

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	205847
<b>Document Title:</b>	Ventura County Supervisor, 3rd District Comments: On Public Site Visit, Environmental Scoping Meeting, & Informational Hearing
<b>Description:</b>	For the Proposed Puente Power Project
<b>Filer:</b>	System
<b>Organization:</b>	Kathy Long, Ventura County Supervisor, Third District
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*Comment Received From: Kathy Long, Ventura County Supervisor, Third District*

*Submitted On: 8/26/2015*

*Docket Number: 15-AFC-01*

**Comments on the Public Site Visit, Environmental Scoping Meeting, and Informational Hearing for the Proposed Puente Power Project (15-AFC-01)**

*Additional submitted attachment is included below.*



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August 26, 2015

Commissioner Janea A. Scott, Presiding Member  
Commissioner Karen Douglas, Associate Member  
California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

**RE: Comments on the Public Site Visit, Environmental Scoping Meeting, and Informational Hearing for the Proposed Puente Power Project (15-AFC-01)**

Dear Presiding Commissioner Scott and Commissioner Douglas;

Thank you for the opportunity to provide comments regarding the Puente Power Project during this initial phase of the California Energy Commission's (CEC) power plant certification and licensing process.

As Chair of the Ventura County Board of Supervisors and Ventura County Regional Energy Alliance, I appreciate the core responsibilities of CEC in ensuring a safe, resilient and reliable supply of energy. As such, I am writing to urge that this process adequately analyze the environmental risks and vulnerabilities of this project, and comprehensively evaluate project alternatives, including alternative locations.

In particular, I support analysis of the site's location within an environmentally sensitive and ecologically significant area, impacts of sea level rise, coastal hazard risks as well as regional impacts on restoration projects of local, state and national significance.

The project area is in the middle of the Mandalay Dunes and the Santa Clara River Estuary, areas of importance to the recovery of threatened and endangered species.

With regard to sea level rise, the County of Ventura partnered with The Nature Conservancy to fund a complete scientific analysis of sea level rise on the Ventura County coast ("Coastal Resilience Project"). The Coastal Resilience Project modeled sea level rise and is recognized as a tool for land use authorities to utilize in evaluating the impacts of sea level rise by the California Coastal Commission's adopted Sea Level Rise Guidance Document. There should be strong consideration of the use of the most appropriate scientific sea level rise and hazard risk data for this project.

I am also concerned about the regional impacts on local restoration projects. Oxnard's coastline is home to two high priority restoration projects—the Santa Clara River Parkway Project (includes

the estuary and Mandalay dunes) as well as the Ormond Beach Wetlands Restoration Project. These projects represent significant investment made by organizations such as the Coastal Conservancy, The Nature Conservancy and State Parks. The expansion or development of power plants in the Coastal Zone could create barriers with these restoration projects.

I also strongly support a comprehensive evaluation of project alternatives, including alternative locations. The County of Ventura recently supported funding for a regional feasibility study of Community Choice Aggregation, an example of emerging opportunities available to residents in alternative sources of power. Furthermore, the CEC's *Puente Power Project (15-AFC-01) Issues Identification Report* recognizes the importance of evaluating alternative site locations, however, it only mentions the Ormond Beach area. As I indicated above, Ormond Beach is already a site of significant ecological restoration. Expanding the list of alternative site locations as well as a "no project" alternative will provide an important opportunity to evaluate locations that could substantially lessen the potential for adverse environmental impacts, such as a proposal to Southern California Edison by Calpine to meet the needs within the Moorpark Subarea.

Again, I ask that this process adequately analyze the cumulative environmental risks and vulnerabilities of the Puente Power Project application, and comprehensively evaluate alternatives. Thank you for your consideration.

Sincerely,

  
Kathy I. Long, Chair  
Supervisor, Third District