

DOCKETED

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Filer:	Darlene Burgess
Organization:	The Nature Conservancy
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September 8, 2016

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: California Energy Commission's Application for Certification (15-AFC-01) – NRG Energy Center Oxnard, LLC, Puente Power Project, reviewed pursuant to Coastal Act section 30413(d)

Dear Commissioners:

The mission of The Nature Conservancy (“TNC”) is to conserve the lands and waters on which all life depends. TNC is working to preserve ecologically important lands for nature and people in California and around the globe. In Ventura County, TNC has worked since 1999 to protect natural resources and promote multi-benefit solutions for nature, people, and property. To date, TNC has protected over 4,000 acres along the Santa Clara River and Ormond Beach and cultivated diverse partnerships with local, State and Federal agencies, as well as farmers, developers and local organizations.

Sea level is projected to rise approximately 5 to 24 inches by 2050 and 17 to 66 inches by 2100 along the California coast, posing a serious risk to critical infrastructure and current habitat.¹ This change in sea surface elevation will exacerbate existing hazards and reduce the period of time over which coastal development is expected to remain relatively safe. The City of Oxnard's shores and coastal assets are at risk from sea level rise (“SLR”) and associated climate-driven hazards, such as erosion, river flooding, and storm surge, and will need to be more resilient in order to deal with increasingly variable conditions.

The Coastal Resilience Ventura (“CRV”) project was initiated in 2011 by TNC to assess the anticipated impacts of these threats along coastal Ventura County. CRV works jointly with partners to: 1) use cutting-edge science to identify and quantify the risks posed by climate change within coastal Ventura County; 2) inform decision-makers of these risks and what policy alternatives exist to mitigate them; and, 3) demonstrate that nature-based solutions are a cost-effective alternative for achieving a more resilient coast. From the beginning, CRV has been guided directly by a Steering Committee representing over 30 city, regional, state, and national

¹ National Research Council, Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, present, and Future (2012), available at <http://www.nap.edu/catalog/13389/sea-level-rise-for-the-coasts-of-california-oregon-and-washington>.

government agencies and public and private organizations.² The Steering Committee provides data, input, and guidance to all stages of project, including the coastal hazards mapping.


Dynamic sea level rise projections and coastal hazards mapping for the CRV project was completed by Environmental Science Associates.³ The geographic focus of the mapping effort is all of coastal Ventura County and the analysis comprises high resolution maps of beach profiles, shoreline change, backshore characterization, wave modeling and run-up calculations, shoreline erosion hazards, river flood hazards, rising tides, and coastal storm flood hazards for three time horizons – 2030, 2050, and 2100. The final mapping is online (free of charge, available to anyone) through an interactive web mapping tool at www.coastalresilience.org. The project was paid for by TNC, private donations, and a grant from the County of Ventura.

In 2015, the California Coastal Commission (“the Commission”) issued Sea Level Rise Policy Guidance (“Guidance”), which calls for the Commission to seriously evaluate scientific information regarding impacts to the coast associated with climate change that may drive power plants away from the coast. In the Guidance, the Commission calls for consideration of greater design standards (e.g., 200-year event, 500-year event) for critical infrastructure – including power plants – along the coast.⁴ In addition, the Commission recommends applying high sea level rise projections and “worst case scenarios” for the siting and design of critical facilities.⁵

Results from the Coastal Resilience Ventura climate hazards model show existing risks in coastal Ventura County - and specifically at the proposed site of the Puente Power Project (Map 1) - that increase over time. These results also show significant risks of coastal erosion and flood hazards under various future climate scenarios at the site (Map 2). Accordingly, the CRV project’s science and analyses on the current and future flood hazards of the proposed Puente Power Project site are consistent with the findings in the Commission staff report.

Please do not hesitate to contact Lily Verdone, lverdone@tnc.org or Sarah Newkirk, snewkirk@tnc.org, if you have any questions. TNC is invested in building a resilient coast in Ventura County and is grateful the Commission’s attention to this issue.

Sincerely,



Lily Verdone
Coastal Project Director



Sarah Newkirk
Senior Coastal Project Director

² A complete list of the agencies and organizations represented on the steering committee can be found on the Coastal Resilience Ventura website at <http://coastalresilience.org/geographies/ventura-county/partners>.

³ Environmental Science Associates Philip Williams & Associates (ESA PWA) (2013). “Coastal Resilience Ventura Technical Report for Coastal Hazards Mapping.” Prepared for The Nature Conservancy.

