

DOCKETED

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Submitted On: 2/6/2017

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On Concerns Regarding the Puente Power Project

Additional submitted attachment is included below.



VIA U.S. Mail and EMAIL

February 6, 2017

Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street, MS-31, Sacramento CA 95814

Commissioner Janea Scott
California Energy Commission
1516 Ninth Street, MS-31, Sacramento CA 95814

Re: Puente Power Project, Application for Certification 15-AFC-01

Dear Commissioners Douglas and Scott:

I write to register our concerns regarding the Puente Power Project (the Project) as currently proposed and conditioned. The project proposes to site a new industrial facility between two publicly maintained beaches valued both for the rare and delicate coastal habitat they contain and the public access they allow. The proposed plant would site a new facility in an area that is subject to flooding, tsunami and storm surge risk with inadequate margin of safety given the uncertainties presented by sea level rise and climate change. We suggest the Commission direct the applicant to look for an inland location away from sensitive coastal dune habitat and uncertain climatic conditions.

The Coastal Conservancy's mission is to work with local governments, other public agencies, nonprofit organizations, and private landowners to preserve, protect, and restore the resources of the California coast. The Coastal Conservancy has adopted a climate change policy that directs the agency to "consider flooding and erosion due to sea level rise, and extreme events such as tsunamis in assessing project vulnerability and, to the extent feasible, reduce expected risks and increase adaptive capacity using current scientific information

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and state guidance documents.”¹ To date, the Conservancy has expended over \$70 million in Ventura County to help protect its unique coastal areas. Specifically, the Conservancy has been directly involved in the following major efforts in Ventura County:

Ormond Beach Wetlands: As the Final Staff Assessment recognizes,² the Coastal Conservancy acquired 265 acres from Southern California Edison, provided funding to The Nature Conservancy to acquire 276 acres from the Municipal Water District, and is currently involved in preparing a final restoration plan for 1,000 acres of wetlands and other habitat areas surrounding the Ormond Beach Generating Station. Ormond Beach is one of the most important wetland restoration opportunities in southern California. Restoration of the wetlands is a high priority of the Southern California Wetlands Recovery Project, as this is one of the few places in coastal southern California with an intact dune-transition zone-marsh system, allowing restoration of an intact wetland ecosystem and providing a buffer against sea level rise and the impacts of climate change.

Santa Clara River Parkway: Since 2001, the Conservancy has granted over \$15 million for acquisitions along the Santa Clara River. In addition, the Conservancy contracted for a geomorphic assessment of the Santa Clara River watershed, including where the river meets the Pacific Ocean. That report assessed and mapped the potential for flooding in the lower channel as well as the potential for restoration efforts in this area. Attached to this letter is a more detailed map of the modeled flooding from a 25-year and 100-year flood event. This is part of the same report cited in the Coastal Commission’s report to this body.³ In order to provide the Commission with accurate information concerning this mapping effort, we asked our contractor, Stillwater Sciences, to clarify the model result for the Mandalay station. Zooey Diggory (MS) of Stillwater Sciences related that the mapping assumed existing levee conditions and did not consider sea level rise in its evaluation. The analysis found flooding would occur at Mandalay station of up to 4ft for a 100-year flood event.⁴ Ms. Diggory stated, “it can be reasonably assumed that the Q100 flow event with sea

¹ Available at <http://sec.ca.gov/2009/01/21/coastal-conservancy-climate-change-policy-and-project-selection-criteria/#more-100>.

² Final Staff Assessment, vol. 1, p. 4.2-29 (Dec. 2016).

³ Available at [http://parkway.scrwatershed.org/wkb/scrbiblio/techreportreference.2011-](http://parkway.scrwatershed.org/wkb/scrbiblio/techreportreference.2011-09-)

08.4420182586/attachment_download/Levee_Setback_Memo_FINAL_low%20res.pdf

⁴ Email communication with Dr. Bruce Orr, February 2, 2017.

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level rise (which was not modeled specifically) would result in even deeper and longer duration of flooding at Mandalay.”⁵

Mandalay Dunes: In February 2000, the Conservancy authorized the acquisition of the Mandalay Dunes, which is directly proximate to the proposed Project. The Conservancy determined that this area comprised rare coastal dune scrub habitat and, according to biologists, former backdune swale wetlands. The Conservancy Board recognized the opportunity to restore this area and integrate it with the surrounding parks, preserves, and endangered species habitat while providing continuous public management. Since that time, the Conservancy has also acted to fund acquisition of the adjoining Santa Clara River Estuary, acquisition of in holdings within McGrath State Beach, and the establishment of a Tern/Plover Restoration program in the area.

In addition to these efforts, the Conservancy has been increasingly involved in understanding and planning for the impacts of climate change and sea level rise on the California coast. The Coastal Conservancy is leading a major restoration planning effort at Ormond Beach and recently agreed to provide funding to The Nature Conservancy for the acquisition of a large neighboring property. Acquisition of this property is intended, in part, to allow for the migration of the wetland and other habitats as sea level rises. Having reviewed the Final Staff Assessment and the recommendations of the California Coastal Commission, we conclude the placing of new major infrastructure directly adjacent to the beach at Mandalay would be contrary to existing studies commissioned by the Coastal Conservancy and additional studies developed by the City of Oxnard. We agree with the Coastal Commission’s conclusion⁶ that the project has the potential for adverse effects on land use, environmentally sensitive habitats and wetland that the Conservancy seeks to preserve, coastal hazards of flooding, sea level rise and tsunami, wastewater management in the beach area fronting the project, and public access to the shoreline and the adjoining beach parks.

