

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

May 23, 2002

Mr. Ramon Abueg, P.E.
Assistant Director of Engineering and Operations
City of Vernon
4305 Santa Fe Ave.
Vernon, CA 90058

Dear Mr. Abueg:

RE: CITY OF VERNON - MALBURG GENERATING STATION DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716 and 2025, the California Energy Commission requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

These data requests are being made in the area of: Cultural Resources (#1 – 29); Geological Resources (# 30 - 31); Socioeconomics (#32 - 38); Traffic and Transportation (#39 - 49); Transmission System Engineering (#50 - 51); Visual Resources (#52 – 56) and Soil & Water Resources (#57 - 70). Written responses to the enclosed data requests are due to the Energy Commission staff on or before June 12, 2002, or at such later date as may be mutually agreed upon.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 10 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at (916) 654-4206.

Sincerely,

BILL PFANNER
Energy Facility Siting Project Manager

Enclosure

cc: Docket (01-AFC-25)
Proof of Service List
Citizens for Better Environment

**MALBURG GENERATING STATION
DATA REQUEST
(01-AFC-25)**

Technical Area: Cultural Resources
Author: Mary Maniery

If a response reveals archaeological site locations, please submit it under confidential cover. Please retain a specialist who meets the Secretary of Interior Standards in history, historic architecture, industrial or public history to address the historic questions.

BACKGROUND

The AFC (Page 8.3-9) states that a search of records was conducted at the regional information center for the California Historical Resources Information System (CHRIS). No copy of this material is available in the AFC or AFC Appendix.

DATA REQUEST

1. Please provide a copy of the record search results obtained from the regional CHRIS information center.

BACKGROUND

To determine project impacts, staff needs the location of potential cultural resources identified in relation to project components.

DATA REQUEST

2. Please provide a map in a scale 1:24,000 that identifies the proposed project site and linears. Identify areas subjected to an archaeological or architectural survey for this project. To the same map add the locations of any previously identified or newly identified cultural resources.

BACKGROUND

Page 8.3-8 of the AFC states that two technical reports documenting the results of the surveys are attached in Appendix J of the AFC. Only an architectural survey report is provided in Appendix J.

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DATA REQUEST

3. Please provide a copy of the archaeological survey technical report.

BACKGROUND

Page 8.3-8 of the AFC states that an architectural historian conducted the archaeological survey of the proposed power plant site on August 24, 2001, and of the proposed reclaimed water pipeline route on October 30, 2001. The Response to Data Adequacy Recommendation dated January 16, 2002, states that the Report of Survey conducted August 24, 2001, was conducted by Michael P. Pumphrey. Page 8.3-9 of the AFC indicates that archaeologists conducted the surveys on July 3, 2001 and on October 30, 2001.

4. Please clarify who conducted each survey, explain whether it was an architectural or archaeological survey and discuss the qualifications of the surveyors who conducted archaeological surveys in light of Secretary of Interior Standards.

BACKGROUND

The present course of the Los Angeles River passes within less than one mile of the project site. The Geologic Hazards Section (8.15) of the AFC indicates that the plant site rests upon approximately four feet of modern or historic fill containing some amount of rubble in the form of "asphaltic concrete" (AFC page 8.15-2). This in turn resides upon sandy alluvium. Page 8.3-8 of the AFC states that given the amount of previous ground disturbance in the area, any subsurface cultural resources would have been seen and noted; therefore, the archaeological sensitivity of the power plant and pipeline routes is considered low. Considering that much of the built environment appears to date from the 1930's, before environmental laws were in place, staff is concerned that cultural resources may not have been identified and there would have been no central location where they would have been noted. In addition, page 8.15-4 discusses the procedures conducted at the proposed project site for diesel release remediation and indicates that the pump house was removed as part of the remediation process.

DATA REQUEST

5. On AFC Figure 1.2-1, please identify the area that was subject to diesel release remediation. Please identify the prior location of the old pumphouse and other

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vegetation, features or buildings that were removed during the remediation process.

