DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	213641
Document Title:	Comments on Preliminary Staff Assessment from The Nature Conservancy
Description:	N/A
Filer:	System
Organization:	The Nature Conservancy
Submitter Role:	Public
Submission Date:	9/14/2016 12:11:31 PM
Docketed Date:	9/14/2016

Comment Received From: Lily Verdone
Submitted On: 9/14/2016
Docket Number: 15-AFC-01

Puente Power Plant (15-AFC-01) Comments on Preliminary Staff Assessment from The Nature Conservancy

Additional submitted attachment is included below.

The Nature Conservancy
Protecting nature. Preserving life.™

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September 14, 2016

Via e-comment
https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=15-AFC-01

California Energy Commission
Dockets Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Puente Power Plant (15-AFC-01) Comments on Preliminary Staff Assessment from The Nature Conservancy

Dear Commissioners:

The Nature Conservancy ("TNC") appreciates the opportunity to provide comments on the Preliminary Staff Assessment ("PSA") for the Puente Power Plant ("Project"). The mission of 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

[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.

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 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 CCC") issued Sea Level Rise Policy Guidance ("Guidance"), which calls for the CCC 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 CCC 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 CCC recommends applying high sea level rise projections and "worst case scenarios" for the siting and design of critical facilities.[5]

The PSA evaluated SLR impacts to the proposed Puente Power Project site with the preliminarily released results of the Coastal Storm Modeling System (CoSMoS 3.0). It is noted in the PSA that these are initial results from a preliminary release of CoSMoS 3.0; however, it is not noted that the preliminary results do not show erosion or cliff retreat included in those flood projections nor do they model the combined risks of these hazards. Final results from the Coastal Resilience Ventura climate hazards model are complete, comprehensive, and model combined risks of multiple hazards. These results clearly indicate existing risks in coastal Ventura County - and specifically at the proposed site of the proposed 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).

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 appreciates the opportunity to provide these comments on the Preliminary Staff Assessment for the Puente Power Plant.

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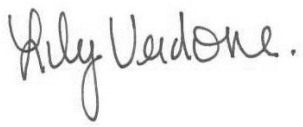
[2] A complete list of the agencies and organizations represented on the steering committee can be found on the Coastal Resilience Ventura website at http://coastalresilience.org/geographies/ventura-county/partners.

[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.

