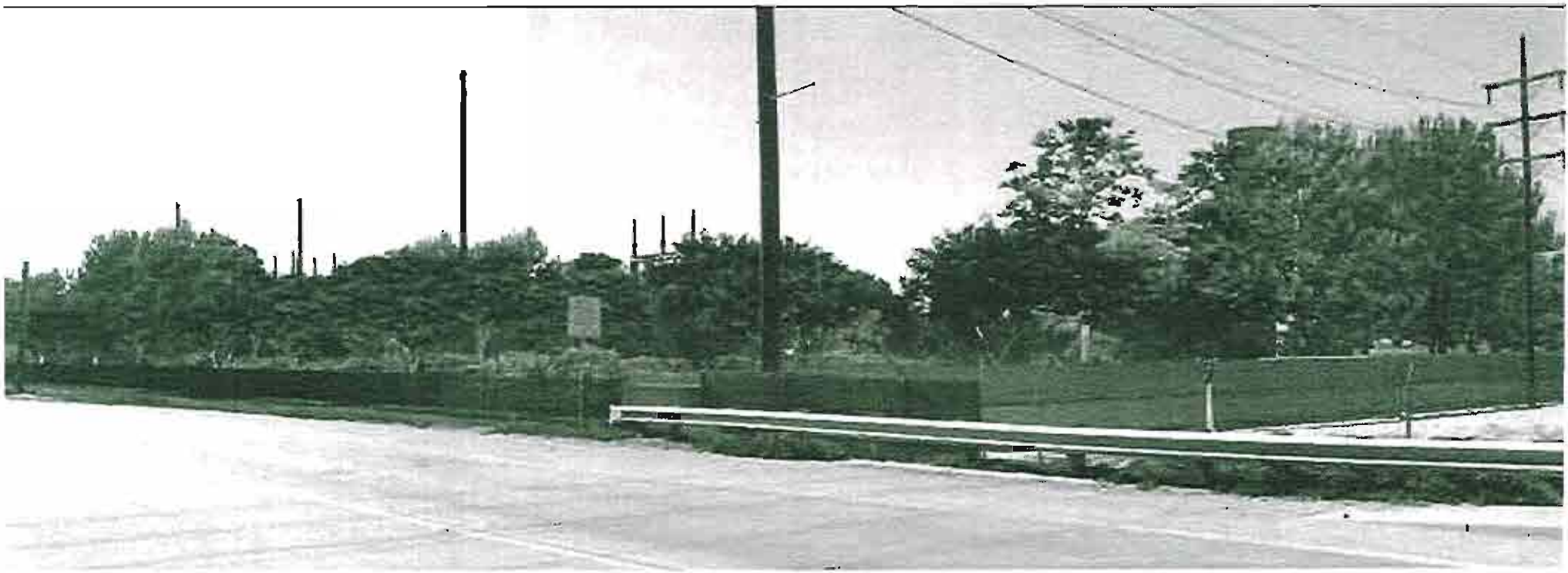
SOUTHERN CALIFORNIA EDISON COMPANY
251 N. HARBOR BLVD., OXNARD, CALIFORNIA

APPENDIX C

Key for View Locations

ILENAME: key views locations.

VP1 - Project view from northeast corner of the SCE property - before



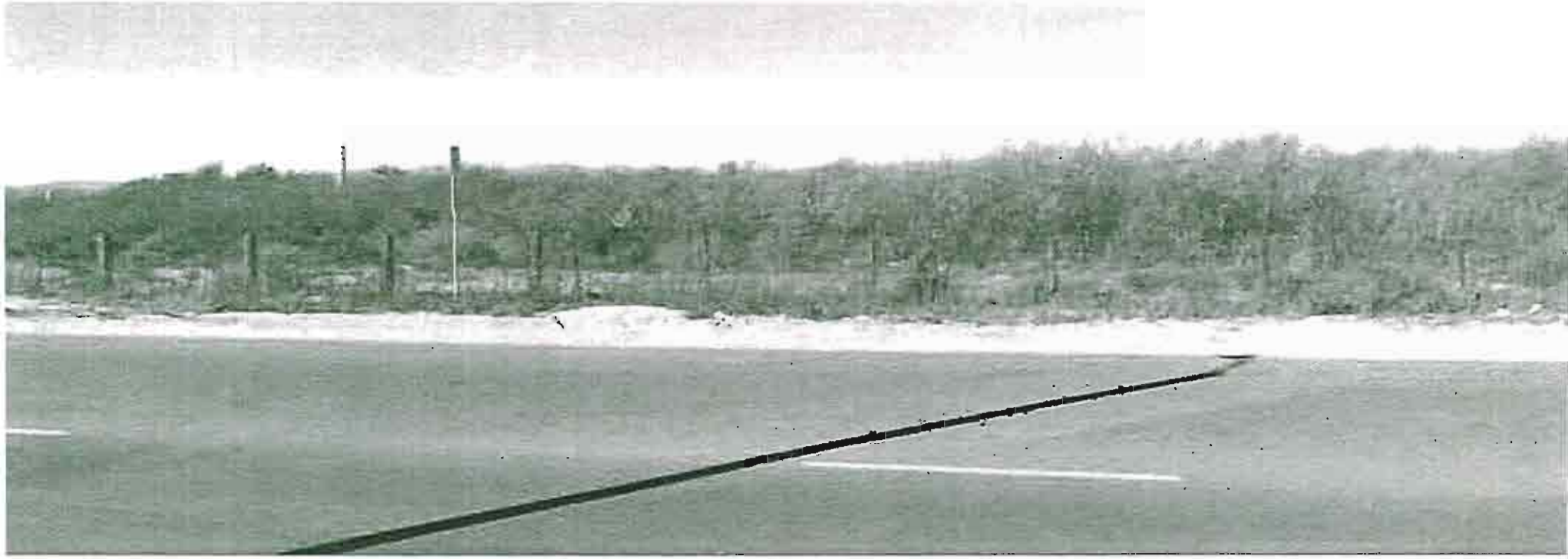
VP2 - Project view from midpoint of the SCE property - before

VP3 - Project view from southeast corner of the SCE property - before

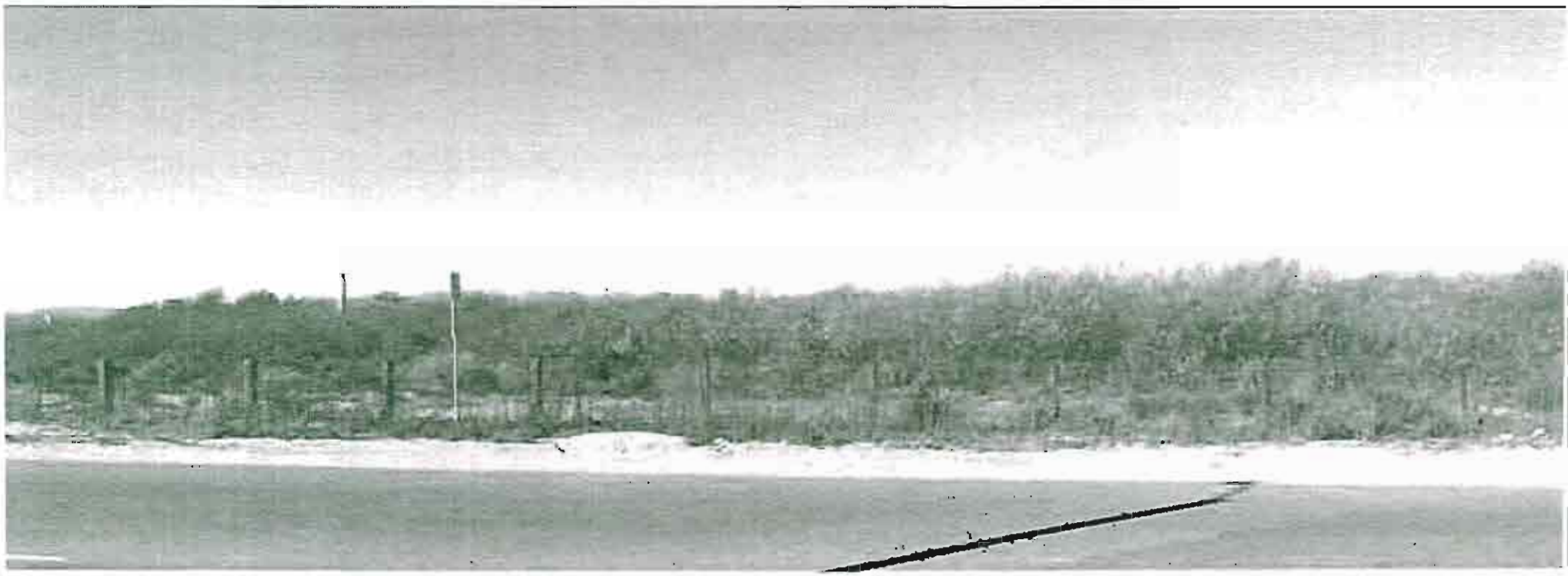
VP4 - View of transmission lines from the north - before

VP5 - View of transmission lines from the south - before

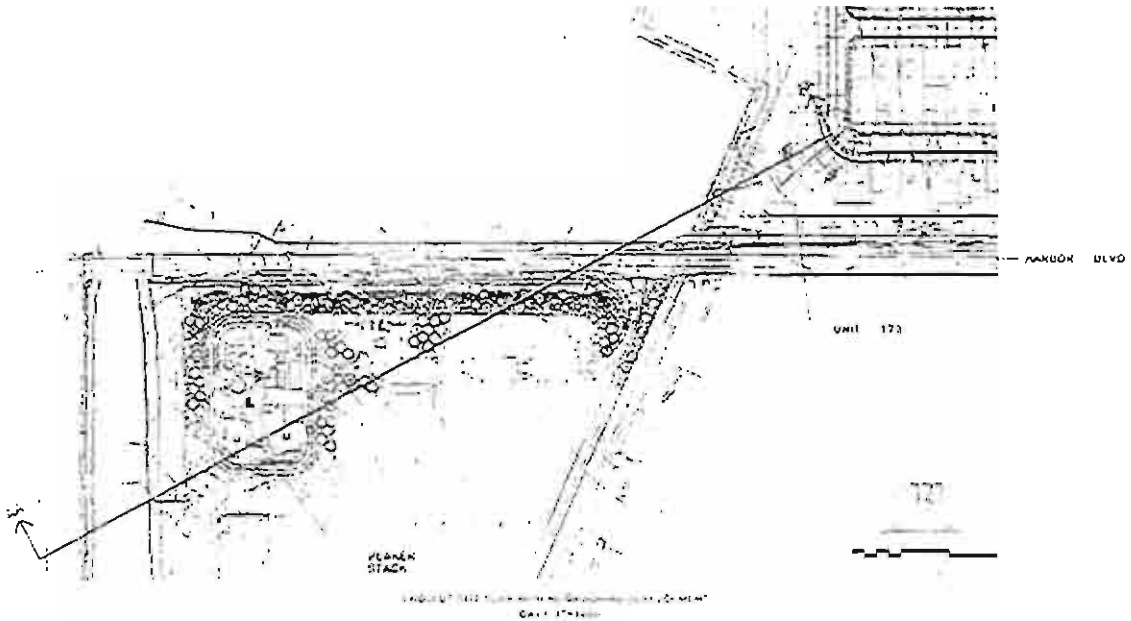
VP6 - Future entrance to North Shore at Mandalay Bay development - before

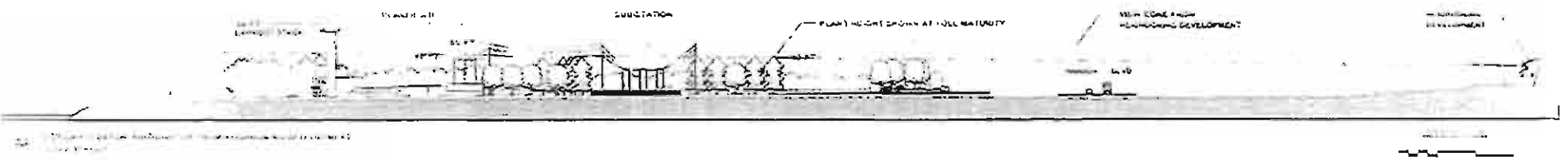


VP7 - Midpoint on 5th Street from Oxnard Shores Mobile Home Park - before



VP8 - West end of 5th Street from Oxnard Shores Mobile Home Park - before





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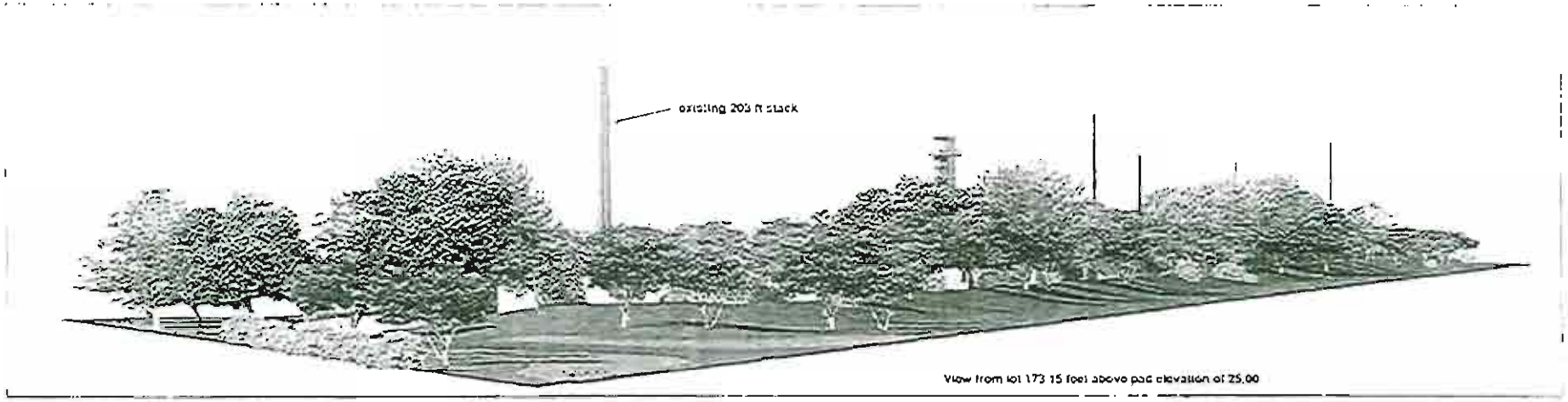
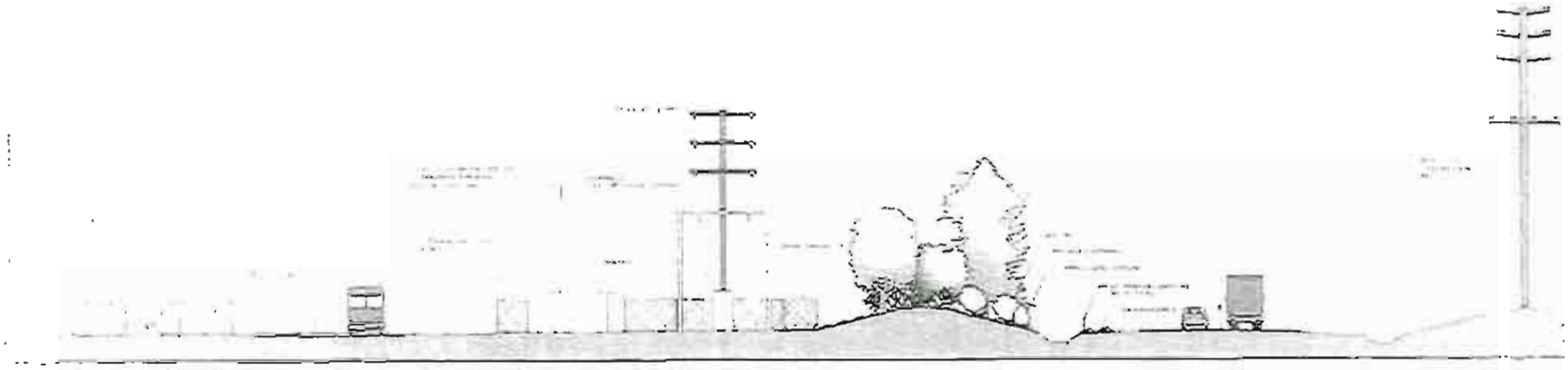
APPENDIX D



Computer Simulation of View of SCE Mandalay Peaker Project from Second Floor of Closest Residence in Future Northshore at Mandalay Bay



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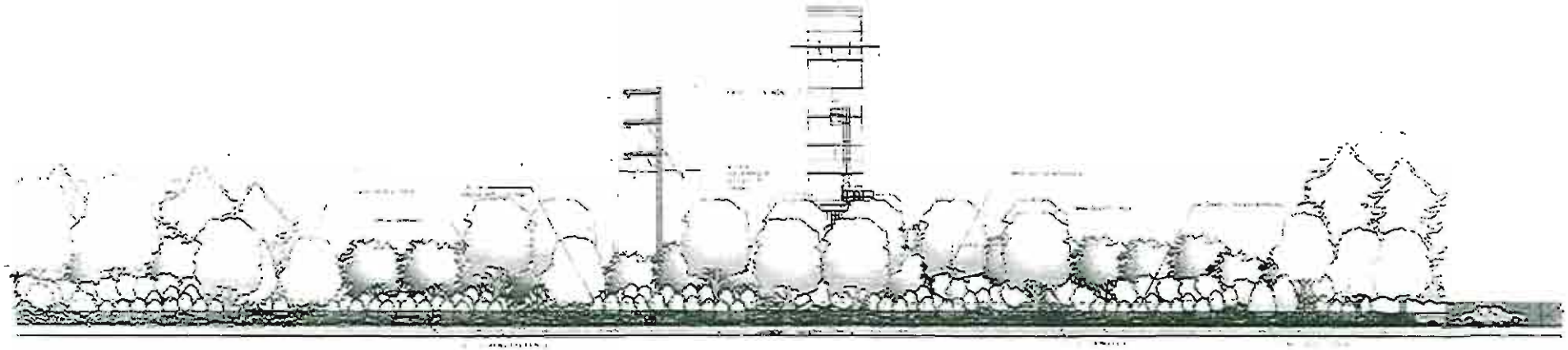

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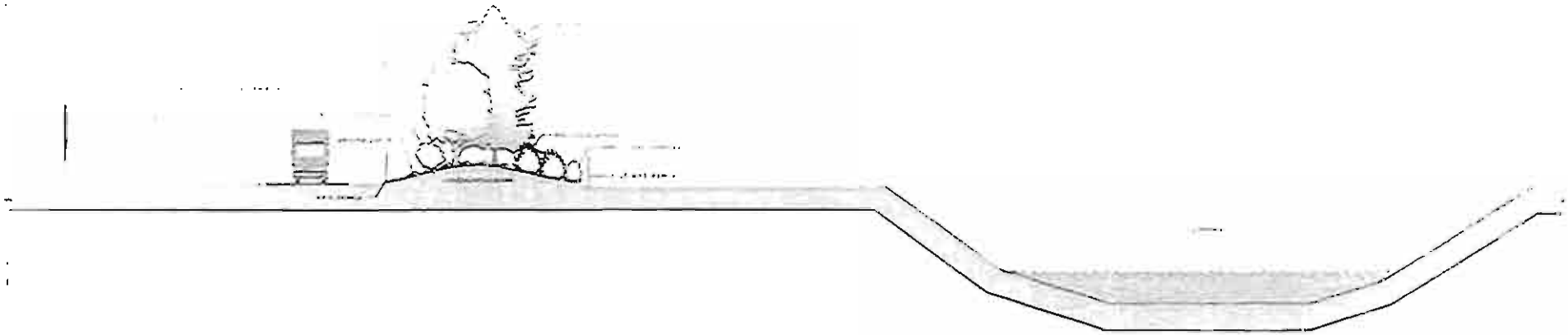

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MANDALAY SITE

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TABLE OF CONTENTS

Page

D.1 CONSTRUCTION EMISSIONS CALCULATIONS 1
- D.1.1 Construction Equipment Exhaust Emission Calculations 1
- D.1.2 Motor Vehicle Exhaust Emission Calculations 2
- D.1.3 Motor Vehicle Entrained Road Dust Emission Calculations 3
- D.1.4 Excavation Fugitive PM10 Emission Calculations 4
- D.1.5 Painting ROC Emission Calculations 7
- D.1.6 Asphaltic Paving ROC Emission Calculations 7
- D.1.7 Peak Daily Construction Emission Calculations 8

D.2 OPERATIONAL CRITERIA POLLUTANT EMISSION CALCULATIONS 8
- D.2.1 LM6000 Turbine 8
  - D.2.1.1 Normal Operations 9
  - D.2.1.2 Startup/Shutdown Operations 10
  - D.2.1.3 Commissioning 12
  - D.2.1.4 Annual Emission Rates 13
- D.2.2 Black Start Generator 14
  - D.2.2.1 Maximum Hourly Emission Calculations 14
  - D.2.2.2 Annual Emission Rates 15
  - D.2.2.3 Direct Operational Criteria Pollutant Emissions 16
- D.2.3 Aqueous Ammonia Delivery Truck Criteria Pollutant Emissions 16

D.3 OPERATIONAL TOXIC AIR CONTAMINANT EMISSION CALCULATIONS 17
- D.3.1 Methodology 17
- D.3.2 TAC Calculations for LM6000 Turbine 17
  - D.3.2.1 Maximum Hourly Emissions 17
  - D.3.2.2 Annual Average Emissions 18
- D.3.3 TAC Calculations for Waukesha ICE 18
  - D.3.3.1 Maximum Hourly Emissions 18
  - D.3.3.2 Annual Average Emissions 18
- D.3.4 Direct Operational Toxic Air Contaminant Emissions 19

D.4 AMBIENT AIR QUALITY IMPACTS MODELING 20
- D.4.1 Overview 20
- D.4.2 Modeling Methods 20
- D.4.3 Source Description and Downwash 20
- D.4.4 Receptors 24
- D.4.5 Meteorological data 24
- D.4.6 Modeling results 25

D.5 HEALTH RISK ASSESSMENT 29
D.5.1 Health Risk Assessment Procedures 29
D.5.2 Emission Characterization 30
D.5.3 Risk Assessment Dispersion Modeling Methodology 31
D.5.4 Risk Characterization 32
D.5.5 Health Risk Assessment Results 33

ATTACHMENTS

ATTACHMENT D.1 Construction Emission Calculation Spreadsheets
ATTACHMENT D.2 Operational Emission Calculation Spreadsheets
ATTACHMENT D.3 Modeling Input and Output Files (electronic only)

LIST OF FIGURES

Figure D-1. Simplified Plot Plan 22
Figure D-2. Modeled Receptors 26
Figure D-3. Composite Wind Rose 27
Figure D-4. Modeled Receptors 34

LIST OF TABLES

Table D-1 Proposed LM6000 Turbine Maximum Hourly Emissions During Normal Operations .. 10
Table D-2 Proposed LM6000 Turbine Maximum Hourly Emissions During SU/SD Conditions 12
Table D-3 LM6000 Turbine Commissioning Emission Rates 13
Table D-4 LM6000 PTE for First Year and Subsequent Years of Operation 14
Table D-5 Proposed Waukesha Black Start ICE Maximum Hourly Emissions 15
Table D-6 Proposed Waukesha Black Start ICE Annual Average Emissions 16
Table D-7 Proposed Facility-Wide Criteria Pollutant Emissions During Normal Operations 16
Table D-8 Proposed Facility-Wide TAC Emissions During Normal Operations 19
Table D-9 Modeled Emission Rates During Normal Operations 23
Table D-10 Modeled Emission Rates During Startup 23
Table D-11 Modeled Emission Rates During Commissioning 24
Table D-12 Modeled Stack Parameters 24
Table D-13 Normal Operations Modeling Results 28
Table D-14 Startup Modeling Results 29

Table D-15 Commissioning Modeling Results 29
Table D-16 Modeled LM6000 TAC Emissions During Normal Operations 30
Table D-17 Modeled Black Start ICE TAC Emissions During Normal Operations 31
Table D-18 Modeled Stack Parameters 32
Table D-19 Maximum Predicted Risks 33

APPENDIX D

AIR QUALITY ANALYSIS METHODOLOGIES

This appendix provides the methodologies that were used to analyze potential air quality impacts associated with the proposed Southern California Edison Peaker Projects, described in Section 2 of the Initial Study. This appendix begins with a discussion of the methodologies used to calculate construction and operational emissions. Procedures used for ambient air quality modeling to calculate impacts of increases in operational emissions from the proposed project are then presented, followed by the human health risk assessment procedures. Spreadsheets that provide details of the emissions calculations are attached as well as computer model inputs and outputs from the ambient air quality modeling and the health risk assessments.

D.1 CONSTRUCTION EMISSIONS CALCULATIONS

Construction emissions can be distinguished as either onsite or offsite. Onsite emissions generated during construction principally consist of exhaust emissions (CO, ROC, NO_X, SO_X, and PM10) from construction equipment, fugitive dust (PM10) from grading and excavation, and ROC from painting and asphaltic paving. Offsite emissions during the construction phase normally consist of exhaust emissions and entrained paved road dust from worker commute trips and material delivery trips.

D.1.1 Construction Equipment Exhaust Emission Calculations

The combustion of fuel to provide power for the operation of various construction activities and equipment results in the generation of CO, ROC NO_X, SO_X, and PM10 emissions. The following predictive emission equation was used to calculate exhaust emissions from each type of construction equipment:

$$\text{Exhaust Emissions}_{i,j}\ (\text{lb/day}) = EF_{C,i,j} \times T_{H,j} \qquad \text{(EQ. D.1-1)}$$

where:

$EF_{C,i,j}$ = Emission factor for specific air contaminant i from construction equipment type j (lb/hr)

$T_{H,j}$ = Daily operating time for equipment of type j (hr/day)

The exhaust emission factors used for the calculations of CO, ROC, NO_x and PM10 are composite horsepower-based off-road emission factors for 2007 developed for the South Coast Air Quality Management District (SCAQMD) by the California Air Resources Board (CARB) from

its OFF-ROAD Model. The composite off-road emission factors were derived based on equipment category (tractor, dozer, scraper, etc.), and average equipment age and horsepower rating within horsepower ranges for the year. The emission factors developed by CARB for the SCAQMD for 2007 are listed in Table D.1.3 of Attachment D.1 and can also be downloaded from http://www.aqmd.gov/ceqa/hdbk.html/offroadEF_0620.xls.

The types of construction equipment and the maximum daily operating time for each type of equipment during each bi-weekly construction period were estimated by SCE's engineering contractor for the proposed projects. Emission factors for CO, ROC, NO_x, SO_x, and PM10 were prepared for the specified equipment and are provided in Table D.1.2 of Attachment D.1.

The anticipated construction equipment usage and maximum daily emissions by bi-weekly period are listed in Table D.1.1 of Attachment D.1.

D.1.2 Motor Vehicle Exhaust Emission Calculations

The combustion of fuel in motor vehicle engines results in the generation of CO, ROC NO_X, SO_X, and PM10 emissions. The following predictive emission equation was used to calculate exhaust emissions from both on-site and off-site motor vehicles:

$$\text{Exhaust Emissions}_{i,j}\ (\text{lb/day}) = EF_{V,i,j} \times N_{V,j} \times D_j \qquad \text{(EQ. D.1-2)}$$

where:

$EF_{V,i,j}$ = Emission factor for specific air contaminant i from motor vehicle type j (lb/mi)

$N_{V,j}$ = Number of motor vehicles of type j

D_j = Distance traveled each day by motor vehicles of type j (mi/day)

CO, ROC, NO_x, SO_x and PM10 emission factors were compiled by the SCAQMD by running the California Air Resources Board's EMFAC2002 (version 2.2) Burden Model for the South Coast Air Basin for 2007. The South Coast Air Basin was used to specify the fleet vehicle mix because the ammonia delivery trucks originate in the South Coast Air Basin. A weighted average of vehicle types was used to calculate emission factors for passenger vehicles, and emission factors for heavy heavy-duty diesel trucks were used for delivery trucks. The emission factors account for the emissions from start, running and idling exhaust. In addition, the ROC emission factors take into account diurnal, hot soak, running and resting emissions, and PM10 emission factors take into account tire and brake wear. The motor vehicle exhaust emission factors are listed in Table D.1.4A of Attachment D.1.

