



City of Carlsbad

Office of the City Manager

October 7, 2008

DOCKET

07-AFC-6

DATE OCT 07 2008

RECD. OCT 09 2008

Mike Monasmith
Energy Facility Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

CARLSBAD ENERGY CENTER PROJECT (07-AFC-6) – VISUAL IMPACTS AND SITE CONSTRAINTS

Dear Mr. Monasmith:

As you are aware, for nearly a year the City of Carlsbad (City) has raised concerns about visual impacts and site constraints related to the proposed Carlsbad Energy Center Project (CECP, 07-AFC-6). The City has requested on numerous occasions that the project applicant, NRG, submit site layouts and visual simulations which incorporate the upcoming widening of the I-5 Freeway. To date, NRG has failed to adequately respond to the City's requests.

In order to ensure that both the California Energy Commission (CEC) and the community-at-large have an accurate understanding of what the probable visual impacts of the CECP will be, the City would like to submit Visual Exhibits #1 – 4:

- Exhibit #1 - Overhead shot of the proposed CECP and its proximity to a widened I-5
- Exhibit #2 - Cross section of the proposed plant in relation to traffic along a widened I-5
- Exhibit #3 - Southwest view of how the site currently looks today
- Exhibit #4 - Same view as Exhibit 3, but a simulation of how the site will look once the freeway is widened and the CECP is constructed

As you may recall, both the CEC and City staff have been previously briefed by Caltrans with regards to the proposed I-5 expansion. During the course of that briefing, Caltrans highlighted that they have been working on that project since 2001 (public scoping meetings) and that the EIR contains several different widening scenarios. In preparing the above visual simulations, the City used schematics provided by both Caltrans the applicant.

More recently, City staff has raised questions and concerns regarding the CECP's site layout and construction laydown areas in regards to the upcoming Vista/Carlsbad Sewer Interceptor Project (sewer project). This sewer project has been in development for the past five (5) years and represents a vital upgrade to the regional sewer infrastructure, which services a population of more than 150,000. In order to complete this upgrade, it is necessary for the City to acquire



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additional right-of-way (Visual Exhibit #5) on the CECP site. The City has submitted a number of data requests to the CEC regarding this issue in its September 11, 2008 filing.

The City has and continues to express its deep concerns regarding the CECP and the appropriateness of the project at that location. As the proposed site becomes more constrained on its east and western boundaries, the City's objections to the CECP's visual impacts persist.

Please feel free to contact me if you have any questions at (760) 434-2893.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Garuba", with a long horizontal flourish extending to the right.

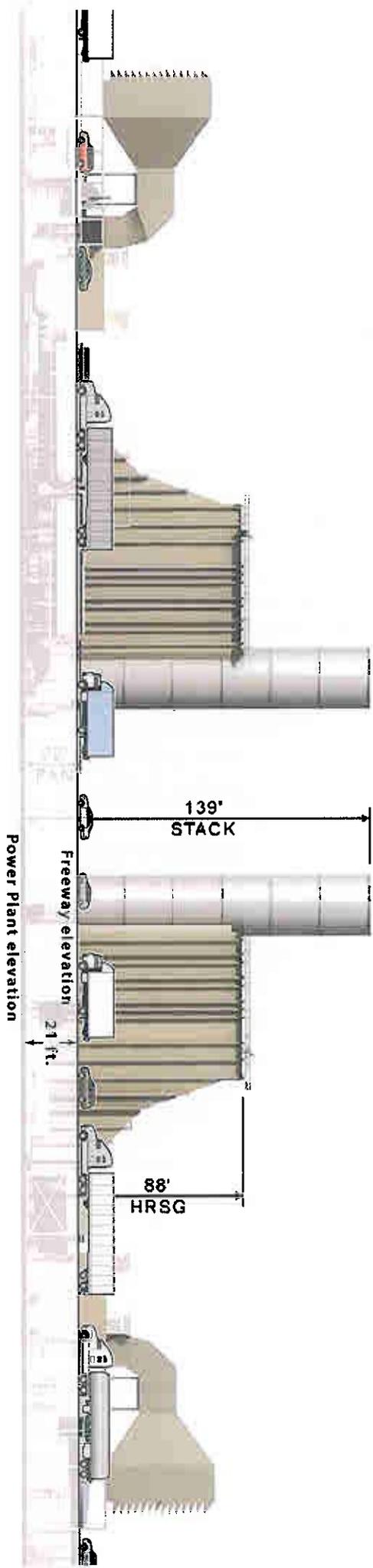
Joe Garuba
Municipal Projects Manager

JG:ad

Enclosures: 5

cc: Proof of Service (Rev. 9/10/2008; electronic service only)
City Manager
Housing and Redevelopment Director
Senior Planner