6. Please identify the maximum and average depth of excavation at the project site for the proposed project and discuss whether grading or excavation will be necessary at the laydown, storage or parking areas. Please also discuss the maximum depth and width of project linears. Please address whether the linears will be located in the shoulder or the middle of roads.

7. Please thoroughly assess the potential for undetected, buried or near surface archaeological resources in the project area. Evaluate the historic topography of the project area, including areas of proposed plant construction, laydown, storage and parking areas and project linears.

BACKGROUND

Historical research is critical to the interpretation and evaluation of historic archaeological resources. The use of historic maps including Sanborn Fire Insurance Maps, General Land Office (GLO) plats, historic USGS maps, and historic county maps can be an important aid in identifying potential resources. County records, such as historic assessment plats and tax rolls, can also be important sources of information. The original deed attached in Volume II, Appendix R-1 indicates that the City of Vernon acquired the parcel through the condemnation process, evicting tenants who lived on the site. Nineteenth and early twentieth-century refuse disposal methods often resulted in hollow filled features (such as privies) or trash pits buried four or more feet under the existing ground surface. Staff needs additional information to assess the project impacts on potential subsurface historical archaeology deposits.

DATA REQUEST

8. Please summarize the information available on historic maps for the project area, including Sanborn, USGS, GLO, and county maps through time and provide a summary of land use prior to 1931 for the project site. Please provide staff with copies of pertinent sections of consulted maps.

9. Please provide information from historic County Tax Assessor plats and roles and other county records regarding the location of any buildings on site and ownership of the project site prior to 1931. Depict approximate locations of past residential, commercial or industrial buildings on Figure 6.1-2 of the AFC or similar site plan.

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10. Please thoroughly evaluate the potential for encountering undetected, buried or near surface historic archaeological resources in the proposed construction area, in light of information obtained through research with historic maps and the County Tax Assessor plats and roles.
11. Page 8.3-8 and 8.3-9 do not indicate whether the laydown storage and parking areas were surveyed for cultural resources. Please survey them for archaeological and historic resources and provide that information. The historic survey may be limited to one property deep adjacent to parking and laydown areas.

BACKGROUND

In some cases, local historical and archaeological societies have knowledge of cultural resources in an area of a project that may not be available through official record sources such as the CHRIS.

DATA REQUEST

12. Please inquire with local historical and archaeological societies in the city or county that might have knowledge of historical or archaeological resources in the area of the proposed project and linears. Provide copies of the inquiry letters, responses and a summary of any telephone responses.
13. If any such resources are over 45 years old and identified adjacent to the proposed project site or within one hundred feet of the center line of project linears and could have their immediate surroundings altered (change in the integrity of the setting) by this project in such a manner that the significance of the historical resource would be materially impaired, and it has not been recorded on a Department of Parks and Recreation (DPR) 523 form, then please record the cultural resources on the DPR 523 form and provide a copy of the form.
14. If any of the resources could be impacted by the project or could have their immediate surroundings altered (change in the integrity of setting) by this project in such a manner that the significance of the historical resource would be materially impaired, please provide a discussion of the significance of the resources under CEQA Guidelines Section 15064.5(a), (3), (A)(B)(C) and (D).

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BACKGROUND

Figure 8.3-1 shows that the reclaimed water pipeline will travel east on E. 50th Street, turn south on Boyle Avenue and continue south to Randolph Street where it will again turn east and continue for another four blocks. This route appears to cross several railroad spurs, tracks and a mainline (near the intersection of Boyle Avenue and Randolph Street). In addition, Appendix R-1 (copy of the original deed) mentions deeding right-of-way to the Los Angeles Junction Railway Company circa 1931. Appendices R-2 (Plot Plan of Existing Site conditions) and R-3 (Certified Survey Plat) both depict two spur tracks leading from Soto Street to the existing Station A and Seville Avenue through the project site. Railroad spurs are also present on the north boundary of the project site. Appendix J-4 (page 8) also notes that a railroad track parallels Seville Avenue along the route of the proposed pipeline. In order to conduct a thorough analysis, staff needs supporting documentation and evaluation of all historic linear resources.

DATA REQUEST

15. Please provide information regarding age and potential historic importance of these railroad features and any others located within or adjacent to the existing site or proposed pipelines to the City of Vernon and to the region.