⁴ CCC 2015 SLR POLICY GUIDANCE, 99, 238-240

⁵ *Id.* at 138.

CC:

Tim Flynn, Mayor, City of Oxnard

Carmen Ramírez, Esq., Mayor Pro Tem, City of Oxnard

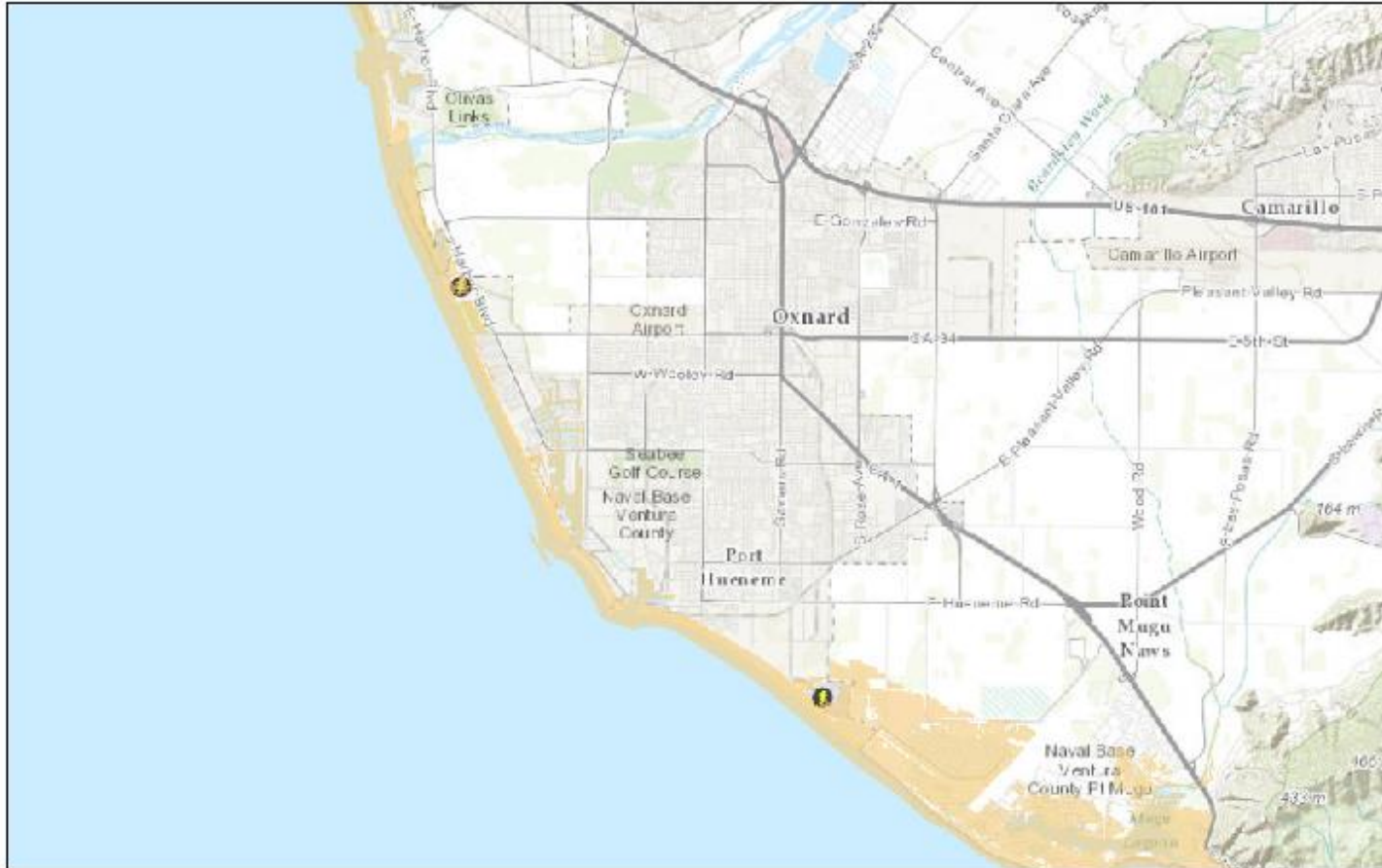
Bryan A. MacDonald, Councilman, City of Oxnard