SCE's engineering contractor estimated the number and length of daily on-site and off-site motor vehicle trips by trucks to deliver materials and supplies, remove construction debris, etc., by bi-

weekly construction period. The anticipated number of construction workers during each bi-weekly construction period was used to calculate the number of construction worker commute trips, assuming each worker would drive separately to and from the off-site parking facility each day. This assumption overestimates the number of trips, since it is likely that some workers will carpool.

The anticipated number of motor vehicles and the resulting emissions by bi-weekly period are listed in Table D.1.1 of Attachment D.1.

D.1.3 Motor Vehicle Entrained Road Dust Emission Calculations

Vehicle travel on paved and unpaved roads generates fugitive PM10 emissions by entrainment of dust on the roads. It should be noted that most of the motor vehicle travel during construction of the proposed project will be on paved roads; however, the analysis assumes that each construction vehicle will travel one-half mile each day on unpaved surfaces to account for vehicle travel to and from the access gate of the property to the project site. The following predictive emission equation was used to calculate PM10 emissions from both on-site and off-site motor vehicle entrained road dust.

$$\text{Entrained Dust PM10 Emissions}_j\ (\text{lb/day}) = EF_{D,j} \times N_{V,j} \times D_j \qquad \text{(EQ. D.1-3)}$$

where:

$EF_{D,j}$ = Emission factor for entrained road dust PM10 from motor vehicle type j (lb/mi)

$N_{V,j}$ = Number of motor vehicles of type j

D_j = Distance traveled each day by motor vehicles of type j (mi/day)

The emission factor for entrained paved road dust was calculated from the following equation from CARB Emission Inventory Methodology 7.9, "Entrained Paved Road Dust" (1997):

$$EF_{D,j}\ (\text{lb/mi}) = 7.26 / 453.6 \times (sL_j/2)^{0.65} \times (W_j/3)^{1.5} \qquad \text{(EQ. D.1-4)}$$

where:

7.26 = A constant for PM10 emissions (g/mi)

453.6 = Factor to convert from grams to pounds (g/lb)

sL_j = Silt loading on roads traveled by motor vehicle of type j (g/m^2)

W_j = Average weight of vehicles on roads traveled by vehicles of type j (tons)

The silt loadings were taken from Table 3 of CARB Emission Inventory Methodology 7.9. As indicated in Table D.1.4B of Attachment D.1, on-site motor vehicles were assumed to travel on

paved roads and areas with silt loadings equivalent to local roads, and off-site motor vehicles were assumed to travel on roads with silt loadings equivalent to collector roads.

The emission factor for entrained unpaved road dust was calculated from the following equation:

$$EF_{D,j}\ (lb/mi) = 1.5 \times (S_j / 12)^{0.9} \times (W_j / 3)^{0.45} \qquad \text{(EQ. D.1-5)}$$

where:

1.5 = A constant for PM10 emissions (g/mi)

S_j = Silt content of unpaved areas traveled by motor vehicle of type j (g/m^2)

W_j = Average weight of vehicles on roads traveled by vehicles of type j (tons)

Reference: Section 13.2.2 for industrial unpaved roads of US EPA Compilation of Air Pollutant Emission Factors (AP-42), December 2003

The unpaved surface silt contents were assumed to be 7.5 percent, as listed in Table A9-9-F-1 of the SCAQMD CEQA Air Quality Handbook for overburden.

Weights of on-site vehicles were based on vehicle class. The average weight of vehicles on roads traveled by off-site motor vehicles was assumed to be 2.4 tons, as listed in Table 3 of CARB Emission Inventory Methodology 7.9 for Ventura County.

Maximum daily motor vehicle paved road dust entrainment emissions are listed for both on-site and off-site motor vehicles by bi-weekly construction period in Table D.1.1 of Attachment D.1.

D.1.4 Excavation Fugitive PM10 Emission Calculations

Excavation for foundations for new and modified equipment during construction of the proposed project will generate fugitive PM10 emissions from soil handling (i.e., dropping) and from wind erosion of temporary storage piles. Although fugitive dust emissions from construction activities are temporary, they may have an impact on local air quality. Fugitive dust emissions often vary substantially from day to day, depending on the level of activity, the specific operations, and the prevailing meteorological conditions. The following methodologies provide the predictive emission equations, emission factors, and default values used to calculate fugitive dust emissions for the project.

Construction contractors will comply with water the site two times per day, reducing the uncontrolled on-site fugitive dust emissions by 50 percent.

Emissions from Soil Handling

Fugitive PM10 emissions are generated during excavation when excavated material is dropped onto the ground at the side of the excavation location or dropped into trucks for removal from the site. The following equation was used to estimate these emissions:

$$\text{Emissions (lb/day)} = EF_S \times V_s \qquad \text{(EQ. D.1-6)}$$

where:

EF_S = Controlled PM10 emission factor for soil dropping (lb/yd^3)

V_S = Volume of soil handled (yd^3/day)

The controlled emission factor was calculated from:

$$EF_S\ (\text{lb/yd}^3) = 0.0011 \times (U/5)^{1.3} / (M/2)^{1.4} \times D \times N_D \times (1\text{-}CE_{403}/100) \qquad \text{(EQ. D.1-7)}$$

where:

U = Mean wind speed (mph)

M = Soil moisture content (percent)

D = Soil density (tons/yd^3)

N_D = Number of times soil is dropped

CE_{403} = Control efficiency (percent)

Source: Equation 1, Section 13.2.4, US EPA Compilation of Air Pollutant Emission Factors (AP-42), January 1995.

The mean wind speed was assumed to be the default value of 12 mph, from Table 9-9-G of the SCAQMD CEQA Handbook (1993). The moisture content was assumed to be 15 percent, from "Open Fugitive Dust PM10 Control Strategies Study," Midwest Research Institute, October 12, 1990, for moist conditions. Soil density was assumed to be 1.215 tons per cubic yard, from Table 2.46, Handbook of Solid Waste Management. It was conservatively assumed that soil would be dropped four times: 1) onto the ground at the side of the excavation; 2) onto a temporary storage pile; 3) into a truck; and 4) out of the truck. The control efficiency for watering was assumed to be 50 percent.

SCE estimated the excavation volumes for construction of foundations for the proposed equipment. The anticipated schedule for constructing the foundations was used to calculate the amount of soil that will be excavated during each bi-weekly construction period. The maximum

daily excavation volume during each construction period was estimated to be one-sixth of the total for the 12 working days during the bi-weekly period.

Maximum daily volumes of soil handled during each bi-weekly construction period and the resulting fugitive PM10 emissions are listed in Table D.1.1 of Attachment D.1.

Wind Erosion from Temporary Storage Piles

Wind erosion of temporary soil storage piles during excavation generates fugitive PM10 emissions. The following equation was used to estimate these emissions:

$$\text{Emissions (lb/day)} = EF_W \times A \qquad \text{(EQ. D.1-8)}$$

where:

EF_W = Controlled PM10 emission factor for storage pile wind erosion (lb/acre-day)

A = Temporary storage pile surface area (acres)

The controlled emission factor was calculated from:

$$EF_W \text{ (lb/acre-day)} = 0.85 \times (s/1.5) \times (365-p/235) \times (U_{12}/15) \times (1-CE_{403}/100) \qquad \text{(EQ. D.1-9)}$$

where:

s = Soil silt content (percent)

p = Number of days per year with precipitation of 0.01 inches or more

U_{12} = Percentage of time unobstructed wind speed exceeds 12 mph

CE_{403} = Control efficiency (percent)

Source: US EPA Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures, 1992

The storage pile silt contents were assumed to be 7.5 percent, as listed in Table A9-9-F-1 of the SCAQMD CEQA Air Quality Handbook for overburden. The number of days with precipitation was conservatively assumed to be zero, and the percentage of the time that the wind speeds exceeds 12 mph was conservatively assumed to be 100 percent. The control efficiency was assumed to be 50 percent. The emission factors are listed in Table D.1.5 of Attachment D.1.

The maximum daily surface area of temporary storage piles was estimated by assuming that the volume of soil excavated each day would be in storage piles three feet tall, square in shape, and flat on the top. The surface areas, in acres, were then calculating by dividing the surface areas, in square feet, by 43,560 square feet per acre.

Maximum daily surface areas of storage piles during each bi-weekly construction period and the resulting fugitive PM10 emissions are listed in Table D.1.1 of Attachment D.1.

D.1.5 Painting ROC Emission Calculations

The application of architectural surface coatings (painting) generates ROC emissions when organic solvents in the coating evaporate as the coating dries. The following equation was used to estimate ROC emissions from architectural coatings:

$$\text{Emissions (lb/day)} = C \times V \qquad \text{(EQ. D.1-10)}$$

where:

C = ROC content of coating (lb/gal)

V = Amount of coating applied (gal/day)

A ROC content of 2.08 lb/gal (100 g/l) was assumed, based on the VOC limit specified in VCAPCD Rule 74.2 - Architectural Coatings for an industrial maintenance coating.

SCE anticipates that a maximum of 20 gallons of coating would be used for touchup for the site. A worst-case usage of 10 gallons per day was assumed to occur during the bi-weekly period prior to the start of equipment testing and commissioning.

Maximum daily surface coating usage and ROC emissions during each bi-weekly construction period are listed in Table D.1.1 of Attachment D.1.

D.1.6 Asphaltic Paving ROC Emission Calculations

Paving areas with asphalt generates ROC emissions as the asphalt cures. The following equation was used to estimate daily ROC emissions from asphaltic paving:

$$\text{Emissions (lb/day)} = 2.62 \times A \qquad \text{(EQ. D.1-11)}$$

where:

A = Area paved (acres/day)

Source: URBEMIS 2002 User's Guide, 2005

It was assumed that half the 220 foot-by-320 foot area of the site and a maximum of one-quarter mile of a 30-foot wide access road would be paved with asphalt, and that half the paving would be conducted on one day at the end of the construction for the site. The total square footage paved

at the site would be (220 feet x 320 feet) / 2 + (1,320 feet x 30 feet) ≈ 70,000 square feet, which is equivalent to 1.6 acres.

Maximum daily paved surface areas and ROC emissions during each bi-weekly construction period are listed in Table D.1.1 of Attachment D.1.

D.1.7 Peak Daily Construction Emission Calculations

Daily emissions from construction equipment exhaust, on-site motor vehicle exhaust and entrained dust, grading and excavation, asphaltic paving, painting, and off-site motor vehicle exhaust and entrained dust during each bi-weekly construction period were calculated using the procedures described in the preceding subsections. Total daily emissions of each criteria pollutant (CO, ROC, NO_x, SO_x, and PM10) during each period were then calculated by summing the daily emissions from the various emission sources. Peak daily emissions of each criteria pollutant were then determined from the daily emissions during each construction period.

Maximum daily emissions during each bi-weekly construction period and peak daily construction emissions for the proposed project are listed in Table D.1.1 of Attachment D.1.

The Ventura County Air Quality Assessment Guidelines recommend specific mitigation measures for construction activities when construction emissions exceed 25 pounds per day of NO_x or ROC. The guidelines do not require that emission reductions be calculated from the implementation of the recommended mitigation measures.

D.2 OPERATIONAL CRITERIA POLLUTANT EMISSION CALCULATIONS

Emissions are based on the project description, proposed permit limits, and anticipated operating levels. The emission calculations and supporting documentation are provided in detail in Attachment D.2 of this appendix. The following subsections describe the emission calculations performed for criteria pollutants emitted from the proposed equipment.

D.2.1 LM6000 Turbine

Emissions from the LM6000 turbine are due to the combustion of natural gas fuel. Controlled emission guarantees for NO_X, CO, PM10, ROC, and ammonia (NH_3) slip were obtained from GE for the LM6000 turbine for normal operations. The emission rates for NO_X and CO are 2.5 and 6.0 ppm, respectively, at 15 percent O_2. Ammonia slip will not exceed 5.0 ppm, and ROC will not exceed 2.0 ppm. The emissions for sulfur dioxide (SO_2) are based on USEPA Compilation of Air Pollution Emission Factors (AP-42), Fifth Edition, Section 3.1, Page 8, Supplement A, dated April 2000.

D.2.1.1 Normal Operations

Normal operations consist of periods when the LM6000 turbine is operating at full load under controlled conditions with water injection, SCR, and oxidation catalyst in operation. GE provided guaranteed controlled hourly emission rates, in pounds per hour (lb/hr), for NO_X, CO, PM10, and ROC for two ambient temperature scenarios, 34°F and 83°F, at the Mandalay project site. The maximum guaranteed emission rates of NO_X, CO, and ROC occur for the 34°F case and are proposed as the permitted, controlled hourly emission rates for these pollutants. The guaranteed hourly rate of PM10 does not vary by ambient temperature.

AP-42 emission factors were used to calculate SO_2 maximum hourly emission rates using the AP-42 emission factor and maximum fuel flow rate.

To ensure PM10 emission rates are not underestimated, SCE assumes that all of the SO_2 will react with excess ammonia (ammonia slip) to form ammonium sulfate, which will exist as fine particulate matter (PM10). Based on the relative masses of ammonium sulfate and SO_2, approximately two pounds of ammonium sulfate is formed for every pound of SO_2 released.

Detailed emission calculations for criteria pollutants during normal operations are shown in Table D.2.1 of Attachment D.2. A sample calculation for maximum hourly SO_2 emission rates are provided below:

Maximum lb/hr (SO_2) = maximum hourly fuel flow rate (MMBtu/hr) X emission factor (lb/MMBtu)

Maximum lb/hr (SO_2) = 451.3 (MMBtu/hr) X (0.0006 lb/MMBtu) = <u>0.27 lb/hr</u>

Table D-1 summarizes the proposed maximum hourly emission rates for all criteria pollutants for the LM6000 turbine during normal operations.

Table D-1 Proposed LM6000 Turbine Maximum Hourly Emissions During Normal Operations

Pollutant	Maximum Emission Rate (lb/hr)	Basis
NO_X	4.30	Vendor Guarantee
CO	6.30	Vendor Guarantee
PM10	4.54	Vendor Guarantee [1]
ROC	1.31	Vendor Guarantee
SO_2	0.27	AP-42, fuel sulfur content

[1] Vendor guarantee of 4.0 lb/hr, plus 2 times SO_2 emission rate to account for estimated sulfates

D.2.1.2 Startup/Shutdown Operations

SU/SD NO_X and CO emission calculations for the LM6000 turbine were performed using SU and SD curves provided by GE. The total emissions of NO_X and CO emissions during a SU or SD were divided by the duration of each event to obtain the maximum hourly emission rates. SUs will take approximately 12 minutes to achieve full load conditions, after which time the SCR and oxidation catalyst are controlling emissions at their guaranteed control efficiencies. Emission estimates for NO_X and CO were provided by GE for each phase of the 12-minute startup sequence, ranging from uncontrolled to fully controlled emissions. The hourly NOx and CO emissions for SU operations are calculated based on 12 minutes of uncontrolled emissions and 48 minutes of controlled emissions at full load.

The oxidation catalyst is expected to be functional after about 6.5 minutes into the SU sequence, at which time ROC emissions will be controlled by the oxidation catalyst. Uncontrolled ROC emission rates provided by GE were used for the first 6.5 minutes of the SU sequence, with controlled emission rates occurring during the remaining 5.5 minutes of the 12 minutes SU sequence.

SDs will last approximately 8 minutes. Emission estimates for NO_X and CO were provided by GE for each phase of the 8-minute SD sequence. These SD emissions, along with normal operation emission rates, were used to estimate the maximum hourly emission rates of NO_X and CO during a typical SD sequence. For ROC, the oxidation catalyst will be functional for the first 2.5 minutes of the SD sequence. Uncontrolled ROC emission rates provided by GE were used for the remaining 5.5 minutes of the SD sequence. The hourly NOx, CO and ROC emissions for SD

operations are calculated based on 8 minutes of SD and 52 minutes of controlled emissions at full load.

Emissions of PM10 and SO_2 during SU/SD are not expected to be any higher than those proposed for normal operations since these pollutant emission rates are strictly a function of the quantity of natural gas burned. Therefore, normal operation emissions are presented during SU/SD conditions for PM10 and SO_2.

Maximum hourly emissions during SU conditions were calculated as follows based on SU curves provided by GE. Sample calculations for NO_X, CO, and ROC are provided below:

Maximum lb/hr (NO_X) = total lbs during startup + [maximum normal operations (lb/hr) / 60 min/hr X 48 min at normal operations]

Maximum lb/hr (NO_X) = 4.3 lbs + [4.3 (lb/hr) /60 min/hr X 48 min] = 7.74 lb/hr

Maximum lb/hr (CO) = total lbs during startup + [maximum normal operations (lb/hr) / 60 min/hr X 48 minutes at normal operations]

Maximum lb/hr (CO) = 3.7 lbs + [6.3 (lb/hr) / 60 min/hr X 48 min] = 8.74 lb/hr

Maximum lb/hr (ROC) = {[uncontrolled ROC (lb/hr) / 60 min/hr X 6.5 min] + [maximum normal operations (lb/hr) /60 min/hr X 5.5 min]} + [maximum normal operations (lb/hr) / 60 min/hr X 48 minutes at normal operations]

Maximum lb/hr (ROC) = {[1.96 (lb/hr) / 60 min/hr X 6.5 min] + [1.31 (lb/hr) / 60 min/hr X 5.5 min]} + [1.31 (lb/hr) / 60 min/hr X 48 minutes at normal operations] = 1.38 lb/hr

Maximum hourly emissions during SD conditions were calculated as follows based on SU curves provided by GE. Sample calculations for NO_X, CO, and ROC are provided below:

Maximum lb/hr (NO_X) = total lbs during shutdown + [maximum normal operations (lb/hr) / 60 min/hr X 52 min]

Maximum lb/hr (NO_X) = 2.8 lbs + [4.3 (lb/hr) / 60 min/hr X 52 min] = 6.53 lb/hr

Maximum lb/hr (CO) = total lbs during shutdown + [maximum normal operations (lb/hr) / 60 min/hr X 52 min]

Maximum lb/hr (CO) = {2.4 lbs + [6.3 (lb/hr) / 60 min/hr X 52 min] = 7.86 lb/hr

Maximum lb/hr (ROC) = {[uncontrolled ROC (lb/hr) / 60 min/hr X 5.5 min] + [maximum normal operations (lb/hr) /60 min/hr X 2.5 min]} + [maximum normal operations (lb/hr) / 60 min/hr X 52 minutes at normal operations]

Maximum lb/hr (ROC) = {[1.96 (lb/hr) / 60 min/hr X 5.5 min] + [1.31 (lb/hr) / 60 min/hr X 2.5 min]} + [1.31 (lb/hr) / 60 min/hr X 52 minutes at normal operations] = 1.37 lb/hr

Table D-2 summarizes the proposed maximum hourly emission rates for all criteria pollutants for the LM6000 turbine during SU/SD conditions. Detailed calculations are found in Tables D.2.2 and D.2.3 of Attachment D.2.

Table D-2 Proposed LM6000 Turbine Maximum Hourly Emissions During SU/SD Conditions

Pollutant	Maximum SU Emission Rate (lb/hr)	Maximum SD Emission Rate (lb/hr)
NO_X	7.74	6.53
CO	8.74	7.86
PM10	4.54	4.54
ROC	1.38	1.37
SO_2	0.27	0.27

D.2.1.3 Commissioning

Commissioning of the LM6000 turbine is anticipated to take 25 hours. Emission calculations for uncontrolled and partially controlled emissions of NO_X, CO, and ROC provided by GE were used to calculate peak hourly rates for these pollutants. Emissions of PM10 and SO_2 are not expected to be any higher than those proposed for normal operations since these pollutant emission rates are strictly a function of the quantity of natural gas burned. Therefore, normal operation emissions are presented during commissioning for PM10 and SO_2.

Table D-3 summarizes the uncontrolled and controlled hourly and total emissions during commissioning for the LM6000 turbine. Detailed commissioning emission calculations are provided in Table D.2.4 of Attachment D.2.

Table D-3 LM6000 Turbine Commissioning Emission Rates

Pollutant	Uncontrolled Emissions (lb/hr)	Controlled Emissions [1] (lb/hr)	Total Commissioning Emissions (lb)
NO_X	105.65	43.3	1394.26
CO	62.20	62.20	1555.00
PM10	4.54	4.54	113.54
ROC	1.96	1.96	49.10
SO_2	0.27	0.27	6.77

[1] Only NO_X emissions will be partially controlled during a portion of commissioning; see Attachment D.2.

D.2.1.4 Annual Emission Rates

Annualized emission rates were calculated for two annual periods: 1) during the first year of operation that includes commissioning, and 2) during subsequent years following commissioning. The first year of operation will consist of 25 hours of uncontrolled commissioning emissions, 60 (1/2 of 120 annual events) SU/SD cycles, and 1,756 hours at normal operations. Annual emission estimates for the first year used these hour estimates, along with estimated commissioning, SU/SD, and normal operation emissions, to calculate annual emission rates.

Subsequent year annual emissions were calculated assuming 120 hours per year of SU/SD operations and 1,881 hours per year of normal operations.

While an estimate of maximum annual hours of operation are provided, herein, SCE is requesting permit to construct and permit to operate limits that will be enforced by fuel use limits, and emissions limitations – not hours of operation.

Table D-4 summarizes the annual average emission rates for LM6000 turbine for the first year and subsequent years. Detailed emission calculations are provided in Tables D.2.6 and D.2.7 of Attachment D.2.

Table D-4 LM6000 PTE for First Year and Subsequent Years of Operation

Pollutant	First Year PTE with Commissioning (tpy)	Subsequent Year PTE (tpy)
NO_X	4.9	4.9
CO	6.8	6.9
PM10	4.3	4.8
ROC	1.3	1.4
SO_2	0.3	0.3

D.2.2 Black Start Generator

The black start Waukesha ICE will operate only during black start conditions, and for routine testing and maintenance. Black starts are anticipated to occur two times per year. Routine testing and maintenance will occur on a monthly basis. The total number of hours per year the Waukesha ICE will operate will be 14 hrs/yr, and will only operate for 30 minutes during each hour of operation, including during black start events.

Controlled emission guarantees for the Waukesha black start ICE were obtained from Waukesha for NO_X and CO in grams per brake-horsepower hour (g/bhp-hr). Guaranteed emission rates of total hydrocarbon were obtained from Waukesha and are assumed to be 100 percent ROC.

AP-42 Fifth Edition, Section 3.2, dated August 2000, emission factors were used to calculate SO_2 and PM10 emission rates.

The maximum fuel flow rate of the Waukesha ICE is $6{,}430 \times 10^3$ Btu/hr for standby power rated at 645 kW of power, using heat exchanger cooling. The fuel flow rate was converted to scf/hr using a heat content of 1,050 Btu/scf (6,124 scf/hr).

D.2.2.1 Maximum Hourly Emission Calculations

A sample calculation of maximum hourly NO_X emissions for the Waukesha ICE is provided below. CO and ROC emission calculations are identical with the exception of the guaranteed g/bhp-hr emission factors.

Maximum lb/hr (NO_X) = guaranteed NO_X rate (g/bhp-hr) X engine rating (bhp) / 453.6 g/lb X 30/60 minutes

Maximum lb/hr (NO_X) = 1.25 (g/bhp-hr) X 865 (bhp) / 453.6 g/lb X 30/60 minutes = 1.19 lb/hr

A sample calculation of maximum hourly SO_2 emissions for the Waukesha ICE is provided below.

Maximum lb/hr (SO_2) = emission factor (lb/MMBtu) X engine rating (MMBtu/hr) X 30/60 minutes

Maximum lb/hr (SO_2) = $5.88X10^{-4}$ (lb/MMBtu) X 6.43 (MMBtu/hr) X 30/60 minutes = $1.89X10^{-3}$ lb/hr

Table D-5 summarizes the maximum hourly emission rates of criteria pollutants for the Waukesha ICE. Detailed emission calculations are provided in Tables D.2.10 and D.2.11 of Attachment D.2.

Table D-5 Proposed Waukesha Black Start ICE Maximum Hourly Emissions

Pollutant	Emission Factor	Maximum Emission Rate (lb/hr)	Basis
NO_X	1.25 g/bhp-hr	1.19	Vendor Guarantee
CO	1.59 g/bhp-hr	1.52	Vendor Guarantee
PM10	$9.91x10^{-3}$ lb/MMBtu	$3.19x10^{-2}$	AP-42
ROC	0.45 g/bhp-hr	0.43	Vendor Guarantee
SO_2	$5.88x10^{-4}$ lb/MMBtu	$1.89x10^{-3}$	AP-42 and fuel sulfur content

D.2.2.2 Annual Emission Rates

Annual emissions from the Waukesha ICE were calculated assuming 14 hrs/yr operation. A sample calculation of annual NO_X emissions is provided below. The calculations of emissions for the remaining criteria pollutants are identical with the exception of the hourly emission rate.

Annual lb/yr (NO_X) = hourly emission rate (lb/hr) X 14 hr/yr / 2,000 lb/ton

Annual tpy (NO_X) = 1.19 (lb/hr) X 14 hr/yr / 2,000 lb/ton = $8.34X10^{-3}$ tpy

Table D-6 summarizes the annual average emission rates of criteria pollutants for the Waukesha ICE. Detailed emission calculations are provided in Tables D.2.10 and D.2.11 of Attachment D.2.

Table D-6 Proposed Waukesha Black Start ICE Annual Average Emissions

Pollutant	PTE (tpy)
NO_X	8.34×10^{-3}
CO	1.06×10^{-2}
PM10	2.23×10^{-4}
ROC	3.00×10^{-3}
SO_2	1.32×10^{-5}

D.2.2.3 Direct Operational Criteria Pollutant Emissions

Table D-7 and Table D.2.8 of Attachment D.2 summarize the proposed facility-wide direct operational emission rates for the proposed project during normal operations.

Table D-7 Proposed Facility-Wide Criteria Pollutant Emissions During Normal Operations

Pollutant	Maximum Hourly Emission Rate (lb/hr)	Maximum Daily Emission Rate (lb/day)	PTE [1] (tpy)	PTE [2] (tpy)
NO_X	5.49	104.39	4.9	4.9
CO	7.82	152.72	6.8	6.9
PM10	4.57	109.03	4.3	4.8
ROC	1.74	31.87	1.3	1.4
SO_2	0.27	6.50	0.3	0.3

[1] Includes commissioning.
[2] Subsequent years following commissioning.

D.2.3 Aqueous Ammonia Delivery Truck Criteria Pollutant Emissions

The proposed use of aqueous ammonia in the selective catalytic reduction (SCR) systems will require periodic delivery of aqueous ammonia to the proposed project sites by tanker truck. No more than one trip will be made to each project site on any day. The one-way travel distance to the site from the Los Angeles County – Ventura County line along the 101 freeway is approximately 31 miles.

Exhaust emissions from these additional truck trips were calculated using Equation D.1-3, and fugitive PM10 emissions from entrained road dust were calculated using Equation D.1-4. Truck exhaust emission factors and entrained paved road PM10 emission factors are provided in Table D.1.4A of Attachment D.1.

D.3 OPERATIONAL TOXIC AIR CONTAMINANT EMISSION CALCULATIONS

Emissions of TAC for the LM6000 turbine and Waukesha ICE were calculated using AP-42 Fifth Edition, Section 3.1 and the California Air Toxic Emission Factor (CATEF) database, respectively.

D.3.1 Methodology

AP-42 emission factors and the maximum hourly and annual fuel consumption rates were used to calculate peak hourly and annual average TAC emission rates for the LM6000 turbine. The maximum fuel consumption rate for the LM6000 turbine is 451.3 MMBtu/hr higher heating value (HHV), and was used to calculate maximum hourly emissions. Proposed maximum annual fuel consumption was used to calculate annual average emissions. No control efficiency from the oxidation catalyst was used.

