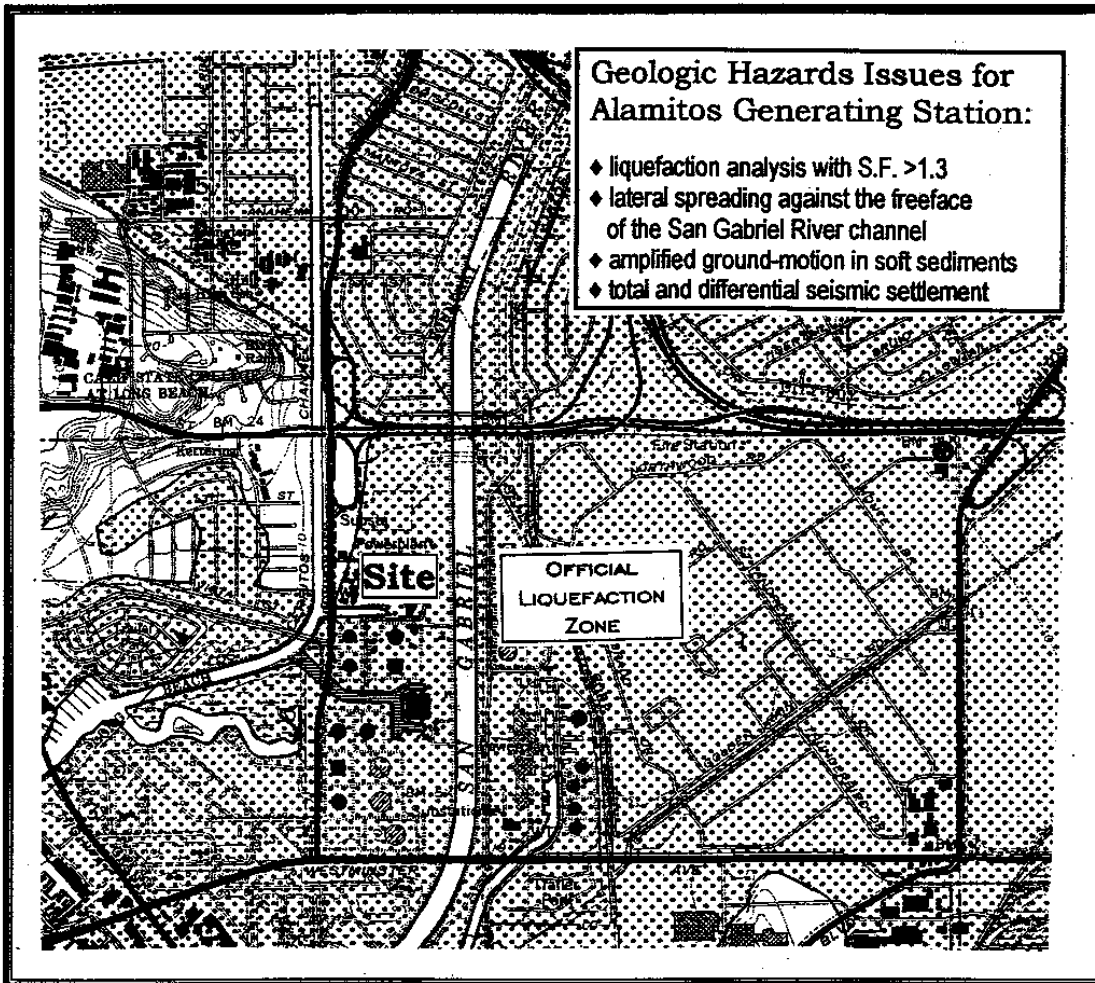


COMMENT LETTER #1



1-1

**Extract of official document: Seismic Hazard Zones Map
Los Alamitos 7½-minute Quadrangle
Scale: 1:24,000 or 1 inch = 2,000 feet
with application to the Alamitos Generating Station**