Dorina Padilla, Councilmember, City of Oxnard



Bert E. Perello, Councilmember, City of Oxnard

Janea A. Scott, Commissioner and Presiding Member, California Energy Commission

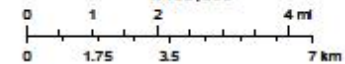
Map 1: Current Coastal Flood Risk - City of Oxnard Electric Power Generation Facilities



April 16, 2014

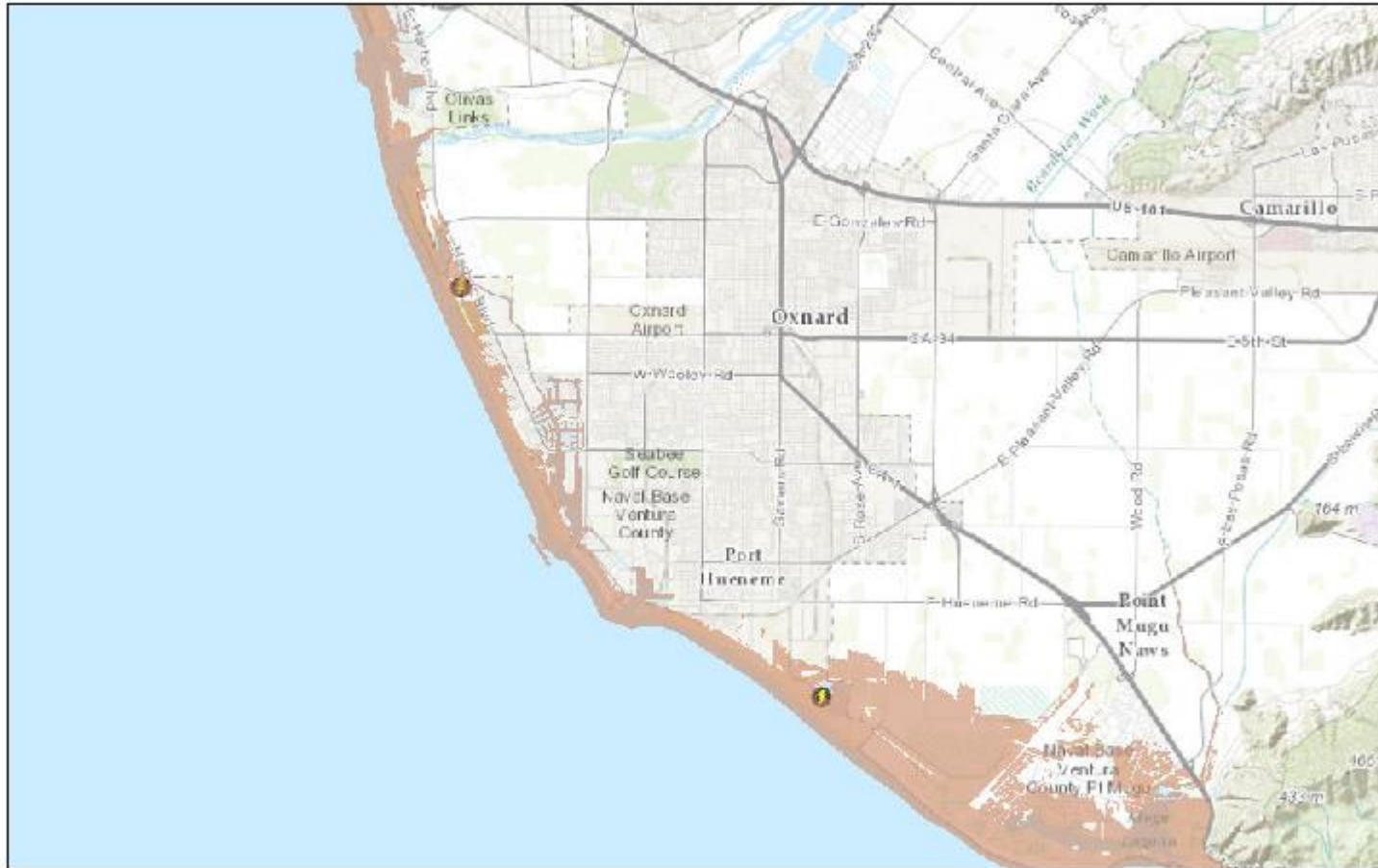
-  Flood Inundation (large storm)_Current
-  Electric Power Generation

1:138,053



Sources: Esri, DeLorme, HERE, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL,

Map 2: Year 2060 Flood Risk - City of Oxnard Power Generation Facilities



April 16, 2014