Accordingly, the Coastal Conservancy recommends that the Commission require NRG to relocate the proposed project to an alternative site away from the coast as suggested by the Coastal Commission’s report, p. 17 and the City of Oxnard.⁷ As a sister agency to the Coastal Commission, we support the efforts of NRG to move away from once-through cooling technology. This effort decouples the need for

⁵ *Id.*

⁶ TN # 213667.

⁷ See for example the testimony of Oxnard Development Services Director Ashlee Golden, TN# 215421, and City Councilmember of Carmen Ramirez, TN # 215419.

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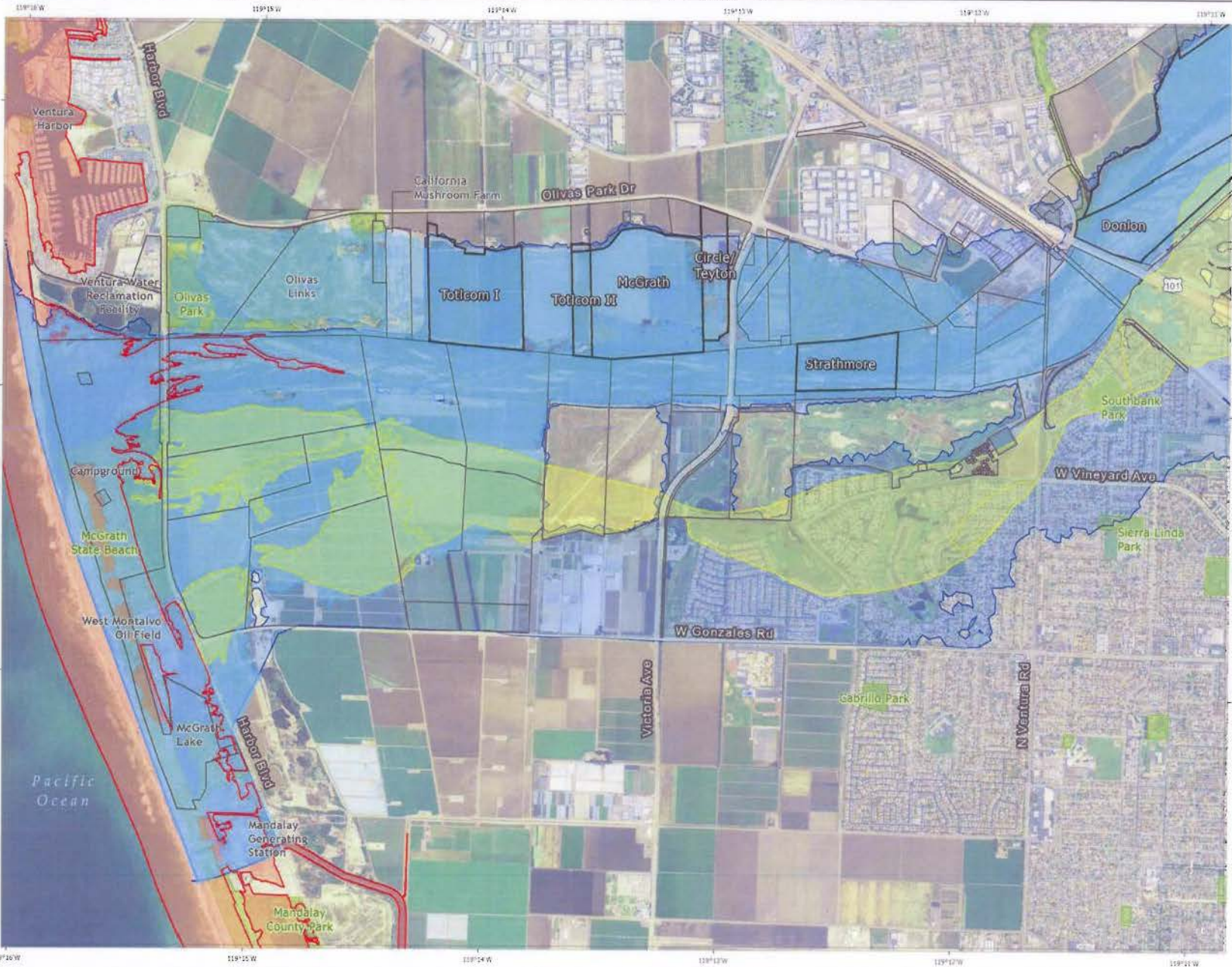
power plants to be sited in the geomorphically active coastal zone of the Santa Clara River and suggests inland sites should be more carefully considered as viable alternatives to meet this region's electric power needs.

Thank you for your consideration of our continued interest in the conservation and restoration of this unique California coastal area.

Sincerely,



Samuel Schuchat
Executive Officer



SANTA CLARA RIVER ESTUARY VISION
BASEMAP - Setback Levee Conditions

DATA SOURCES
 Base imagery: NAIP 2012
 Parcel boundaries: TUC/SCC/Ventura Co.
 Flood extents: chc 2011
 Historical riparian grove: SFEI 2011
 Flood hazard: ESA-PWA/INC, 2013
 Roads, cities, parks: ESRI 2010

MAP PROJECTION
 NAD 1983 UTM Zone 11N
 Transverse_Mercator

SWI
 Sedwater Sciences
 www.sedwater.com

- LEGEND**
- Historical riparian grove
 - Parks
 - FLOOD EXTENTS (levee setback)**
 - 25-year flood extent
 - 100-year flood extent
 - PARKWAY PARCELS**
 - Acquired (labeled)
 - Other
 - PREDICTED COASTAL HAZARDS**
 (for 2100 under medium sea level rise)
 - Combined coastal erosion hazard, storm wave impact, and storm flood hazard zones