For the Waukesha ICE, CATEF emission factors, the maximum hourly consumption rate, duration of operation for any given hour, and number of annual operating hours were used to calculate peak hourly and annual average TAC emission rates. The maximum fuel consumption rate for the black start ICE is 6.43 MMBtu/hr, the duration of each hour of operation is 30 minutes, and the maximum proposed annual operating hours is 14 hrs/yr.

D.3.2 TAC Calculations for LM6000 Turbine

The following sets of sample emission calculations are provided for benzene. The remaining TAC emission calculations are identical, with the exception of the emission factor. Ammonia slip emissions were provided by GE for various operating conditions. The maximum hourly NH_3 emission rate of 3.2 lb/hr was used, along with the proposed annual fuel limit of 957,207 MMBtu/yr after the first year of operation, to calculate annual NH_3 emission rates. Detailed TAC emission calculations are provided in Table D.2.9 of Attachment D.2.

D.3.2.1 Maximum Hourly Emissions

The maximum hourly emissions were calculated using the appropriate AP-42 emission factor and maximum hourly fuel flow rate as follows:

Maximum lb/hr (benzene) = maximum hourly fuel flow rate (MMBtu/hr) X emission factor (lb/MMBtu)

Maximum lb/hr (benzene) = 451.3 (MMBtu/hr) X $1.50X10^{-5}$ (lb/MMBtu) = $6.77X10^{-3}$ lb/hr

D.3.2.2 Annual Average Emissions

The annual average emissions were calculated using the appropriate AP-42 emission factor and annual fuel flow rate as described below. The annual fuel flow was calculated using the maximum fuel flow rate times the proposed annual operating hours.

lb/yr (benzene) = annual fuel flow rate (MMBtu/yr) X emission factor (lb/MMBtu)

Annual lb/yr (benzene) = 957,207 (MMBtu/yr) X $1.50X10^{-5}$ (lb/MMBtu) = 14.4 lb/yr

Annual tpy emissions were calculated by dividing the lb/yr rate by 2000 lb/ton.

D.3.3 TAC Calculations for Waukesha ICE

The following sample emission calculations are provided for benzene. The remaining TAC emission calculations are identical, with the exception of the emission factor. Detailed TAC emission calculations are provided in Table D.2.12 of Attachment D.2.

D.3.3.1 Maximum Hourly Emissions

The maximum hourly emissions were calculated using the appropriate CATEF emission factor, maximum hourly fuel flow rate, and duration of each black start as follows:

Maximum lb/hr (benzene) = maximum hourly fuel flow rate (MMBtu/hr) X emission factor (lb/MMBtu) X 30/60 min

Maximum lb/hr (benzene) = 6.43 (MMBtu/hr) / 1050 MMbtu/MMscf X $2.18X10^{-1}$ (lb/MMscf) X 30/60 min = $6.67X10^{-4}$ lb/hr

D.3.3.2 Annual Average Emissions

The annual average emissions were calculated using the maximum hourly emission rate and number of operating hours per year, as follows:

Annual lb/yr (benzene) = maximum hourly emission rate (lb/hr) X number of hr/yr

Annual lb/yr (benzene) = $6.67X10^{-4}$ (lb/hr) X 14 hr/yr = $9.34X10^{-3}$ lb/yr

Annual tpy emissions were calculated by dividing the lb/yr rate by 2000 lb/ton.

D.3.4 Direct Operational Toxic Air Contaminant Emissions

Table D-8 summarizes the proposed facility-wide emission rates for the proposed project during normal operations.

Table D-8 Proposed Facility-Wide TAC Emissions During Normal Operations

Pollutant	Maximum Hourly Emission Rate (lb/hr)	Annual Average Emission Rate (lb/yr)	PTE [1] (tpy)
1,3-Butadiene	1.32E-03	4.27E-01	2.14E-04
Acetaldehyde	1.97E-02	3.83E+01	1.92E-02
Acrolein	3.07E-03	6.13E+00	3.06E-03
Ammonia	3.20E+00	6.79E+03	3.39E+00
Benzene	7.44E-03	1.44E+01	7.18E-03
Benzo(a)pyrene[2]	8.27E-09	1.16E-07	5.79E-11
Benzo(b)fluoranthene	1.25E-07	1.75E-06	8.77E-10
Benzo(g,h,i)perylene	2.31E-08	3.23E-07	1.62E-10
Benzo(k)fluoranthene	2.40E-08	3.36E-07	1.68E-10
Chrysene	4.38E-08	6.13E-07	3.06E-10
Dibenz(a,h)anthracene	8.27E-09	1.16E-07	5.79E-11
Ethylbenzene	1.47E-02	3.06E+01	1.53E-02
Formaldehyde	3.35E-01	6.80E+02	3.40E-01
Indeno(1,2,3-cd)pyrene	2.20E-08	3.07E-07	1.54E-10
Naphthalene	6.64E-04	1.25E+00	6.23E-04
PAH [as benzo(a)pyrene][2]	9.93E-04	2.11E+00	1.05E-03
Propylene	1.65E-02	2.31E-01	1.15E-04
Propylene Oxide	1.31E-02	2.78E+01	1.39E-02
Toluene	5.94E-02	1.24E+02	6.22E-02
Xylene	3.09E-02	6.13E+01	3.06E-02
Total HAP [3]		**986.8**	**0.5**

1 Subsequent years following commissioning represent worst-case TAC annual emissions.
2 LM6000 PAHs are listed as composite PAHs (as benzo[a]pyrene) in emission factor list; Black start generator PAHs are speciated in emission factor database.
3 Ammonia is not a hazardous air pollutant (HAP) and is not included in the HAP Total.

D.4 AMBIENT AIR QUALITY IMPACTS MODELING

D.4.1 Overview

Dispersion modeling was conducted in accord with the recommendations on the California Air Resources Board modeling guidelines (http://www.arb.ca.gov/html/soft.htm#modeling) and U.S. Environmental Protection Agency's (USEPA's) *Guideline on Air Quality Models*. Criteria pollutant modeling was performed for all operating conditions for comparison against the California and National Ambient Air Quality Standards (AAQS).

D.4.2 Modeling Methods

The USEPA Industrial Source Complex – PRIME (ISC-PRIME, version 04269) dispersion model was used for this analysis. This permit application was submitted during the 1-year phase-out period of the ISCST3 model. Based on guidance from the VCAPCD, the ISCST3 dispersion would be acceptable during the phase-out period. However, due to significant downwash from the black start ICE, the ISC-PRME was used to refine the analysis. The ISC-PRIME model contains the same building downwash algorithm as the USEPA-approved AERMOD dispersion model. The model was run using the regulatory default options except that the NOCALM option was used per VCAPCD requirements.

D.4.3 Source Description and Downwash

Sources and receptors were digitized in Universal Transverse Mercators (UTM) zone 11 coordinates (1866 Clarke Spheroid, North American Datum 1927 [NAD27]). **Figure D-1** provides a simplified digitization of the proposed facility boundary, buildings, and source locations. The USEPA Building Profile Input Program with PRIME (BPIP-PRIME version 04274) was used to calculate direction-specific downwash parameters based on the digitization in **Figure D-1** for each source. The boiler buildings at the adjacent Mandalay Power Generation were reviewed for potential downwash but the structures were sufficiently distant to not cause downwash from the SCE peaker project plumes.

Modeled stack parameters represent the worst-case stack parameters for the LM6000 turbine over several load conditions (startup, commissioning, and normal operations). Worst-case stack parameters are defined as the lowest exhaust temperature and velocity over all possible operating conditions. The black start ICE stack parameters represent 100 percent load conditions. Table D.2.14 of Attachment D.2 contains supporting documentation for the choice of modeled stack parameters.

The highest short-term emission rates for all operating conditions were modeled for the LM6000 and black start ICE for the short-term averaging periods (i.e., 1 to 24-hour). Annual tpy emission

rates were used to calculate annual average emission rates from both sources. The black start ICE was assumed to run a maximum of 1 hour per day. Emissions for the ICE were scaled accordingly for short term periods longer than 1 hour. **Tables D-9** through **D-11** provide the modeled emission rates for each analysis. Modeled stack parameters are provided in **Table D-12**. Emissions of SO_2 and PM10 during startup and commissioning are not expected to be any higher than during normal operations, therefore only NO_X and CO were modeled during startup and commissioning. The black start ICE was assumed not to operate during the commissioning period.

Figure D-1. Simplified Plot Plan

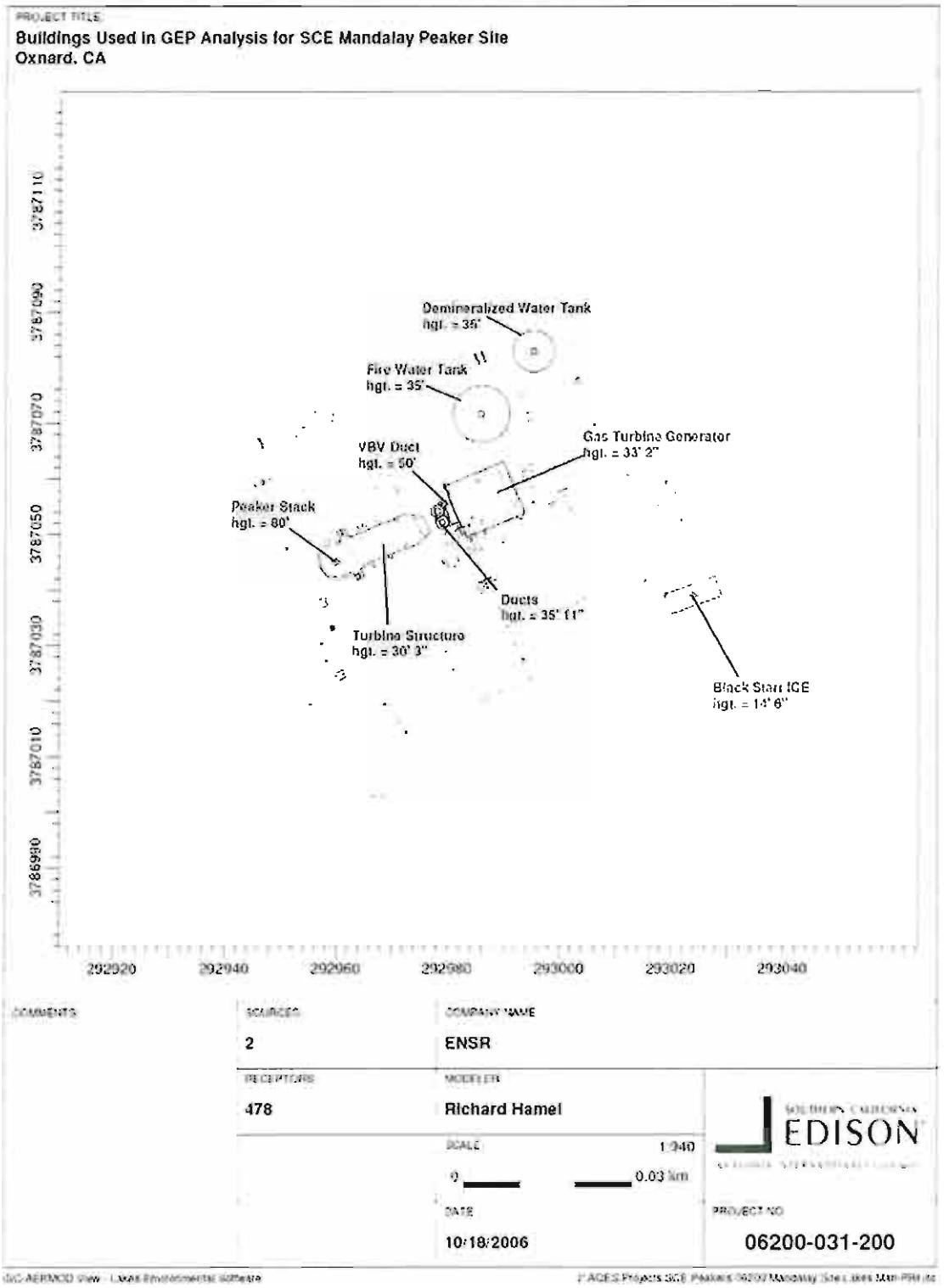


Table D-9 Modeled Emission Rates During Normal Operations

Pollutant	Averaging Period	LM6000 Emission Rate (g/s)	Black Start ICE Emission Rate (g/s)
NO_2	1-hour	0.542	0.150
	Annual	0.141	2.40E-04
CO	1-hour	0.794	0.191
	8-hour	0.794	0.024
SO_2	1-hour	0.034	2.38E-04
	3-hour	0.034	7.94E-05
	24-hour	0.034	9.92E-06
	Annual	8.26E-03	3.81E-07
PM10	24-hour	0.572	1.67E-04
	Annual	0.139	6.42E-06

Table D-10 Modeled Emission Rates During Startup

Pollutant	Averaging Period	LM6000 Emission Rate (g/s)	Black Start ICE Emission Rate (g/s)
NO_2	1-hour	0.975	0.150
CO	1-hour	1.101	0.191
	8-hour	0.832	0.024

Table D-11 Modeled Emission Rates During Commissioning

Pollutant	Averaging Period	LM6000 Emission Rate (g/s)
NO_2	1-hour	13.312
CO	1-hour	7.837
	8-hour	7.837

Table D-12 Modeled Stack Parameters

Source ID	UTM E (m)	UTM N (m)	Base Elev. (m)	Stack Height (m)	Stack Temp. (K)	Stack Velocity [1] (m/s)	Stack Diameter (m)
LM6000 (normal)	292960.0	3787045.0	4.4	24.38	629.3	18.7	3.96
LM6000 (SU)	292960.0	3787045.0	4.4	24.38	629.3	17.6	3.96
LM6000 (Comm.)	292960.0	3787045.0	4.4	24.38	629.3	9.4	3.96
ICE	293024.0	3787038.9	4.4	4.42	723.7	44.8	0.25

D.4.4 Receptors

A network of receptors was generated for the analysis that consist of the following:

- Fenceline receptors placed every 30-m;
- 100-m spacing from the fenceline to 1 kilometer (km) from the fenceline;

Receptor elevations were determined using 7.5-minute Digital Elevation Model data processed by Lakes Environmental's ISC-AERMOD View software (version 5.4.0). Receptors were generated in the NAD27 coordinate system. **Figure D-2** provides the receptor locations used in the analysis.

D.4.5 Meteorological data

VCAPCD-provided ISCST3 pre-processed meteorological data were obtained from the VCAPCD website (http://www.vcapcd.org/air_toxics.htm) for input to the ISC-PRIME model. The data used

was collected at Emma Wood State Beach in Ventura, California, for calendar years 1991 to 1993. **Figure D-3** presents a composite wind rose for the Emma Wood meteorological dataset.

D.4.6 Modeling results

The following sections discuss the results of the various modeling analyses performed. Modeling results are shown in **Tables D-13** through **D-15**. Maximum predicted impacts due to facility operations were compared to the applicable significant impact levels (SILs), where applicable. For pollutants and averaging period that do not have a SIL, maximum predicted impacts due to facility operations were added to a representative background concentration for comparison against the AAQS and increments. For all analyses, it was assumed that 100 percent of the model-predicted NO_X converts to NO_2.

As shown in **Tables D-13** through **D-15**, emissions due to the proposed project will not cause or contribute to an exceedance of the AAQS or increments. Maximum predicted impacts due to the proposed project for PM10 were well below the SILs, therefore the proposed project will not contribute to the measured exceedances of the PM10 AAQS and increments. Digital modeling files will be provided under separate cover.

Figure D-2. Modeled Receptors

Figure D-3. Composite Wind Rose

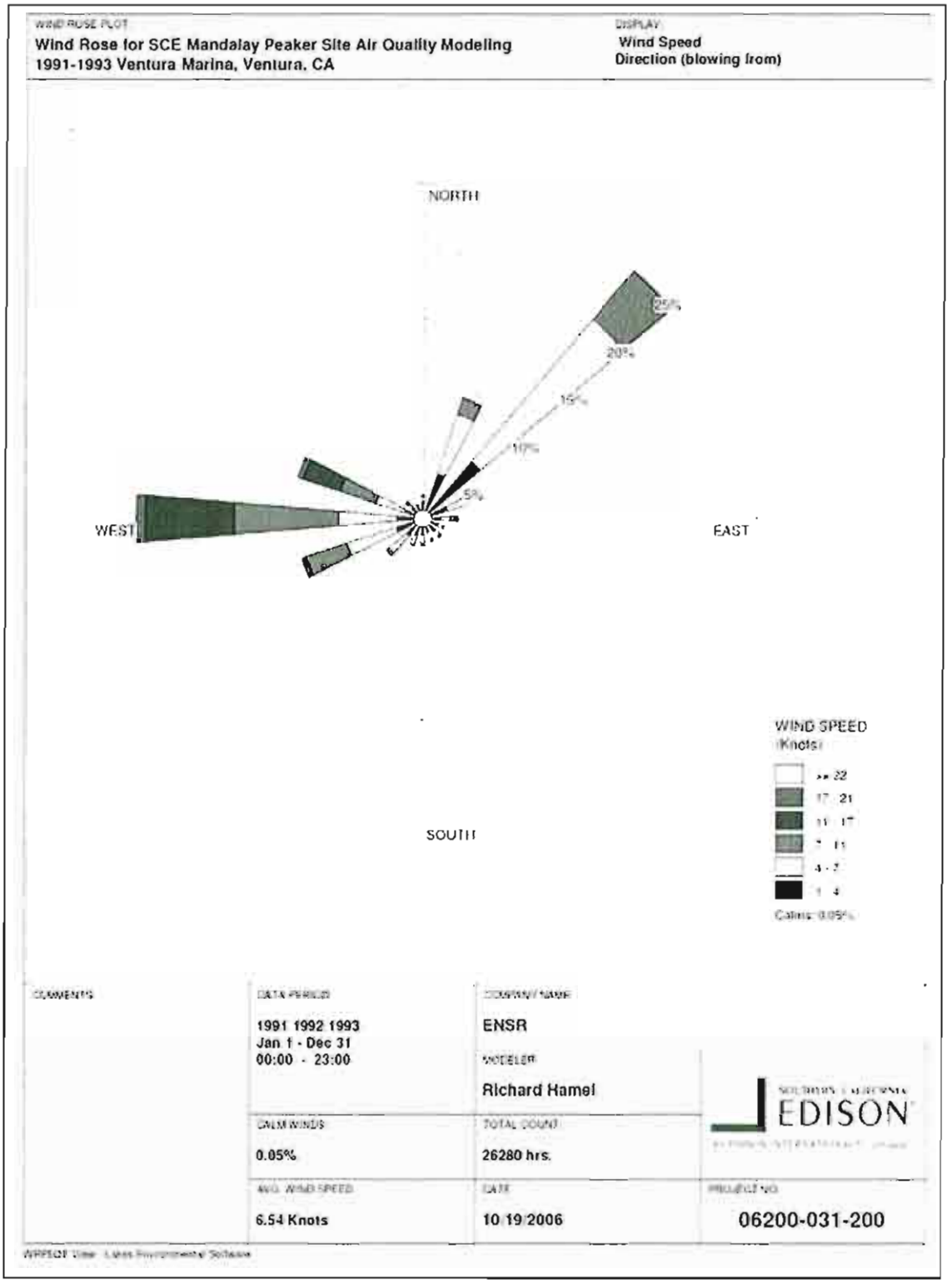


Table D-13 Normal Operations Modeling Results

Pollutant	Averaging Period	Maximum Predicted Impact ($\mu g/m^3$)	Background Conc.[1] ($\mu g/m^3$)	Total Conc. ($\mu g/m^3$)	SIL ($\mu g/m^3$)	AAQS ($\mu g/m^3$)	Increment ($\mu g/m^3$)
NO_2	1-hour	160.70	97.8	258.50	n/a	470	n/a
	Annual	8.37E-03	16.9	16.90	1	100	25
CO	1-hour	204.62	8,280.0	8,484.62	2000	23,000	n/a
	8-hour	16.12	4,025.0	4,041.12	500	10,000	n/a
SO_2	1-hour	0.26	18.3	18.56	n/a	655	n/a
	3-hour	0.08	13.1	13.18	25	1300	512
	24-hour	6.59E-03	10.5	10.51	5	105	91
	Annual	7.0E-05	2.6	2.60	1	80	20
PM10	24-hour	0.11	127.2	127.31	5	50	30
	Annual	1.11E-03	31.0	31.00	1	20	17

[1] Background PM10 concentrations exceed the California AAQS and increments. Project impacts are insignificant.

Table D-14 Startup Modeling Results

Pollutant	Averaging Period	Maximum Predicted Impact ($\mu g/m^3$)	Background Conc. ($\mu g/m^3$)	Total Conc. ($\mu g/m^3$)	SIL ($\mu g/m^3$)	AAQS ($\mu g/m^3$)	Percent of AAQS
NO_2	1-hour	160.70	97.8	258.50	n/a	470	55%
CO	1-hour	204.62	8,280.0	8,484.62	2000	23,000	37%
	8-hour	16.12	4,025.0	4,041.12	500	10,000	40%

Table D-15 Commissioning Modeling Results

Pollutant	Averaging Period	Maximum Predicted Impact ($\mu g/m^3$)	Background Conc. ($\mu g/m^3$)	Total Conc. ($\mu g/m^3$)	SIL ($\mu g/m^3$)	AAQS ($\mu g/m^3$)	Percent of AAQS
NO_2	1-hour	47.21	97.8	145.01	n/a	470	31%
CO	1-hour	27.79	8,280.0	8,307.79	2000	23,000	36%
	8-hour	7.09	4,025.0	4032.09	500	10,000	40%

D.5 HEALTH RISK ASSESSMENT

This document presents the methodology and results of a refined health risk assessment (HRA) performed to assess potential impacts and public exposure associated with emissions of toxic air contaminants (TACs) from the proposed SCE Mandalay Peaker project. This HRA was performed during normal operations of the proposed facility. TAC emissions during periods of startup/shutdown and commissioning are not expected to result in adverse health risks. At the requested permit limits proposed in this application, the corresponding predicted cancer risk, and chronic non-carcinogenic and acute hazard indices will not exceed 1-per-million and 1.0, respectively, at any off-site receptor.

D.5.1 Health Risk Assessment Procedures

The methods used to assess potential human health risks are consistent with the *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* published by the California Office of Health Hazard Assessment at the nearest off-site receptors. The latest California Office of Health Hazard Assessment (OEHHA) cancer inhalation potency factor, and

chronic and acute reference exposure levels (RELs) for each TAC were used. The California Air Resources Board (ARB) Hot Spots Analysis and Reporting Program (HARP) (version 1.3) software was used to perform the analysis. The HARP software contains the USEPA Industrial Source Complex (ISCST3) dispersion model and the latest OEHHA toxicity values.

The health risk assessment was conducted in three steps. First, emissions of TACs from the proposed equipment were estimated. Second, exposure calculations were performed using the ISCST3 dispersion model. Third, results of the exposure calculations along with the cancer potency factor, and chronic non-carcinogenic and acute RELs for each TAC were used to perform the risk characterization to quantify individual health risks.

D.5.2 Emission Characterization

Maximum hourly and annual average emissions are presented in Table D.2.13 of Attachment D.2. In summary, AP-42 emission factors were used for the LM6000 turbine and the California Air Toxics Emission Factor (CATEF) database of emission factors were used for the black start internal combustion engine (ICE). The maximum hourly and annual average natural gas fuel consumption rates for each source were used to calculate the modeled TAC emission rates. **Tables D-16** and **D-17** summarize the modeled TAC emission rates.

Table D-16 Modeled LM6000 TAC Emissions During Normal Operations

Pollutant	AP-42 Emission Factor (lb/MMBtu)	Maximum Hourly Emission Rate (lb/hr)	Annual Average Emission Rate (lb/yr)
1,3-Butadiene	4.30E-07	1.94E-04	4.12E-01
Acetaldehyde	4.00E-05	1.81E-02	3.83E+01
Acrolein	6.40E-06	2.89E-03	6.13E+00
Benzene	1.50E-05	6.77E-03	1.44E+01
Ethylbenzene	3.20E-05	1.44E-02	3.06E+01
Formaldehyde	7.10E-04	3.20E-01	6.80E+02
Naphthalene	1.30E-06	5.87E-04	1.24E+00
PAH [as benzo(a)pyrene]	2.20E-06	9.93E-04	2.11E+00
Propylene Oxide	2.90E-05	1.31E-02	2.78E+01
Toluene	1.30E-04	5.87E-02	1.24E+02
Xylene	6.40E-05	2.89E-02	6.13E+01
Ammonia	n/a	3.20E+00	6.79E+03

Table D-17 Modeled Black Start ICE TAC Emissions During Normal Operations

Pollutant	CATEF Emission Factor (lb/MMscf)	Maximum Hourly Emission Rate (lb/hr)	Annual Average Emission Rate (lb/yr)
1,3-Butadiene	3.67E-01	1.12E-03	1.57E-02
Acetaldehyde	5.29E-01	1.62E-03	2.27E-02
Acrolein	5.90E-02	1.81E-04	2.53E-03
Benzene	2.18E-01	6.67E-04	9.34E-03
Benzo(a)pyrene	2.70E-06	8.27E-09	1.16E-07
Benzo(b)fluoranthene	4.09E-05	1.25E-07	1.75E-06
Benzo(g,h,i)perylene	7.54E-06	2.31E-08	3.23E-07
Benzo(k)fluoranthene	7.83E-06	2.40E-08	3.36E-07
Chrysene	1.43E-05	4.38E-08	6.13E-07
Dibenz(a,h)anthracene	2.70E-06	8.27E-09	1.16E-07
Ethylbenzene	7.11E-02	2.18E-04	3.05E-03
Formaldehyde	4.71E+00	1.44E-02	2.02E-01
Indeno(1,2,3-cd)pyrene	7.17E-06	2.20E-08	3.07E-07
Naphthalene	2.51E-02	7.69E-05	1.08E-03
Propylene	5.38E+00	1.65E-02	2.31E-01
Toluene	2.39E-01	7.32E-04	1.02E-02
Xylene	6.46E-01	1.98E-03	2.77E-02

D.5.3 Risk Assessment Dispersion Modeling Methodology

The ISCST3 dispersion model provided in HARP was used along with 3 years (1991 to 1993) of pre-processed meteorological data collected at the VCAPCD Emma Wood station. **Figure D-3** presents a composite wind rose for the Emma Wood meteorological dataset. ISCST3 was run in rural mode since the land use within 3 kilometers upwind of the site (with respect to the receptor locations) is relatively undeveloped.

Modeled stack parameters are provided in **Table D-18**. Stack parameters represent 100 percent load conditions for both sources. The coordinates are in UTM (NAD27). **Figure D-1** is a simplified site plan with the proposed source and building locations.

Table D-18 Modeled Stack Parameters

Source ID	UTM E (m)	UTM N (m)	Base Elev. (m)	Stack Height (m)	Stack Temp. (K)	Stack Velocity (m/s)	Stack Diameter (m)
LM6000	292960.0	3787045.0	4.4	24.38	629.3	18.7	3.96
ICE	293024.0	3787038.9	4.4	4.42	723.7	44.8	0.25

Building downwash parameters were calculated internally by HARP. The boiler buildings at the adjacent Mandalay Power Generation were reviewed for potential downwash but the structures were sufficiently distant to not cause downwash from the SCE peaker project plumes.

A network of receptors was generated for the analysis that consist of the following:

- Fenceline receptors placed every 30-m;
- A Cartesian grid at 100-m spacing out 2 kilometers from the fenceline;
- Discrete residential receptors located at the proposed residential development to the southeast of the facility; and
- Discrete off-site worker receptors located at the Mandalay Power Generation.

