

DOCKETED

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Project Title:	Puente Power Project
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Document Title:	Comments in support of City of Oxnard motion to extend public comment period on PSA
Description:	N/A
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Organization:	Environmental Defense Center
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July 6, 2016

Submitted via e-filing

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

Re: Puente Power Project (15-AFC-01): Environmental Intervenors' Comments on City of Oxnard Motion to Extend PSA Public Comment Period

Dear Presiding Commissioner Scott and Commissioner Douglas:

In accordance with staff's June 29, 2016 Memorandum treating the City of Oxnard's June 28, 2016 request to extend the public comment period on the Preliminary Staff Assessment ("PSA") as a motion and requesting written responses as soon as possible and no later than July 12, 2016 on that motion, Intervenors Environmental Coalition, Environmental Defense Center, and Sierra Club, Los Padres Chapter (collectively, "environmental intervenors") hereby strongly support the motion and ask that the requested 90 days of additional public comment on the PSA be provided.

As noted in the City's motion, the 1,200 page PSA is a voluminous and complex document that will require significant time and effort to review and respond to. In addition to highly technical issues involving air quality and greenhouse gas emissions, environmental intervenors require additional time to respond to other environmental issues including biological resources, sea level rise and tsunami risk, and impacts to water resources, as well as numerous legal and policy issues.

In addition, the current 45 day comment period overlaps with the height of summer, when many of environmental intervenors' staff and volunteers are out on vacation. Because the schedule for the PSA release and public comment period was changed numerous times, it was difficult for environmental intervenors to successfully plan around the ultimate dates.

Environmental intervenors appreciate the extensive efforts made by CEC staff in preparing the PSA, and know that staff is under pressure to move the application forward. However, the benefits of extending the public comment period for interested parties and the

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impacted public far outweigh any costs that would be incurred by the applicant from a 90 day extension to the public comment period. We thereby support the City of Oxnard's motion and respectfully request that the presiding member of the commission exercise her discretion to accordingly extend the comment period.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'JS', with a stylized flourish underneath.

Brian Segee