

Th 12c

ADDENDUM TO COMMISSION PACKET FOR ENERGY, OCEAN RESOURCES and FEDERAL CONSISTENCY

For Thursday, May 8, 2008

Item No. Th 12c

A-4-OXN-07-096

Southern California Edison Co.

- **Staff Modifications**
- **Ex Parte Communications**
- **Correspondence**

CALIFORNIA COASTAL COMMISSION

455 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200



Th12c

May 6, 2008

To: Coastal Commissioners and Interested Persons

From: Alison Dettmer, Deputy Director
Cassidy Teufel, Analyst, Energy, Ocean Resources & Federal Consistency Division

Subject: **STAFF REPORT ADDENDUM for Item Th12c**
Coastal Development Permit Appeal A-4-OXN-07-096 (Southern California Edison Company, Oxnard)

Coastal Commission staff recommends the following modifications to the staff report. Deletions are shown with ~~striketrough~~ and additions are underlined.

[MODIFICATION 1: To be inserted into the final partial sentence on page 4 of the staff report]

The Commission in **Special Condition 6 7** requires that if the independent assessment concludes that operation of the...

[MODIFICATION 2: To be inserted into Special Condition 3 on pages 6 and 7 of the staff report]

3. **Landscaping.** Prior to initiating any landscaping work, ~~issuance of this coastal development permit~~, SCE shall submit, for Executive Director approval, a revised Landscaping Plan that does not include the use of invasive plants and includes:
 - (a) Replacement of all tall and medium sized tree species noted on the proposed landscaping plan included as Exhibit 4 with a selection of native bush and shrub species that provide maximum visual screening of the project site without providing nesting habitat for birds known to prey on western snowy plovers, California least terns or their eggs, nestlings or fledglings;

- (b) Installation of an underground drip irrigation system that is appropriate for native plant species and minimizes water use;
- (c) Avoidance of landscaping or construction activities, with the exception of dewatering wastewater discharge, natural gas pipeline installation on Harbor Boulevard over Mandalay Canal, and use of existing roads for equipment access, within 50 feet of Mandalay State Beach and the 100 feet of Mandalay Canal;
- (d) Measures to minimize water use and the application of fertilizers, pesticides and herbicides;
- (e) Provisions for implementing the removal of invasive plant species including along the proposed natural gas pipeline and transmission line routes;
- (f) Provisions for documenting and reporting the physical and biological "as built" condition of the project site within 30 days of completion of the initial landscaping activities;

...

[MODIFICATION 3: To be inserted into the first and second sentences of Special Condition 4(b) on page 7 of the staff report]

Following final designation of specific locations for all project activities to the east of Harbor Boulevard, SCE shall consult with the City of Oxnard and the California Department of Fish and Game to retain the services of a botanist with experience identifying the Ventura marsh milkvetch, salt marsh bird's-beak, red sand-verbena, dunedelion, estuary seablite, and wooly seablite to conduct a focused survey during the flowering season (July – October) for these plants in those locations. If any individuals of these or any other special status plant species are detected, the botanist shall provide notification to the Executive Director of the Coastal Commission as well as the local offices of the California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (FWS) and no project activities shall be conducted to the east of Harbor Boulevard until consultation with these agencies is carried out and an impact avoidance plan that includes fencing and any feasible re-location or re-routing of project activities necessary to avoid sensitive plant species has been reviewed and approved by the Executive Director. ~~If the Executive Director determines, after consultation with FWS and CDFG, that impacts to sensitive plant species are unavoidable~~In addition, SCE shall submit for the Executive Director's approval a Habitat Restoration Plan to mitigate impacts to sensitive plant species restore the construction corridor east of Harbor Boulevard. The plan shall provide for no less than 1:1 mitigation for all impacts to the aforementioned species affected during project-related activities and provide for the re-vegetation of all project-related disturbance areas to the east of Harbor Boulevard with a selection of representative dune scrub species propagated from locally collected seed. The plan shall describe mitigation to be implemented for these effects, including location, planting plans, quantitative performance standards, mitigation time lines, monitoring requirements, and funding to be provided for implementation. The submitted plan shall first be approved by the FWS. ~~If a Habitat Restoration Plan is required, P~~project activities cannot commence until the Executive Director approves the Habitat Restoration Plan.