BACKGROUND

As noted in Appendix J-4 digging, infill and street paving may have unintended effects upon historic structures. Vibrations from jack hammers and heavy equipment can sometimes cause damage to structurally fragile historic buildings adjacent to construction zones or pipeline construction.

DATA REQUEST

16. Please provide a characterization of the buildings in the area within 100 feet of the project linears (age, industrial, residential, {original use} {current use} and/or ethnic etc.).

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BACKGROUND

Appendix J-4 (page 5) provides an evaluation of the existing Station A under National Register of Historic Places Criteria C and D and concludes that the structure is important architecturally under Criterion C and the equipment inside the structure meets Criterion D. National Park Service Bulletin 15 (*How to Apply the National Register Criteria for Evaluation*) suggests that engineering equipment is usually evaluated under Criterion C. Criterion D requires a context and research questions that can be addressed by the resource in order to support importance under that criterion. Appendix J-4 page 1 states that at the time of its completion the plant was the second largest diesel generating plant in the world.

DATA REQUEST

17. Prior to evaluating the property under the California Register criteria as stipulated in CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D), please establish a thorough historic context to support the evaluation.

18. In consideration of the plant's status as the second largest diesel generating plant in the world at the time it went on-line, please discuss the significance of the property under Criterion A (association with events that have made a significant contribution to the broad patterns of history) and B (association with lives of persons significant in our past).

19. To support the evaluation under criterion D, please apply the historic context in the evaluation of the equipment and develop pertinent research questions to demonstrate the connection between the important information potential and the equipment in order to support a Criterion D assessment. Conversely, please reconsider the engineering design and equipment's importance under Criterion C.

BACKGROUND

Appendix J-4 (page 5) provides an evaluation of the existing Station A under National Register of Historic Places Criteria C and D. The evaluation mentions a cooling tower and switchyard as associated structures. Appendix R-3 includes a map of the existing site- condition that depicts numerous trees and vegetation associated with the complex.

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20. Please provide dates of construction for the cooling tower, and switchyard. In accordance with *Instructions for Recording Historical Resources Manual* (State Office of Historic Preservation 1995), please provide DPR 523A and DPR 523B forms for resources over 45 years of age within the project site.

21. Please provide a discussion of the significance of these resources under CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D) and provide staff with a copy of the assessments and the specialist's conclusions regarding the resource(s).

22. Please provide a discussion of the existing vegetation and landscaping in light of its potential historical value. Assess the significance of the plantings within the context of the overall cultural landscape of the facility under the California Register criteria as stipulated in CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D).

23. Please discuss future plans for the existing power plant, Station A and appurtenant facilities. What potential impacts will occur when the proposed plant is closed?

24. Please discuss the impacts of the project on all contributing elements of the historic facility, such as the switchyard, vegetation, railroad spur, cooling tower, Station A, or others.

BACKGROUND

As cited in the AFC (Page 8.3-11), eligible historic properties are districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association. Appendix J-4 (page 5) provides brief descriptions and assessments of buildings adjacent or nearby the project site, such as Gamco, O. E. Clark Paper Company, and others. The evaluation only considers the individual architectural merit of these structures.

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25. Please provide dates of construction for all buildings adjacent to the project site. In accordance with *Instructions for Recording Historical Resources Manual* (State Office of Historic Preservation 1995), please provide DPR 523A and DPR 523B forms for resources over 45 years of age. (Staff is available to discuss the merits of recording or evaluating potential cultural resources).
26. Please provide a discussion of the industrial development of this area in the City of Vernon through time and place the individual buildings within this context.
27. Please assess the potential for a cohesive industrial district that includes the buildings discussed in Appendix J-4 and the existing power plant complex and provide a discussion of the significance of the district and its elements under CEQA Guidelines Section 15064.5(a), (3), (A), (B), (C), and (D). Please provide staff with a copy of the assessments and the specialist's conclusions regarding the resource(s).

