

DOCKETED

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SHUTE, MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

ELLISON FOLK
Attorney
folk@smwlaw.com

October 14, 2016

John Chillerni, President
NRG Oxnard Energy Center, LLC
100 California Street, Suite 650
San Francisco, California 94111

Re: Puente Power Project (15-AFC-01); Data Requests, Set 6 (Nos. 104-111)

Dear Mr. Chillerni:

Pursuant to Title 20, California Code of Regulations, section 1716(a), the City of Oxnard requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand proposed changes to the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures and alternatives.

In this Set 6, Data Requests are being made in the technical area of Soil and Water Resources. Written responses to the enclosed data requests are due to the City staff on or before November 14, 2016.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the City and me within 20 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 17.16(f)).

If you have any questions regarding the enclosed data requests, please call me at (415) 552-7272.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Ellison Folk

Encl.

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 DATA REQUESTS,
SET 6**

ELLISON FOLK (State Bar No. 149232)
EDWARD T. SCHEXNAYDER (State Bar No. 284494)
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
Telephone: (415) 552-7272
Facsimile: (415) 552-5816
Folk@smwlaw.com
Schexnayder@smwlaw.com

Attorneys for the CITY OF OXNARD

SOIL AND WATER RESOURCES

Data Request No. 104:

The Edison canal receives stormwater discharge from two County of Ventura Watershed Protection District (VCWPD) drainage channels, the West Fifth Street Drain, and the Doris Drain (see attached FEMA map 903F), as well as discharges from surrounding agricultural operations and adjacent properties. What is the canal's drainage design capacity and how much of that capacity do the existing drainages fill? What impact would NRG's proposed discharge have on the canal's ability to accommodate all discharge sources during an 100 year storm event.

Data Request No. 105:

FEMA FIRM maps that were just released assume that there is no discharge from NRG properties into the canal. What impact would discharge into the canal have on the flooding potential associated with the canal?

Data Request No. 106:

What is the likelihood that during the co-occurrence of high tide and a 100-year storm event that NRG's proposed discharge will 'back up' behind the discharge of the VCWPD at full volume flows, and increase flooding risk near Harbor Boulevard or within the NRG facility?

Data Request No. 107:

Would 2 feet of sea level rise alter the answers to questions 105 and 106?

Data Request No. 108:

NRG's plans indicate that the dune adjacent to the outfall will be restored following outfall removal. The Puente project relies on the dune that fronts the project site as protection from sea level rise, flooding, and other coastal hazards. Please discuss how NRG will maintain the integrity the dune system once it is restored.

Data Request No. 109:

Any environmental analysis must consider alternatives and mitigation. To assist in determining whether discharge to the Edison Canal is the only feasible measure to reduce impacts associated with use of the existing outfall across the beach, please provide an analysis of the feasibility of discharging into the City of Oxnard's sanitary sewer system, which currently has a 12" main trunk line at Harbor Boulevard and Beachcomber Way.

Data Request No. 110:

The current outfall crosses public tidelands before discharging into the Pacific Ocean. Please provide all communications with the State Lands Commission regarding ownership of the property over which the outfall and drainage passes or regarding the outfall and discharge itself.

Data Request No. 111:

How would the MGS stormwater collection system discharge to the ocean during periods of high runoff if the outfall is removed?

DATED: October 14, 2016

SHUTE, MIHALY & WEINBERGER LLP

By: s/ Ellison Folk

ELLISON FOLK

EDWARD T. SCHEXNAYDER

Attorneys for the CITY OF OXNARD

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