[MODIFICATION 4: To be inserted into the final sentence of Special Condition 4(b) on page 8 of the staff report]

...If a Habitat Restoration Plan is required, project activities east of Harbor Boulevard and in areas that contain identified impacts, cannot commence until the Executive Director approves the Habitat Restoration Plan.

[MODIFICATION 5: To be inserted into Special Condition 5 on page 8 of the staff report]

5. **Geologic Hazards.** SCE shall incorporate all recommendations contained in the Geotechnical Investigation, dated December 13, 2006, prepared by Kleinfelder, Inc. into all final design and construction plans. Prior to issuance of this coastal development permit, SCE shall submit evidence of Kleinfelder, Inc.'s review and approval that all of its design criteria were incorporated into all final design and construction plans for the of all project plans. Evidence shall include affixation of the consulting geologists' stamp and signature to the final project plans and designs. If implementation of Kleinfelder's recommendations result in project modifications, an amendment to this coastal development permit may be required.

[MODIFICATION 6: To be inserted into page 8 of the staff report, following Special Condition 5]

6. **Assumption of Risk, Waiver of Liability and Indemnity:** By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards from liquefaction and lateral spreading; (ii) to assume the risks to the applicant and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

[MODIFICATION 7: To be inserted into page 8 of the staff report, re-numbered Greenhouse Gas Emissions Special Condition]

67. **Greenhouse Gas Emissions:** If the...

[MODIFICATION 8: To be inserted into page 24 of the staff report, within the paragraph at the top of the page]

...The Commission therefore finds that considering the distance of the SCE property line from the Mandalay Canal and the inclusion of a vegetated bioswale along the northern edge of the proposed project site, project activities proposed for this area are not likely to adversely affect the wetland habitat provided by the Mandalay Canal. In addition, SCE has informed Commission staff that "Reliant uses the land between our fenceline and the canal for industrial purposes and has an access road running adjacent to our property along which they currently conduct maintenance activities closer to the water than 50 feet. Similarly, there is a transmission line running down this same strip of land." To further protect the resources of the Mandalay Canal in this area, **Special Condition 3(c)** requires that all project development, with the exception of dewatering wastewater discharge and installation of the proposed natural gas pipeline on Harbor Boulevard over Mandalay Canal, remain more than 50+00 feet from the Mandalay Canal. The Commission believes the minimum buffer distance is sufficient in this area due to the existing buffer provided by the access road between proposed work and the Mandalay Canal (as described above). An exception to **Special Condition 3(c)** is specified for the discharge of dewatering wastewater because this discharge would occur through an existing storm drain and is anticipated to be drawn into the Reliant Mandalay Generating Station's cooling system with minimal potential to adversely impact the resources of the Mandalay Canal. An additional exemption is provided for the natural gas pipeline installation on Harbor Boulevard over the Mandalay Canal because this installation activity would make use of an existing bridge and roadway to remain outside and above the Mandalay Canal and therefore has very low potential to result in adverse impacts to the canal.

Although the proposed replacement of transmission poles shown on page 3 of Exhibit 1 appears to be within 50 feet of the Mandalay Canal to the east of Harbor Boulevard, SCE has committed to maximize the transmission line span distance over the canal to ensure that new and replacement poles are installed at least 50 feet from the edge of the Mandalay Canal and all associated construction and removal activities occur outside of the buffer area required under **Special Condition 3(c)**. While a larger buffer distance in this area may provide a greater level of protection for the wetland vegetation and resources of the canal, SCE notes that an additional increase in the transmission line span across the Mandalay Canal to accommodate a larger buffer area would necessitate the installation of taller and larger engineered steel transmission poles on either side of the canal in this location. These poles would require a larger disturbance footprint during installation and would be 5 to 10 feet taller than the wood transmission poles that are currently proposed. Considering this larger disturbance footprint as well as the current buffer provided by the existence of a dirt access and maintenance road between the proposed southern pole location and the canal (shown on page 1 of Exhibit 1), the Commission finds that the establishment of a 50 foot buffer, as specified in **Special Condition 3(c)** is sufficient to minimize the potential adverse impacts to the wetland resources of the Mandalay Canal that may result from the proposed installation of transmission poles. With the inclusion of this condition, the Commission finds that the

proposed project is in conformance with the provisions and buffer distance requirements of LCP Policy 6.