*Issued as an Official Map by State Geologist on March 25, 1999
Delineated in compliance with Chapter 7.8, Division 2, California Public Resources Code
Seismic Hazards Mapping Act of 1990*

The coarse stippled patterns indicate official zones for liquefaction investigations.
For explanation, refer to California Division of Mines & Geology Special Publication 117,
Guidelines for Evaluating and Mitigating Seismic Hazards in California, 1997, 74 pages.
SP-117 and the complete zone map may be downloaded free from the CDMG homepage at
www.consrv.ca.gov/dmg

COMMENT LETTER #2



CITY OF ANAHEIM, CALIFORNIA

Planning Department

RECEIVED
NOV 15 2000

November 14, 2000

Dr. Steve Smith
South Coast Air Quality Management District
CEQA Section
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

RE: Notice of Preparation of a Draft Environmental Impact Report for the Proposed
AES Alamos, L.L.C. – Selective Catalytic Reduction (SCR) Installation Project

Dear Dr. Smith:

Thank you for providing the City of Anaheim notice and the opportunity to comment regarding the above-referenced project. We have no information or comment to provide.

Please forward any subsequent public notices and/or environmental documents regarding this project to my attention at the address listed below.

If you have any questions regarding this response, please do not hesitate to contact me at (714) 765-5139, extension 5440.

2-1

Sincerely,

Lucy N. Yeager
Senior Planner

Scaqmd11resp





COMMENT LETTER #3

CITY OF LONG BEACH

DEPARTMENT OF PLANNING AND BUILDING

333 WEST OCEAN BOULEVARD, 5TH FLOOR • LONG BEACH, CA 90802 • (562) 570-6894 FAX (562) 570-6068

COMMUNITY AND ENVIRONMENTAL PLANNING

November 7, 2000

Steve Smith, Ph.D.
Program Supervisor
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765-4182

Subject: Notice of Preparation of a Draft Environmental Impact Report

Project Title: Proposed AES Alamitos, L.L.C. – Selective Catalytic Reduction (SCR)
Installation Project.

Dear Mr. Smith:

Thank you for the opportunity to review the Notice of Preparation.

We concur that a cumulative health risk assessment and a risk management plan should be included in the Draft EIR.] 3-1

Recently, the power plant was re-parcelized. If the project is located on a parcel which is not required, the Draft EIR should indicate the precise project location relative to the Coastal Zone.] 3-2

Nearby land to the south and west is likely to be restored wetlands. The DEIR should address impacts if any to the biological resources including avifauna as well a marine biology and water quality.] 3-3

Finally, the DEIR should address compliance with the National Pollution Discharge Elimination System.] 3-4

Sincerely,

Gerhardt (Gerry) H. Felgemaker
Environmental Planning Officer

jp

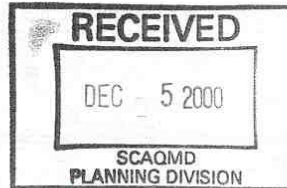
cc: Gene Zeller, Director of Planning and Building
Bob Benard, Zoning Officer, Planning and Building Department

bcc: Frank Colonna, Councilmember, 3rd District, City Council



November 29, 2000

Steve Smith, Ph.D.
Program Supervisor
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182



COMMENT LETTER #4

SUBJECT: **CITY OF SEAL BEACH COMMENTS RE: "NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT - PROPOSED SELECTIVE CATALYTIC REDUCTION (SCR) INSTALLATION PROJECT, AES LOS ALAMITOS, LONG BEACH"**

Dear Dr. Smith:

The City of Seal Beach has reviewed the above referenced Notice of Preparation (NOP) and has several comments relative to the document. The proposed project is close enough to the City of Seal Beach as to cause concern regarding environmental impacts upon our community, in particular the Leisure World retirement community located east of the subject property, on the easterly side of the San Gabriel River.