There are no sensitive receptors within 3 kilometers of the proposed site. Receptor elevations were internally calculated by HARP using 7.5-minute USGS Digital Elevation Model data. Receptors were generated in NAD27, Zone 11. **Figure D-4** shows the receptor locations used in the analysis.

D.5.4 Risk Characterization

Carcinogenic risks and chronic non-carcinogenic and acute health effects were assessed using the dispersion modeling described above and numerical values of toxicity provided by OEHHA. The HARP software performs the necessary risk calculations following the OEHHA risk assessment guidelines and the ARB Interim Risk Management Policy for risk management decisions. These guidelines recommend that the following risk analysis methods be employed:

- Cancer Risk: Derived (Adjusted) Method;
- Chronic Hazard Index: Derived (OEHHA) Method; and
- Acute Hazard Index: Acute HI Simple (Concurrent Max.).

Exposure pathways included inhalation, homegrown produce (using default ingestion fractions), and dermal, soil, and mother's milk absorption. Off-site worker exposure used the HARP default setting, since the proposed facility could operate 24 hours per day, and refinement was deemed unnecessary to adjust the ground level impacts for off-site worker exposure. Long-term risks (i.e., cancer risk and chronic non-carcinogenic hazard index) and short-term risks (acute HI) were calculated at the fenceline, as well as all Cartesian grid and discrete receptors.

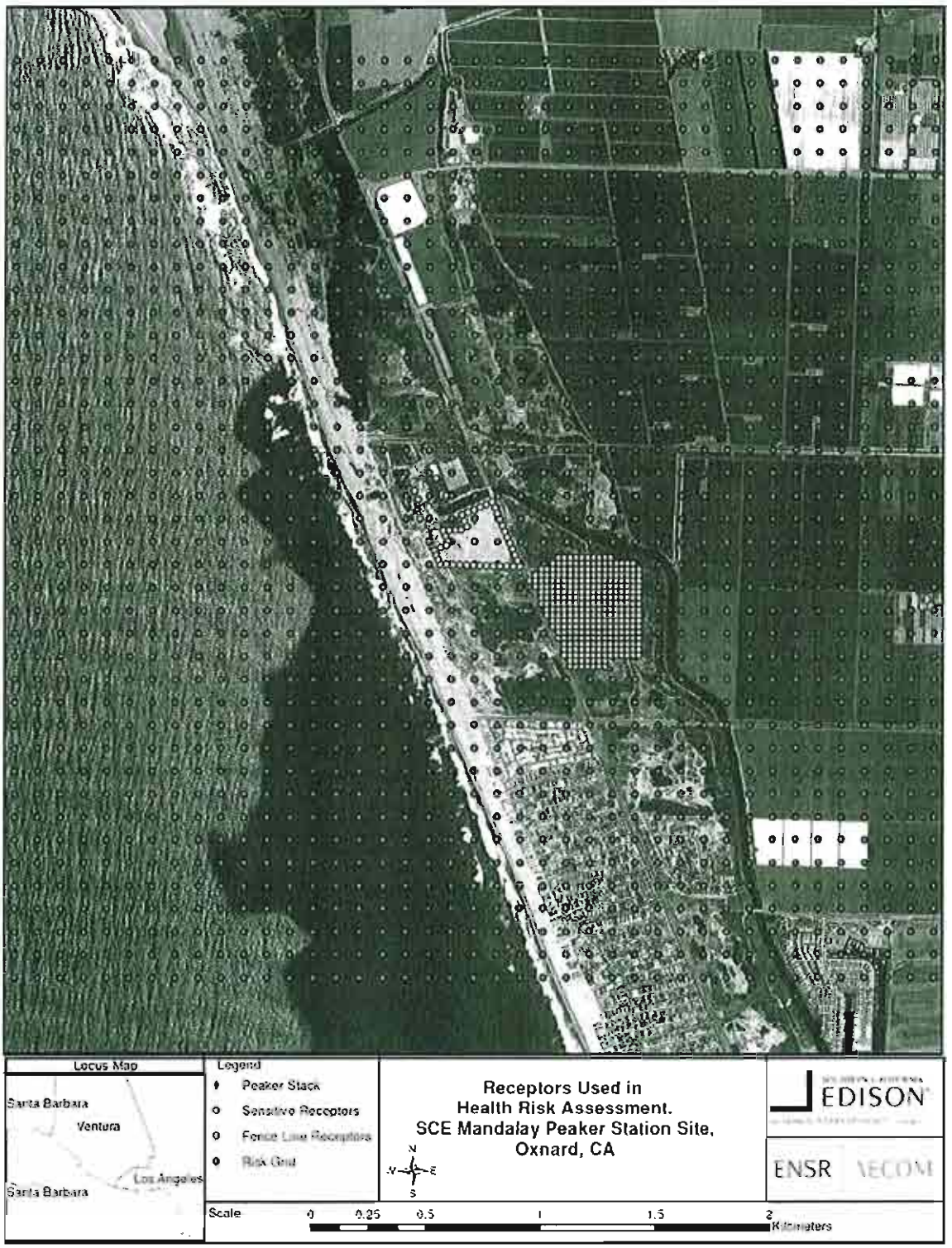
D.5.5 Health Risk Assessment Results

Table D-19 presents the peak risk assessment results for all receptors for both residential and off-site worker exposure. The calculated cancer risks were below 1-per-million, and the calculated chronic non-carcinogenic and acute hazard indices were less than 1.0. All predicted risks are below the established health risk assessment significance thresholds. Digital modeling files will be submitted under separate cover on CD-ROM.

Table D-19 Maximum Predicted Risks

Receptor	Cancer Risk (Per Million)	Chronic Hazard Index	Acute Hazard Index
Residential	0.01	2.43E-04	0.68
Off-Site Worker	1.87E-03	2.43E-04	0.68
Significance Thresholds	**1.0**	**1.0**	**1.0**

Figure D-4. Modeled Receptors



ATTACHMENT D.1

Construction Emission Calculation Spreadsheets

ATTACHMENT D.2

Operational Emission Calculation Spreadsheets

ATTACHMENT D.3

Modeling Input and Output Files (electronic only)

APPENDIX
F

Mandalay Peaker Project
Biological Resources Assessment

Prepared By

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February 2007

BIOLOGICAL RESOURCES
SOUTHERN CALIFORNIA EDISON MANDALAY PEAKER PROJECT

1.0 INTRODUCTION

Southern California Edison (SCE) is proposing to construct a "peaker" unit in the northeast section of the former Mandalay Fuel Storage Tank site, located just south of the existing Mandalay Generating Station located at 200 N. Harbor Blvd. in Oxnard, Ventura County, California (Figure 1.) The California Public Utility Commission (CPUC) directed SCE to address future electric reliability needs. This peaker will provide necessary grid support during times of prolonged high electricity demand. A biological site assessment was conducted at this former tank site to determine whether the proposed activities have the potential to affect sensitive biological resources.

1.1 Project Area

The proposed project will be located at 251 N. Harbor Boulevard, in Oxnard, on property owned by SCE. Peaker project facilities will be located within an area approximately 220- by 320-foot in size. To accommodate the required utility interconnections, a 65- by 75-foot customer substation and a 40- by 75-foot gas metering station will be also be constructed immediately south of the peaker facilities.

The proposed project site was a former tank farm that served the adjacent Mandalay Power Generation facility. The site is bounded on the north by the existing Mandalay Power Generation facility, on the west by an existing oil processing facility, on the east by Harbor Boulevard and undeveloped SCE-owned land, and on the south by an access road and oil field with operating well pumps. The Pacific Ocean is located approximately 750 feet west of the proposed project site, and Mandalay State Beach Park is located approximately 1,000 feet southwest of the site. Located across Harbor Boulevard and approximately 750 feet southeast of the proposed site is a proposed low-density residential area known as North Shore at Mandalay Bay. A site location map and aerial photograph of the facility are provided as **Figures 1** and **2,** respectively.

The project vicinity is an area known to support several special-status biological resources. Mandalay State Beach is one of two stretches of coastal sand dunes remaining in Ventura County, and supports dune scrub and is near freshwater coastal marsh. Special-status species known to occur in this area include saltmarsh bird's beak (*Cordylanthus maritimus*), California least tern (*Sternula antillarum browni*) and western snowy plover (*Charadrius alexandrinus nivosus*). In addition, the only known population of the Ventura marsh milk-vetch (*Astragalus pycnostachyus* ssp. *lanosissimus*) occurs near the project site. These species are further discussed in Section 3.3 of this report.

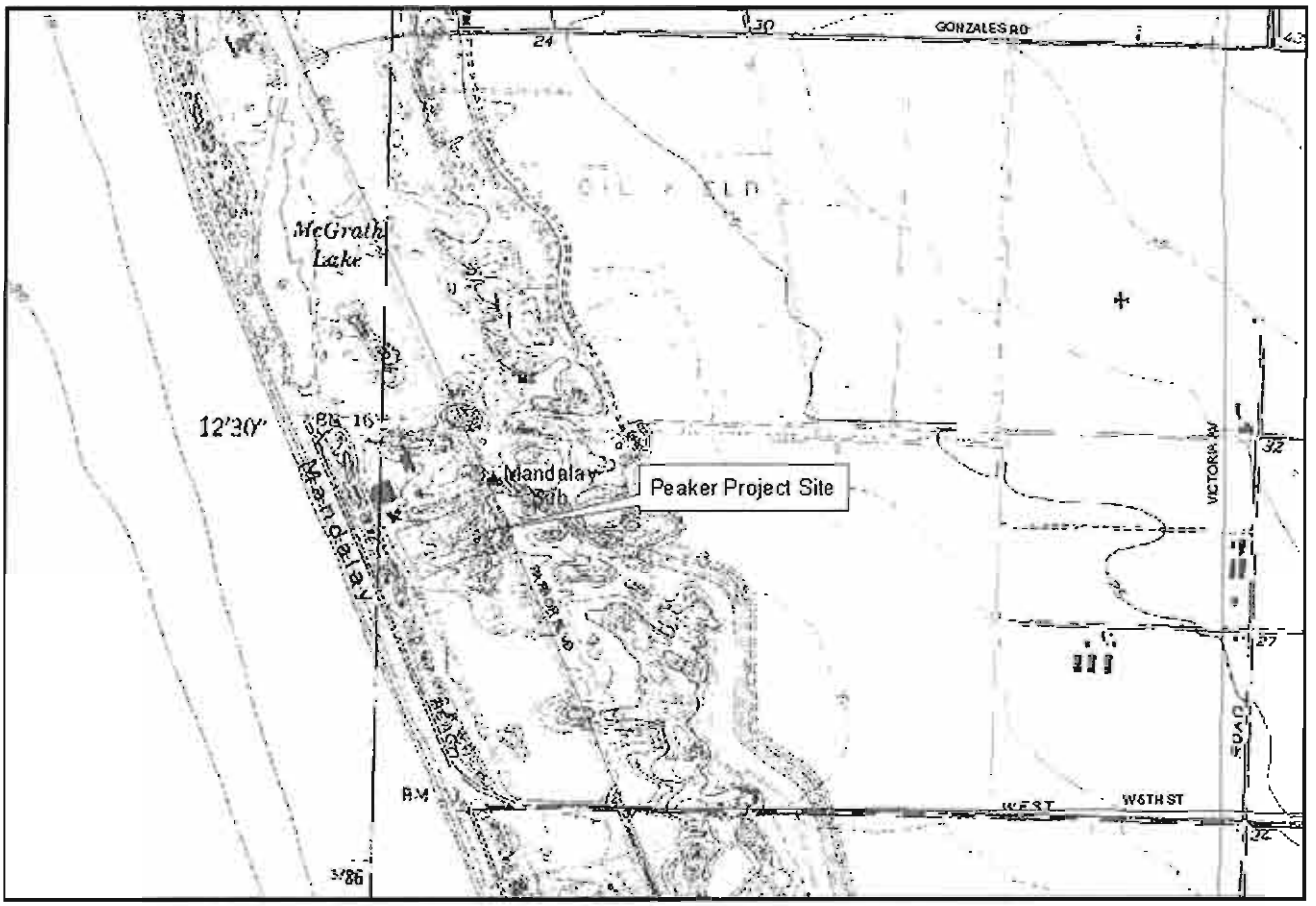

Figure 1. Project Location at 200 N. Harbor Blvd. in Oxnard, Ventura County, California.

1.2 Project Description

Southern California Edison Company (SCE) proposes to build a new small electricity generating unit commonly referred to as a "peaker" that will be capable of producing up to 45 net Megawatts (MW) of electricity. The unit will be operated primarily during periods of peak power demand when the electrical grid system needs additional usable electric power capacity. The unit can be started on short notice to respond to demand peaks.

The proposed peaker unit will assist southern California in meeting required standards for local reserve capacity during periods of peak demand. If local reserve capacity falls below CAISO limits, the CAISO must initiate "rolling blackouts" to reduce electrical use on the system. Rolling blackouts are undesirable and adversely affect customers. If sufficient peaking capacity is available, rolling blackouts are not required to ensure grid reliability.

The project facilities will include one natural gas-fired General Electric (GE) LM6000 gas turbine generator, pollution control equipment, an 80-foot tall exhaust stack, a 10,500-gallon ammonia storage tank, fuel gas supply line, fuel gas compressor, water supply line, water demineralizer, two water storage tanks, transformers, 66 kilovolt (kV) transmission tap line, one natural gas-fired black-start generator, and a power control module.

In addition, the following ancillary facilities are proposed and are further described in the Mitigated Negative Declaration for the project:

- Landscaping along the full length of the SCE property line fronting Harbor Boulevard.
- A new access road onsite to connect the project facility to the existing site entrance.
- An approximately 450- by 450-foot construction staging or "laydown" area within the previously disturbed area and adjacent to the peaker site to store supplies and materials, as well as construction office trailers and temporary parking space for peaker and pipeline construction workers.
- An electrical transmission substation 65- by 75-foot in size within the previously disturbed area just to the south of the proposed peaker site.
- 800 feet of new transmission line including four new power poles within the project site and ten new poles along the east side of Harbor Boulevard and at the Mandalay Substation (four will replace existing poles) to connect the peaker to the substation.
- A new natural gas pipeline exiting the project site and crossing Harbor Boulevard, then extending northwest along the east side of Harbor Boulevard,

until it turns inland to ties into the existing transmission pipeline that currently serves the Mandalay Generating Station. Construction will be limited to the public right-of-way for Harbor Boulevard in a previously disturbed pipeline corridor, aside from a temporary construction easement in the vicinity of the tie-in point, which will extend approximately 30 feet from the edge of the pavement along the road shoulder and 54 feet in the vicinity of the tie-in.

Figure 2. Project site showing location of peaker unit within northeast section of Mandalay Fuel Storage Tank facility as well as existing SCE Mandalay Substation northeast of peaker unit site on the other side of Harbor Blvd.

2.0 METHODS

2.1 Literature Review

Prior to conducting surveys, Keane Biological Consulting (KBC) reviewed the project description, plot plan, project maps and aerial photos to ascertain habitat suitability and use of the project site and adjacent areas by special-status species and other native wildlife species. KBC also reviewed documents pertaining to special-status species that may be present in the project vicinity.

A plant or wildlife species is defined as having "special-status" when it has been afforded special recognition by federal, state, or local resources conservation agencies (e.g., U.S. Fish and Wildlife Service [USFWS], California Department of Fish and Game [CDFG]) and/or resource conservation organizations (e.g., California Native Plant Society [CNPS] or the National Audubon Society). Sources used to identify special-status species potentially occurring in the project vicinity but not necessarily within the boundaries of the Project Sites include the following:

- State and Federally Listed Endangered and Threatened Animals of California, CDFG, Natural Heritage Division, July 2006 (http://www.dfg.ca.gov/whdab/pdfs/TEAnimals.pdf);
- State and Federally Listed Endangered, Threatened and Rare Plants of California, CDFG, Natural Heritage Division, July 2006 (http://www.dfg.ca.gov/whdab/pdfs/TEPlants.pdf);
- Special Plants List, CDFG, Natural Heritage Division, July 2006 (http://www.dfg.ca.gov/whdab/pdfs/spplants.pdf);
- Special Animals (including California Species of Special Concern), CDFG, Natural Heritage Division, July 2006 (http://www.dfg.ca.gov/whdab/pdfs/spanimals.pdf);
- California Natural Diversity Database (CNDDB), July 2006

2.2 Field Survey Methods

Kathy Keane of KBC conducted a general survey of the approximately 10-acre project site on September 20, 2006, between the hours of 8:00 am and 11:30 pm and on February 15, 2007 between the hours of 9:00 am and 10:00 am. The survey was conducted by walking the entire site and recording all observed plant and wildlife species. Wildlife species and evidence of wildlife use of the site observed during the survey were also noted, and the potential for the site to support special-status wildlife species was noted. The survey also evaluated habitats in areas adjacent to the site that may incur indirect project impacts. Plant nomenclature in this report is consistent with *The Jepson Manual, Higher Plants of California* (Hickman 1993). All plant species observed were identified in the field or photographed and collected for later identification.

In addition to the general survey described above, the site walk-through included a focused search over the entire project site, including the area east of Harbor Blvd., for the federally-listed Ventura marsh milkvetch known to occur southeast of the project site.

3.0 EXISTING CONDITIONS

3.1 Vegetation

The project site likely supported a coastal dune scrub plant community prior to construction of the tank farm, but the ground disturbance associated with construction and removal of tanks has resulted in a composition of plants dominated by those well-adapted to disturbed soils, with remnant components of a coastal dune scrub community. The substrate is sandy with gravel and small rocks to those approximately four inches in diameter, with low-growing vegetation and a relatively sparse plant distribution (Figure 3).

The dominant plant of the project site is telegraph weed (*Heterotheca grandiflora*), a plant native to southern California but often found in disturbed environments. Other native species observed include beach sand verbena (*Abronia umbellata umbellata*), beachbur (*Ambrosia chamissonis*), deerweed (*Lotus scoparius*), coastal lotus (*Lotus salsuginosus*), two species of lupine (*Lupinus chamissonis* and another *Lupinus* sp.), beach primrose (*Camissonia cheiranthifolia suffruticosa*), California cudweed aster (*Lessingia filaginifolia filaginifolia*), beach morning glory (*Calystegia soldanella*), horseweed (*Conyza* sp.), Bermuda grass (*Cynodon dactylon*), western thistle (*Cirsium occidentale*), and green everlasting (*Gnaphalium californicum*), in addition to non-native species including ice plant (*Carpobrotus* sp.) and ripgut grass (*Bromus diandrus*). At the southwestern end of the site and near the access gate at the southeastern end, other plants such as sea rocket (*Cakile maritima*) and white sweet clover (*Melilotus alba*) are present, in addition to the above-described species. Along the fence bordering the southern portion of the site are several individuals of myoporum (*Myoporum laetum*) and eucalyptus (*Eucalyptus* sp.).

In the northern portion of the site is a shallow depression leading to a culvert that passes under the fence and that shows evidence of seasonal ponding. No wetland vegetation was present in this area other than some sparse rabbitsfoot grass (*Polypogon monspeliensis*), a species sometimes found in moist soils.

East of Harbor Blvd. is a coastal dune scrub community (Figures 4 and 5) dominated by California encelia (*Encelia californica*), beach sand verbena (*Abronia umbellata umbellata*), ice plant (*Carpobrotus* sp.), mock heather (*Ericameria ericoides*), croton (*Croton californica*), lemonadeberry (*Rhus integrifolia*), California sagebrush (*Artemisia californica*), and coastal prickly-pear (*Opuntia littoralis*), in addition to some of the species mentioned above including California cudweed aster (*Lessingia filaginifolia filaginifolia*), beach morning glory (*Calystegia macrostegia*), sea rocket (*Cakile maritima*), coastal lotus (*Lotus salsuginosus*), myoporum (*Myoporum laetum*), and a few mulefat (*Baccharis salicifolia*).

Similar species are present near the substation northeast of the project site and east of Harbor Blvd., in addition to poison-oak (*Toxicodendron diversilobum*), toyon (*Heteromeles arbutifolia*), and a large laurel sumac (*Malosma laurina*).

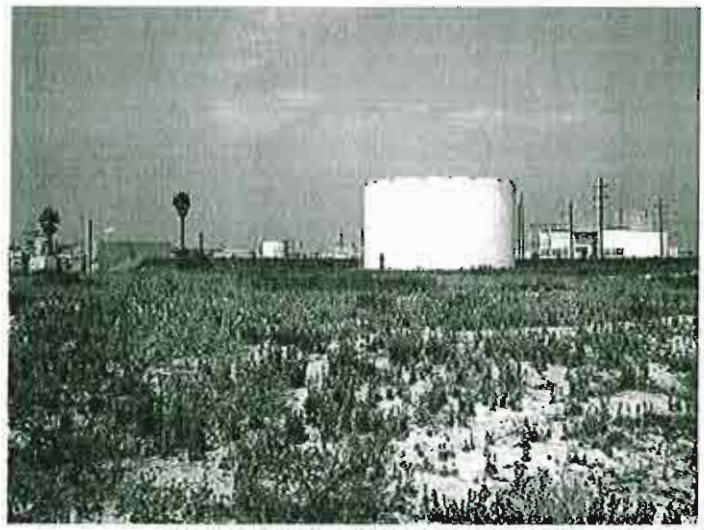

Figure 3. Project Site

Figure 4. Mulefat and iceplant east of Harbor Blvd.

Figure 5. Coastal Dune Scrub east of Harbor Blvd.

3.2 Wildlife

No amphibian or fish species are expected to occur on the project site, which supports no aquatic or marine habitat. However, some fish and reptile species are likely associated with the generating station canal north of the site. No reptile species were observed during the survey, although several species including side-blotched lizard, western fence lizard, southern alligator lizard, San Diego coast horned lizard, western rattlesnake, and gopher snake are expected to occur in the project vicinity.

Very few bird species were present on the site during the survey. The most abundant species observed on the project site was the non-native European starling (*Sturnus vulgaris*); other birds observed on the site included American kestrel (*Falco sparverius*), black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), house finch (*Carpodacus mexicanus*). A belted kingfisher (*Ceryle alcyon*) was heard offsite during the survey, likely foraging over the generating station canal for fish.

No mammalian wildlife species were directly observed during the survey, although tracks of coyote (*Canis latrans*) or gray fox (*Urocyon cinereoargenteus*), Botta's pocket gopher (*Thomomys bottae*) and Audubon's (desert) cottontail (*Sylvilagus audubonii*) were present. It is likely that Virginia opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), California ground squirrel (*Spermophilus beecheyi*), house mouse (*Mus musculus*), and possibly Norway rat (*Rattus norvegicus*) also occur here.

3.3 Special-Status Species

Although a variety of special-status species are known to occur in the vicinity of the Mandalay Peaker project site (Table 1 and City of Oxnard 1998) from McGrath State Beach north of the site to Ormond Beach several miles south, only species with a low to moderate potential to occur on or near the project site are discussed below.

The Ventura marsh milkvetch (*Astragalus pycnostachyus* ssp. *lanosissimus*) is known to occur just southeast of the project site on the North Shore development site at Fifth Street and Harbor Boulevard in the City of Oxnard, its only known natural occurrence (City of Oxnard 1999. It is an herbaceous perennial that grows in a sparsely vegetated low area, at an elevation of about 30 feet in coastal dune-swale areas, where freshwater levels (in the form of saturated soils or groundwater) are high enough to reach the roots of the plants. The soils associated with Ventura marsh milkvetch are well-drained, yet contain a mix of sand and clay.

Focused surveys conducted for this species at the North Shore site in July 1997 revealed 374 plants, but this number had declined to 280 individuals in July 1998. Plants occurred in two colonies on relatively level terrain in the south-central portion of the site at approximately 29 feet in elevation. Coyote brush (*Baccharis pilularis*) was the dominant overstory plant species and iceplant the dominant understory species

associated with the milk-vetch populations, which occurred within a substrate of imported clay soil and fill material (City of Oxnard 1999).

The USFWS designated critical habitat for the species in three areas: (1) Mandalay, including the site of the extant population in the city of Oxnard; (2) McGrath Lake area, McGrath State Beach; and (3) Carpinteria Salt Marsh Reserve. The Mandalay critical habitat unit is approximately 153 acres and is the only site currently occupied by a natural population of the species.

Although the Edison Mandalay Peaker project site is located just north of this unit and the North Shore milk-vetch populations, the peaker location is within a previously disturbed site and supports no suitable habitat. In the coastal dunes east of the proposed peaker site, there is a low probability that it could occur within the transmission line portion of the project. The focused site survey conducted by KBC located no individuals of this species on the project site, therefore the species is not expected to occur here. Mitigation measure 2 below addresses the low potential for occurrence in the transmission line area for the project.

The **California least tern** (*Sternula antillarum browni*) is federally- and state-listed as endangered. A migratory species, it nests from April through August along the coast of California from San Francisco south to Baja California. In 2005, the California least tern breeding population was estimated at over 6,000 pairs, a ten-fold increase from estimated numbers when it was listed in the early 1970's. Least terns breed on sparsely vegetated sandy beaches, salt flats, and dredge spoil in colonies of few to several hundred nesting pairs. California least terns nest at 35 to 38 sites in California, including McGrath State Beach located north of the project site at the Santa Clara River mouth, as well as some years, at McGrath Lake northwest of the Mandalay Generating Station. California Least Terns also nest at Ormond Beach south of the project site. Least terns were observed foraging in the Edison canal in June 1996 and August 1997. Although California least terns prefer sparsely-vegetated areas such as those that occur on the project site for nesting, they prefer to nest closer to their offshore and estuarine foraging areas. Thus, based on Kathy Keane's experience of over 30 years in working with California least terns, the project site is not expected to support California least terns, and the site offers no foraging habitat for least terns.

The coastal population of the **western snowy plover** (*Charadrius alexandrinus nivosus*) breeds along the Pacific Coast from southern Washington to southern Baja California on sparsely vegetated beaches backed by dunes, dredge spoils, flats of salt evaporation ponds, and river bars. During winter months it withdraws from northerly parts of its range southwards. The coastal population of western snowy plover was listed as federally-threatened in 1993. Western snowy plovers are known to nest at Ormond Beach several miles south of the project site but no potential nesting habitat is present for this species on the project site.

The **Belding's Savannah sparrow** (*Passserculus sandwichensis beldingi*) is state-listed as endangered. Habitat occupied by this species is dominated by pickleweed

(*Salicornia virginica*), sea-blite (*Suaeda* sp.), salt bush (*Atriplex* sp.), and salt grass (*Distichlis spicata*), although it is known to forage in other nearby habitats. Nests are built low in pickleweed in middle to upper portions of salt marshes, or in non-tidal seepage areas dominated by pickleweed. A statewide survey for Belding's savannah sparrows conducted in 2006 found several individuals at Ormond Beach, and it formerly occurred but is no longer present at McGrath State Beach north of the project site. No potential habitat for this species is present on the project site.

Several additional special-status species are known to occur in the project vicinity, but no potential habitat for these species is present on the project site. These include the globose dune beetle (*Coelus globosus*), California brown pelican (*Pelicanus occidentalis*), elegant tern (*Sterna elegans*), double-crested cormorant (*Phalacrocorax auritus*), American peregrine falcon (*Falco peregrinus*).

The **burrowing owl** (*Athene cunicularia*) is a California species of special concern. This species is found in open areas of usually sparse vegetation. It occupies rodent burrows, most often of California ground squirrels (*Spermophilus beechyi*). There are historic records of the owl occurring in the project area, however, only marginal habitat is present for this species in the project area. SCE has conducted surveys for the burrowing owl around the Mandalay Substation just to the northeast of the peaker unit location and near the transmission line portion of the project, but the results of these surveys were negative for the owl. No burrowing owls or burrows were observed during the survey for this project; however, one burrowing owl was observed on the project site during soil testing for the project on February 8, 2007. It is likely the owl was a winter visitor, since no burrows were located on the project site during the survey. However, a focused survey for burrowing owls will occur prior to project construction (see Section 5.0).

