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STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Application for Certification of the
PUENTE POWER PROJECT

DOCKET NO. 15-AFC-01

**CITY OF OXNARD'S STATEMENT
OF ISSUES TO BE BRIEFED**

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Following the evidentiary hearings, the City of Oxnard believes that the following issues should be the subject of briefing:¹

Whether the Project may be approved consistent with the requirements of the California Environmental Quality Act, particularly with respect to the following issues:

Alternatives:

- Whether the FSA analyzed a legally-adequate range of alternatives to the proposed project.
- Whether preferred resources and battery storage represent a feasible project alternative.
- Whether alternative locations are environmentally superior to the project site.
- Whether the FSA properly characterized of project objectives, need, and benefits.

Environmental Justice:

- Whether potentially significant impacts to environmental justice communities have been properly disclosed and mitigated.
- Whether the mitigation of potential air quality impacts avoids disproportionate impacts to environmental justice communities.
- Whether the analysis of impacts to environmental justice communities adequately considers the range of potential impacts.

Land Use:

- Whether the Project's conflicts with the City of Oxnard's land use policies, regulations, and plans and whether it conflicts with other applicable regulations and policies, including the California Coastal Act have been properly disclosed and mitigated.

¹ The City reserves the right to address any issue or contention raised by the Commission or any party in addition to those set forth in this statement.

- Whether the Project's conflicts with adjacent land uses have been properly disclosed and mitigated.

Biology:

- Whether there has been adequate investigation and identification of environmentally sensitive habitat areas and sensitive species on the project site.
- Whether there has been adequate investigation, analysis, and mitigation of impacts to biological resources both on the project site and adjacent to the project site.

Sea Level Rise/Coastal Hazards:

- Whether the Project site is at risk from sea level rise and other coastal hazards and whether that risk has been adequately mitigated.
- Whether the project would interfere with efforts to manage for sea level rise in the future.

Transportation:

- Required analysis and mitigation of the project's air traffic safety impacts.

Whether the Commission Can Make The Findings Required by Public Resources Code Section 25525:

- Whether the Project conflicts with the City of Oxnard's land use policies, regulations, and plans and whether it conflicts with other applicable regulations and policies, including the California Coastal Act.
- Whether the Commission can override conflicts between the project and applicable land use regulations and policies.
- Whether the project serves the public convenience and necessity or whether there are feasible and prudent alternatives, including preferred resources and battery storage, that would serve the local capacity requirements.

Whether the Commission has consulted with the City of Oxnard about measures that would avoid or reduce conflicts with City land use policies.

DATED: February 15, 2017

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