

## DOCKETED

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## INTERVENOR CITY OF OXNARD

### EXHIBIT \_\_\_\_

#### Testimony of Darwin Base

#### Re: Emergency Response to Proposed NRG P3 Generating Facility

#### Statement

I am Darwin Base, Fire Chief of the Oxnard Fire Department (OFD). I have had more than 28 years of experience with the Oxnard Fire Department, working in various roles including fire engineer, fire captain and battalion chief. I have over nine years of experience teaching courses in fire technology for Oxnard Community College as well as for the Office of the State Fire Marshal and California Specialized Training Institute.

This testimony is regarding the ability of the OFD to provide first-responder emergency service to the proposed Puente Power Plant (P3) located at 383 North Harbor Boulevard.

The OFD relies on mutual aid with Ventura County, the City of Ventura, and Naval Base Ventura County (NBVC) for certain types of fire and rescue responses, for additional resources in general, and/or for response assistance in geographic areas distant or inaccessible from City facilities.

#### **Potential Flooding that Inhibits or Prevents Emergency Response to the P3**

The MGS and proposed P3 facility are accessed from two entrances on Harbor Boulevard, the main NRG entrance north of the "SCE Canal" bridge, and indirect access via the SCE McGrath Peaker Plant with an entrance south of the canal bridge. There is no paved vehicle access to the MGS/P3 site from the north or west. Maps of coastal hazards prepared by the City establish, at a minimum, the risk of flooding at some depth in and around the MGS and P3 facilities by any of several coastal storm, heavy rain riverine flooding, and/or a dam failure events. The existing coastal and riverine flooding scenarios increase during the 30-year life span of the P3 facility. With this information as context for accessing the MGS and P3 facilities, the OFD emergency response comments are:

- The MGS and P3 facilities are in Fire District 6.
- The OFD does not have adequate information regarding the decommissioned MGS or proposed P3 on-site security equipment and procedures to offer a review statement as to fire warning and suppression equipment and procedures for critical electric generation and grid facilities with hazardous chemicals stored on site. OFD requests that the CEC require NRG to submit security plans and pay for the

review by OFD to ensure the plans are adequate. OFD also requests that the CEC incorporate OFD's conditions of approval in the AFC permit, should an AFC permit be issued. This same concern extends to the P3 facility in 2050 when it ceases operations. OFD requests that the P3 AFC permit, should it be issued, require the P3 to be dismantled immediately after decommissioning.

- OFD's largest vehicles cannot operate in floodwater above two feet in depth. Should the MGS/P3 area be flooded and require OFD response for either hazardous chemicals, fire, and/or paramedic service, OPF either could not respond or would request mutual aid assistance from the County for a helicopter.
- In the event of a major emergency such as a Tsunami, earthquake, or release of hazardous materials, a call for service from the NRG facility would not be a priority compared to fire suppression, rescue of residents, and evacuation. NRG would, essentially, be on their own until higher priorities are addressed.
- The existing MGS structure and proposed P3 structure present possible need for technical rescues in confined spaces for which the OFD has inadequate resources and training. The OFD would have to request mutual aid from the County and rely on the availability of County aid if it were available.

It is my expert opinion as a career Firefighter and as the Fire Chief of the City of Oxnard that the proposed NRG P3 facility should not be developed in an area of comparatively higher risk of impediments to first responders when there is an inland location that does not present these issues.

While I cannot say with certainty that coastal flooding will occur to the extent of preventing OFD emergency access, maps prepared by the City in connection with the LCP update demonstrate that such inundation is possible. Given this risk and the limited ability of the OFD to respond in the event of a flood, the OFD recommends that the CEC investigate alternative locations and sources of power in a non-coastal location.

DLBCE  
Signature

5 JAN 17  
Date