[MODIFICATION 9: To be inserted into page 24 of the staff report, within the third sentence of the third paragraph]

Given this proximity, the potential exists for sensitive plant species to exist within the two acre proposed project disturbance limits. To provide for the protection of these sensitive species, **Special Condition 4(e) 4(b)** would require a botanical survey of the proposed disturbance areas once they have been designated. To facilitate the discovery and identification of special status dune scrub species, this survey would be carried out during the late summer to fall flowering season for these annual and perennial plants.

[MODIFICATION 9: To be inserted into pages 24 and 25 of the staff report, within the final paragraph of page 24 and initial paragraph of page 25]

Approval of this plan by the Executive Director shall be obtained prior to the initiation of construction or ground disturbance activities to the east of Harbor Boulevard. If impacts to sensitive plant species are determined to be unavoidable after consultation with the Commission, FWS, and CDFG, necessary take permits shall be obtained from FWS and/or CDFG by SCE. In addition, and SCE shall submit for Executive Director review and approval a habitat mitigation and restoration plan to restore the construction corridor east of Harbor Boulevard for impacts to sensitive plant species. The plan shall provide for no less than 1:1 mitigation for all impacts to the aforementioned species affected during project-related activities and provide for the re-vegetation of all project-related disturbance areas to the east of Harbor Boulevard with a selection of representative dune scrub species propagated from locally collected seed. The plan shall describe mitigation to be implemented for these effects, including location, planting plans, quantitative performance standards, mitigation time lines, monitoring requirements, and funding to be provided for implementation. The submitted plan shall first be approved by the U.S. Fish and Wildlife Service.

Restoration of project-related disturbance areas to the east of Harbor Boulevard would ensure that the affect of natural gas pipeline and transmission pole installation and construction activities on native dune scrub vegetation is minimized and mitigated. In addition, to further facilitate the restoration of these areas Special Condition 3(e) requires that all invasive plant species are removed from project construction areas. This condition shall provide for a decrease in competition among native and invasive species and enhance the restoration and growth of native dune scrub species.

[MODIFICATION 10: To be included on page 27 of the staff report, at the beginning of the third paragraph]

To ensure the successful screening of the peaker plant for the life of the project, the Commission is also requiring in **Special Condition 3(e) (f)** through **(i)** that SCE add to its revised landscaping plan periodic monitoring and the development of success criteria, contingency plans and maintenance standards.

[MODIFICATION 11: To be included on page 29 of the staff report, prior to the final sentence of the final paragraph]

The Commission's staff geologist reviewed the geotechnical report and agrees with the recommendations it contains. **Special Condition 5** requires that SCE implement the recommendations detailed in the project's geotechnical report (Kleinfelder, 2006) as well as the relevant policies of the Uniform Building Code and California Building Code. Although Kleinfelder Inc. has no longer been retained as SCE's geotechnical consultant, because this firm developed the hazard risk minimization recommendations proposed to be used for this project, Special Condition 5 requires that Kleinfelder Inc. provide review and approval of all final project design and construction plans to ensure that its design criteria have been appropriately incorporated. As conditioned, the Commission finds the proposed project consistent with LCP Policy 39.

[MODIFICATION 12: To be inserted into page 31 of the staff report, within the first partial sentence]

In addition, **Special Condition 3(b)** requires that the landscaping plan be revised to include the use of ~~underground drip irrigation~~ an irrigation system that minimizes water use and is appropriate for native plant species. Although LCP Policy 41 specifies that water conservation methods include underground drip irrigation systems, such systems may not be appropriate for the native shrub, bush and grass species that would be used within the project's landscaping. Some native species do not do well with drip irrigation as too much water may be added to the roots with this type of system to encourage root growth and avoid rot due to over-saturation. In addition, because the project would make use of low-water use vegetation for landscaping, within several years landscaping plants should be sustained with little or no water beyond what is provided through natural precipitation. The installation of a permanent underground irrigation system may therefore not be needed or appropriate in this case. As described in Special Condition 3, SCE's irrigation system must be one that minimizes water use and must be approved by the Executive Director prior to implementation.

