

DOCKETED

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California Energy Commission (CEC)
Issues Hearing / Environmental Scoping Meeting
NRG Puente Project (15-AFC-01)

City of Oxnard Comments
Responding to CEC Issues Identification
of August 10, 2015

Chris Williamson
Principal Planner

August 27, 2015



Inaccurate Description of Surrounding Area/Context.

Inadequate CEC issue Identification:

- 1 Coastal Hazards/Sea Level Rise Question Reliability
- 2 New Earthquake Tsunami Risk Study Available
- 3 Regional and Local Coastal Views Made Worse
- 4 Biology and Sensitive Habitat Surrounds the Site
- 5 Fire and Police: Not Certain During Emergencies
- 6 Environmental Justice, Disproportionate Impact
- 7 Five Feasible Inland Alternatives Sites

Inaccurate Description of Surrounding Area

pg. 1 “...industrial uses to the north, south, and east...”

WEST: one sand dune, State Tide Lands, Pacific Ocean.

NORTH: 28 acres owned by City, permanent wetlands restoration, and McGrath State Beach (State Parks).

SOUTH: 16 acres owned by SCE, 1.4 acres by McGrath Farms, and 92 acres by Ventura County and State of California, part of McGrath State Beach and planned for dune habitat and park development.

EAST: 37 acres of sensitive habitat with a 1.5 acre SCE substation, and the “Edison” canal that has potential for recreation reuse.



Mandalay is...

...an isolated 50-year old “legacy” power plant site, with nearby oil facilities, surrounded by residential, resource, and recreation uses.

...would CEC permit a power plant here if it were raw land ?



Inadequate CEC issue Identification:

1 Coastal Hazards/Sea Level Rise Question Reliability

Listed under “Soil Water and Geologic Resources”

Puente should be evaluated as “critical public infrastructure” under worst case coastal hazards with highest sea level rise.

SCE’s CPUC testimony of “Basis for...Need”

- Pg 5 “...with respect to critical contingency...”
- Pg. 7 “Service disruption...including critical services”

NRG’s testimony submitted to the CPUC:

“P3 will ensure the long-term viability of this existing critical generating location and will provide essential electrical services to the residents of Ventura County...”

2 New Earthquake Tsunami Risk Study Available

New information just released

B2 THURSDAY, AUGUST 20, 2015 • Los Angeles Times LATIMES.COM

EARTHQUAKE WATCH

A new Ventura tsunami scenario

Floodwaters would hit areas once thought to be out of reach, a study suggests

RONG-GONG LIN II



In recent years, some scientists have been warning that Ventura County is at greater seismic risk than previously thought. Now, a new study has found that a major quake in the area could pose a heightened tsunami threat. A study by UC Riverside and U.S. Geological Survey scientists published Tuesday said tsunami floodwaters could reach points in the Ventura county beyond the area currently marked in California's official tsunami inundation map. Tsunami wave heights could approach 20 feet in the Ventura Harbor and Channel Islands Beach area near Oxnard. A California Geological Survey official said the agency would study the report. The agency is creating a second edition of tsunami inundation maps after publishing the first version about six years ago. The latest study comes amid new focus on the earthquake faults that stretch deep under the Santa Barbara and Ventura areas. Previously, some seismic experts thought that the faults in the area posed only a moderate threat. But research in recent years suggests they are connected in a way that could cause a magnitude 7.7 to 8.1 earthquake. The latest study focuses on a hypothetical scenario in which a magnitude 7.7 earthquake begins nine miles under the Earth's surface northeast of Santa Barbara, creating a tsunami.

WAVES POUND near homes in Ventura during a winter storm in 2010. A new study focuses on a hypothetical scenario in which a magnitude 7.7 earthquake strikes nine miles under the Earth's surface northeast of Santa Barbara, creating a tsunami.

THURSDAY, AUGUST 20, 2015

VENTURA COUNTY STAR

LE GROUND ON HOMELESS PROGRAM: LOCAL, 1B \$1.00

By Cheri Carlson
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Quake model raises issues

A 7.7-magnitude earthquake off the Ventura coast could generate a tsunami that would hit the shore within 30 minutes, sending waves up to a mile inland in some areas. That's according to a UC Riverside study published this week in the journal Geophysical Research Letters.