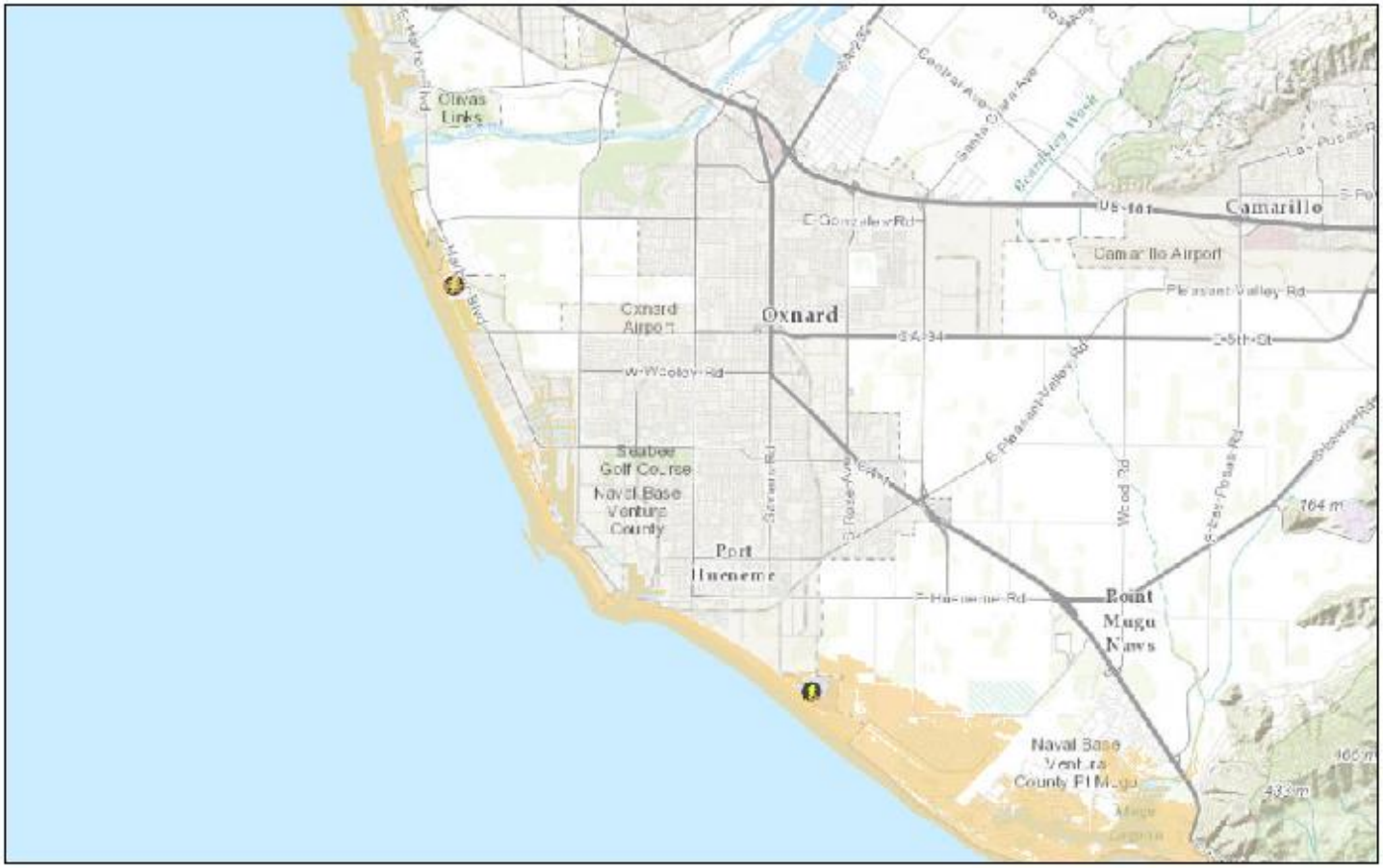
Sincerely,



Lily Verdone
Coastal Project Director

Sarah Newkirk
Senior Coastal Project Director

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



April 16, 2014

Flood Inundation (large storm)__Current

Electric Power Generation

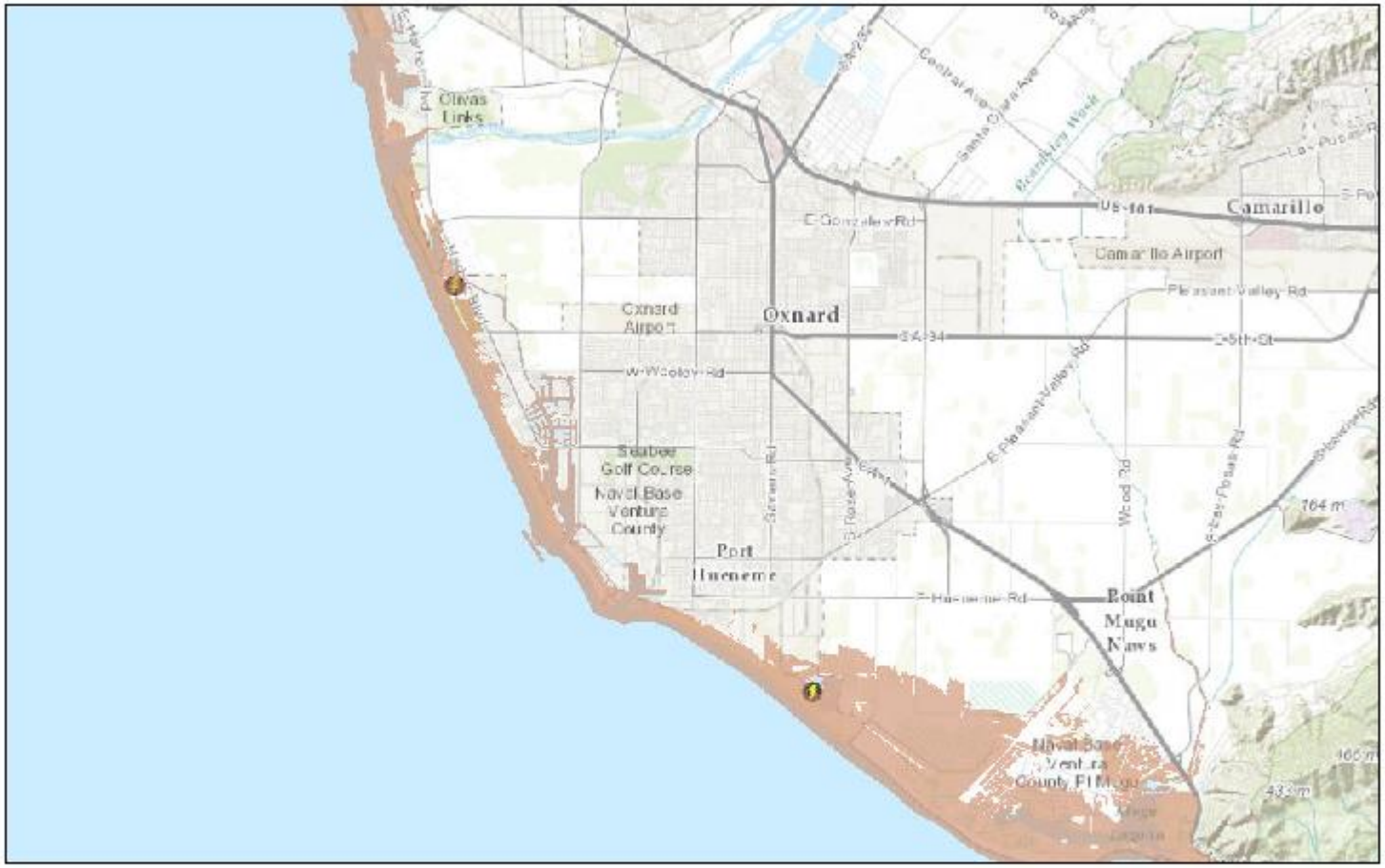
1:138,053

0 1 2 4 mi

0 1.75 3.5 7 km

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



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