BACKGROUND

AFC Figure 1.2-1 (Project Site before Construction) suggests that the three-story Station A building is taller than the surrounding industrial structures by at least one story. Its imposing mass and height dominates the current landscape. AFC Figure 1.2-2 (Project Site after Construction) suggests that the two proposed cooling towers will be much taller than the existing Station A structure. The AFC (Page 8.3-11) notes that the proposed project may disrupt the setting of the Station A building. CEQA defines integrity as the location, design, setting, materials, workmanship, feeling and association of a property (CEQA Guidelines Section 15064.5). Appendix J-4 (page 8) concludes that the project will have no impact on the integrity of Station A.

DATA REQUEST

28. Please provide a discussion of the potential project impacts on the existing facility's integrity, considering all seven types of integrity and the importance of the existing facility to the surrounding industrial landscape under CEQA Guidelines Section 15064.5.

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29. Please reconcile the conflicting impacts assessment discussion found on AFC page 8.3-11 and Appendix J-4:8.

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Technical Area: Geology and Paleontology
Author: Dal Hunter, Ph.D., C.E.G.

BACKGROUND

Table 8.15-2 indicates that the only City Ordinance relating to Geological Resources and Geological Hazards is the requirement for a Building Permit from the City of Vernon.

DATA REQUEST

30. Please verify that there are no other geotechnical policies or requirements, including Grading Permits in a City of Vernon General Plan or similar document.

BACKGROUND

Flooding due to inundation from (presumed) failure of the Hanson and Sepulveda flood control dams is not addressed in the report, but is briefly discussed in Appendix C.

DATA REQUEST

31. Please provide a more thorough discussion of the dam inundation hazard, including the conditions under which this might occur and anticipated flood depths. Is mitigation planned, possible, or even appropriate?

**MALBURG GENERATING STATION
DATA REQUEST
(01-AFC-25)**

Technical Area: Socioeconomics

Author: Joseph Diamond, Ph.D.

BACKGROUND

The information in the AFC in regard to education appears in Table 8.8-6, Summary of Los Angeles Unified School District Facilities. Additional information would increase our understanding of potential educational impacts.

DATA REQUEST

32. Please respond to the following points:
- Are the Los Angeles Unified School District Facilities in Los Angeles County?
 - Please provide the available capacity?

BACKGROUND

The information in the AFC does not include a complete economic impact analysis. Additional information would increase our understanding of the economic benefits of the Malburg Generating Station Project.

DATA REQUEST

33. Please respond to the following points:
- Estimate the secondary (indirect and induced) income and employment economic impacts for construction and operation of the power plant.
 - Show the income and employment multipliers (e.g., Type I, Type II, or Type III as appropriate) and how they are calculated.
 - Delineate and explain the rationale for the region used in the economic impact estimates.

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DATA REQUEST
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BACKGROUND

The information in the AFC in regard to cumulative impacts might be clarified and further explained. Additional impact information would increase our understanding of the cumulative impacts of the Malburg Generating Station Project.

DATA REQUEST

34. Are there any other major projects planned near the power plant site or associated pipelines (water, natural gas, and sewer).

BACKGROUND

The information in the AFC states that most of the construction workforce will come from Los Angeles County and commute daily to the project area during construction. This is defined as the regional area. The local area is the cities of Bell, Huntington Park, Los Angeles, Maywood, and Vernon. Construction workers are slated to come largely from the regional area, operations workers from the local labor force.

Generally construction workers commute as much as two hours (one-way). This defines the local labor market. Construction workers who live in communities at greater distances than a two-hour one-way commute tend to relocate to the project for the workweek, then return on the weekend. Operations workers tend to fall inside a one-hour, one-way commute, and if they fall outside this area they will relocate. Additional information would increase our understanding of the relevant labor markets and the local labor pool.

DATA REQUEST

35. Please respond to the following points:
- Specify the geographic boundaries of the construction and operations workforce in terms of geography and commute time in order to estimate the number of “non-local” workers.

 - Please specify the number of “non-local” (note this project’s definition of regional might correspond to our view of local for construction) construction workers who may relocate to work on this project. The AFC refers to the number of construction workers who would relocate as “few if any.”

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BACKGROUND

THE TIME VALUE OF MONEY SHOULD BE REFLECTED FOR ECONOMIC ESTIMATES .