4-1

In reviewing the NOP, SCAQMD is proposing to evaluate the areas of "Air Quality", "Hazards and Hazardous Materials", and "Mandatory Findings of Significance" in the Draft EIR. In reviewing the discussion within the "Environmental Checklist and Discussion" of the NOP, SCAQMD sets forth the reasons for those determinations. As indicated below, it is the position of the City of Seal Beach that the area of "Noise" and "Public Services" also need to be discussed in the Draft EIR, for the reasons set forth below.

4-2

It is of extreme concern that the impacts of the proposed project are fully discussed, evaluated, and mitigated in the above mentioned areas of concern, particularly in regards to the community of Leisure World. It is the opinion of our Director of Development Services that a substantial amount of discussion is necessary to allow full and complete evaluation of potential impacts upon the residents of Seal Beach, which could have substantial adverse impacts if not adequately described, evaluated, and mitigated.

4-3

Following are specific concerns of the City of Seal Beach that should be analyzed, discussed, and appropriately mitigated in the Draft EIR:

Air Quality:

The discussion on page 2-6 indicates that NO_x emissions are anticipated to be reduced approximately 90%. This overall air quality benefit is supported and should be quantified and discussed thoroughly within the Draft EIR, including discussion regarding the possible health benefits of that reduction in NO_x.

4-4

It is indicated that the expected ammonia slip emission will be set at 10 ppm over the whole load range. The Leisure World retirement community is immediately east of the AES Los Alamitos facility, and comprises approximately 8,300 residents, with approximately 90% being over the age of 65. It is a concern to the City as to how the levels of ammonia slip being discussed could impact this population group, particularly those individuals with respiratory or other related health concerns.

4-5

It is indicated that the annual one-hour maximum ground concentration is anticipated to be reduced to less than 1 ppm. Where is this level anticipated to occur at, on the AES Los Alamitos facility or on adjoining properties? If on adjoining or nearby properties, those should be indicated by the use of a map.

4-6

It is indicated on page 2-6 that a cumulative health risk assessment was performed for the combined ammonia emissions from all four proposed SCR units. In reviewing the reference documents for the NOP, it is not apparent that the indicated "cumulative health risk assessment" document is available. The "health risk assessment" document, along with the indicated "risk management plan" on page 2-8, should be provided as technical appendices to the Draft EIR document, permitting the interested public to review and comment as to the adequacy of these documents. The specific health risk assessment issues relating to an elderly, retirement community population of 8,300 persons, should be particularly discussed in this portion of the Draft EIR.

4-7

4-8

4-9

Hazards and Hazardous Materials:

The discussion relates to general risk of upset/human health impacts of transportation of aqueous ammonia from various potential locations within the District to the subject site.

*City of Seal Beach Environmental Quality Control Board Comment Letter
To South Coast Air Quality Management District re:
"Notice of Preparation – SCR Installation Project, AES Los Alamitos"
November 29, 2000*

There should be discussion as to the statistical likelihood of a liquid ammonia release, based on operating conditions of other similar facilities. In addition, there should be an indication of the storage capacity of the diked area, assuming a release were to occur, and a determination as to the length of a release without overflowing the proposed low curb retention system. 4-10

As was indicated in the 1993 Subsequent EIR for the same facility, the worst-case population exposure to the 100-ppm ammonia irritation level for a complete containment facility failure was 2,070 persons. It is assumed that an increased level of exposure would now be created, and that a portion of this exposed population is located in Seal Beach, and most probably within Leisure World. The new analysis should include a map presentation of the area impacted by the modeled dispersion at the 100 ppm level, to allow both the City of Long Beach and the City of Seal Beach to be more fully informed as to potential impacts upon their respective residents. In the case of Seal Beach, there is a heightened level of concern, since the Leisure World community comprises approximately 8,300 residents, with approximately 90% being over the age of 65. It is a concern to the City as to how the levels of ammonia being discussed could impact this population group, particularly those individuals with respiratory or other related health concerns. This discussion should also provide information as to the nearest responding emergency service unit locations, estimated response times, and potential impact upon the capabilities of emergency medical response to meet the demands placed upon the emergency medical response system by a large amount of emergency calls from impacted persons. 4-11

