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DOCKET
06-AFC-3
DATE OCT 19 2006
RECD. JAN 5 2007

October 19, 2006

Bill Pfanner
Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Scoping Comments for the South Bay Replacement Project, SBRP (AFC 06-AFC-3)

Dear Mr. Pfanner:

As suggested at the scoping meeting on the SBRP held on October 12 at the Environmental Health Organization office. I appreciate this opportunity to provide these supplemental comments.

Alternatives.

- Alternative plant sites both at the LS property and off site should be provided
- Air cooling fan types; conventional and low noise

Noise- Wildlife receptors

- Noise propagation and level studies must take into consideration both meteorological conditions as well as the physical terrain. The fact that the proposed power plant is adjacent to San Diego Bay means that sensitive wildlife receptors in this region will be directly exposed to the noise from the power plant during construction and operation as there are virtually no natural or human made structures to attenuate the noise.
- The wildlife response to noise must be considered and not assumed to the same as human response.
- Steam blow noise during construction must be mitigated to protect the wildlife.

Soil and Water Resources

- Provide the daily water volume requirements.
- Describe water conservation methods including use of native plants for landscaping and recycling rain water.
- Water Recycling. Note that in September of this year the Governor signed into law a water recycling bill, AB 371. The City of San Diego Metropolitan Wastewater Department South Bay Water Reclamation Plant is in operation to provide tertiary treated wastewater that complies with the State Title 22 requirements. Efforts should be taken to determine the feasibility to use this source for landscaping as well as for plant operational needs.
- The fact that there is very low tidal exchange of the waters of South Bay means that is critical that contaminated storm water must not be allowed to enter the Bay. The San Diego Bay National Wildlife Refuge is in South Bay and requires high water quality to provide healthy, sustainable habitats. Rigorous standards must be established for the construction storm water pollution prevention plans and the industrial storm water discharge permits.

Thank you.

Sincerely,

Ed Kimura

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