DATA REQUEST

36. To the extent possible, please indicate the year (2001 dollars?) economic estimates were made e.g., total project costs, construction payroll, operation payroll etc.

BACKGROUND

The AFC estimated the total project cost to be approximately \$100 to \$110 million. Total project cost should include construction and operation payroll etc.

DATA REQUEST

37. Please provide an estimate of total project cost, total project cost for construction, and total project cost for operation. Indicate the year the dollar estimate relates to (e.g., in 2001 dollars).

BACKGROUND

It is useful to know the project's capital cost (i.e., plant and equipment). The AFC estimated \$48 million worth of equipment.

DATA REQUEST

38. Please provide an estimate of the project's capital cost and indicate the year the dollars were estimated (e.g., in 2001 dollars).

**MALBURG GENERATING STATION
DATA REQUEST
(01-AFC-25)**

Technical Area: Traffic and Transportation

Author: James Fore

BACKGROUND

AFC Section 8.10.2.7 for the Malburg Generating Station indicates that aqueous ammonia (19 percent) will be delivered to the project site by tanker truck every week during operation. To evaluate potential traffic and safety issues the potential truck route needs to be evaluated. This would include roadway conditions and any sensitive receptors along the route. The AFC does not indicate the truck route for the delivery of hazardous material. Section 8.12.1 of the AFC indicates that there are schools, hospitals, day-care centers, emergency response facilities, and long-term health care facilities within one mile of the project site.

DATA REQUEST

39. Please clarify for the hazardous material delivery the expected truck route and provide a detail map of the hazardous material route from the appropriate freeway exit to the facility during operation. The truck route should identify:
 - If there are any road hazards such as railroad crossings, sharp curves, and intersections without traffic control such as signals, yield or stop signs, etc.
 - Describe the land use along the route; and the location of any sensitive receptors along the route such as schools, hospitals, commercial or housing development, etc., affected by hazardous material deliveries.
40. Please provide a precise estimate of the number of all hazardous materials deliveries each month.

BACKGROUND

The AFC for the Malburg Generating Station indicates that in roadway construction will be required for the natural gas fuel and water pipelines. The AFC provides information on the pipeline routes. Please indicate what action will be taken through a traffic control plan to ensure minimal disruption to traffic along the routes.

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DATA REQUEST

41. Please provide for the proposed pipeline routes:
- the current level of service (LOS) for roadways that the pipelines will follow,
 - the location of the pipeline within the roadway and the area required for the trenching operation,
 - the number of traffic lanes to be closed,
 - the impact on traffic flow,
 - anticipated traffic control measures that will be required, and
 - the amount of roadway under construction at any one time.

BACKGROUND

The AFC does not indicate the location of regional or private airports in the vicinity of the plant site.

DATA REQUEST

42. Please supply additional location information on airport facilities (i.e. addresses or location near mapped roads) for (regional and private airports) in the area.
43. Please discuss the steps the applicant will take to ensure that the power plant's stacks do not present a traffic hazard. This would include small aircraft using local airport facilities.
44. Discuss any air safety problem that could be caused by a plume from the cooling towers.

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(01-AFC-25)**

BACKGROUND

AFC Section 8.10.1.3 indicates that public transportation bus routes exist in the vicinity of the plant site. It does not indicate if the construction activity will disrupt service along any of the route.

DATA REQUEST

45. Please identify and describe:

- the bus routes and schedules,
- any bus routes that will have to be rerouted during construction, and
- **BUS STOPS THAT MAY BE TEMPORARY CLOSED DURING CONSTRUCTION ACTIVITY**

BACKGROUND

In order to analyze the impact that project construction traffic would have on the area roadways, AFC Section 8.10.2.2.1 assumed a commuter trip distribution for the project construction workforce.

DATA REQUEST

46. Please indicate how this trip distribution for the project construction workforce was derived.

- Please discuss the basis for any carpooling assumptions.

BACKGROUND

The AFC indicates that the project will use an offsite laydown area to the west of the site and a laydown/parking area to the southeast of the site.