4.0 REGULATORY SETTING

4.1 Federal Regulations

4.1.1 Federal Endangered Species Act

Species listed as endangered and threatened by the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA) are protected under Section 9 of FESA, which forbids any person to "take" an endangered or threatened species. "Take" is defined in Section 3 of the Act as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The U.S. Supreme Court ruled in 1995 that the term "harm" includes destruction or modification of habitat. Sections 7 and 10 of the Act may authorize "incidental take" for otherwise lawful activity (a development project, for example) if it is determined that the activity would not jeopardize the species' survival or recovery. Although two federally-listed species (the California least tern and the Ventura marsh milkvetch) are known to

occur in the project vicinity, potential habitat for these species is lacking on the Mandalay Peaker project site. No other federally-listed species is expected to occur on the Mandalay Peaker project site. However, there is a low probability that the Ventura marsh milkvetch could occur in the dune area east of the project site where new transmission poles will be placed as part of the project, and a focused survey for this species should be conducted prior to placement of new transmission poles in the dunes.

4.1.4 Section 404 of the U.S. Clean Water Act

The objective of the Clean Water Act of 1977 is to restore and maintain the chemical, physical, and biological integrity of the nation's waters. Section 404 of the Act regulates activities that result in discharge of dredged, fill, or excavated material into "waters of the United States;" this generally includes any waterway, intermittent stream, man-made wetland, or reservoir. Projects that include any such physical modification of a "water of the United States" must generally comply with Section 404 under the jurisdiction of ACOE. Construction of the Mandalay Peaker project would not result in deposition of fill or excavated materials into waters of the United States or wetlands as defined by Section 404 of the U.S. Clean Water Act.

4.1.5 Section 401 and 402 of the U.S. Clean Water Act

These sections of the Clean Water Act address problems of water pollution through the National Pollutant Discharge Elimination System (NPDES). Section 401 prohibits the discharge of any pollutant without a permit, and Section 402 establishes the permit program administered by the Environmental Protection Agency (EPA). The California Regional Water Quality Control Board (RWQCB) is the agency that issues Section 401 permits. The Mandalay Peaker project is required to comply with both Section 401 and 402 of the U.S. Clean Water Act.

4.1.3 Migratory Bird Treaty Act and California Fish and Game Code 3503

The federal Migratory Bird Treaty Act (MBTA), first enacted in 1916, prohibits any person unless permitted by regulations, to:

> "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703).

The list of migratory birds includes nearly all bird species native to the United States; non-native species such as European starlings, house sparrows and rock pigeons are not included. The statute was extended in 1974 to include parts of birds, as well as eggs and nests. Thus, it is illegal under MBTA to directly kill any native bird species.

Activities that result in removal or destruction of an active nest (a nest with eggs or young being attended by one or more adults) of a native bird would also violate the MBTA. Removal of unoccupied nests, or bird mortality resulting indirectly from a project, is not considered a violation of the MBTA. California Fish and Game Code 3503, 3503.5, and 3512 also prohibit take of birds and active nests. Any activity, such as grading or grubbing for construction of the project site, that results in destruction of one or more active nests of native birds, whether or not it is listed as an endangered species,would be a violation of the MBTA. Construction activities that result in abandonment of an active bird nest (such as a burrowing owl) may also violate sections of the Fish and Game Code. Construction activities associated with the Mandalay Peaker project must comply with MBTA and related provisions of the California Fish and Game Code.

4.2 State Regulations

4.2.1 California Endangered Species Act

The California Endangered Species Act (CESA), enacted in 1970, provides protection to endangered and threatened species in California. The definition of "take" under CESA does not include "harm" or "harass" as does FESA; thus, no provisions to protect habitat are included. Sections 2080.1 and 2090 of CESA allow for consultation by Project proponents with the California Department of Fish and Game (CDFG) regarding measures to minimize impacts on CESA-listed species. The Belding's savannah sparrow is listed as endangered under CESA, but no potential habitat for this or other species listed by CESA occurs on the Mandalay Peaker site.

4.2.2 California Fish and Game Code Section 1600-1606

CDFG oversees streambeds and associated habitats, and issues Streambed Alteration Agreements, pursuant to Sections 1600 to 1607 of the California Fish and Game Code. An application for a Streambed Alteration Agreement (SAA) must be submitted to the CDFG for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department in which there is at any time an existing fish or wildlife resource, or from which these resources derive benefit." CDFG reviews the application and, if necessary, provides the project applicant a proposal for measures to protect affected fish and wildlife resources. Construction of the Mandalay Peaker project would not result in diversions or obstructions of any waterways. Thus, the project need not comply with CDFG Fish and Game Code sections 1600-1606.

5.0 PROJECT IMPACTS

5.1 Significance Criteria

The following Standards of Significance (**SOS**) are addressed in the following sections. In accordance with Appendix G of the *State CEQA Guidelines*, a future project on this site may have a significant impact on biological resources if it would:

1) Have a substantial[1] adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies or regulations, or by the CDFG or USFWS;
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFG or USFWS;
3) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrologic interruption, or other means;
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nurseries;
5) Conflict with any local, state, or federal policies or ordinances protecting biological resources, such as the Migratory Bird Treaty Act, or California Fish and Game Code 3503, 3503.5, and 3512; or
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

This document considers both direct and indirect impacts. Direct impacts are long-term and directly remove a resource such as trees and other vegetation or breeding habitat for wildlife species. Mortality (killing) of an animal that could result from such activities would also be considered a direct impact. Indirect impacts would include the potential loss of habitat used for foraging by some wildlife species, or high noise levels and project lighting that may affect wildlife populations in the project vicinity. Resources are discussed in the same order they are addressed in the Existing Conditions section.

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[1] Because CEQA does not define the term "substantial," a substantial effect is defined in this document as one that would adversely affect a biological resource considered rare or of limited distribution in coastal Ventura County.

5.2 IMPACT ANALYSIS

5.2.1 Direct Impacts on Plant Communities and Vegetation

Construction of the Mandalay Peaker project, including the peaker site, laydown/staging areas, access, and a gas line from Harbor Blvd. would not result in direct impacts to native plant communities and vegetation. However, the transmission lines, as proposed, from the substation northeast of the site would result in removal of a coastal dune scrub community that includes native plant species. However, because this plant community is relatively sparse and disturbed by previous activities on the project site and it supports no candidate, sensitive, or special-status species, riparian habitat or wetlands, this would not result in a significant impact per the significance criteria presented in Section 5.1.

5.2.2 Direct Impacts on Wildlife

Construction as described above would also remove habitat for wildlife using the project site, particularly the transmission line portion of the project site; doves, raptors and other native birds may forage occasionally in other areas of the project site. However, as discussed in Section 3.2, few wildlife species were observed on the project site, and other wildlife species expected to occur on the site are those generally well-adapted to human-modified habitats. Thus, per the significance criteria presented in Section 5.1, impacts on wildlife due to construction of the Mandalay Peaker project would not be significant.

However, depending on the timing of construction, one or more nests of birds protected by the MBTA may be damaged or removed. This would be a significant impact per criteria 5 of the significance criteria presented in Section 5.1 but could be reduced to less than significant by implementation of Mitigation Measure 1 in Section 6 below.

5.2.3 Direct Impacts on Special-Status Species

As discussed in Section 3.3, no candidate, sensitive, or special-status species are expected to occur on the project site. However, because of the low probability for occurrence of the Ventura marsh milkvetch in the coastal dunes east of Harbor Boulevard and for the moderate to high probability of burrowing owl at the peaker site and around the Mandalay Substation east of the project site, a pre-activity survey for these species should be conducted, per Mitigation Measures 2 and 3 presented in Section 6 below. These pre-activity surveys would include advice on adjustments necessary in determining location of transmission poles to avoid a significant impact on special-status species per significance criteria 1 in Section 5.1.

5.2.4 Indirect Impacts on Plant Communities and Vegetation

Vegetation in the project vicinity, particularly the coastal dune vegetation east of the project site, could be adversely affected by dust and airborne pollutants generated by construction vehicles during project construction. This impact would be temporary and reversible and thus, per the significance criteria presented in Section 5.1, would not be considered significant.

However, indirect impacts on vegetation (and wildlife) could occur as the result of impacts to water quality by siltation and urban pollutants. Runoff from improper disposal of chemicals (including petroleum) and other materials construction (temporary) and use of herbicides and insecticides (permanent) could adversely impact water quality in the Edison Mandalay canal. Additionally, increased siltation caused by disturbing the soil (temporary) and increased hardscape (permanent) could also adversely affect water quality. This impact could be significant per criteria 2 of the significance criteria presented in Section 5.1 but can be minimized to less than significant by implementation of Mitigation Measure 4 below.

5.2.5 Indirect Impacts on Wildlife

Construction activity including the presence of humans and construction vehicles may result in temporary avoidance of the project site by some birds and other wildlife. However, because wildlife species in the project vicinity are generally well-adapted to human presence, this would not be considered a significant impact per the significance criteria presented in Section 5.1.

Noise levels on and in the vicinity of the project site will increase over present levels during construction. Noise has a potential to disrupt foraging, roosting, nesting, and denning activities for wildlife. Startle effects and vibration due to some construction activities can also disturb wildlife in the vicinity of construction. Because most species in the vicinity are generally well-adapted to human-related disturbances, impacts due to noise would not be considered significant per the significance criteria presented in Section 5.1. Noise following project construction would not be expected to increase over present levels; thus, wildlife in the project vicinity is not expected to incur significant indirect impacts per the significance criteria presented in Section 5.1 following project completion.

As discussed above in Section 5.2.4, significant impacts on water quality may occur as a result of project construction. This could include impacts on populations of aquatic species such as fish, amphibian, reptile, bird and mammal species. Siltation and runoff could also cover and sweep away eggs of fish and amphibians. Mitigation Measure 4 addresses this impact.

5.2.6 Indirect Impacts on Special-Status Species

As stated in Section 5.2.3, no special-status species are expected to occur on the project site. California least terns may nest northwest of the project site at McGrath Lake during project construction. However, considering the fact that this species nests

at active container terminals (Port of Los Angeles, the second-largest nesting site in California in 2006) and airports (Lindberg Field in San Diego, which supported over 100 nests in 2006), it is unlikely that the noise, vibration and other disturbances associated with construction and operation of the Mandalay Peaker project would result in significant indirect impacts on this species. However, some species, including the Ventura marsh milkvetch and the burrowing owl, may occur in the project vicinity and thus be subject to the indirect impacts described above in Sections 5.2.4 and 5.2.5. Provisions of Mitigation Measure 4 would also minimize potentially significant indirect impacts on special-status species to less than significant.

6.0 PROTECTIVE MEASURES AND MITIGATION

1) Depending on the timing of project construction, construction of the Mandalay Peaker project may destroy one or more bird nests, thus violating the MBTA and/or related provisions of the California Fish and Game Code. Thus, SCE should limit project grubbing and other project construction activities that may destroy bird nests to the non-breeding season for most birds, approximately September 1 through March 1. However, if project grubbing and grading cannot avoid the breeding season, SCE will retain the services of a qualified biologist to conduct a survey of the construction zone prior to the initiation of any project grubbing or grading activity can be conducted. If the biologist detects any occupied nests of native birds within the construction zone, a minimum buffer of 100 feet between the nest and limits of construction shall be established, and the construction crew shall be instructed to avoid any activities in this zone until the bird nest(s) is/are no longer occupied, per a subsequent survey by the qualified biologist.

2) Following designation of specific locations of transmission poles and any other project components that may result in disturbance of vegetation in the coastal dune scrub community east of the project site, SCE will retain the services of a botanist with experience identifying the Ventura marsh milkvetch to conduct a focused survey for the plant in those locations. If any individuals of the Ventura marsh milkvetch are detected, the botanist will provide recommendations to SCE staff so that the project can be modified to avoid direct and indirect impacts on the Ventura marsh milkvetch. Protective measures shall be implemented, including fencing of the plants during construction or a re-route of the transmission line to avoid any plants found.

3) A pre-construction survey will be conducted for burrowing owls no more than 30 days prior to ground disturbing activities at the proposed peaker site as well as in areas around Mandalay Substation and where suitable habitat is located for the transmission line route. Should any burrows be actively used by owls within the project vicinity, appropriate distances based on current California Department of Fish and Game guidelines will be kept from all occupied burrows, and a qualified biological monitor will be present during all construction activities. If burrowing owls cannot be avoided during construction, consultation with the California Department of Fish and Game will be conducted to develop appropriate measures to minimize project impacts on burrowing owls to less than significant.

4) The following measures will minimize indirect impacts on biological resources:

   a) Clearing of vegetation will be confined to the minimal area needed for construction.

b) The contractor will employee BMPs such as sandbags or other structures to avoid potential runoff of construction materials into drainages or other waterways.
c) The contractor will minimize the potential for spills of chemicals, hydraulic fluid, fuels, or other hazardous materials during construction and will have onsite an emergency spill containment kit to contain and remove any spilled fluids. All contaminated soils will be removed from the site and properly disposed offsite.
d) Refueling of construction vehicles with any hydraulic fluids or fuels will not occur within 100 feet of waterways including the generating station canal.
e) All trash generated during construction shall be promptly disposed in covered containers and removed from the project site.

7.0 LITERATURE CITED

CDFG. 2006. Endangered and Threatened Plants of California. State of California, The Resources Agency, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base, July 2006 update.

CDFG. 2006. Endangered and Threatened Animals of California. State of California, The Resources Agency, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base, July 2006 update.

CDFG. 2006. Special Animals [species of special concern]. State of California, The Resources Agency, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base, July 2006 update.

CDFG. 2006. Threatened, Endangered and Rare Plants. State of California, The Resources Agency, Department of Fish and Game, Natural Heritage Division, Natural Diversity Data Base, July 2006 update.

California Environmental Quality Act (CEQA). California Public Resources Code Sections 21000–21178.1.

California Natural Diversity Data Base (CNDDB). 2006. Data base search for special-status elements of USGS 7½' Oxnard and 8 adjacent topo quads. California Department of Fish and Game, Sacramento.

City of Oxnard. [manjunath—please provide the full reference]

Hickman, J.C. (Editor). 1993. The Jepson Manual, Higher Plants of California. University of California Press, Berkeley, California.

Table 1. Sensitive Species Potentially Occurring in the Project Area for Mandalay Peaker Project within the Oxnard USGS 7.5-minute Quadrangle.

Scientific Name	Common Name	Listing Status	Habitat at Project Site	Occurrence Potential	Observed In Field?
ANIMALS					
Athene cunicularia	Burrowing owl	SC	Yes - Marginal	Low	Yes
Charadrius alexandrinus nivosus	Western snowy plover	FT, SC	No	No	No
Coccyzus americanus occidentalis	Western yellow-billed cuckoo	FC, SC	No	No	No
Riparia riparia	Bank swallow	ST	No	No	No
Passerculus sandwichensis beldingi	Belding's savannah sparrow	SE	No	No	No
Sternula antillarum browni	California least tern	FE, SE	No	No	No
Vireo bellii pusillus	Least Bell's vireo	FE, SE	No	No	No
Emys (=Clemmys) marmorata pallida	Southwestern pond turtle	SC	No	No	No
Phrynosoma coronatum blainvillii	Coast (San Diego) horned lizard	SC	No	No	No
Anniella pulchra pulchra	Silvery legless lizard	SC	No	No	No
Eucycloglobius newberryi	Tidewater goby	FE, SC	No	No	No
PLANTS					
Astragalus pycnostachyus var. *lanosissimus*	Ventura marsh milkvetch	FE, SE, CNPS 1B	Yes-Marginal	No	No
Cordylanthus maritimus ssp. *maritimus*	Salt marsh bird's-beak	FE, SE, CNPS 1B	No	No	No
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	CNPS 1B	No	No	No

APPENDIX G

Veneklasen Associates

Acoustical Analysis Report

for

Peaker Power Units – Mandalay Substation

November 17, 2006
Revised April 18, 2007

Prepared for

Southern California Edison
Engineering and Technical Services
300 No. Lone Hill Avenue
San Dimas, California 91773

By

Veneklasen Associates, Inc.
1711 16th Street
Santa Monica, California 90404

Aaron Bétit
Senior Associate

Veneklasen Associates

Summary

Southern California Edison contracted Veneklasen Associates (VA) to perform an acoustical study to evaluate the noise impact to the community surrounding the Mandalay Substation if a peaker unit and the required auxiliary equipment was added to the site.

VA performed acoustical measurements at the project site. Using the sound information provided by GE, VA developed a computer model to compare the predicted noise level with the local noise criteria for the proposed project site. With this model VA determined the equipment and the plant layout selected by GE will meet the existing noise guidelines at the Mandalay project sites.

Project Site Description

The attached figure 2 shows the Mandalay project site, located in Oxnard, CA. The closest residences are approximately 2,300 feet from the Mandalay property line. The site is bounded by Harbor Boulevard to the east, a canal and power plant to the north, a small access road and undeveloped land to the immediate south and the ocean to the west. The location was selected because it is adjacent to other industrial zoned project sites.

Weather conditions at and around the project site include heavy fog. There are some weather conditions that will cause an unexpected increase in noise level. However, in foggy weather sound usually propagates less as some of the sound energy is absorbed by the damp air. VA calculated the noise levels under typical weather conditions and thus we expect the noise levels calculated to be the worst case scenario.

Figure 5 shows the proposed equipment layout.

Noise Criteria

It is understood that the peaker unit is expected to only operate during daytime hours when peak loads are required (typically between 1:00PM and 9:00PM). As a result VA used the daytime hours (between 7:00AM and 10:00PM) to evaluate compliance with the local noise ordinance.

The Mandalay project site falls under the Municipal Code of the City of Oxnard. Section 7-185 "Exterior Sound Standards" The code indicates that residential property lines shall have an allowable exterior sound level of 55 dBA during the daytime and an allowable exterior sound level of 50 dBA during the night time hours (10:PM to 7:00AM).

Item C. states:

> "No person at any location within the city shall create, maintain, cause or allow any sound on property which causes the sound level, when measured on any other property to exceed:
>
> 1) The allowable exterior sound level for a cumlative of more then 30 minutes in any hour..."

Because it is expected that the equipment will operate for periods longer then 30 minutes, the noise limit at the residential property line is 55 dBA during the day and 50 dBA during the night.

Ambient Noise Conditions

Veneklasen Associates performed noise measurements at the Mandalay project site at the location indicated in figure 2 on September 20th and 21st 2006. The hourly ambient noise level between 1:00PM and 9:00PM on these days ranged from 58 dBA to 62 dBA. During nighttime hours (between 10:00PM and 7:00AM) the ambient noise ranged between 51 dBA and 60 dBA. Thus the controlling criterion for the property line at this location during the expected hours of operation is the lowest recorded (58 dBA) ambient noise level cannot be exceeded. If the equipment is expected to operate during nighttime hours, the lowest measured ambient (51 dBA) would become the criterion.

Veneklasen Associates

Expected Operation Parameters

The equipment noise levels were provided by General Electric based on the equipment selection and operating conditions and are reported in the attached appendix. As shown in the attached site layout. Figure 5. the proposed layout included a 10' sound wall around the Gas Compressor Discharge Cooler. the Fuel Gas Compressor Skid. and the fuel gas regulators. VA assumed the sound wall would be constructed with materials having an STC value greater then STC 32. Acceptable construction materials include CMU. or modular acoustical panels equal to Phoenix-E type Sono-Con Class 1-E or IAC model NoiseShield Regular.

Veneklasen Associates understands typical hours where all the new equipment would be operating will be between 1:00PM and 9:00PM.

Computer Noise Model

In order to predict future noise conditions at the project site. VA developed a 3D computer model of the project site utilizing LIMA noise modeling software developed by Stapelfeldt Ingenieurgesellschaft and distributed by Bruel & Kjaer. The software utilizes the ISO standard 9613-2 "Acoustics – Attenuation of Sound During Propagation Outdoors" to evaluate the expected future noise conditions.

Computer Model Results

The expected noise level at the location indicated in figure 2 was calculated and is indicated in the table below. Figure 3 provides contours showing the expected noise contribution from the equipment if the limits indicated in the Appendix are met. Figure 4 shows the expected noise contribution contours if the nighttime mitigation is implemented.

Project Site	Calculated Sound Level at most Stringent Property Line	Local Noise Criteria	Ambient	Combination Ambient and Equipment	Pass/Fail
Daytime Operation	48 dBA	58 dBA*	58 dBA	58 dBA	Pass
Nighttime Operation	48 dBA	51 dBA*	51 dBA	53 dBA	Fail
Nighttime Operation with Mitigation	41 dBA	51 dBA*	51 dBA	51 dBA	Pass

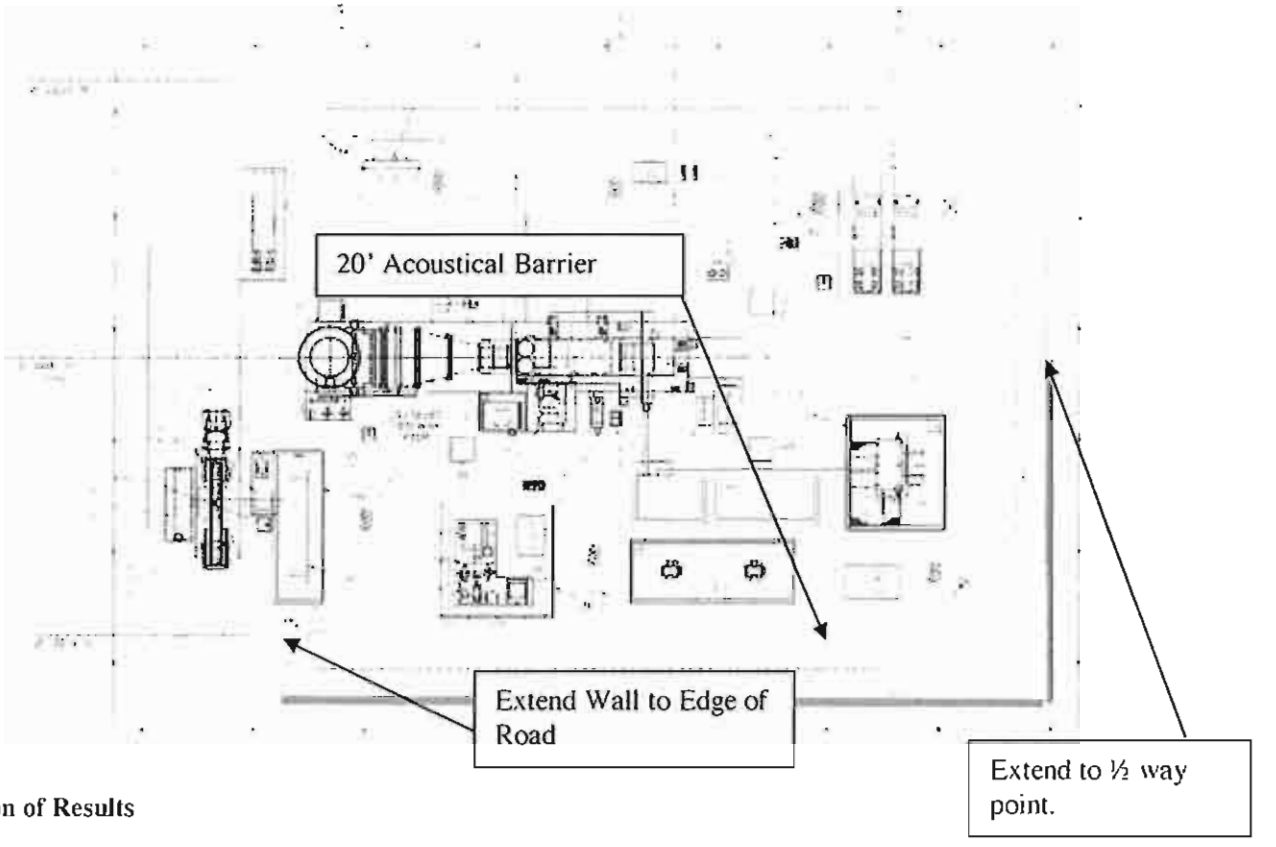
* The measured ambient exceeded the local noise standard; thus the measured ambient becomes the controlling noise criterion.

The values reported are calculated at 5' above the ground level. The calculated noise increase is insignificant (less than 0.5 dB) at 32' above the ground level.

Required Mitigation

As indicated above. if the equipment needs to operate during nighttime hours. it will be necessary to provide additional mitigation if the equipment is intended to operate between the hours of 10:00PM and 7:00AM. It will be necessary to include a 20' acoustical wall constructed out of materials with an STC value greater than STC 32 around the equipment as shown in figure 1 below. In addition it will be necessary to limit the noise emanating from exhaust duct so that it does not exceed 75 dBA at 3 feet.

Figure 1 – Required Acoustical Barrier



Discussion of Results

Based on the sound levels provided and proposed layouts for the peaker equipment the Mandalay project sites will meet the local noise ordinance without any additional mitigation if the equipment operates during daytime hours. If the equipment operates during nighttime hours additional mitigation as documented in this report will be required.

Vaneklasen Associates

Appendix

Equipment Sound Level Limits
(Based on Data Provided by the Equipment Manufacturer)

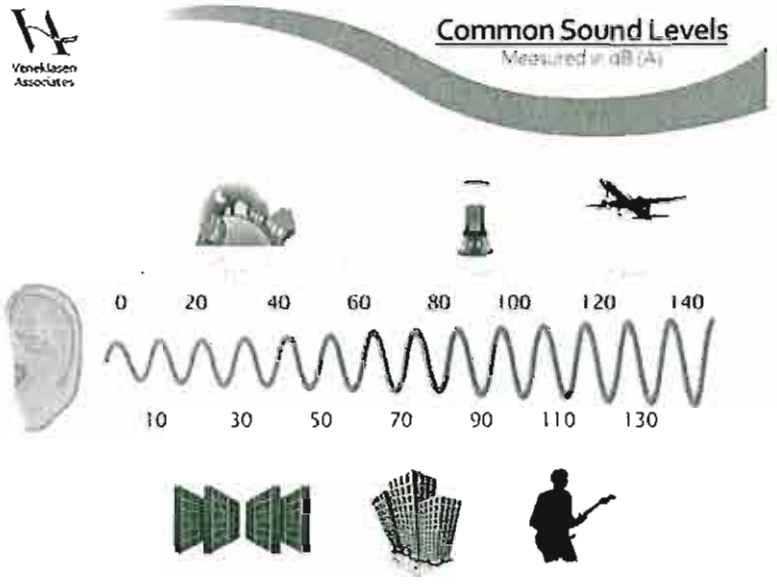
Equipment	Maximum Sound Pressure Level @ 3'
1. Combustion Turbine Generator	85 dBA
Exhaust Stack	85 dBA*
2. SCR	85 dBA
5. CTG Air/Oil Cooler	85 dBA
13. 13.8 Kv/4.16 KV Transformer	60 dBA
14. 13.8/480V Transformer	60 dBA
15. GSU Transformer	70 dBA
19. Air Compressors	85 dBA
22. Ammonia Forwarding and Storage System	85 dBA
27. Fuel Gas Compressor	95 dBA
30. Blackstart Generator	85 dBA

* Exhaust stack must be limited to 75 dBA at 3 if the equipment is to be operated between the hours of 10:00PM and 7:00AM.

All other Equipment associated with the peaker unit is expected to generate noise levels below 60 dBA.