The 1993 Subsequent EIR for this facility also indicated that the worst-case population exposure to the 100-ppm ammonia irritation level is 5,020 resulting from a transportation spill and a complete containment failure, based upon analysis prepared for the Redondo Station. 4-12

The DEIR should indicate the transportation routes that will be utilized to transport the aqueous ammonia from anticipated suppliers to the AES Los Alamitos Generating Station. The 1993 DSEIR indicated that most of the anticipated suppliers are located to the north or east. In order to eliminate potential impacts to the Leisure World community, it is recommended that all truck transport of aqueous ammonia utilize the Route 405/605/Studebaker Road access locations to serve the generating station, with no deliveries occurring along Pacific Coast Highway, Westminster Avenue or Seal Beach Boulevard. It is also requested that local fire and police departments, both Long Beach and Seal Beach, be informed 24-hours prior to shipment, including routing information. 4-13

If truck transport will occur within Seal Beach, it is assumed that a portion of this exposed population is located in Seal Beach, and most probably within 4-14

4-15

4-16

4-17

4-18

Leisure World. The DEIR analysis should include a presentation of the area impacted by the modeled dispersion at the 100 ppm level, to allow both the City of Long Beach and the City of Seal Beach to be more fully informed as to potential impacts upon their respective residents. Discussion should also be provided as to the types of anticipated human health problems to be anticipated assuming exposure of a large elderly population. Please refer to the discussion regarding Leisure World above.

4-19

4-20

Noise:

The NOP indicates that noise issues will not be discussed within the Draft EIR. The City of Seal Beach is concerned that the public has no opportunity to review and comment as to the ability of the measures indicated on page 2-24 of the NOP (existing noise reduction measures within the generating station, proposed noise reduction measures) to reduce any additional noise generating sources to a less than significant level. The Draft EIR should include a noise impact section, and in particular discuss the additional operational noise generated by the new facilities, the ability of the "proposed noise reduction measures" to reduce that noise to a level of less than significant, and discussion as what noise level is deemed acceptable.

4-21

Public Services:

As discussed in "Noise" above, the City is concerned that the public has no opportunity to review and comment as to the ability of emergency service providers to adequately respond to an emergency situation at the revised facility. Again, the City of Seal Beach requests the Draft EIR to provide discussion and specific information as to the nearest responding emergency service unit locations (map exhibit), and estimated response times, and potential impact upon the capabilities of emergency medical response to meet the demands placed upon the emergency medical response system by a large amount of emergency calls from impacted persons. It should be indicated that Orange County Fire Authority units, located in Seal Beach, and the Seal Beach Police Department may also be impacted by additional emergency response training, assuming that mutual aid agreements are required to be effectuated. Costs of additional emergency response training should be the responsibility of the project proponent.

4-22

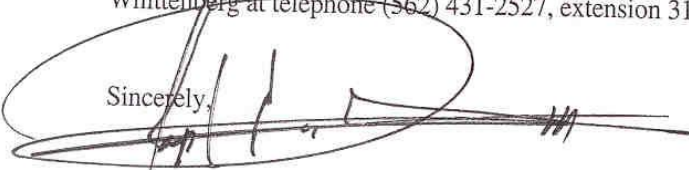
The Environmental Quality Control Board (EQCB) considered and discussed the NOP document on November 29, 2000. The EQCB authorized the Chairman to sign this letter indicating the official comments of the City of Seal Beach.