DATA REQUEST

47. Please indicate what streets will be used for access to and from these areas.

**MALBURG GENERATING STATION
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- Discuss the number and location of parking spots that will be available for the construction workforce.

- Explain the measures that the applicant will use to ensure workers do not park on the street.

BACKGROUND

AFC Section 1.10.1 in the Executive Summary indicates that the project will consume significant quantities of reclaimed water by evaporation in its cooling towers, with the peak demand reaching 1,000 gallons per minute. There is a potential for visibility impairment due to vapor plumes produced by the project reaching ground level, or casting shadows that could cause drivers to be temporarily blinded by a sudden change in light intensity on adjacent roadways. This may affect traffic safety on the local roadways in the vicinity of the project site.

DATA REQUEST

48. Please provide information based on your plume analysis for:
- The roadways that might be affected.

 - Discuss the expected frequency and duration of traffic impacts from vapor plume related ground fog or shadows.

 - Discuss the potential for traffic safety issues resulting from the plumes.
49. Please discuss the applicant's plans for mitigating any traffic safety and visibility effects caused by vapor plumes.

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DATA REQUEST
(01-AFC-25)**

TECHNICAL AREA: Transmission System Engineering

Author: Ajoy Guha, P. E.

Technical Senior: Al McCuen

BACKGROUND

Staff needs to be confident of identifying the interconnection facilities and any new and/or modified downstream facilities necessary to support interconnection of the Malburg Generating Station (MGS) to the City of Vernon system.

The System Impact/Facility Study (SI/FS) filed in April, 2002 was conducted for interconnection of 134 MW nominal generation output with 2003 summer peak and spring off-peak base cases. Staff notes that in the 2003 spring off-peak case, the City of Vernon system load was assumed as 161 MW (about 80 percent of summer peak load).

Staff's experience indicates that a spring off-peak load of about 60 percent may be appropriate for the worst case analysis.

DATA REQUESTS

50. Please verify the appropriateness of using 80 percent of the summer peak load for the spring off-peak study. If a different value is appropriate for the worst case analysis, please analyze the system for the spring off-peak case with and without the proposed plant output of 134 MW for Power Flows for the following conditions:
 - Single (N-1) and Double (N-2) contingencies of 66 kV lines connected to the Vernon and Laguna Bell 66 kV substations and if prudent include additional contingencies within and around the City of Vernon system.
 - Provide a list of overload criteria violations in one table showing the loadings before and after the new generation and their differences side by side.
 - List all mitigation measures considered in sequence including upgrades, operational solutions or Special Protection System (SPS), and those selected for each criteria violation.

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- Provide power flow diagrams (MVA, percent loading & P. U. voltage) for the base cases with and without the project. Power flow diagrams must also be provided for all N-0, N-1 and N-2 studies where overload or voltage criteria violations appear.

 - Provide a list of all contingencies evaluated for the supplemental study.
51. Based on the Short Circuit Study results submitted (refer to SI/FS, Table 6-1 of Section 6, Section 8; Report dated 4-10-02 by Randall Hunt), for each substation low and high sides, identify, select and list (in consultation with the transmission owners: Southern California Edison, Los Angeles Department of Water & Power, and City of Vernon) in one table the number of breakers which are overstressed due to the addition of the MGS.and would need replacement. Provide the existing and proposed ratings of the breakers in the table and provide letters from the respective transmission owner about the selected mitigation for replacement of breakers.

Staff previously suggested that alternatives (such as installation of Current Limiting Reactors at the Vernon substation or any other strategic location in the system) to replacing breakers may be feasible and the large number of breaker replacements in the City of Vernon system (refer Section 6, Item 1.d) and/or elsewhere could potentially be reduced. In such case provide a supplementary Short Circuit Study report in one table and the mitigation measures selected as stated above

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Technical Area: Visual Resources
Author: Eric Knight

BACKGROUND

Staff will need to make use of the Applicant's figures presented in the AFC and supplemental filings.