3 Regional and Local Coastal Views Made Worse

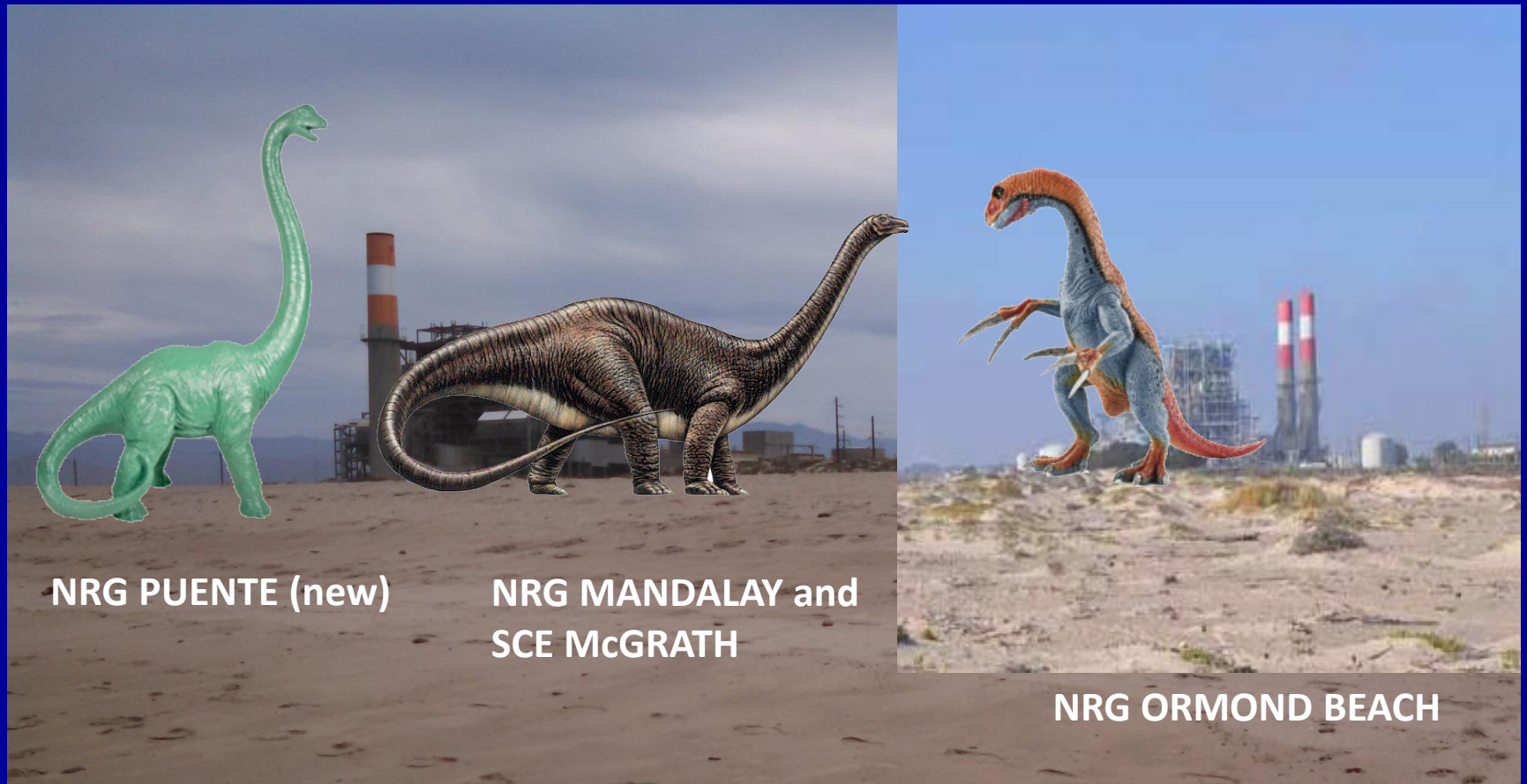
Incredibly, views and aesthetics not identified as an issue.
“Doubling” of already impacted view is doubling the impact.
“It’s already bad” suggests never trying to improve views?
NRG CEC application clearly states Mandalay remains after 2020.