Upon the preparation of the Draft EIR for this project, please send 4 copies to Mr. Lee Whittenberg, Director of Development Services, City Hall, 211 Eighth Street, Seal Beach, 90740. Thank you for your consideration of the comments of the City of Seal

*City of Seal Beach Environmental Quality Control Board Comment Letter
To South Coast Air Quality Management District re:
"Notice of Preparation – SCR Installation Project, AES Los Alamitos"
November 29, 2000*

Beach. If you have questions concerning this matter, please do not hesitate to contact Mr. Whittenberg at telephone (562) 431-2527, extension 313.

Sincerely,



Joseph E. Porter, III
Chairman, Environmental Quality Control Board
City of Seal Beach

Distribution:

Seal Beach City Council
Acting City Manager
Police Chief

Seal Beach Planning Commission
Director of Development Services

Golden Rain Foundation
Orange County Fire Authority

City of Long Beach

COMMENT LETTER #5

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, ADVANCE PLANNING
IGR OFFICE 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-0486 ATSS: 8- 647-0486
FAX: (213) 897-8906
E-mail: :NoraPiring/CAGOV@DOT



November 30, 2000

MR. STEVE SMITH
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, CA 91765

Re: IGR/CEQA #001129/NP
NOP, AES Alamitos, L.L.C. Selective
Catalytic Reduction
City of Long Beach
Vic. LA-001-1.97/SCH No. 2000111039

Dear Mr. Smith:

Caltrans acknowledges receipt of the above-named document. The proposed project involves installation of three (3) above ground, 20,000 gallon aqueous ammonia storage tanks and installation of selective catalytic reduction control equipment on units, 1,2,3, & 4.

5-1

We have no comment, except to recommend, truck trips, especially heavily laden truck traffic, be limited to off-peak commute hours.

5-2

Thank you for including Caltrans in the environmental review of the project. If you have any questions, please feel free to contact the undersigned at 213-897-4429 and refer to our IGR/CEQA #001129/NP.

Sincerely,

STEPHEN J. BUSWELL
Program Manager
IGR/CEQA

cc: Scott Morgan
State Clearinghouse



Winston H. Hickox
 Agency Secretary
 California Environmental
 Protection Agency

Department of Toxic Substances Control

Edwin F. Lowry, Director
 1011 N. Grandview Avenue
 Glendale, California 91201

COMMENT LETTER #6



Gray Davis
 Governor

December 6, 2000

Mr. Steve Smith
 South Coast Air Quality Management District
 21865 East Copley Drive
 Diamond Bar, California 91765

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
 AES ALAMITOS, L.L.C-SELECTIVE CATALYTIC REDUCTION (PROJECT),
 SCH 2000111039

Dear Mr. Smith:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the above mentioned Project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area. 6-1
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment. 6-2
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. 6-3
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate Health and Safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight. 6-4

Mr. Steve Smith
December 6, 2000
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP or to meet/discuss this matter further, please contact Bob Krug, Project Manager, at (818) 551-2866 or me at (818) 551-2877.

6-5

Sincerely,



Harlan R. Jeché
Unit Chief
Southern California Cleanup Operations - Glendale Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

COMMENT LETTER #7

STATE OF CALIFORNIA

Gray Davis, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



November 16, 2000



Steve Smith
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

RE: SCH# 2000111039, AES Alamos, L.L.C.-Selective Catalytic Reduction

Dear Mr. Smith:

The Native American Heritage Commission has reviewed the above mentioned NOP. To adequately assess the project-related impact on archaeological resources, the Commission recommends the following action be required:

- 1. Contact the appropriate Information Center for a records search. The record search will determine:
 - Whether a part or all of the project area has been previously surveyed for cultural resources.
 - Whether any known cultural resources have already been recorded on or adjacent to the project area.
 - Whether the probability is low, moderate, or high that cultural resources are located within the project area.
 - Whether a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If a archaeological inventory survey is required, the final stage of the is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - Required the report containing site significance and mitigation be submitted immediately to the planning department.
 - Required site forms and final written report be submitted within 3 months after work has been completed to the Information Center.
- 3. Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and assist in the mitigation measures.