DATA REQUEST

52. Please provide a CD containing electronic versions of the following AFC figures: 1.2-1 (Project Site Before Construction), 1.2-2 (Project Site After Construction), 3.4-2 (MGS Side Elevation View), and 6.1-2 (Natural Gas Tie-in to Power Plant)

53. Please provide a CD containing the following figures from the Visual Resources section of the AFC: 10-1 (Topographic Map of Project Area), 8.11-2 (Project Viewshed), 8.11-5 (View of Project Site from KOP Before Construction), 8.11-6 (View of Project Site from KOP After Construction), and 8.11-7 (Current View from KOP).

54. Please provide a CD containing electronic versions of the images requested in data request number 5 below.

BACKGROUND

Prior to filing the AFC, staff visited the project area with the Applicant to identify key observation points to be representative locations from which to conduct detailed analyses of the project and to obtain existing conditions photographs and prepare visual simulations. Staff and the Applicant were able to identify only one sensitive viewing location that would have views of the proposed project structures. The KOP selected is located at the terminus of 53rd Street in Huntington Park about 1,250 feet southwest of the project site and was chosen to represent 7 residential views. However, subsequent to the filing of the AFC, a warehouse was constructed between the KOP area and the project site, and views of the project would not be possible from this KOP. Because visible water vapor plumes can increase the visibility of a project, staff suggested to the Applicant in conversations during data adequacy that a new simulation could be prepared and a new KOP established if the predicted size of the plumes would make the project visible to sensitive viewers. In anticipation of this data request, staff requested the information needed to conduct plume modeling. Based on staff's plume analysis, staff believes that the cooling tower plumes, which are predicted to be approximately 235 feet tall (the project's tallest structures would be 110 feet tall), would be visible to a number of residential viewers. Based on a site visit and line of site analyses, staff would not expect the predicted plumes to be visible from the 53rd Street

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KOP due to the recently built warehouse being located so near to these viewers. However, staff would expect that residences located about 3,000 feet south of the project site in Huntington Park along East 58th Street (east of Seville Avenue) would have views of the predicted cooling tower plumes.

DATA REQUEST

55. Please establish a new KOP along 58th Street (east of Seville Avenue) in Huntington Park. The new KOP should be sited to provide the least obstructed line of sight in the direction of the project site that is representative of the residential views along 58th Street.

56. Please estimate the number of viewers in the area of this KOP that would have views of the plume, and provide an evaluation of the potential visual impacts that would be experienced from this KOP. As part of this evaluation, please provide an existing condition photograph and a visual simulation of the cooling tower plume from the new KOP. The new images must be at "life size scale" when viewed at a standard reading/viewing distance of 18 inches. Please provide photocopies of high quality 11"x17" color images of the existing view and simulation. By May 24, staff will provide the Applicant with the dimensions (height, length, and width) of the plume to be simulated.

**MALBURG GENERATING STATION
DATA REQUEST
(01-AFC-25)**

Technical Area: Soil and Water Resources
Author: Antonio Mediati

BACKGROUND

The 134-megawatt Malburg Generating Station (MGS) will consist of a natural gas-fired combined cycle power plant, and will require approximately 1,500 AF/year of reclaimed water supplied by the Central Basin Municipal Water District (CBMWD) to support facility operation. Potable water estimated at 17 gpm will be supplied by the City of Vernon through their existing 6-inch supply line. Wastewater will be discharged to the County Sanitation District of Los Angeles County (CSDLAC) existing treatment facility.

The AFC and Supplement provides a minimal alternative water source and cooling methods evaluation.

DATA REQUEST

57. Project operation will require a maximum of approximately 32 (Section 3.7) employees. Figure 11-5 Water Balance Diagram allocates 5 to 10 gpm of potable water to sanitary users and 5 to 7 gpm for service/utility water. Recalculation of the anticipated sanitary wastewater volume expected to be generated with 30 employee/units per day results in a total flow of 0.30 gpm. Please explain the need for more than 16 times the volume of water to support the plant's sanitary needs.
58. What will be the source and demand of landscaping water for the Project?
59. Section 3.8.3.7 states MGS will require approximately 53 acre-feet of potable water per year and references Table 3.4-9. Please review/revise this number and table as appropriate.
60. Please provide a detailed feasibility and environmental impact analysis regarding alternative water supplies, cooling methods and waste disposal in comparison to the proposed options. The analysis should include, as a minimum:
 - impacts on water use, other users and waste discharge in comparison to those currently proposed for the project;