Slide 7

If approved, Oxnard would have four beachfront power plants.

How can we ever get rid of these obsolete dinosaurs ?



NRG PUENTE (new)

**NRG MANDALAY and
SCE McGRATH**

NRG ORMOND BEACH

4 **Biology and Sensitive Habitat Surrounds the Site**

City has draft Environmentally Sensitive Habitat (ESHA) mapping completed for the Local Coastal Plan (LCP) Update.

ESHA surrounds the P3 project site (slide 2).

CEC does acknowledge predatory bird threat to EPA-listed Snowy Plover and Least Tern nesting sites just north and south of the existing power plant.

P3 will add more potential predation of Federally-protected beach nesting sites, and around McGrath Lake.

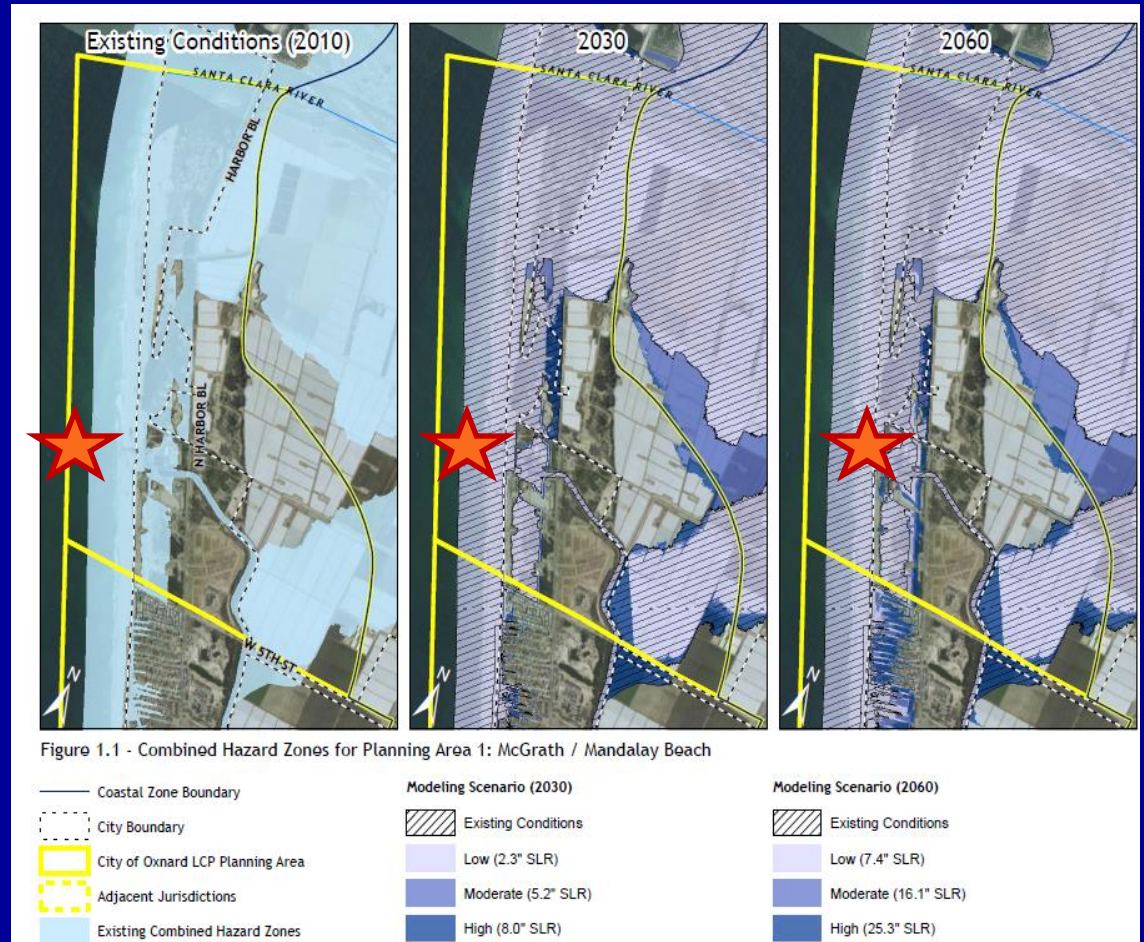
5 Fire and Police: Not Certain during Emergencies

City mapping shows Harbor Blvd. flooded under existing and 2030 scenarios.