A Brief Introduction to Environmental Acoustics

Sound is the physical phenomenon of complex minute variations of atmospheric pressure. Because of the range of sound pressure level detectable by the human ear, sound pressure level (SPL) is represented on a logarithmic scale known as decibels (dB). A sound level of 0 dB is approximately the threshold of human hearing and is usually not audible, even under extremely quiet (laboratory-type) listening conditions. A SPL of 120 dB begins to be felt inside the ear as discomfort and pain at approximately 140 dB. Because decibels are logarithmic, they cannot be added or subtracted linearly. Instead, it is necessary to add the values logarithmically. For example, if two sound sources each produce 100 dB, when they are operated together they will produce 103 dB, not 200 dB. Four 100 dB sources operating together again double the sound energy, resulting in a total SPL of 106 dB, and so on. In addition, if one source is 10dB louder than another, the two sources operating together will produce the same SPL as if the louder source were operating alone. Thus, a 100 dB source plus an 80 dB source produce 100 dB when operating together. Two useful rules to remember when comparing SPLs are: (1) most people perceive a 10 dB increase in SPL between two noise events to be about a doubling of loudness, and (2) changes in SPL of less than about 3 dB between two events are not detected by typical humans. The table below reports some typical noise levels for reference:



Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second or hertz (Hz). The normal frequency range of hearing for most people extends from about 20 to 20k Hz. The human ear is more sensitive to middle and high frequencies, especially when the noise levels are quieter. As the noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon a weighting system to evaluate how loud a noise level is to a human was developed. The frequency weighting called "A" weighting is typically used for quieter noise levels which de-emphasizes the low frequency components of the sound in a manner similar to the response of a human ear.

Sound levels vary with time. For example, the sound increases as an aircraft approaches, then falls and blends into the ambient or background as the aircraft recedes into the distance. Because of this variation, it is often convenient to describe a particular noise "event" by its highest or maximum sound level (Lmax). Note Lmax describes only one dimension of an event; it provides no information on the cumulative noise exposure generated by a sound source. In fact, two events with identical Lmax may produce very different total exposures. One may be of very short duration, while the other may be much longer.

For the evaluation of community noise effects of long term noise sources such as traffic, aircraft, or mechanical equipment the Day-Night Average Sound Level (DNL) and Community Noise Equivalent Level (CNEL) are used. DNL averages sound levels at a location over a complete 24-hour period, with a 10-decibel adjustment added to those noise events occurring between 10:00 p.m. and 7:00 a.m. (local time) the following morning. The 10:00 p.m. to 7:00 a.m. period is defined as nighttime (or night) and the 7:00 a.m. to 10:00 p.m. period is defined as daytime (or day). The CNEL metric is similar to the DNL metric in that it produces a penalty

for the nighttime hours, but it also includes an evening hour penalty adjustment. Thus ambient noise measured between 7:00 a.m. and 7:00 p.m. has no penalty; a +5 dB adjustment must be made to noise measured between 7:00 p.m. and 10:00 p.m. and a 10+ dB penalty is added to noise measured between 10:00 p.m. and 7:00 a.m.

Sound from a point source propagates similar to the waves caused by throwing a stone into a pond. At the initial point of the disturbance the energy is strongest and dissipated over a small surface area. As the wave moves outward away from the initial point of disturbance, the circumference of the wave increases. Neglecting friction, the total energy remains the same but it is distributed over a greater surface area. Therefore for any specific point at the wave even though the total energy hasn't changed, the energy is less as the distance from the source increases. Under typical conditions the reduction in noise level is 6 dB per doubling of distance.

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Acoustical Terminology

deciBel	A unit for describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 microPascals. deciBels are denoted "dB".
A-weighted sound pressure level	The sound pressure level in deciBels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise. A-weighted deciBels are denoted "dBA" or "dB(A)".
Equivalent Sound Level	The sound level containing the same total energy as a time-varying signal over a given sample period. Equivalent sound level, denoted "L_{eq}" is typically computed over 1, 8 and 24-hour sample periods.
The Day-Night Level	Denoted "L_{dn}", the Day-Night Level is calculated by averaging equivalent sound levels recorded over a 24-hour period after the addition of a ten deciBel weighting to sound levels measured at night, between 10:00 p.m. and 7:00 a.m.
Percentile level	Denoted L_n, percentile level indicates the time-average sound level that is exceeded for "n" percent of the total measurement period. Unless otherwise stated, A-weighting is understood. *Example: L_{90} indicates the average sound pressure level that was exceeded 90% of the measurement period.*

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FIGURE 2 – MANDALAY

FIGURE 3 CALCULATED NOISE CONTOURS WITHOUT MITIGATION

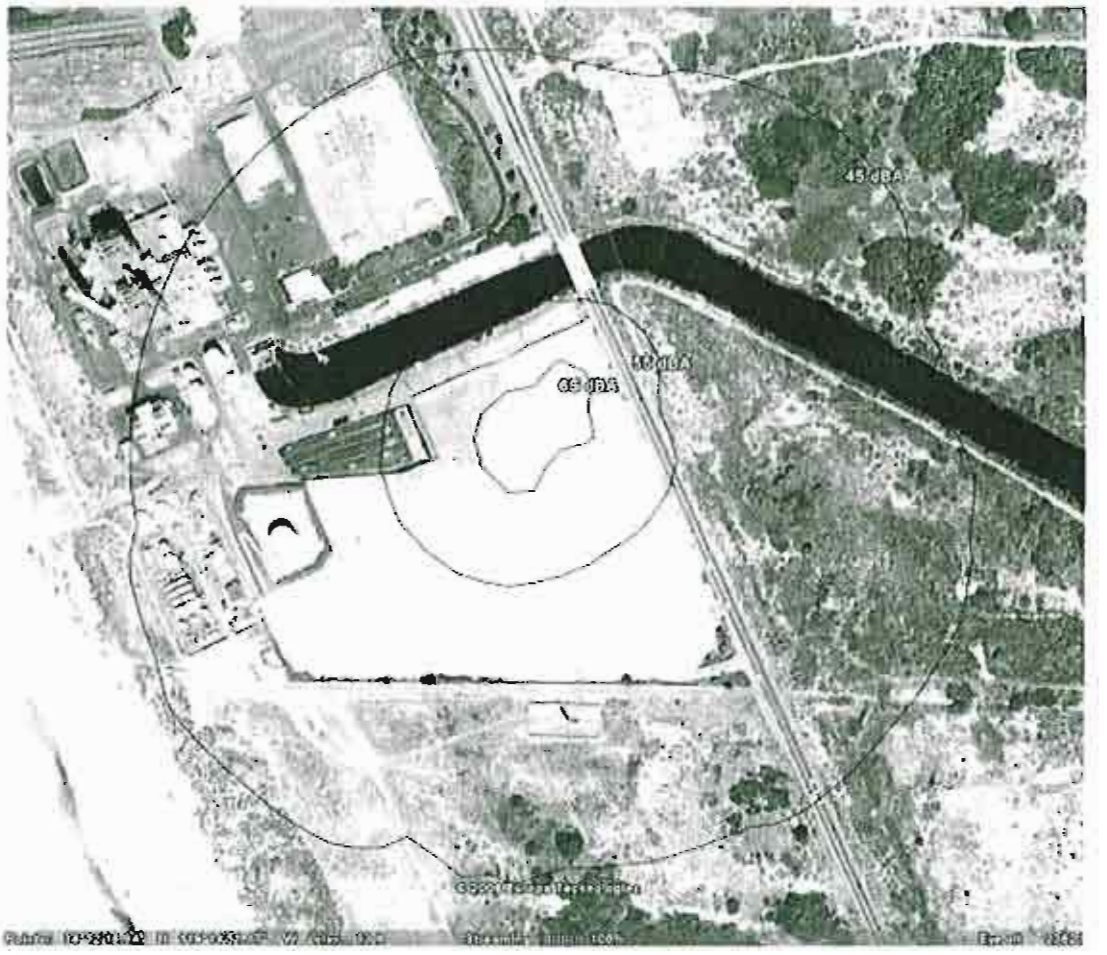

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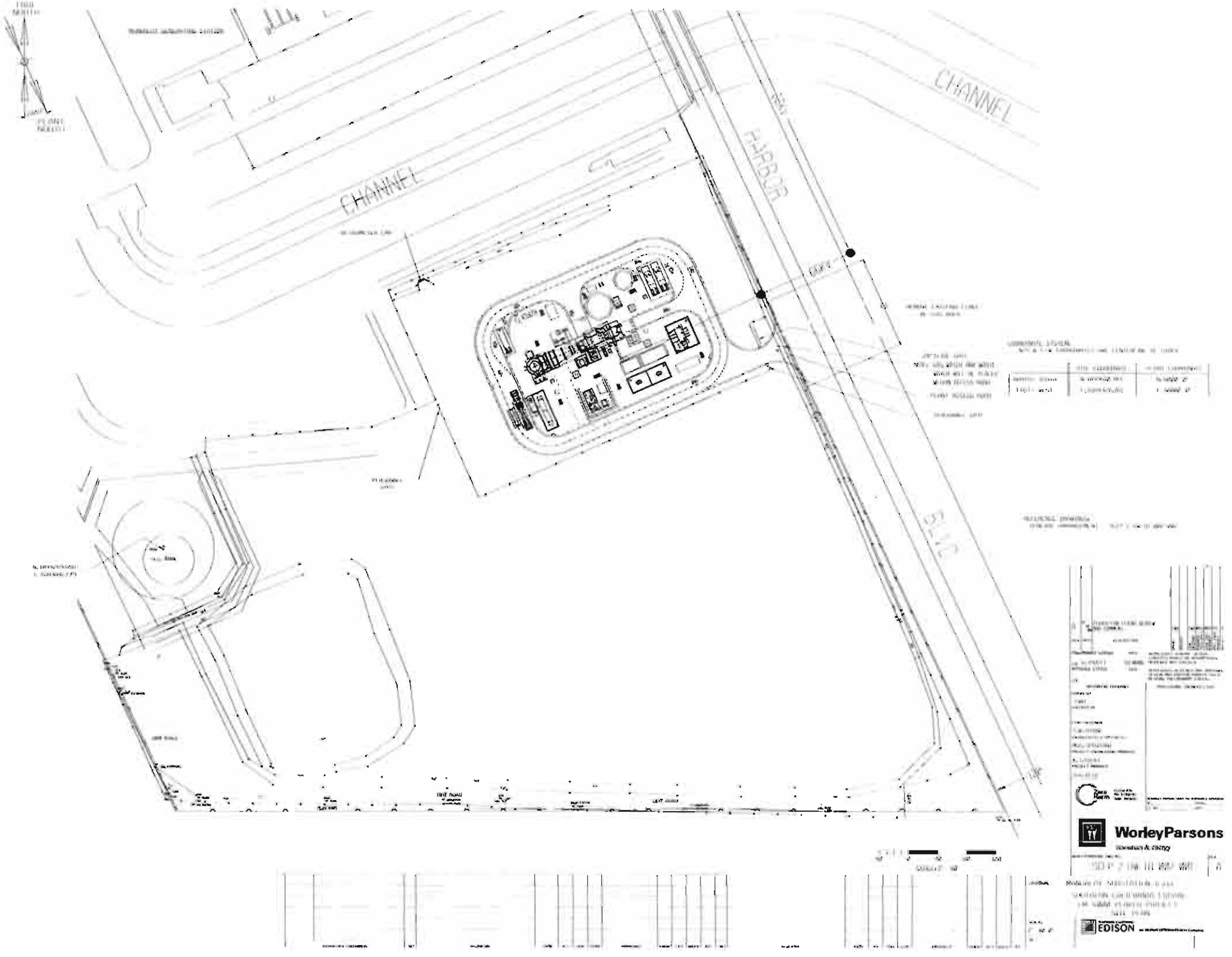
FIGURE 4 CALCULATED NOISE CONTOURS WITH MITIGATION

Vaneldasen Associates

FIGURE 5 EQUIPMENT LAYOUT


CHANNEL
CHANNEL
HARBOR
WorleyParsons
EDISON

ATTACHMENT F

MND 07-02 COMMENTS

Agencies

Southern California Association of Governments
City of Ventura, Planning Division
Ventura County Watershed Protection District
Ventura County Public Works Transportation Department
Ventura County Air Pollution Control District
California Department of Parks and Recreations
U.S. Fish and Wildlife Service
Ventureno Chumash Council

Applicant

Southern California Edison

Public

22 letters and e-mails

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JUN 04 2007

PLANNING DIVISION
CITY OF OXNARD

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

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Orange County: Chris Norby, Orange County • Christine Barnes, La Palma • John Beauman, Brea • Lou Bone, Tustin • Debbie Cook, Huntington Beach • Leslie Daigle, Newport Beach • Richard Dixon, Lake Forest • Troy Edgar, Los Alamitos • Paul Glaab, Laguna Niguel • Robert Hernandez, Anaheim • Shawn Quirk, Fullerton

Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

Ventura County: Linda Parks, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

May 30, 2007

Mr. Christopher Williamson
Senior Planner, City of Oxnard
Planning Division
305 W. Third Street
Oxnard, CA 93030

RE: SCAG Clearinghouse No. I 20070289 Coastal Development Permit (PZ 06-400-5)

Dear Mr. Williamson:

Thank you for submitting the **Coastal Development Permit (PZ 06-400-5)** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Coastal Development Permit (PZ 06-400-5)**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **May 1-15, 2007** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1856. Thank you.

Sincerely,

SHERYLL DEL ROSARIO
Associate Planner
Intergovernmental Review

Doc #136125

CITY OF
VENTURA

RECEIVED

MAY 29 2007

PLANNING DIVISION
CITY OF OXNARD

May 22, 2007

Dr. Chris Williamson, AICP
City of Oxnard Development Services Department
305 W. Third Street
Oxnard, CA 93030

RE: Mitigated Negative Declaration 07-02, 251 North Harbor Boulevard

Dear Dr. Williamson:

The City of San Buenaventura's Advanced Planning section appreciates the opportunity to comment on the Mitigated Negative Declaration (MND) prepared for the proposed "peaker" generator facility located at 251 North Harbor Boulevard. The following comments concern the potential visual impacts this project may have on the vicinity.

1. A.3. It is unclear from the photos and simulations provided in Appendix C and D how the proposed facilities will *not* degrade the quality of the site and view from the beaches to the north and northwest. Please illustrate how the proposed development will appear from the north and northwest.
2. A.4. Permanent lighting. It is unclear from the discussion and rationale how new lighting at the facility will *not* generate considerable nighttime glare. Please include a rendering demonstrating the location and intensity of proposed lighting.

Again, thank you for the opportunity to comment on the proposed generator facility. If you have any questions concerning these comments, please contact me by phone at (805) 658-4755 or by email at lwilkinson@cityofventura.net.

Sincerely,

Lisa Wilkinson
Associate Planner

Copy:
Nelson Hernandez, Community Development Director
Kaizer Rangwala, Assistant Community Development Director

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division
Kimberly L. Rodriguez
Director

June 8, 2007

Post-It® Fax Note 7671	Date 6/12/07	# of pages ▸ 7
To C. Williamson	From C. Anthony	
Co./Dept.	Co.	
Phone #	Phone #	
Fax # 385-7417	Fax #	

City of Oxnard, Planning Division
Christopher Williamson
305 W. Third St.
Oxnard, CA 93030

FAX #: 385-8156

Subject: Comments on MND for Mandalay Peaker Project (So. Calif. Edison)

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Chuck Anthony, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Chuck Anthony at (805) 654-3683.

Sincerely,

Kim Rodriguez
County Planning Director

G:\Planning Division\Outside Environmental Documents\Response Letters

Attachment

County RMA Reference Number 07-027

VENTURA COUNTY
WATERSHED PROTECTION DISTRICT
PLANNING AND REGULATORY DIVISION
800 South Victoria Avenue, Ventura, California 93009
PAUL CALLAWAY, Permit Manager - 805 654-2011

DATE: June 1, 2007

TO: Chuck Anthony, Resource Management

FROM: Paul Callaway, Permit Manager

SUBJECT: RMA 07-027.MANDALAY PEAKER PROJECT

The Watershed Protection District has reviewed the above project and our comments are as follows:

EINVIRONMENTAL SERVICES

Figures 1, 2, 4 and 6 were poorly reproduced copies and failed to provide adequate project location and project detail information. Please replace thee with clearly copied and labeled maps.

The biological resources section needs to consider potential impact to the federally endangered tidewater goby (Eucyclogobius Newberri) in the Edison canal.

We recommend preconstruction surveys by a qualified natural fish biologist and appropriate protective measures (eg., exclusion nets or silt fences) during construction.

WATER RESOURCES

We have reviewed the Environmental Factor Section H. Hydrology and Water Quality Items No. 2 and 6, which are checked "No Impact". We disagree with the "No Impact" designations listed. Trucking of wastewater to an approved disposal site is acknowledged, however, the planned connection to the city wastewater system is the preferred long-term option. The proposed project should not adversely affect water quality after connecting to the City of Oxnard sewer system. Groundwater hydrology could however, be impacted by loss of surface infiltration due to paved surfaces and building footprints. Since this

project is located above the "clay cap" protecting deeper useable aquifers, there should be less-than-significant losses to groundwater recharge within the unused Perched Zone aquifer. We therefore recommend changing the Initial Study findings from "No Impact" to "Less than Significant" for the reviewed Items No. 2 and 6.

In addition, groundwater quantity is regulated by the Fox Canyon Groundwater Management Agency (FCGMA) since the City is within the boundaries and authority of that resource agency, including any groundwater deliveries from United Water Conservation District. Any additional required imported water volume will be dictated by availability and City contract limitations with the Calleguas Municipal Water District (CMWD).

PLANNING AND REGULATORY

NO COMMENT

End of Text

PUBLIC WORKS AGENCY
TRANSPORTATION DEPARTMENT
Traffic, Advance Planning & Permits Division

MEMORANDUM

DATE: June 6, 2007

TO: Resource Management Agency, Planning Division
Attention: Chuck Anthony

FROM: Nazir Lalani, Deputy Director NL

SUBJECT: **REVIEW OF DOCUMENT 07-027, MANDALAY PEAKER PROJECT (SOUTHERN CALIFORNIA EDISON) Mitigated Negative Declaration (MND)**
No. 07-02 – Southern California Edison Company (SCE) proposes a 45-Megawatt (MW) "peaker" generator that will be operated primarily during periods of peak power demand.
251 N. Harbor Boulevard, in Oxnard (OXB).
Project Applicant: Southern California Edison (SCE)
Lead Agency: **City of Oxnard**

The Public Works Agency -- Transportation Department has reviewed the Mitigated Negative Declaration (MND) for the Mandalay Peaker Project. The Project is to construct a 45-Megawatt (MW) "peaker" generator that will be operated primarily during periods of peak power demand. The project will include a six-inch diameter, approximately 1800 feet in length, pipeline to supply natural gas to the project site that will be constructed on project property and within the right-of-way of Harbor Blvd. in a previously disturbed pipeline corridor. Construction of water pipeline would also occur within the right-of-way for Harbor Blvd. The proposed equipment will be installed at 251 N. Harbor Blvd. in Oxnard on property owned by SCE. The proposed project site was a former tank farm that served the adjacent Mandalay Power Generation facility.

We offer the following comments:

1. We generally concur with the comments in the MND for those areas under the purview of the Transportation Department. Traffic generated by this project is a result of construction activities that are short term in nature. The cumulative impact of this project falls below the minimum threshold identified in the Reciprocal Traffic Impact Agreement between the City of Oxnard and the County of Ventura. Therefore, the impact on County Roads due to this project is considered a Less Than Significant and the project will not be required to pay a Traffic Impact Mitigation Fee (TIMF).

2. The Traffic Study for the MND should evaluate and provide mitigation measures for the site-specific impacts this project may have on the County's Regional Road Network. As provided in the proposed truck route, of particular interest to the County are the potential traffic impacts at the following intersections and portion of the County road:

- Intersection of Doris Avenue and Victoria Avenue;
- Intersection of Victoria Avenue and Gonzales Road;
- Intersection of Victoria Avenue and Olivas Park Drive; and
- Portion of Victoria Avenue from Oxnard City Limit (at Teal Club Road) to Ventura City Limit (at Olivas Park Drive).

4. If any portion of pipeline construction is within the County ROW, this project will require an encroachment permit from the Transportation Department for work done within the road right-of-way. The applicant shall contact (805) 654-2055 for requirements of this permit.

5. A traffic control plan shall be submitted for any detour, road closures, or partial road closures on County roads. The traffic control plan must be approved by the Transportation Department 48 hours prior to the actual closure.

6. The project proponent shall also repair any damage to Victoria Avenue, Harbor Blvd., Gonzales Road, and W. Fifth Street due to the traffic generated by this project up to and including providing a new overlay as determined by the Ventura County Transportation Department.

7. All construction within County right-of-way shall conform to County Road Standards. Installation of pipe, trenching, and backfill within the County right-of-way shall be in accordance with Section 306 of the "Greenbook" Standard Specifications for Public Works Construction.

8. The Initial Study and MND identifies Mitigation Measures TT-1 and TT-2 (pages 5 & 6 of the Summary of Mitigation Measures). These mitigation measures should be included in the project conditions.

Our review is limited to the impacts this project may have on the County's Regional Road Network.

Please call me at 654-2080 if you have questions.

P:\TRANSPOR\LanDev\Non_County\07-027 OXD.doc

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Chuck Anthony, Planning DATE: June 6, 2007

FROM: Alicia Stratton

SUBJECT: Request for Review of Mitigated Negative Declaration for the Mandalay Peaker Project, Southern California Edison, City of Oxnard (Reference No. 07-027)

Air Pollution Control District staff has reviewed the subject project, which is a request to develop a 45-Megawatt peaker generator at 251 North Harbor Boulevard that includes one natural gas-fired General Electric LM6000 gas turbine generator, pollution control equipment, an 80-foot tall exhaust stack, a 10,500-gallon 19-percent aqueous ammonia storage tank, fuel gas supply line, fuel gas compressor, water supply line, water demineralizer, two water storage tanks, transformers, 66 kilovolt transmission tap line, a natural gas-fired "black-start" generator, a power control module, a 65' by 75' customer substation and a 40' by 75' gas metering station.

Section C of the mitigated negative declaration addresses air quality. We concur with the findings of this discussion that significant air quality impacts will not result from the project. Emission controls for the project will require an APCD Authority to Construct permit from our District, and those permit application issues are currently underway with our permitting division. Dispersion modeling of the project's operational emissions was conducted to determine if project operation would increase toxic health risks to nearby sensitive receptors. We concur with the modeling methodology results indicating that air toxics emissions would be less than significant. Moreover, Pages 28-30 discuss construction emissions and describe mitigation measures that will minimize fugitive dust and particulate matter resulting from site preparation and construction activities. These mitigation measures are further described on Pages 42-43, with the monitoring program and schedule.

If you have any questions, please call me at (805) 645-1426.

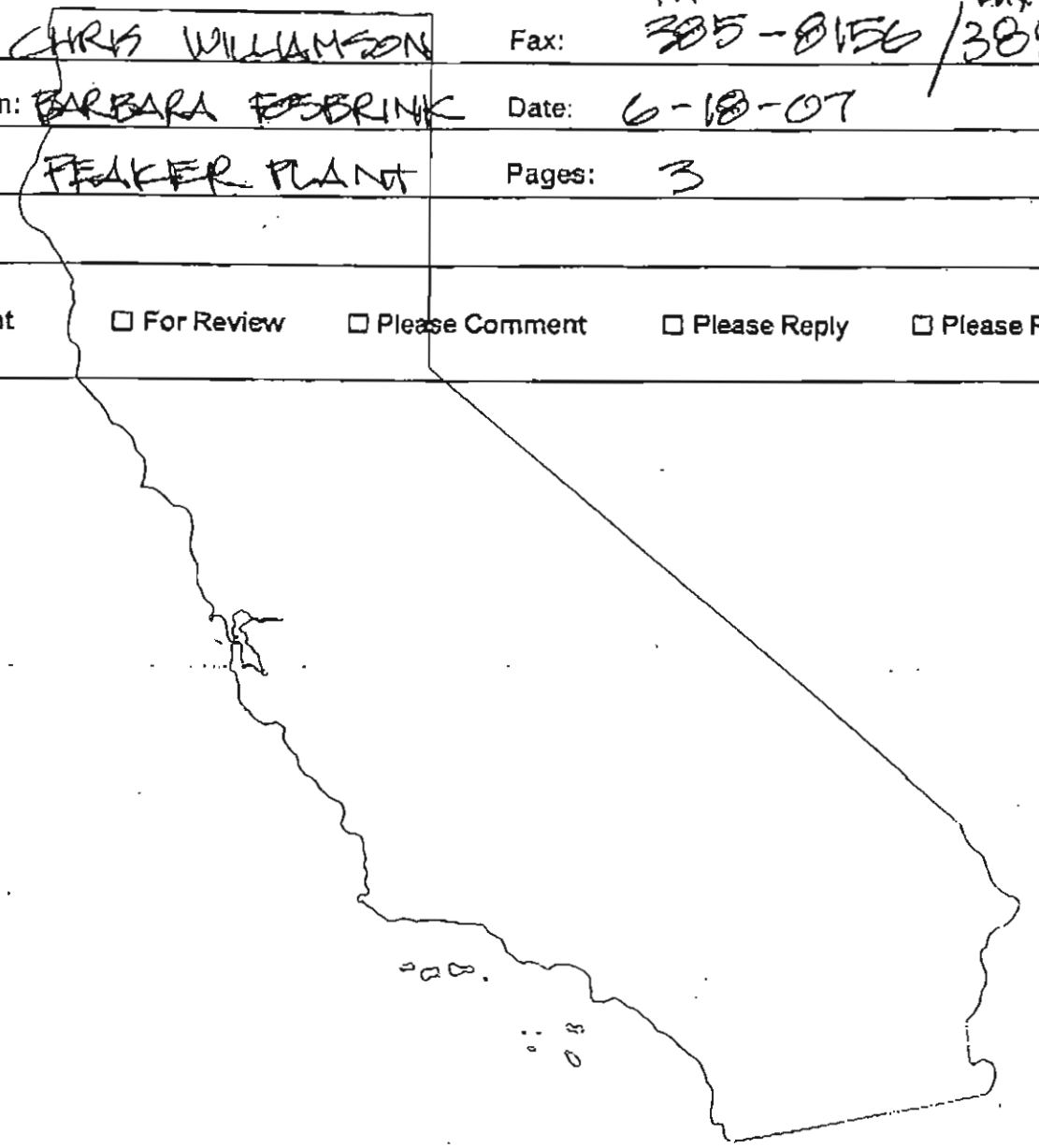
California State Parks
CHANNEL COAST DISTRICT OFFICE
911 San Pedro Street
Ventura, CA 93001
(805) 585-1850
Fax: (805) 585-1857

facsimile transmittal

To: CHRIS WILLIAMSON		Fax:	Ph 385-8156 / Fax 385-7417
From: BARBARA ~~FOSBRINK~~		Date:	6-18-07
Re: PEAKER PLANT		Pages:	3
CC:			

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Notes:



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State of California • The Resources Agency
Arnold Schwarzenegger, *Governor*
DEPARTMENT OF PARKS AND RECREATION
Ruth Coleman, *Director*
911 San Pedro Street
Ventura, CA 93003
805-585-1850/FAX:805-585-1857

June 15, 2007

Christopher Williamson
Senior Planner
City of Oxnard
Planning Division
305 W Third Street
Oxnard CA 93030

Subject: MND 07-02 Edison Peaker Plant

Dear Mr. Williamson:

After review of the Draft Mitigated Negative Declaration for the proposed Edison Peaker Plant, 251 N. Harbor Blvd, we find it appropriate to provide the following comments:

- In describing the project's location it should be noted that **Mandalay State Beach** is to the **southeast** of the proposed plant site and **McGrath State Beach** is to the northwest of the site and the Reliant Energy Plant.

- When evaluating visual impacts of the proposed project it should be noted that, "the intervening land between Mandalay State Beach and the proposed project site" is **NOT** "dotted with existing oil processing structures that are approximately 70 feet high, and the stacks of the Mandalay Power Generation Facility which is 203 feet high". All that separates Mandalay State Beach from the proposed peaker plant site is a six foot chain link fence on the Edison property.

- Impacts to the access road and resources at Mandalay State Beach have not been evaluated or mitigations considered.

- The extent of the project area has not been adequately defined for pre-construction biological survey purposes.

- Given extensive restoration activities undertaken at Mandalay State Beach, a native plant palette using locally collected seed should be required for landscaping.