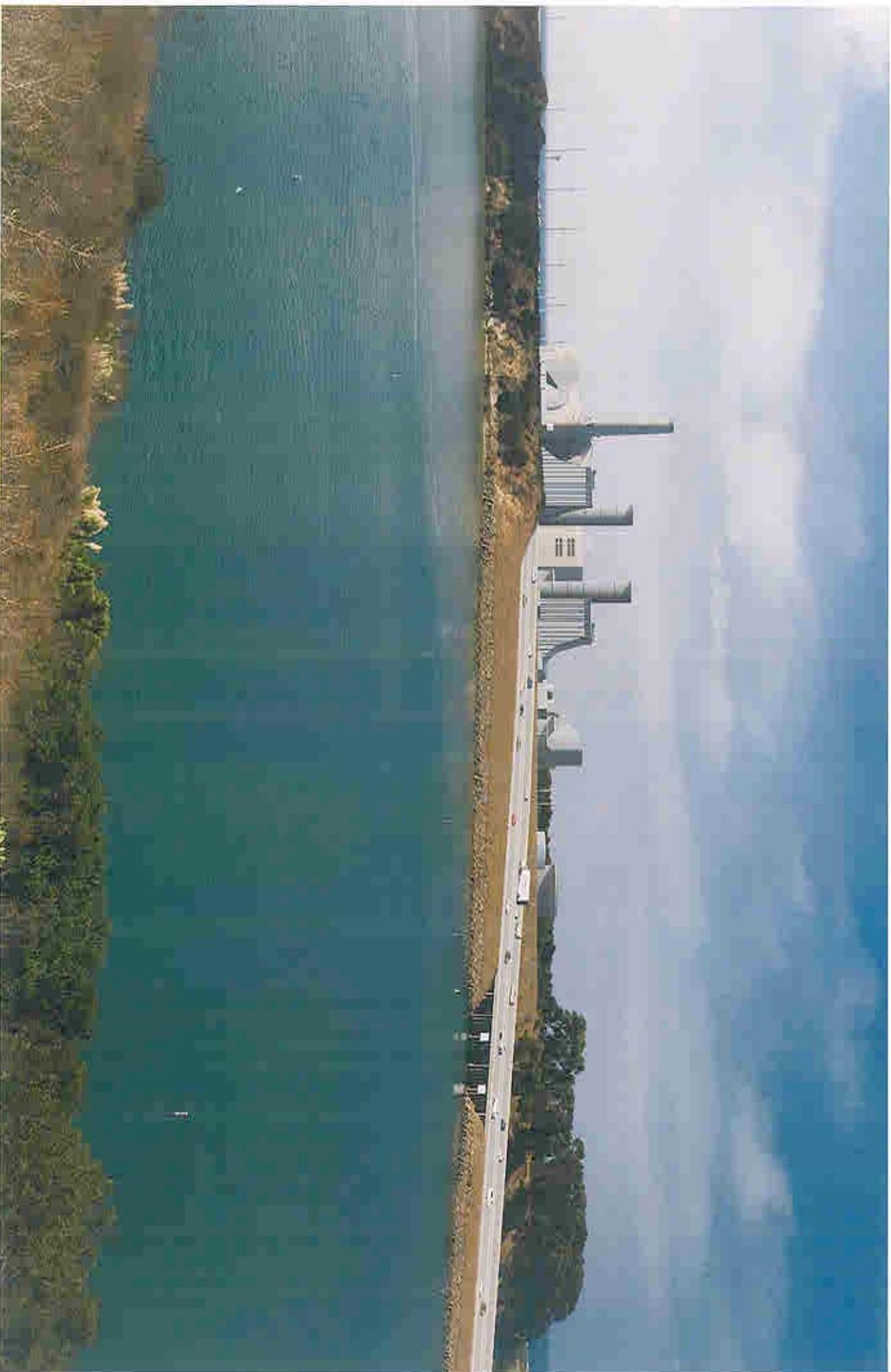


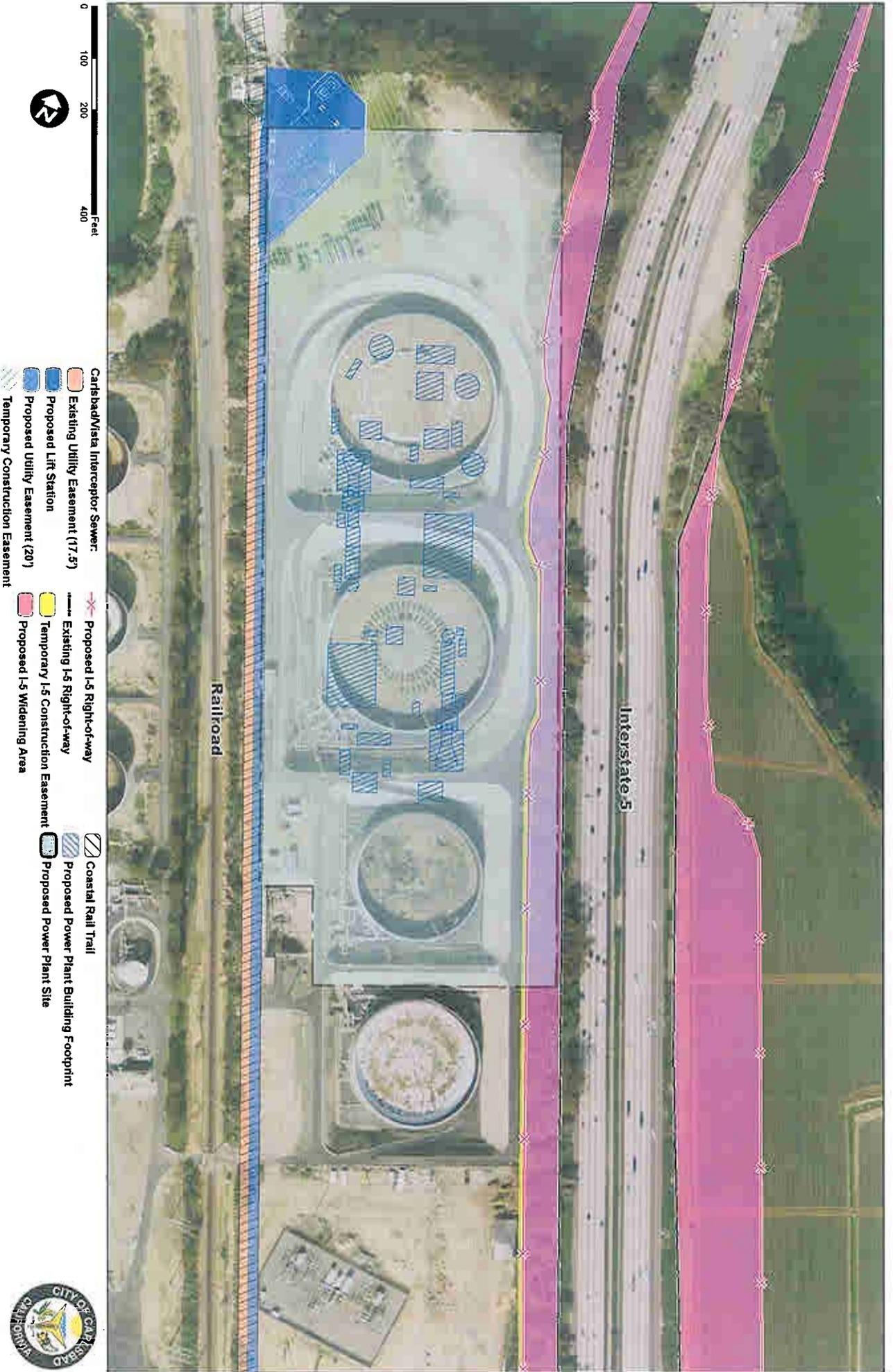
Visual Exhibit 2



Visual Exhibit 3

Visual Exhibit 4







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

APPLICATION FOR CERTIFICATION
FOR THE **CARLSBAD ENERGY CENTER
PROJECT**

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 9/10/2008)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

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DECLARATION OF SERVICE

I, Andrea Dykes, declare that on 10/7/08, I deposited copies of the attached Visual Impacts Doc., in the United States mail at Carlsbad, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

Andrea Dykes