7-1

7-2

7-3

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should include provisions for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA) §15064.5 (f). Health and Safety Code §7050.5 and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-4040.

7-4

Sincerely,

Rob Wood
Associate Governmental Program Analyst

CC: State Clearinghouse

COMMENT LETTER #8



Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

Officers: President: Councilmember Ron Bates, City of Los Alamitos • First Vice President: Supervisor Kathy Davis, San Bernardino County • Second Vice President: Councilmember Hal Bernson, Los Angeles • Immediate Past President: Supervisor Zev Yaroslavsky, Los Angeles County

Imperial County: Tom Veysey, Imperial County • David Dhillon, El Centro

Los Angeles County: Yvonne Brathwaite Butler, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Eileen Ansari, Diamond Bar • Bob Bartlett, Monrovia • Bruce Barrows, Cerritos • George Bass, Bell • Hal Bernson, Los Angeles • Chris Christensen, Covina • Robert Bruesch, Rosemead • Laura Chick, Los Angeles • Gene Daniels, Paramount • Jo Anne Darcy, Santa Clarita • John Ferraro, Los Angeles • Michael Feuer, Los Angeles • Ruth Galanter, Los Angeles • Jackie Goldberg, Los Angeles • Ray Grunski, Long Beach • Dee Harrison, Torrance • Mike Hernandez, Los Angeles • Nate Holden, Los Angeles • Lawrence Kirkley, Inglewood • Keith McCarthy, Downey • Cindy Miscikowski, Los Angeles • Stacey Murphy, Burbank • Pam O'Connor, Santa Monica • Jenny Oropeza, Long Beach • Nick Pacheco, Los Angeles • Alex Padilla, Los Angeles • Bob Pimzer, Redondo Beach • Beatrice Proo, Pico Rivera • Mark Ridley-Thomas, Los Angeles • Richard Riosada, Los Angeles • Sarah Rosenthal, Claremont • Marcine Shaw, Compton • Rudy Svorinich, Los Angeles • Paul Talbot, Alhambra • Sidney Tyler, Jr., Pasadena • Joel Wachs, Los Angeles • Bina Walters, Los Angeles • Dennis Washburn, Calabasas

Orange County: Charles Smith, Orange County • Ron Bates, Los Alamitos • Ralph Bauer, Huntington Beach • Art Brown, Buena Park • Elizabeth Cowan, Costa Mesa • Jan Dehay, Newport Beach • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Shirley McCracken, Anaheim • Rev Perry, Brea

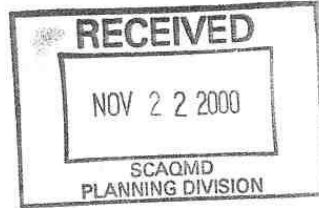
Riverside County: Bob Buster, Riverside County • Ron Loversidge, Riverside • Greg Pettis, Cathedral City • Andrea Fuga, Corona • Ron Roberts, Temecula • Charles White, Moreno Valley

San Bernardino County: Kathy Davis, San Bernardino County • Bill Alexander, Rancho Cucamonga • Jim Bagley, Twentynine Palms • David Eshleman, Fontana • Lee Ann Garcia, Grand Terrace • Gwenn Norton-Perry, Chino Hills • Judith Valles, San Bernardino

Ventura County: Judy Mikel, Ventura County • Donna De Paola, San Buenaventura • Glen Becerra, Simi Valley • Tom Young, Fort Huenceme

Riverside County Transportation Commission: Kolbin Love, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley



November 16, 2000

Mr. Steve Smith, Ph.D.
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

RE: SCAG Clearinghouse I20000551 Proposed AES Alamitos, L.L.C-- Selective Catalytic Reduction (SCR) Installation at Alamitos Generating Station

Dear Mr. Smith:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project was published in the November 15, 2000 Intergovernmental Review 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) 236-1867.

Sincerely,

Handwritten signature of Jeffrey M. Smith

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

8-1