- Properties entrusted to the California Department of Parks and Recreation for stewarding contain high resource and recreational values. Mandalay and McGrath State Beaches contain wetland, dune, backdune and riparian habitats.

The acreage of these parks hold what remains of these habitat types and as such are protected from urban development. Construction and intensification of use in the coastal area immediately adjacent to these two State Park properties does not appear to be adequately evaluated. The MND appears to look only at the proposed site and adjacent dunes. No investigation of impacts to the backdune or wetland sites has been considered.

Given the vanishing open spaces and the need for coastal recreation opportunities along our southern California Coast one would like to think that there is a more appropriate location outside of the coastal zone for this proposed facility. We would be most interested in being able to sit down with interested parties to discuss other options for this site beyond its currently proposed use.

Thank you for the opportunity to comment on the MND. Please provide any notices, staff reports or documents related to future reviews or actions on the Edison Peaker Project to Barbara Fosbrink, District Services Manager, CDPR – Channel Coast District, 911 San Pedro Street, Ventura CA 93001.

Sincerely,

Richard A. Rojas
District Superintendent
Channel Coast District

U. S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003
(805) 644-1766 Telephone (805) 644-3958 Facsimile

Date: June 18, 2007

TO: Christopher Williamson, Senior Planner
City of Oxnard

From: Chris Dellith

Fax Number: (805) 385-7417

Pages: 3 Pages

The original letter will be sent via regular mail on June 19, 2007.

Thank you

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

TAKE PRIDE IN AMERICA

IN REPLY REFER TO
PAS 3408.5196.7441

June 18, 2007

Christopher Williamson, Senior Planner
Planning Division
City of Oxnard
305 W. Third Street
Oxnard, California 93030

Subject: Comments on the Mandalay Peaker Project, Mitigated Negative Declaration, No. 07-02

Dear Mr. Williamson:

This letter is in response to your correspondence, requesting comments on subject project located at 251 N. Harbor Boulevard, Oxnard, in Ventura County California. We understand that the City of Oxnard is currently reviewing the subject project proposed by Southern California Edison. The proposed project consists of developing a 45-Megawatt peaker generator just south of the existing Reliant power plant that includes one natural gas-fired General Electric turbine generator, pollution control equipment, an 80-foot tall exhaust stack, a 10,500 gallon aqueous storage tank, fuel gas supply line, fuel gas compressor, water supply line, and other miscellaneous structures and equipment to support the facility. We are concerned about the potential effects of this project on the federally endangered California least tern (*Sterna antillarum browni*) and threatened western snowy plover (*Charadrius alexandrinus nivosus*), which known to breed on the adjacent beaches.

The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines "take" to mean "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Service regulations (50 CFR 17.3) define "harm" to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species. Exemptions to the prohibitions against take may be obtained through the Service in two ways: through interagency consultation for projects with Federal involvement pursuant to section 7, or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

Our assessment of the proposed project does not constitute a full review of potential effects to species listed pursuant to the Act. We have the following comment and recommendation regarding the proposed project:

You have determined that potential sensitive receptors may be affected by a change in scenic visual resources in the proposed project area, which include motorists along Harbor Boulevard, recreational users along the beach and shoreline approximately 750 feet west of the project site, recreational users at Mandalay Beach State Park located approximately 1,000 feet southwest of the project site, and future residents of the proposed Northshore at Mandalay Bay residential area located approximately 750 feet southeast of the proposed project site. In order to shield views of project structures from sensitive receptors along Harbor Boulevard, Edison has proposed a landscape plan to be incorporated into the project. The landscape plan includes berms, native vegetation, and planting a row of trees along Harbor Boulevard and along a portion of the northern boundary of the site to visually screen the proposed peaker unit and associated structures.

Our concerns lie with the proposed row of trees. It is likely that this row of trees will provide nesting habitat for American crows (*Corvus brachyrhynchos*) and ravens (*Corvus corax*) that prey on the California least tern and western snowy plover chicks and eggs located on the adjacent beaches. Specifically, we are concerned that these species are known to take up residence in areas with suitable breeding habitat and that are adjacent to food sources (e.g., California least tern colonies).

Therefore, we recommend that if Edison decides to go forward with their proposed landscape plan, it should also develop a predator management plan. Furthermore, Edison should work with us and the California Department of Parks and Recreation to monitor California least terns and western snowy plovers on nearby beaches to determine the effectiveness of the predator management plan and to determine if any changes are needed to further protect sensitive species in the area.

Lastly, if you decide to authorize this project and crows or ravens take up residence in the row of trees, take of California least terns and western snowy plovers would likely occur. In that case, we would recommend that you work with Edison to obtain exemption to the prohibitions against take either through interagency consultation pursuant to section 7, or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

We appreciate the opportunity to comment on the proposed project, and look forward to working with you to find ways to avoid impacts to listed species. If you have any questions regarding this matter, please contact Chris Dellith of my staff at (805) 644-1766, extension 227.

Sincerely,

Steve Henry
Assistant Field Supervisor

cc: Betty Courtney, California Department of Fish and Game

June 13, 2007

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JUN 14 2007
PLANNING DIVISION
CITY OF OXNARD

Chris Williamson
City of Oxnard Planning and
Environmental Services
305 West Third Street
Oxnard, CA 93030

RE: MND 07-02, 251 Harbor Blvd., Southern CA Edison

I am submitting this letter to uphold the mitigation measures set forth in the Cultural Resource section of this declaration. The Chumash Council has no objections to the proposed project if the mitigation measures stated are included and placed into effect in this project. The measures are listed on page 50, CUL-1. We would like to ensure that a qualified Native Monitor would be present during the excavation period of this project.

Adding these measures would avoid any adverse effects to resources that could possibly be located in the area. This issue is a concern to the Native American Community, and implementation of such guidelines or measures would address this concern. Should you have any questions please do not hesitate to call. Thank you.

Sincerely

Susan Ruiz
Ventureno Chumash Council Member
P.O. Box 6612
Oxnard, CA 993031
(805) 443-8599

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EDISON
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PLANNING DIVISION
CITY OF OXNARD

June 15, 2007

Chris Williamson
Senior Planner
Planning Division
305 W. Third Street
Oxnard, CA 93030

Subject: MND 07-02, CDP PZ 06-400-5, Proposed SCE 45-Megawatt Peaker Plant, 251 N. Harbor Blvd., Comments on Mitigated Negative Declaration

Dear Mr. Williamson,

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on the City of Oxnard's Notice of Intent to adopt a Mitigated Negative Declaration (MND 07-02) and Coastal Development Permit (PZ 06-400-5) for SCE's proposed peaker project. With one significant exception, SCE concurs with the analysis, conclusions and mitigation measures contained in the City's Draft MND.

Section I of the MND, Land Use and Planning, includes the relevant section of the CEQA Checklist as well as a discussion of those Checklist topics. For all three of the CEQA Checklist questions in the Land Use and Planning category, the MND found that the project will result in "No Impact." Furthermore, the discussion in the MND (Section I.2) concludes that the proposed project is consistent with (i) the City of Oxnard 2002 General Plan land use designation for the site, which is Public Utility/Energy Development, (ii) the City of Oxnard Coastal Land Use Plan, and (iii) the Coastal Zoning Regulations and Zone Maps, which designate the site as Coastal Energy Facility (EC).

CITY COASTAL ZONE JURISDICTION

The City of Oxnard has prepared both a Local Coastal Program (LCP) and a coastal Land Use Plan (LUP) that have been certified by the California Coastal Commission (CCC) under the California Coastal Act (Coastal Act). The SCE-owned property on which the proposed peaker facility would be constructed is within the Coastal Energy Facility (EC) sub-zone of the City of Oxnard's LUP (Figure I-2). This sub-zone area allows energy development uses under both the LUP and the City zoning ordinances. Existing facilities in this sub-zone include the Mandalay Generating Station, the 220kV Mandalay electric transmission substation, the 66 kV McGrath electric transmission substation, and numerous electric transmission lines.

The land on which the proposed peaker would be built is within the EC zone. The peaker project site is a remediated brownfield location that formerly contained the fuel oil tank farm that supplied fuel oil to the adjacent Mandalay Generating Station. As shown in Figure I-2, MND page 73, the land immediately on all sides of the proposed project is

2244 Walnut Grove Ave.
Rosemead, CA 91770

also designated as "Coastal Energy Facility" (EC). The MND indicates that the adjacent land to the south is considered "coastal resource protection." However, that "coastal resource protection" land is not immediately adjacent to the proposed peaker site. Rather, while "coastal resource protection" may be the designation of the next adjacent separate parcel of land, it is still separated from the proposed peaker project by an undeveloped buffer area within the SCE-owned parcel. Additionally, the land adjacent to SCE's parcel contains numerous oil pumps and pipelines. Interestingly, despite LUP Policy number 55, which finds that both residential uses and visitor-serving commercial uses are not compatible as a neighboring use with energy facility zoning, the Planning Commission recently approved residential development cattycorner to the energy coastal subzone.

Once a local jurisdiction has prepared an LCP that has been certified by the CCC, the local government may implement the requirements of the Coastal Act. This delegation does not give a local jurisdiction "local authority" over a utility project, but merely provides authority to issue Coastal Development Permits (CDP) for development within the coastal zone covered by the LCP. Thus, SCE has filed its application for a CDP with the City.

ISSUES

Consistency with the LUP and Coastal Act

To issue a CDP for the project, the construction of the proposed peaker unit must be consistent with the LUP and the Coastal Act. The MND, at page 72, states that the peaker project is "consistent with this zoning designation," referring to the Coastal Energy Facility zone created under the LUP. The MND also finds that the proposed project will not impact any sensitive habitat, such as wetlands, beaches, or dune areas. However, the MND also states, in paragraph 3 on page 72, that "the project does not qualify as a coastal dependent use, and would not be allowed at this location." The MND indicates that if the peaker project were classified as an "accessory use" to the existing Mandalay Power Generating facility," then the project might be considered a "coastal dependent development" and approvable by the Planning Commission.

The two statements above in the MND conflict with each other about whether the peaker project is consistent with the LUP and Coastal Act. The MND's finding that the project must be a "coastal dependent development or use"[1] is in error. According to the MND, for the project to obtain a CDP, the Planning Commission must find the peaker project to be a coastal dependent use.[2] The MND further addresses this issue by proposing mitigation measure LUP-1, which provides:

---

[1] The LUP and Public Resources Code Section 30101 define a "coastal dependent development or use" as "any development or use which requires a site on, or adjacent to, the sea to be able to function at all."

[2] SCE met with Planning Commission staff on June 8, 2007, to seek clarification regarding this issue, to ensure that SCE was correctly understanding the MND language to say that this project must be coastal dependent to be approved. SCE appreciates the staff's time to discuss the issue.

> If the Planning Commission finds the proposed use is not consistent with the Coastal Zone designation, the application would have to file for a Coastal Land use Plan amendment to add 'non-coastal energy facility' to the approved use list."

The only discussion in the Land Use Section that raises a question about consistency with the LUP and Coastal Act is the assertion that the project must be a coastal dependent use. Thus, this mitigation measure and the MND language on page 72 lead to the conclusion that the project cannot be permitted because it is not a coastal dependent use, unless the City's LUP is amended to allow for an energy facility that is not a coastal dependent use. For the reasons explained below, the MND's "coastal dependent use" conclusion is inconsistent with both the LUP and the Coastal Act.

First, nothing in either the LUP or the Coastal Act requires that an energy facility be a "coastal dependent development or use" prior to being located within either the coastal zone or the "coastal energy" subzone. Rather, the LUP and Coastal Act use of the term "coastal dependent development or use" as a mechanism to limit the permitting of facilities in certain **sensitive** areas that would result in degradation to important natural resources. For example, Public Resources Code Section 30233 limits the construction of any facilities in wetlands and open coastal waters to certain types of uses, such as energy and coastal-dependent industrial facilities. However, Section 30233 is not applicable in this instance because the proposed location for the peaker unit is not within coastal waters or wetlands, or any other area protected by Section 30233. Therefore, the peaker does not need to be a coastal dependent use to comply with the Coastal Act.

Second, Oxnard City Code LUP Section 17-20, which defines the EC, Coastal Energy Facilities, Sub-zone, specifically provides that the purpose of the sub-zone is "to provide areas that allow for the siting, construction, modification and maintenance of power generating facilities and electrical substations consistent with Policies 51, 52, 54, 55, and 56 of the Oxnard coastal land use plan." [Sec. 37-2.11.1 (B); Article II. Coastal Sub-zones, Section 17-20. EC, Coastal Energy Facilities, Sub-Zone.] The proposed peaker project is an energy facility and is consistent with the above referenced policies. Importantly, Section 17-20 does **not** require that power generating facilities and electrical substations must be coastal dependent uses.

The above interpretation is consistent with the provisions of the LUP itself. On page II-4, the LUP explains the "energy facility" designation as:

> "This designation will allow development of energy-related facilities, including essential and coastal-dependent uses, such as electrical generation station, marine fuel loading facilities, pipelines, and fuel processing plants."

The definition above includes coastal-dependent uses, but does not preclude other uses that are not coastal dependent. Further, the definition of "energy facility" in Article 17-3(25) is "Any public or private processing, producing, generating, storing, transmitting or recovering facility for electricity, natural gas, petroleum, coal or other sources of energy."

The above explanation and definition makes it clear that all energy-related facilities may be developed in the energy facility subzone, not just coastal dependent uses.

City planning staff have verbally informed SCE representatives that City planning staff believe the peaker project is not consistent with Oxnard City Code Section 17-20. Consequently, SCE provides the following analysis of Section 17-20 in relation to the peaker project to address staff's claims of noncompliance.

(A)(1) "Coastal dependent energy facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth, where consistent with this article." (citing Public Resources Code Section 30260)

While the peaker unit may not be a "coastal dependent" energy facility, it would nonetheless be located within an existing site designated for energy facilities. This section of the Oxnard ordinance does not preclude non coastal dependent energy resources from being located within the EC zone; it merely states that "coastal dependent" facilities should be encouraged to locate within the EC sub-zone. Other energy facilities, such as SCE's proposed peaker project, may be located within this subzone consistent with this requirement.

Further, the proposed peaker project is an expansion of the existing electric generating infrastructure within the existing EC sub-zone site, and is being proposed to address the rapid growth in the regional energy demand including in the Oxnard area. Siting the peaker at this location utilizes a brownfield site rather requiring development of a new site, minimizes (indeed almost avoids) the need for new transmission lines, and will also improve the reliability of the emergency black start capability for Mandalay Generating Station, which is currently dependent upon a nearly 40 year old peaking unit which is of increasingly uncertain reliability and is not equipped with any emissions controls, unlike the proposed unit which is new, is a model with an excellent reliability track record, and is equipped with state of the art emissions controls.

(A)(2) "All new energy related development shall conform to the air quality regulations set forth by the Ventura Air Pollution Control District, the air quality management plan and new source review rule 26."

SCE will obtain all necessary permits from the Ventura County Air Pollution Control District (VCAPCD). As part of its normal process and prior to issuing these permits, the VCAPCD must confirm that that project conforms to all applicable air quality regulations, the air quality management plan, and new source review rule 26. Note that this section does not state that the energy related development must be "coastal dependent."

(A)(3) "Energy related development shall not be located in coastal resource areas including sensitive habitats, recreational areas and archaeological sites. All developments adjacent to these resource areas or agricultural areas shall be designed to mitigate any adverse impacts."

The proposed peaker location is on land previously used for a fuel oil tank farm from 1959 to 2003. Biological and archaeological resource studies and an independent review of the proximity to recreational areas have confirmed that the proposed project is not located in one of the areas of concern listed by this section. The MND reaches this same conclusion. As with the above subsection, this section does not state that the energy related development must be "coastal dependent."

(A)(4) "All new energy related development shall be located and designed to minimize adverse effects upon public access to the beach."

The proposed project will not obstruct any public access to the beach. The proposed peaker site is within an existing, fenced industrial site. Project construction will not change local beach access points. Further, the proposed site is located inland from the beach and has existing industrial development associated with an oil processing facility and the Mandalay Generating Station between it and the ocean. Like the above two subsections and all the subsections below, the LUP section addresses "energy related development," not "coastal dependent" energy development.

(A)(5) "No energy related development shall be located seaward of the 100 year flood/wave run-up line as designated by the U.S. Department of Housing Insurance Program Administration and the land use map of the Oxnard coastal land use plan."

The proposed project is located inland of the 100 year flood/wave run up line designated by the U.S. Department of Housing Insurance Program Administration and the land use map of the Oxnard coastal land use plan.

(A)(6) "Wastewater from any energy related facilities shall be treated as necessary and put to reuse including, but not limited to the following:

a. Re-injection into the aquifer or ground water recharge system; and
b. Recycling for industrial, agricultural or urban use."

Wastewater produced by the project will be minimal. Eight gallons per minute of wastewater from the evaporative cooler would be produced during the limited hours that the unit will operate. This water will have elevated levels of total dissolved solids but no other added pollutants and will be collected and disposed of at a facility that complies with the above requirement.

Moreover, Section 17-20 (B)(2) specifically provides that electrical power generating plants, such as the peaker project, are "permitted subject to the approval of a coastal development permit pursuant to the provisions of article V." Section 17-20(B)(2) does not limit the energy facilities that may be sited within the coastal energy zone to facilities that are coastal dependent uses. Article V, referenced in this section, contains the requirements for processing a coastal development permit under Section 17-57. This proceeding is at the Planning Commission because SCE has applied for a coastal development permit from the City pursuant to Article V. Next, Section 17-20(C) states that "all uses shall be subject to the applicable standards of this chapter" (Coastal Zoning Chapter in the City Code). The SCE peaker project conforms to Articles III, IV, and V of the Coastal Zoning Chapter, as required. None of those articles require that energy facilities be coastal dependent uses in order to allow the use to be permitting within the coastal energy subzone.

As shown above, the coastal energy subzone does not require that an energy facility be "coastal dependent." Nor do other subzones have a similar requirement that authorized uses within those subzones be coastal dependent. SCE notes that the City has authorized many developments and uses to occur within the coastal zone without requiring that those projects be "coastal dependent uses." The MND cannot now interpret the City coastal zoning ordinance to require the SCE peaker project to be a coastal dependent use when no other development within the coastal zone must meet that standard, unless the development is within wetlands, open coastal waters, or other similar sensitive habitat. Instead, the MND must treat the peaker project in the same manner as all other applications for coastal development permits.

Mitigation Measure LUP-1

In addition to the concerns raised above, SCE questions the appropriateness of Mitigation Measure LUP-1. As set forth above, LUP-1 provides that SCE would need to seek an amendment to the LUP if the Planning Commission finds the project is not consistent with the Coastal Zone designation. This is not a mitigation measure. Mitigation measures are conditions imposed upon an authorization that require an applicant to address a project-related environmental impact. LUP-1 is unrelated to any project impact. Rather, LUP-1 is an administrative process that the Planning Commission staff believe the applicant may follow to obtain a coastal development permit for the peaker project should the Planning Commission deny the current permit application. While SCE appreciates staff's advice as to how SCE may proceed should the permit application be denied, LUP-1 has no place in the MND as a mitigation measure.

CONCLUSION

Section 17-20 specifically allows the construction of generating facilities, like the peaker project, within the coastal energy subzone. The peaker project is in conformance with the City of Oxnard's Coastal Zoning Ordinance and the state Coastal Act. Accordingly, SCE requests that the MND be revised to clarify that (i) the peaker project need not be a

coastal dependent use, and (ii) the project is consistent with the LUP and the Coastal Act. Particularly, the MND should be revised to remove the third paragraph on Page 72 and Mitigation Measure LUP-1 on page 74. With these corrections to the MND, the Planning Commission may issue SCE a coastal development permit without the need for any amendments to the LUP.

Thank you for this opportunity to comment on the MND for SCE's proposed peaker project. Should you have any questions about these SCE comments to the MND, please call Wendy Miller at (626) 302-9543.

Sincerely,

Wendy L. Miller
SCE Environment Health & Safety

5141 W. Wooley Rd
Oxnard Ca 93033
January 28, 2007

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JAN 30 2007
PLANNING DIVISION
CITY OF OXNARD

CITY OF OXNARD
PLANNING DEPT

REGARDING THE DEMOLITION OF THE "WAGON WHEEL RESTAURANT AND MOTEL" AND REPLACEMENT WITH 2 OFFICE TOWERS I WOULD LIKE TO SAY THAT I'M VERY DISSAPOINTED IN the failure to retain anything with history and character in our city.

The WAGON WHEEL COMPLEX WAS PART of my VERY FIRST impression of Oxnard when I came there in 1992 and it was a positive one.

Now we are starting to look like everyone else. Just many anonymous, character less, endless suburbs that dot the Southern California Landscape.

Please, we need to retain our individuality & history. Also, we need alot of open spaces and vegetation for our many citizens & visitors to go, the endless concrete that brings traffic

JAMS and the high rise buildings that Blot out the sunsets.

I believe that Developers are mostly interested in their own short term gain and should not have so much power in determining our future here.

Thank you

Shirin Anderson

P.S. Also oppose the building of a 2nd power plant at Mandalay Beach.
The remainder of the Beach Front at Mandalay Shores should be made into a seaside park and sanctuary. NO MORE selling out to developers. Please

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MAY 21 2007
PLANNING DIVISION
CITY OF OXNARD

SAVIERS ROAD DESIGN TEAM
3830 SAN SIMEON AVE.
OXNARD, CA 93033

May 21, 2007

Susan L. Martin
Planning Division Manager
City of Oxnard, Planning Division
305 W. Third Street
Oxnard, CA 93030

RE: Environmental Impact Report NO. 05-03
North and South Ormond Beach DEIR

Dear Ms. Martin:

The Saviers Road Design Team is requesting that the review period be extended from 45 days to at least 60 days for the DEIR for this project due to the scope and complexity of the DEIR. In addition, two major holidays (Memorial Day and July 4th) occur during the review period effectively eliminating two weeks of the review period.

Sincerely,

Shirley Godwin

Shirley Godwin, Chairperson
Saviers Road Design Team

Christopher Williamson
City of Oxnard, Planning Division
305 W. Third Street
Oxnard, CA 93030
May 21, 2007

RECEIVED
MAY 21 2007
PLANNING DIVISION
CITY OF OXNARD

The following comments are submitted on the MND 07-02 and Coastal Development Permit (PZ 06-400-02) for the Edison peaker power plant:

1. Any industrial project in the Coastal Zone must have a full Environmental Impact Report.

2. The peaker plant is not coastal dependent and can not be approved. There is never any justification for putting non-coastal dependent industry in the Coastal Zone. The plant is not consistent with the Coastal Zone designation of "Coastal Energy Facility".

3. The plant can not be classified as an accessory use to the existing Mandalay Power Generation facility since it will operate independent of the Mandalay facility.

4. The MND must address the requirements of AB-32 with respect to greenhouse gas. The Air Quality impact analysis does not even calculate or address the amount carbon dioxide emitted.

5. The project does not comply with the Ventura County Air Quality Assessment (AQMP) Guidelines since it does not conform to the applicable General Plan designation.

6. The AQMP must assume that the plant will operate 100% of the time. There is no compelling reason to believe, that after spending $50 million to construct the plant, that Southern California Edison would not operate the plant as much as possible.

7. There is no discussion of the restoration requirements when the oil tanks on the site were removed and if any of those requirements remain.

8. If the plant is built, it must be removed when the existing Mandalay Power Generation facility is removed and the site restored. There is a requirement that existing power plants, that use seawater for cooling, cease operation in 5 to 10 years. Since these plants are not suitable for upgrading, they most likely will be removed.

Larry Godwin
3830 San Simeon Ave.
Oxnard, CA 93033

RECEIVED

JUN 07 2007

PLANNING DIVISION
CITY OF OXNARD

ORE

OCTAVIO R. ELIAS

1080 MANDALAY BEACH ROAD • OXNARD SHORES • CALIFORNIA 93035

June 5, 2007

To: Chris Williamson
Planning Dept, City of Oxnard
From: Bodine and Octavio Elias

Re: Proposed Peaker Power Plant, Harbor Bl

We were very disappointed to see that an Environmental Impact Report was not required for the Peaker Plant even though Edison's own literature refers to emissions from nitrogen oxide (Nox), carbon monoxide, volatile organic compounds (VOC) and the presence of storage tanks filled with ammonia.

The siting of this plant where the prevailing winds blow from ocean to land is poorly thought out. Even with what Edison describes as 'state of the art equipment', any emissions are unacceptable. See the attached photo of the Reliant plant and note the wind direction.

Governor Schwarzenegger said when he vetoed the LNG facility that to meet California standards, the requirement is to ***improve air quality and protect its coastal resources.*** The Peaker Plant does neither.

The American Lung Association recently reported that Ventura County moved up to the 12th most ozone-polluted county in the USA. With the increase of asthma and lung disease, locating a polluting facility on the shoreline is almost criminal.

When the GO CART track was in operation as scheduled weekend recreation, the drone/noise was clearly audible where I live which must be more than two miles from its location on the north side of the Reliant Plant. The Peaker Plant is to be located on the south side of the existing plant and will run at any time that there is a peak power need in communities outside of our own. The noise will disturb hundreds of households. *Why is Oxnard again a Target – Dumping Ground for industrial blight?*

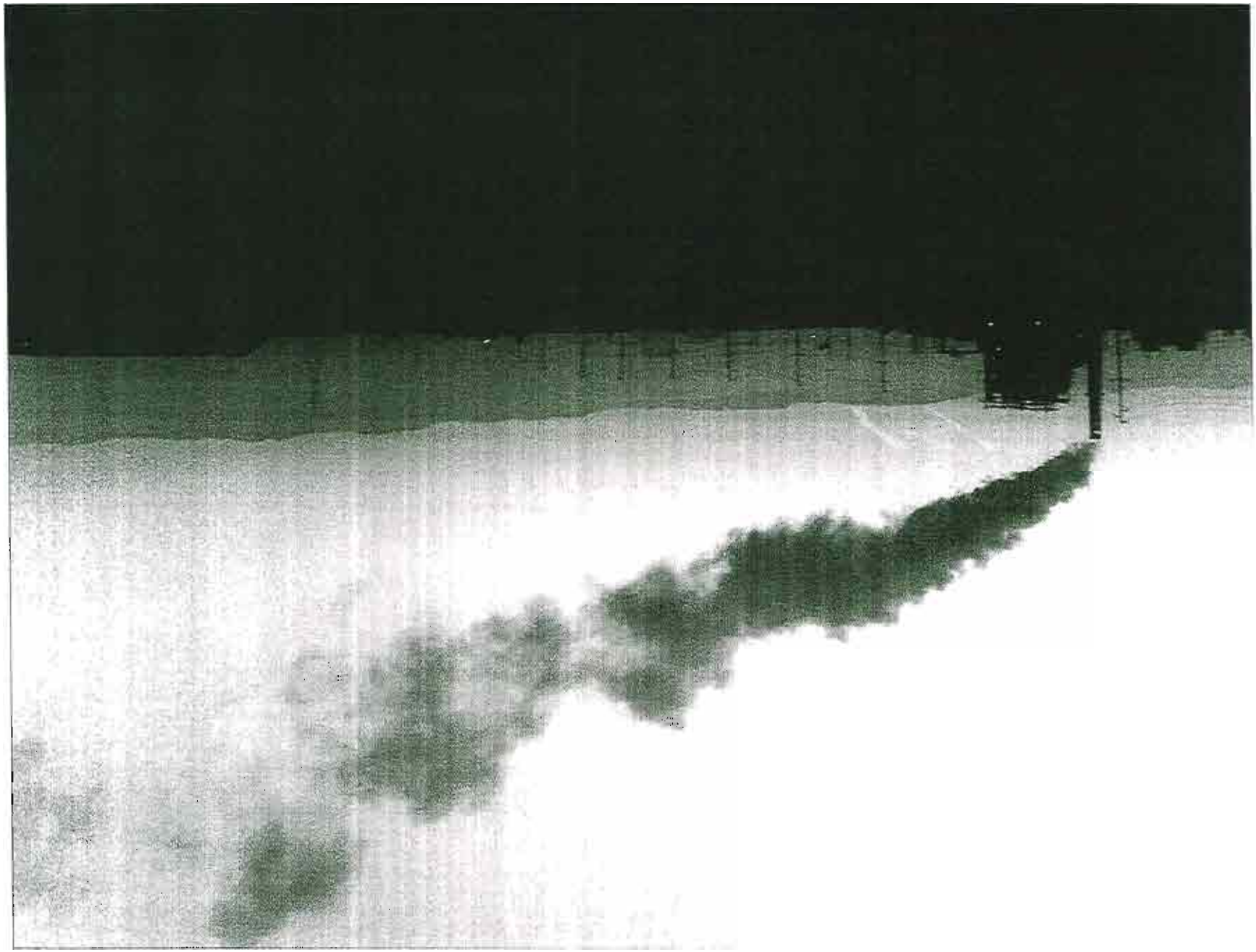
We strongly oppose the siting of the Peaker Power Plant for reasons of Health, Environment, Beach Restoration, Noise, Tourism, Property Values and Quality of Beach Life.

