

DOCKETED

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Comment Received From: Steven L. Kinney

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Support Puente Project, with one concern.

Additional submitted attachment is included below.

September 15, 2016

California Energy Commission
1516 Ninth Street
Sacramento, CA

RE: Puente Power Project

Dear Ladies and Gentlemen:

I am writing on behalf of the Friends of Channel Islands Harbor, of which I am the Executive Director. The FOCIH is a 501(c)(6) non-profit association comprising all of the leaseholders of land surrounding the harbor, on which all of the private development at the harbor has been built. In other words, this association represents all of the business interests at the harbor, whether commercial, residential, hotel, or marina.

Our association supports the Puente Power Project. We believe that the proposed site is a valid site for the type of power plant under consideration, and the project itself offers no threat to the surrounding environment or community.

Our reservation relates to a water quality issue not associated with the new plant, but rather with the cessation of pumping at the current facility, slated for closure in 2020. By virtue of the physical linkage between the plant and Channel Islands Harbor, i.e., the Edison Canal, we believe that there is an inherent beneficial effect on water quality in the harbor from the flushing action supplied by the pumping at the Mandalay Plant. The entire design of Channel Islands Harbor from the outset was predicated on the existence of the canal and its outfall to the ocean, and the closing of that "back door" to the ocean, we fear, could lead to a significant deterioration of water quality in the harbor.

I understand that the staff's position is that the change in water quality would not rise to a level of significance. Our concern is that their conclusion is based largely on modeling which is uncertain in its reliability, and if events in real life do not track with the predictions of the modeling, then the consequences of that discrepancy would fall on us and the residents around Channel Islands Harbor.

I should also make you aware that NRG staff, from the first time that we voiced our concern on this issue to them, were sympathetic to our position and were willing to work with us to examine the potential alternatives to an outright shut-down of the pumps. They have gone so far as to perform some current water sampling and modeling of expected water flows in direct response to our concerns, and have shared those results with us. We want to express our appreciation to the NRG staff for their responsiveness and professionalism. While the results of the current NRG studies show good water quality throughout Channel Islands Harbor, we remain

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concerned about the unknown changes that are bound to occur throughout the harbor waterways after the pumps are shut off for good.

Therefore, our request is simply that this issue be considered as yet unresolved, subject to further analysis and discussions. Again, we support the permitting of the new power project to proceed. The issue will lie with the conditions of the closure and dismantling of the current Mandalay Plant, and there we would ask that the door be left open for a further look at the alternative of keeping the pumps in an active state, not for cooling but for simple circulation of the water coming from Channel Islands Harbor via the Edison Canal.

On behalf of my Board of Directors, we would appreciate your due consideration of this issue, and again wish to compliment NRG for their willingness to work with us to find a satisfactory resolution of the water quality issue.

Sincerely,

Steven L. Kinney
Executive Director
Friends of Channel Islands Harbor