Police and Fire Departments have not completed their 30-year reviews.

Must include County Public Works, Fire, and Sheriff Departments.

Slide 10

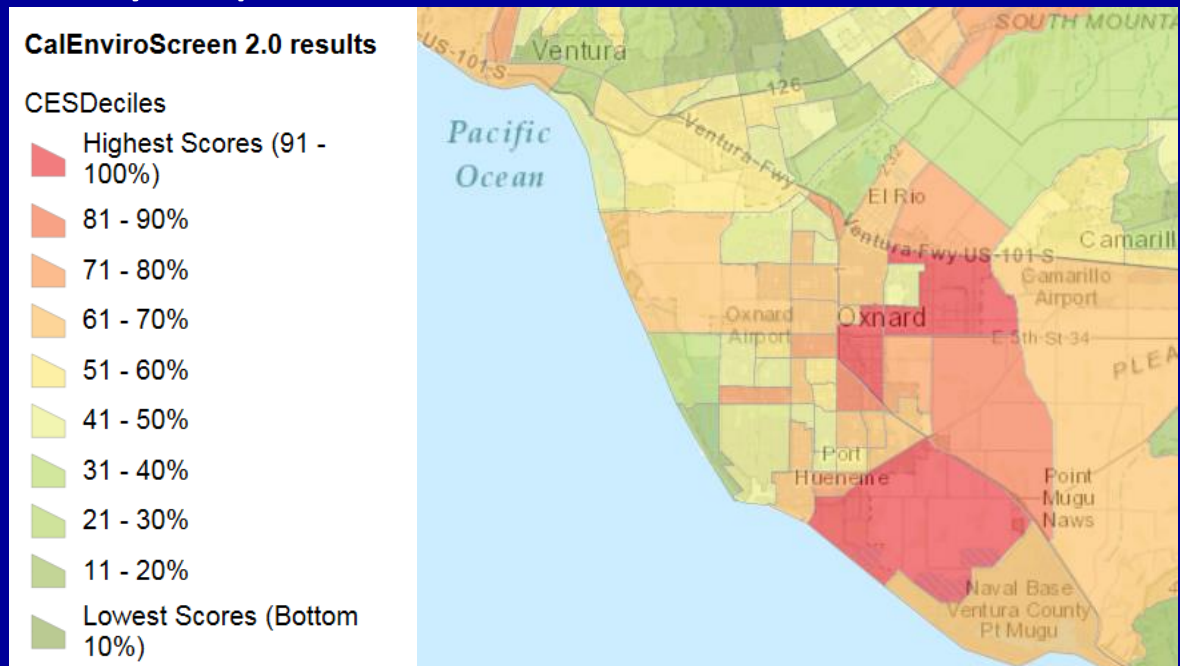


6 Environmental Justice, Disproportionate Impact

Oxnard a majority-minority community:

74% Hispanic Origin + 10% Other Non-White total = 84%

CalEnviroScreen 2.0 categorizes much of the area disadvantaged.
With three power plants, landfills, and EPA superfund site,
Oxnard is disproportionately impacted.



7 Five Feasible Inland Alternatives Sites

Close to high pressure gas lines and SCE transmission lines.

Two within Oxnard city limits, zoned industrial, vacant:

1. Power Machinery/Camino Avenue
2. NEC Del Norte & Fifth Street

Two could be annexed, vacant, voter approval not required:

3. Sanitation District Flower Field
4. Beedy Street

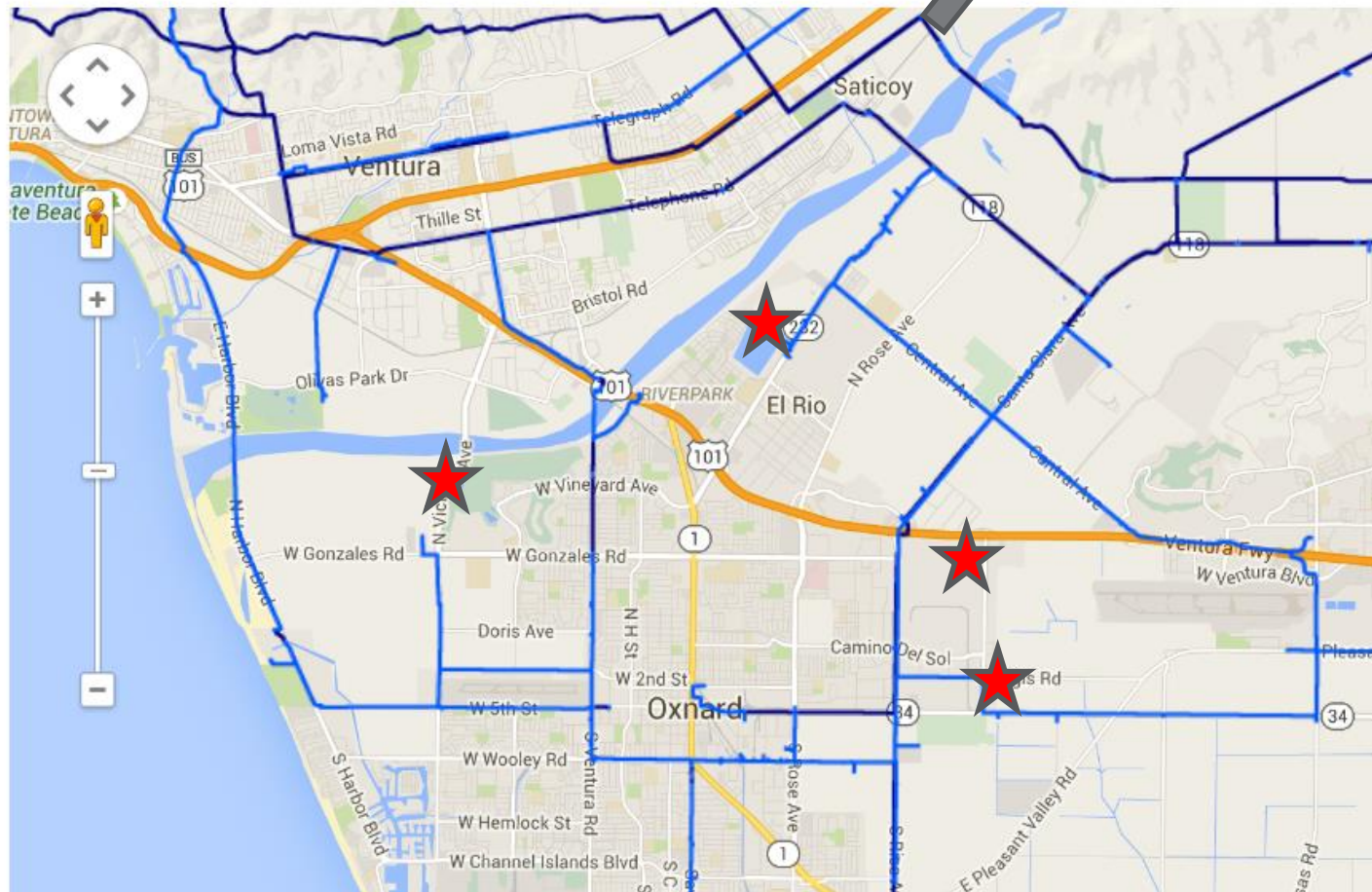
Mission Rock “Calpine” site near Santa Paula:

5. Mission Rock Energy Center

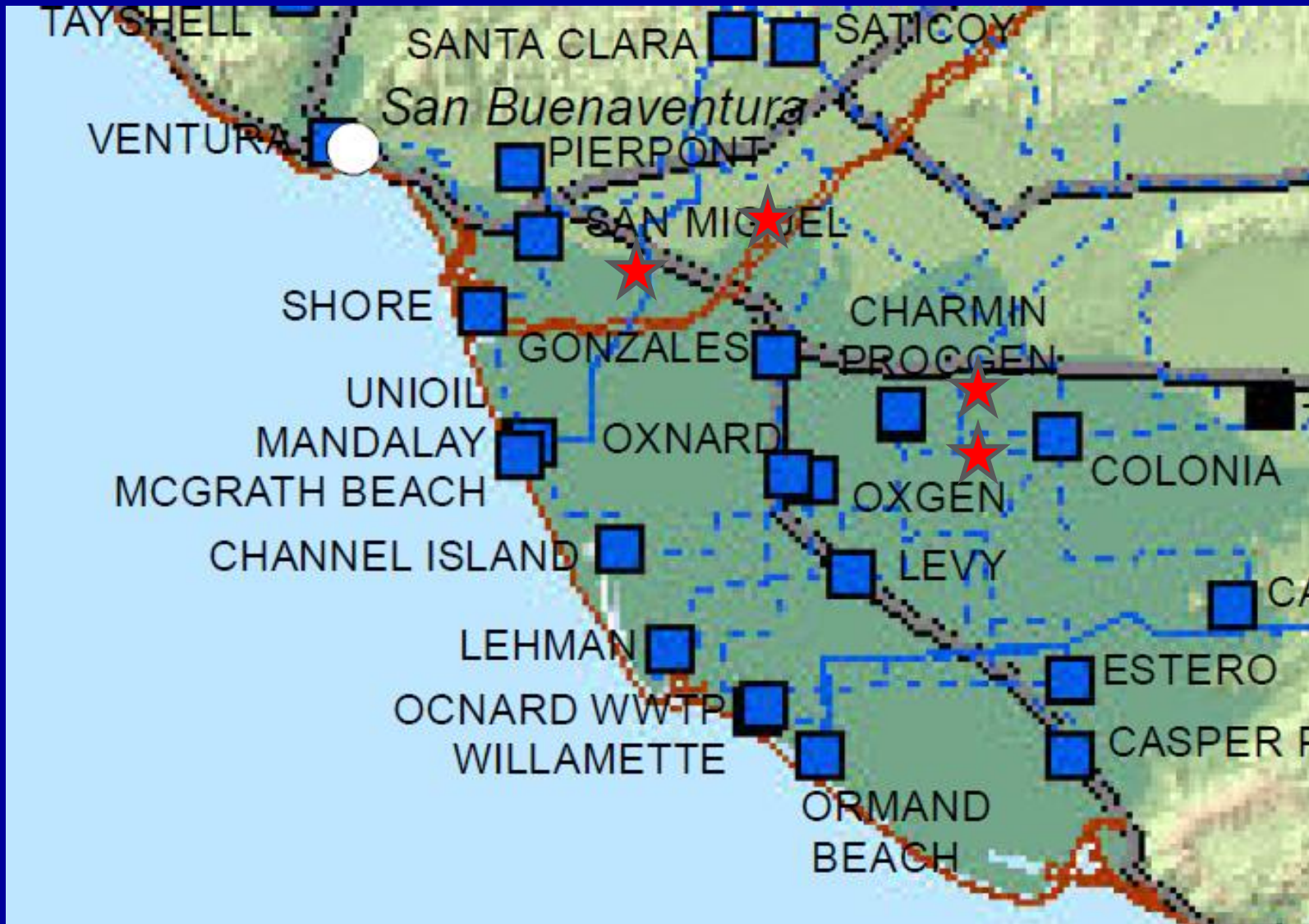
Need to be near high-pressure natural gas line

Gas Transmission and High Pressure Distribution Pipeline Interactive Map - Ventura

Find Address Enter your zip code or address.