BAD AIR ISN'T GOOD FOR EVEN HEALTHY PEOPLE TO BREATHE

Sincerely,

Bodine Elias

Octavio and Bodine Elias
1080 Mandalay Beach Road
Oxnard Shores



RECEIVED
JUN 07 2007
PLANNING DIVISION
CITY OF OXNARD

June 6, 2007

Christopher Williamson
Senior Planner
City of Oxnard Planning Division
305 West 3rd St.
Oxnard, Ca. 93030

Dear Mr. Williamson,

We are writing to you as very concerned citizens with regards to the proposed "peaker plant" at Oxnard shores, and your proposed Mitigated Negative Declaration for this project.
As someone involved in the development business and having looked at the MID itself, I would ask you to reconsider this and ask for a complete, extensive EIR on the project. I realize that there is a trend to minimize unnecessary EIR's but I have never seen a MID outside of residential housing. An EIR, I believe, would uncover shortcomings of the project and more importantly would open the question of whether or not this is even the right location for this project. The fact that several hundred new homes are going in across the street strengthens the argument. All of the other "peaker plant" locations are located inland. Since this plant does not rely on the exchange of water for operation, why does it have to be on one of our beaches? Furthermore this plant is not even going to service us but instead service distant communities. These communities should develop "peaker plants" on their turf, not ours. We already have our share of power plant pollution and we don't need more! Oxnard, according to your Mayor Tom Holden, has shouldered more than it's share of heavy utility sites and now we are stuck with the mess at the Halaco site as well.

The other matter that concerns us is the proximity of this plant to the proposed LNG unloading site at the "Grace platform". As we understand it they are proposing to use existing pipelines that go from Grace to exactly where this natural gas "peaker plant"will be built-interesting coincidence? And the existing pipes are currently leaking oil-we have seen it going by in our boat and citations have been issued in the past. Like Cabrillo Port which was defeated by The State Lands Commission, The Coastal Commission, thousands of concerned citizens, and the Governor, this hopefully will also be stopped, but approval of this "peaker plant" will give the appearance that

you are paving the way for the approval of the proposed LNG unloading site at Grace. The air pollution from constant ships, volatile winds, potential earthquakes in the channel, the danger to wildlife, the potential of accidents with other ships, and being a target for terrorism are just a few of the concerns, as they were with Cabrillo Port.

We urge the Planning Department and the City Council of Oxnard to demand Edison take their "peaker plant" elsewhere, or at the very least to really explore the ramifications of such a project in this location, with an extensive Enviromental Impact Report.Thank you.

Bill and Clarissa Meeker
Hueneme Beach

Chris Williamson - FW: Oxnard Peaker

From: <dhermanson@primaryenergy.com>
To: <chris.williamson@ci.oxnard.ca.us>, <gbrown@primaryenergy.com>
Date: 6/7/2007 9:30 AM
Subject: FW: Oxnard Peaker

Chris-

Please place the following in the public comments on the proposed SCE peaker plant on Harbor Drive. I would love for our alternate site to be discussed in hopes of reaching a consensus that would allow the plant to be placed in a less controversial area.

Dave Hermanson

General Manager

West Coast Operations

Oxnard 805-385-6375

San Diego 858-492-5470 effective 8/1/2006

From: Hermanson, David
Sent: Thursday, March 01, 2007 4:22 PM
To: 'Mark.Nelson@sce.com'
Subject: Oxnard Peaker

Mark-

I spoke to Pam Snethen about SCE locating its proposed Oxnard LM6000 peaker adjacent to our facility. Attached is a Google Earth shot of our facility to help you visualize the benefits of our proposal.

1. The site is an Industrial zoned area

2. The area is a Industrial Development District so the City of Oxnard obtains the property tax revenues directly rather than sharing them with the county.

3. EF Oxnard already has the gas pipeline and compressors installed

4. EF Oxnard has air and demin water installed

5. SCE already has a switchyard and underground 66kv circuit.

6. EF Oxnard has Operators on site 24 hours a day for trouble call outs or fail to starts.

7. EF Oxnard has GT Technicians on site to diagnose or perform minor repairs

8. The site is adjacent to a rail spur so the GT package could be rail delivered and place on the foundation

9. The generator would still be owned by SCE for inclusion in rate base

10. An August 1 start date is achievable at this location.

11. The bird lovers and the City of Oxnard would be very pleased if SCE proposed an alternate location other than Harbor drive.

I would like to meet and discuss this in greater detail with you at your convenience. The GT would go in the "pink zone" adjacent to the rail road siding (rarely used). All gas, water, air utilities would be on the pipe rack over the railroad spur.

Dave Hermanson

General Manager

West Coast Operations

Oxnard 805-385-6375

San Diego 858-492-5470 effective 8/1/2006

****
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From: Suzanne Schechter <suzannes5@roadrunner.com>
To: <Chris.Williamson@ci.oxnard.ca.us>
Date: 6/7/2007 4:46:29 PM
Subject: peaker power plant

Chris Williamson
Planning commision
CITY OF OXNARD

As a resident of Oxnard Shores, I want to register my EXTREME OBJECTION to the additional power plant being built in such close proximily to my home.
Surely, the Planning commision as well as other officials of the city of Oxnard, must realize besides all other valid enviormental reason s of air quality, etc, allowing this facility to be placed ON the shore, next to the existing plant, will continue to make the case for an LNG plant , and you know there will be other attempts made to place an LNG plant in the ocean off Oxnard !

I beseech you to make every effort to do another review, before granting a permit for this horrible idea.

Sincerely
Suzanne Schechter
suzannes5@roadrunner.com

RECEIVED

JUN 12 2007

PLANNING DIVISION
CITY OF OXNARD

Chris Williamson
City of Oxnard Planning Department
305 W. Third Street
Oxnard, CA 93030

June 9, 2007

Re: Public comments on Edison's Peaker Plant Proposal for Oxnard Shores

We have lived in Oxnard Shores for several years and we love living here.

We believe the City of Oxnard should require the proponent to complete a satisfactory Environmental Impact Report. It is very important that we protect our coastal resources for the benefit of all. Edison's own literature states that the proposal will emit nitrogen oxide, carbon monoxide, volatile organic compounds and ammonia. We must be assured that this proposal meets air quality standards.

Since the peak power needs are in other parts of the state like Cucamonga and not in this area of Oxnard we should not just allow this plant to be set up here without a proper and complete review. We should not just agree to it because Edison has the land available to set up the plant.

Oxnard has been the dumping ground for too many projects with negative impacts.

Thank you for giving this project the careful consideration it requires.

Sincerely,

Nancy Symons & Ed Pagliassotti

Nancy Symons & Edward Pagliassotti
5222 Sandpiper Way
Oxnard, CA 93035
805-985-1177

cc. Mayor Tom Holden

From: <Shorebreak50@aol.com>
To: <Chris.Williamson@ci.oxnard.ca.us>
Date: 6/10/2007 11:25:58 AM
Subject: Why put peaker in Oxnard?

Dear Chris,
Once again I don't get it, why is Oxnard always the dumping zone? We have such a beautiful area why do they continue to exploit it with such environmental blunders. Not only to we need to continue fighting to keep out LNG Tankers, they now have chosen Oxnard to place Edison's Peaker Power Plant on Harbor Blvd., less then a mile away from Oxnard Shores. Edison has admitted to emissions of nitrogen oxide, carbon monoxide. volatile organic compounds, and ammonia. Why is the city allowing them to put it here? Oxnard won't benefit from having it here, put it where they need it high electricity demands on hot days "inland".
After talking to you Chris on the phone about my concerns of noise this project will create here at the Shores, I looked up the web site you gave me and my questions were still not answered! Once again I'm asking Oxnard what about the noise this wills create for us and the new housing development going in on Harbor? Please address these issues.
I know I know same old story, not in my backyard. Come on Oxnard isn't their enough stuff in our back yard already?

Sincerely, Singer Family

********** See what's free at http://www.aol.com.

From: "Miele, Mildred" <Mildred.Miele@wellpoint.com>
To: <chris.williamson@ci.oxnard.ca.us>
Date: 6/11/2007 9:10:59 AM
Subject: Proposed Peaker Power Plant

Was amazed to find out that Oxnard is being targeted again as a dumping ground for pollutants. Was shocked when
I heard that there was no Environmental Impact Report for the Proposed Peaker Power Plant proposed just North
of Oxnard Shores on Harbor Blvd., Oxnard.

After years of having the stench of the dump on Victoria assault Oxnard residents, having the ground contaminated
at 5th and Harbor by oil companies, having to fight off the proposed polluting, dangerous LNG Terminal, we are under
a pollution attack again by, shockingly, the City of Oxnard. The greed of our city officials is beyond belief.
They care nothing about the citizens health and wellbeing, only lining their pockets. Shame on them!!!

Why should Oxnard have to be polluted again to cover the needs of Cucamonga at peak electricity demands. The plant
will not serve Oxnard. Although the City of Oxnard did not require an Environmental Impact Report, Edison's own
literature speaks about the emission of Nitrogen Oxide (Nox), carbon monoxide, volatile organic compounds (VOC) and
ammonia stored in tanks on site. What if the plant is built and fails to achieve the promised emission reduction? With
prevailing winds from ocean to land, any emissions generated are unacceptable. When Governor Schwarzeneger
terminated the experimental, floating LNG Terminal proposed by BHP Billiton, he said that any LNG facility must meet
standards California requires to improve air quality and protect its coast Resources. THIS PROJECT DOES NEITHER!!!

Mickey Miele
3107 So. Harbor Blvd.
Oxnard, CA 93035
805-985-6817

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From: <Angelaslaff@aol.com>
To: <Chris.Williamson@ci.oxnard.ca.us>
Date: 6/11/2007 8:48:46 AM
Subject: PEAKER POWER PLANT

Once again, the population of Oxnard is threatened with yet another company wanting to pollute our area with unwanted, unneeded emissions.

Never mind that Oxnard was the dumping ground for Ventura County for over fifty years along the Santa Clara River.Or that a recycling plant contaminated more Oxnard property terribly. Or that we already have two existing power plants here in Oxnard. Now Edison wants to further pollute our area with a peaker power plant right in our neighborhood with the energy generated by this plant to go to cities inland.

With so much concern about our environment, it is shocking to me that an Environmental Impact Report was NOT required by the City of Oxnard. How can this be???

Please consider the impact of this proposal on the population of Oxnard instead of any revenue that it might bring at the expense of health and welfare of the people who live here.

Angela Slaff

********** See what's free at http://www.aol.com.

CC: <letters@VenturaCountyStar.com>

6/11/07

HAND Written

4:25 PM

811 RAFT LN
OXNARD, CA. 93035

RECEIVED
JUN 11 2007
PLANNING DIVISION
CITY OF OXNARD

Mr. Christopher Williamson, PHD
City of Oxnard
Planning Division
305 W. 3rd Street
Oxnard, CA 93030

RE: NOTICE of Intent
MND 07-02

DEAR Mr Williamson;

Please allow this written letter to serve as my formal protest to the direction to adopt MND 07-02 - V5 - Bringing forth a full EIR for the Proposed Project of a 45 - Megawatt Peaker Generator Plant.

I Also object to the fact only Property owners within a 300 foot Radius were mailed notices of such an important issue that will indeed impact the Quality of life to the residence of Oxnard. The adverse effect to Oxnard is unmessurable. Thank You

Edward M. Castillo
(805) 815-3366

June 13, 2007

Chris Williamson
City of Oxnard Planning Dept.
305 W. Third Street
Oxnard, CA 93030

Dear Mr. Williamson:

I am writing to express my discontent with the proposed Peaker Power Plant. I fail to understand why this plant needs to be put in this area!! The plant should be put in the area where the power is needed—somewhere where the air conditioners are running day and night!

We have bought expensive property in this area because we need the cool breezes and clean air for our health. Many of the homeowners in this area moved here because they wanted out of the hot, smog-infested valleys. This plant will affect our air quality negatively. Even the Edison literature states that there are emissions of nitrogen oxide, volatile organic compounds, ammonia, and carbon monoxide! Do we want this in our pristine beach community??

Why is there no Environmental Impact Report required by the City of Oxnard?? What are you thinking? I am unable to attend the Planning Commission meeting on June 18, but I urge you not to allow this plant to be built in this area.

Sincerely,

Art & Janice Serote
5020 Amalfi Way
Oxnard, CA 93035

Chris Williamson - Peaker power plant Oxnard Shores

From: "David Cook" <dave@deardorfffamilyfarms.com>
To: <chris.williamson@ci.oxnard.ca.us>
Date: 6/14/2007 10:51 AM
Subject: Peaker power plant Oxnard Shores

Mr. Williamson:
The Oxnard Shores Neighborhood Council has asked all residents to contact you regarding the proposed addition to the existing power plant near our neighborhood.
Obviously no one wants something like this near their house unless absolutely necessary, but I have criticized the Council's positions in the past because they seem to be against any energy development at all.
Since they sponsor an energy-wasting Christmas light contest each year, perhaps they should re-examine their attitudes.
On one hand, it is easy to see that an addition to an existing plant makes sense, since the infrastructure is already there. On the other hand, why not build the addition at the Ormond Beach plant where there are no houses nearby?
Thanks for listening

David N Cook
5252 Breakers Way
Oxnard, CA 93035-1007
805-985-7758

From: <laceandlumber@cox.net>
To: <Chris.Williamson@ci.oxnard.ca.us>
Date: 6/14/2007 1:25:53 PM
Subject: Power plant

Dear Chris

We already have enough issues were dealing with in Oxnard, gangs, traffic, noise,air polution just to name a few. Maybe we should solve a few of these issues before we make power to solve the rest of calif.'s problems. We should be thinking of other ways to use the sun and wind for our energy needs. Please don't put a power plant in our backyard. We just finished a fight with the LNG people and you saw how that turned out. Luckly for our benifit but we don't want to be fighting these things in Oxnard day in and day out gve it a rest Thank you marty

From: "Leon Meeks" <leon@dock.net>
To: <CHRIS.WILLIAMSON@CI.OXNARD.CA.US>
Date: 6/15/2007 8:41:57 PM
Subject: 45 MEGAWATT PEAKER POWER PLANT

As a resident of Oxnard and living in the area near the proposed plant I feel that it should have to file an environmental impact report. The literature from Edison states that the emissions of "nitrogen oxide(NOx), carbon monoxide, volatile organic compounds(VOC) and ammonia are present and could leak affecting the residents in the general area. The prevailing winds form the ocean to land would put in to our residence and I moved here several years ago for health reasons to get away from pollutants.

It was my understanding that CA standards requires to "improve air quality and protect its coastal resources."

I don not see how this Peaker Power Plant does not met these requirements.

We use to be none polluted, now according to the American Lung Assn. Ventura County has moved up to the 12th ozone-polluted county in the USA.

Please stop this power plant.

Leon Meeks

leon@dock.net

June 18, 2007

Nancy Pedersen
514 East Kamala Street
Oxnard, CA

RECEIVED
JUN 18 2007
PLANNING DIVISION
CITY OF OXNARD

MND 07-02
Coastal Development Permit PZ 06-400-5

SCE Peaker Plant

This should not even be a Mitigated Negative Declaration. It should be a full EIR because of its proposed location on our fragile coast. As with the LNG proposal at Ormond Beach, this project has the potential to severely damage our environment and our coastal resources. It is inappropriate for anonymous City of Oxnard staff members to decide whether a project of this scope should receive a full EIR or a MND. The best interests of the people of Oxnard and the protection of rare resources should dictate a cautious approach to any project that affects the coastline and the health of the residents of Oxnard.

There is no demonstrated need that requires this project be built on Oxnard's coast. Oxnard has natural air conditioning, so it is ludicrous for SCE staff to state that this plant must be built to prevent brown outs when we all turn on our air conditioners in a heat wave. Few homes in Oxnard even have an air conditioner. What compelling need requires that only this location can be used for this project? Why not build this plant in an area that has heat waves and a need for more electricity?

Social Justice:
No other coastal area in this county has even one electric plant located on the coast. Oxnard has two with this as the third. Why dump all unwanted uses in Oxnard? Social Justice demands that this proposal be examined for its effects on the largely minority residents of Oxnard. The argument was made by SCE staff that this plant is being located on our coast because there is already another power plant there and SCE owns the land. This argument would have allowed Halaco to enlarge their operation because they were already there and owned the land. The EPA proposed Superfund designation of Halaco is an indictment of our past use of our limited ocean adjacent resources. Improperly using Oxnard's limited coastal resources to

Nancy Pedersen
514 East Kamala Street
Oxnard, CA

place two electric plants next to the ocean is not a reason to expand and continue the environmental damage by adding this third proposal of an electric peaker plant.

Air Pollution:
What are the effects of this proposal on the air quality of Oxnard and Ventura County? With Global Warming a recognized reality, this project and all other projects must be examined in light of the increased air pollution they would create. What are the prevailing wind patterns? Where would this air pollution go? What residents would be impacted by this air pollution? How would the fragile bird, plant and other wildlife populations in this area be affected by this increased air pollution? This proposed plant is surrounded by homes, a beach park, nature preserves and the ocean. This project is not compatible with any of these uses.

Noise:
Any noise in this area, surrounded by nature preserves and the ocean, is not acceptable. This is not an isolated industrial park. It is a coastal area with an ocean, dunes, uplands and parks around it. There is serious discussion about removing the two plants (including Ormond's) because they are sited on the fragile coastline and are outdated. To add a third improper use to the coast is ludicrous. The noise will affect all the wildlife in the nearby areas including the ocean. In an inland industrial park in Thousand Oaks or Simi Valley, the noise might be acceptable. On the coast, surrounded by marine mammals, endangered shore birds, residents and people enjoying the public resources of our coast, this project is indefensible.

Light Pollution:
The present lights already negatively affect the wildlife nearby. More light pollution will not improve the situation. What kinds of mitigation can be done to force the applicants to allow their light to affect only the areas necessary to be lighted? The light from the PVP parking lots at Ormond Beach can be seen from my home two miles away. They told us they use the best available technology to keep their light on site. Obviously affecting the quality of life of people living two miles away is not acceptable and shows that this project will have similar effects on those living nearby.

Birds:
The 80 foot tall exhaust stack seems to be a hazard for the birds that use the ocean, dunes, nature preserves, McGrath Lake and other nearby areas. How will birds be protected from this hazard? How will the air pollution and light pollution affect the already endangered wildlife? Audubon reported that bird populations are falling rapidly. Will this project cause even more losses?

Visual/aesthetics:
The 80 foot tall stack will be a visual blight. The view is from the ocean and the land--how will people using the ocean or the land be shielded from this ugly visual blight? Again, in Thousand Oaks or Camarillo in an industrial park such a huge tower might not be so objectionable. This is a beach location---not an industrial park hidden from view. This is part of a scenic coastal area which should be protected, restored and preserved as other cities are doing and have done. As we saw when Ormond Beach was threatened by BHP Billiton's LNG proposal, the beach areas have many friends. The ocean and the coast belong to everyone and what is done to this area affects everyone in this county and even state.

This project must have a full Environmental Impact Report. The many negative impacts on the area must be considered, discussed and mitigation offered by the applicants. This will disclose that, as I believe, the negative effects can not be mitigated, requiring the project to be denied.

Nancy Pedersen
514 East Kamala Street
Oxnard, CA 93033

(805)486-9146

RECEIVED
JUN 18 2007
PLANNING DIVISION
CITY OF OXNARD

June 13, 2007

Chris Williamson
City of Oxnard Planning Dept.
305 W. Third Street
Oxnard, CA 93030

Dear Mr. Williamson:

I am writing to express my discontent with the proposed Peaker Power Plant. I fail to understand why this plant needs to be put in this area!! The plant should be put in the area where the power is needed—somewhere where the air conditioners are running day and night!

We have bought expensive property in this area because we need the cool breezes and clean air for our health. Many of the homeowners in this area moved here because they wanted out of the hot, smog-infested valleys. This plant will affect our air quality negatively. Even the Edison literature states that there are emissions of nitrogen oxide, volatile organic compounds, ammonia, and carbon monoxide! Do we want this in our pristine beach community??

Why is there no Environmental Impact Report required by the City of Oxnard?? What are you thinking? I am unable to attend the Planning Commission meeting on June 18, but I urge you not to allow this plant to be built in this area.

Sincerely,

Art Serote
Janice Serote

Art & Janice Serote
5020 Amalfi Way
Oxnard, CA 93035

Roger G. Pariseau, Jr.

140 Linewood Way • Oxnard, CA 93030-3334
(805) 377-8879 • rpariseau@cadlumex.com

June 18, 2007

Re: Negative Declaration 07-02

Oxnard Planning Commission
305 West Third Street
Oxnard, CA 93030

RECEIVED
JUN 18 2007
PLANNING DIVISION
CITY OF OXNARD

Dear Sirs:

The proposed negative declaration for a 45-Megawatt peaker generator at 251 N. Harbor Boulevard insufficiently addresses the disruption and safety issues that will be caused by closures of Harbor Boulevard, by potential releases of hazardous aqueous ammonia, by its affect on our coast, on our ocean and on the wildlife living in this area.

Closing Harbor Boulevard will seriously impact our already undersized arteries, such as Gonzales Road, Victoria Avenue, Vineyard Avenue, Ventura Road, among others, that drivers would attempt to use as alternatives to Harbor Boulevard.

Ammonia even at dilute concentrations is highly toxic to aquatic animals, and for this reason it is classified as dangerous for the environment. This plant might be the right idea for the industry, but it and the two other power plants near Oxnard are improperly sited. Adding more hazards to the existing ones appears inane.

I request that you not approve Negative Declaration 07-02 and further that you require the Oxnard Planning Department to execute a full, formal Environmental Impact Report due to this and other omissions in this declaration.

Sincerely,

From: "Lester Gray" <lgray@reinhold-ind.com>
To: <Chris.Williamson@ci.oxnard.ca.us>
Date: 6/18/2007 2:53:48 PM
Subject: Peaker Power Plant - Public Comment to Chris Williamson, City Of Oxnard Planning Department

Dear Mr. Williamson,

As a resident of Oxnard, I wish to submit my comment to the City of Oxnard Planning Department regarding the proposed Peaker Power Plant on Harbor Boulevard, Oxnard:

I object to this proposal as it would be detrimental to Environment & Well-Being of the City & Residents of Oxnard.

Inappreciation of your consideration & inclusion of this comment.

Best Regards,
Lester Gray

EDISON PEAKER PLANT

William L. Terry
250 E. Pleasant Valley Rd. #47
Oxnard, Ca. 93033
805-488-0422

RECEIVED
JUN 18 2007
PLANNING DIVISION
CITY OF OXNARD

Mr. Chris Williamson
Dear Sir:

The Mitigated Negative Declaration for this project is totally inadequate.
There needs to be a full E.I.R..

1. Because there have been many changes in the area since the last E.I.R..
2. The Peaker Plant is not a Coastal Dependant project.
3. There are at least four (4) peaker plants within five (5) miles of this location, in fact there is a peaker plant within the Reliant Mandalay Bay Power plant.
4. The Peaker Plants, are not very efficient, which should be controlled by AB32 (GLOBAL WARMING), another reason for an FULL E.I.R..
5. California Public Utilities Commission(CPUC) President Michael Peevey, was President of Southern California Edison. Southern California Edison LOBBYING the CPUC for following results.

This is questionable SCE is taking this action in response to a directive issued in August 2006 by California Public Utilities Commission (CPUC) President Michael Peevey, which was prompted in part by this past summer's heat storm. This ruling directs SCE to implement additional conservation and energy efficiency programs and to put in place up to 250 MW of new utility-owned generation that can be online in time for summer 2007.

As part of SCE's response to the CPUC directive, SCE is proposing to build five peaker plants throughout its service territory in Southern California.

The proposed Mandalay peaker will increase the power supply to the local community and provide an important service called "voltage support" to the local distribution network. Unlike large power plants, which are typically constructed in remote locations and connected to the statewide grid at very high voltages, this peaker unit will be connected to the local distribution grid where it will supply electricity to local homes and businesses. As directed by the CPUC, the peaker will also help keep local distribution voltages and frequencies at normal levels during times of system strain or imbalance. The peaker will operate primarily during periods of high electricity demand (such as on hot summer days) or when high-voltage transmission lines go out of service, or when another source of generation unexpectedly goes offline.

Thank You, William L. Terry

William L. Terry

Larry and Sheri Calabrese
26418 President Avenue * Harbor City, CA 90710
(310) 891-6889

June 18, 2007

Chris Williamson
City of Oxnard
Planning Department
305 West Third Street
Oxnard, CA 93030

Sent via e-mail: chris.Williamson@ci.oxnard.ca.us

Dear Mr. Williamson,

I am writing this letter in regards to my concern about the possibility of a Peaker Power Plant in our neighborhood. My concerns are that if this plant is approved, it will be too close to our neighborhood and will advance us in a more polluted and noising environment, which will decrease the value of Oxnard's coastal environment. If this is approved, it will be dangerous for our children and elders, being so close to nitrogen oxide, carbon monoxide, and ammonia substances, as well as, the rest of us. How sad that Edison is looking at our coastal areas to pollute and ruin Oxnard's beautiful beaches, when there are remote areas for them to build a plant.

I hope the city of Oxnard will listen to the people and make the right decision.

Sincerely,

Sheri Calabrese
Property Owner of 5142 Sandpiper Avenue, Oxnard

RECEIVED
JUN 19 2007
PLANNING DIVISION
CITY OF OXNARD

To: Chris Williamson, City Of Oxnard Planning Dept.
From: George C. and Linda Coudert, 5120 Wooley Rd. #1, Oxnard, Calif.
Subject: Peaker Power Plant proposal, public comments

It seems terribly ironic that after a long battle with the BHP's Cabrillo Port proposal that we are now discussing a new proposal that would also bring added pollutants to our community. For the same reasons we rejected the BHP plan, we should also reject any plan to increase the air pollution in Ventura County. Our county does not meet current air quality standards now, why would any rational Government body even consider increasing the emission of nitrogen oxide, carbon monoxide, volatile organic compounds and ammonia stored at the site, if this proposal is agreed to. Our own Mayor told the Land Commission and the Coastal commission that Oxnard has done more than its share in providing power plants and land fills in the past and now it is time to protect its citizens by cleaning up the environment, and the quality of the air that we breathe. We must demand from Edison and city government an environmental impact study, anything less would be unconscionable! Any intelligent decision on this or any other matter that threatens the public health should be well examined, is it in the best interest of the people of our community, is the reason they want to put the plant here because it is more cost effective, should they be placing the plant nearer to the area it will most likely serve, would the increase in air pollution adversely affect the health of the citizens. And many more questions. We are now in a culture that must ask these imperative questions, we did not in the past, and we are living with the consequences. We expect our elected officials to act in a responsible manner when dealing with the health of both the environment and the citizens they represent.

George C. Coudert
Linda Coudert