

DOCKETED

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December 4, 2015

John Chillerni, President
NRG Oxnard Energy Center, LLC
100 California Street, Suite 650
San Francisco, California 94111

Re: Puente Power Project (15-AFC-01); Data Requests, Set 4 (Nos. 80-94)

Dear Mr. Chillerni:

Pursuant to Title 20, California Code of Regulations, section 1716(a), the City of Oxnard 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.

In this Set 4, data requests are being made in the technical areas of Air Quality and Environmental Hazards. Written responses to the enclosed data requests are due to the City staff on or before January 4, 2016.

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 City and me within 20 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 17.16(f)).

If you have any questions regarding the enclosed data requests, please call me at (415) 552-7272.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Edward T. Schexnayder

Encl.

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STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Application for Certification of the
PUENTE POWER PROJECT

DOCKET NO. 15-AFC-01

**CITY OF OXNARD'S DATA REQUESTS,
SET 4**

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AIR QUALITY

Background

The applicant has substantially revised the air quality and public health analysis to address new information obtained from GE related to emissions from the proposed new turbine, including new gas turbine performance runs that will impact emissions of all pollutants and new exhaust parameters, which will impact all air quality modeling. Please provide the requested information regarding these changes.

Data Request 80:

The OEHHA guidelines for performing health risk assessments were amended in March 2015 to reflect advances in the field of risk assessment including new more conservative methods to accommodate infants and children and their associated inhalation rates. Please indicate whether these new guidelines have been incorporated into the revised health risk assessment.

Data Request 81:

The applicant's November 30, 2015 responses to CEC Data Request Set 2 states that the applicant altered the air quality and public health modeling "due to new information received from the gas turbine vendor [GE]." Please provide all new information that the applicant received from GE regarding the gas turbine emissions, including, but not limited to, an explanation of the revised particulate matter emission rate as stated in GE's October 28, 2015 letter.

Data Request 82:

The November 30 responses updated the emission calculations and modeling used to support the application. Please provide all correspondence, notes of conversations, and any other communications between the applicant and Sierra Research and/or GE regarding the emission information and air quality and public health modeling that is currently used to support the application.

ENVIRONMENTAL HAZARDS (Tsunami Inundation and Sea Level Rise)

Background

The City's Data Requests, Set 2 requested that the applicant provide additional information related to sea level rise, tsunami, and other coastal hazards which threaten the project site. On October 8 and November 6, 2015, the applicant submitted responses to these requests. The following data requests seek additional information and clarification regarding the applicant's initial responses to the City's data requests for the environmental hazards analysis.

Data Request 83:

Applicant's Table 56-1 contains records of dredging operations at Ventura Harbor. The beach width in front of the Mandalay Generating Station is influenced not just by upcoast sediment supply from Ventura Harbor dredging, but also by downcoast dredging operations at Channel Islands Harbor. Please update Table 56-1 to provide records of dredging at Channel Islands Harbor.

Data Request 84:

In response to the City's Data Request 48, the applicant provided hyperlinks to LiDAR information that was used in the sea level rise technical memorandum. Please indicate the date and time of the LiDAR data used in this analysis. Additionally, one provided hyperlink (<http://coast.noaa.gov/dataviewer/index.html?action=advsearch&qType=in&qFld=ID&qVal=2612>) produces an error message. Please provide a working hyperlink.

Data Request 85:

In response to the City's Data Request No. 47, the applicant discusses wave run-up and dune erosion at the Mandalay Beach. Please provide the wave run-up and erosion calculations used to support this response.

Data Request 86:

Some of the figures included in the applicant's responses lack information that is necessary to interpret these figures. Please identify the source of the topographic data used in Figure 54-2. Please also reproduce Figure 56-1 with a legend describing the data points.

Data Request 87:

The applicant's responses to the City's Data Requests, Set 2 mention an average slope of Mandalay Beach calculated using beach profiles obtained from the 2013 LiDAR data. Please provide the beach profiles used to calculate the average slope of Mandalay Beach.

Data Request 88:

It is unlikely that the photographs used for the referenced 2013 LiDAR data were actually collected in 2013. These photographs are likely from the 2009-2011 date coastal LiDAR. Please provide the date and timestamps of the overflight photos used in this LiDAR data.

Data Request 89:

The responses state that Figure 56-2 shows water lines observed in aerial photos of Mandalay Beach. Appendix 64-1 contains additional aerial photos of Mandalay Beach that were excluded from Figure 56-2. Please update Figure 56-2 to include the water lines from the photographs contained in Appendix 64-1.

Data Request 90:

The responses state that the water lines represented in Figure 56-2 were developed by overlaying the water lines from historic aerial photos. Please fully describe the method used to register (georeference) the air photos used for Figure 56-2, and the requested revision to Figure 56-2.

Data Request 91:

Please provide the observed subsidence both generally on the Oxnard plain and particularly near the P3 site.

Data Request 92:

In response to City Data Request No. 49, the applicant states that “it would be unlikely for the tsunami to enter the Channel Island Harbor and the travel up the Edison Canal without considerable loss of energy due to the physical geometry of the harbor.” Please provide all analysis, methods and associated results (calculations) that the applicant developed or relied upon to support this statement.

Data Request 93:

Please provide all analysis, methods and associated results (calculations) used to develop the information in Table 59-1 and Table 60-1 in the Applicant’s November 6, 2015 responses to City’s data requests. Additionally, please update Table 60-1 to account for sea level rise in 2050 and 2100.

Data Request 94:

In response to City Data Request No. 62, the applicant mentions preliminary calculations to evaluate the potential stability of dunes and dikes. Please provide all analysis, methods and associated results (calculations) used to draw the conclusions presented in the response on page 62-1.

DATED: December 4, 2015

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