...also near SCE Transmission Lines/Corridors



#1 Power Machinery/Camino Real Business Park



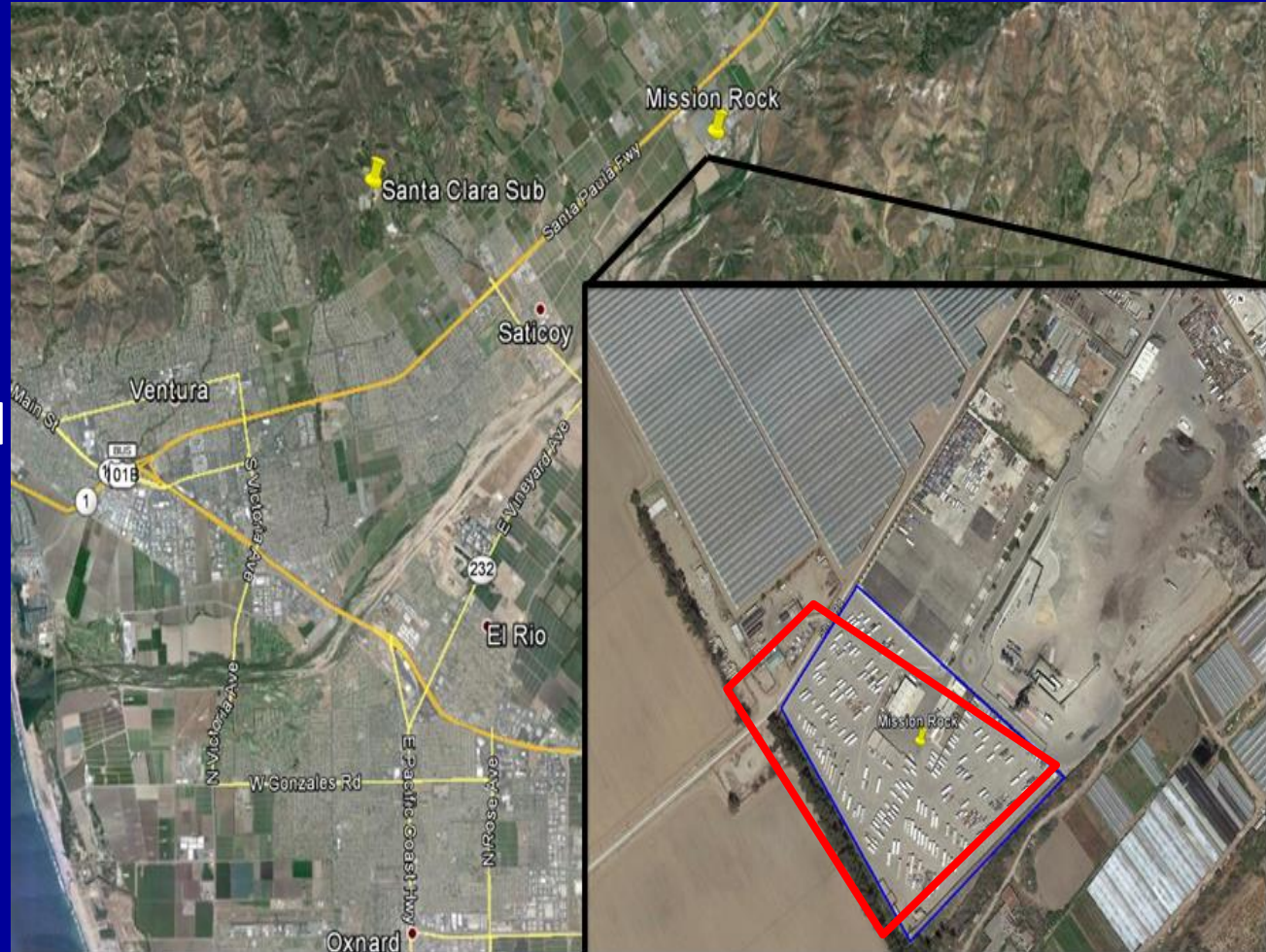
#2 Del Norte/Fifth Street

SCE Transmission Line
through open fields



#5 Mission Rock Energy Center

10 miles inland
Industrial-zoning
10 acres
Low-profile (80ft)
Easements obtained
Recycled water
Compatible uses



Source:

“Alternative proposed to prevent peaker plant along Oxnard coast”

Pacific Coast Business Times/ Friday, July 24th, 2015

Calpine

Slide

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..conclusion:

California coastline is special – 1972 Initiative and the Coastal Act.

We are implementing Federal and State Law re: endangered species, affordable coastal recreation, & adaptation to sea level rise.

50+ years ago, many regrettable local land use decision were made. Time for new directions as we update our Local Coastal Program.

Do not condemn us to another 30 years of coastal power plants because NRG maximizes a return on investment, poor choices.

There are feasible, safer, more reliable, and community supported alternative sites that appear to meet SCE criteria.

Submitted to CEC AFC Docket 15-AFC-01

Thank you for your Attention.

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