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- all economic factors considered (such as capital and operating costs including water purchase and infrastructure price; efficiency losses and economic impacts; etc...) and all assumptions and or vendor data to support these estimates;
- changes in plant and linear facility infrastructure required to support each technology;
- plant efficiency and output calculations and assumptions for each alternative considered; and
- analysis to support determinations on environmental impacts (particularly land use, biological and cultural resources, agriculture and soils, geologic hazards, traffic & transportation and water resources).
- All information sources and appropriate references.

BACKGROUND

The drainage facilities will be designed to prevent flooding from a 25-year, 24-hour storm event. Storm water will drain to on-site catch basins, which will then drain to a storm water detention basin prior to release.

Section 8.14.2.2 states:

“...an increase in the storm water runoff volume to the municipal separate storm sewer (“MS4”) is expected.”

The city will comply with Standard Urban Storm Water Mitigation (SUSMP) requirements called for under Los Angeles County Municipal NPDES Permit.

DATA REQUEST

61. Please provide a more detailed description of the detention basin including but not limited to the retention capacity prior to release, ability to prevent release if the water is found to be contaminated, and the discharge mechanism.

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62. Please identify the design features or management practices the Applicant will employ for controlling the discharge and preventing erosion from detention basin outflow and overflow.
63. Please provide a preliminary construction Erosion Control Plan with associated construction monitoring programs showing conceptual design and locations proposed for temporary BMPs for erosion control during construction.
64. Please provide drainage plans with proposed contours showing existing and proposed watershed areas, drainage channels, peak discharge rates and volumes at key concentration points, and conceptual design and capacities of the proposed conveyance systems, erosion control features, detention basin and holding tanks. The contact and non-contact drainage systems and design should be clearly differentiated in terms of location, watershed area, drainage conveyance design, storage system design, peak flow rates and runoff volumes. The plan should include post-development storm water discharge rates and volumes for contact and non-contact areas for the 5, 10, 25- and 100-year recurrence intervals. Provide a description of how frequently runoff volumes are expected to exceed the capacity of the detention basin and holding tank, and how excess runoff will be accommodated and prevented from carrying contaminants off-site in the event of back-to-back storms or storms in excess of the storage capacity. Please provide a narrative description as well as conceptual plans and design details with all back-up hydrologic and hydraulic calculations used in developing the drainage concept design.
65. Please describe the existing off-site drainage where storm water will be discharged, clearly indicating its location in a drainage plan, and characterizing its capacity to carry storm water in relation to pre and post-development flows. Include any sediment controls in the system as well as clean-outs and monitoring plans.
66. Please provide written evidence of consultation with the County regarding conformance of the proposed storm water facilities with County regulations and policies.
67. Please provide written evidence of consultation with the RWQCB regarding conformance of the proposed storm water facilities with Los Angeles County Municipal NPDES Permit.
68. Please provide the requirements of the SUSMP.

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69. To evaluate how contact water is to be contained and recycled, please provide an on-site water/wastewater/storm water piping plan at a scale of 1" = 100', or larger. Label drain pipes and identify pipe sizes and pumping facilities as necessary.

BACKGROUND

The AFC and Supplement describe how the project is going to comply with LORS.

Example: The California Safe Drinking Water and Toxic Enforcement Act.

The AFC states;

“Compliance: The project will discharge industrial wastewater to the County Sanitation District of Los Angeles County’s sewer system. An Industrial Wastewater Discharge Permit application has been prepared and submitted to the City of Vernon, Department of Community Services and Water for review and approval before being sent to the County Sanitation District for their approval and issuance of the permit.”

In addition to sending wastewater to the sewer system the project is most likely complying with this code in other ways, including secondary containment of chemical, monitoring and spill contingency plans, SWPPP, one-way valves on the potable water supply, etc.

DATA REQUEST

70. Please provide additional information on how the project is going to comply with LORS. Please revise the LORS compliance for Water Resources to more accurately state the lengths the project is going to in order to comply with LORS.