[MODIFICATION 13: To be inserted into page 31 of the staff report, within the Mitigated Negative Declaration excerpt]

Overall, the volume of water required to operate this type of facility [the peaker plant] is very low, the main water uses are for direct injection into the turbine to control NOx emissions (50 gpm) and spraying a mist into the inlet of the combustion turbine to lower air temperature to improve efficiency ~~942 gpm.~~ (12 gpm).

[MODIFICATION 14: To be inserted into pages 42 of the staff report, within the first complete sentence]

The Commission is further requiring in **Special Condition 6 7** that if the independent assessment...

[MODIFICATION 15: To be inserted into pages 44 and 45 of the staff report, within the list of substantive file documents]

Southern California Edison Company, Letter to California Coastal Commission (with attachments), April 9, 2008.

Southern California Edison Company, Letter to California Coastal Commission (with attachments), February 21, 2008.

Item Th12c
Appeal No. A-4-OXN-07-096
Southern California Edison

EX PARTE COMMUNICATIONS

Chairman Krue

FORM FOR DISCLOSURE OF
EX PARTE COMMUNICATIONS

RECEIVED
APR 29 2008
CALIFORNIA
COASTAL COMMISSION

Name or description of project , LPC, etc: Southern California Edison Oxnard
Peaker Project Appeal No.
A-4-OXN-07-096 Agenda Item Th12c

Date and time of receipt of communication: April 29, 2008; 9:45 a.m.

Location of communication: La Jolla, CA

Type of communication (letter, facsimile, etc.): face-to-face meeting; Commissioner
Pat Krue was present

Person(s) Initiating communication: David Kaye, SCE, Applicants
Susan McCabe, McCabe & Company
Rick Zbur, Latham & Watkins

Detailed substantive description of content of communication:
(Attach a copy of the complete text of any written material received.)

Applicant gave me an overview of the project indicating they support the staff recommendation. They covered the information in the briefing materials previously provided to the Coastal Commission staff.

4/29/08
Date


Chairman Pat Krue

**FORM FOR DISCLOSURE OF
EX-PARTE COMMUNICATIONS****RECEIVED**
MAY 02 2008
CALIFORNIA
COASTAL COMMISSION

Name or description of the project: Thursday 12.c. Appeal No. A-4-
OXN-07-096 (Southern California
Edison, Oxnard)

Time/Date of communication: 9am, May 2, 2008

Location of communication: La Jolla

Person(s) initiating communication: Gabriel Solmer, Marco Gonzalez,
Bruce Reznik & Joanne Persson

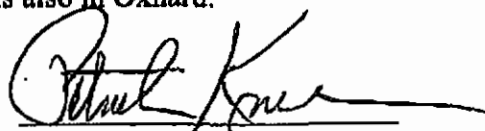
Person(s) receiving communication: Patrick Kruer

Type of communication: Meeting

Urged opposition to staff recommendation of approval with conditions. Any industrial facility, especially a power generating facility, located in the fragile and sensitive coastal zone, must have full environmental review.

- Alternative sites must be evaluated in an EIR. For example, since the peaker is not coastal dependent, the SCE substation in Moorpark, and other inland alternatives that are not in the Coastal Zone, must be evaluated.
- Peaker plant emissions must be accurately evaluated in an EIR. Emissions will not decrease, because the electricity will first be transmitted to the Santa Clara Station in Ventura, CA before any distribution to the Oxnard area or to other local areas. SCE's emissions projections are averaged on a yearly basis rather than a daily basis of actual days of peaker use, which understates the emissions during actual use.
- The Mandalay Beach site cannot be presumed to be an expansion within an existing site because this site and the neighboring Reliant Generating Station site are under separate ownership. The Independent System Operator is studying the RGS as not essential to the grid and not suitable for repowering, and it could be decommissioned.
- Environmental Justice must be addressed in an EIR. Oxnard has a significant minority population. Oxnard is already home to two power generation plants at Mandalay Beach and Ormond Beach as well as several cogeneration plants. The Halaco metals recycling Superfund Priority listed site is also in Oxnard.

Date: May 2, 2008


Patrick Kruer

May 05 08 08:47a

Drs. Dan & Mary Secord

805 682 3756

p.3

WED. ITEM 12C

DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project:

Southern California Edison Oxnard Peaker Power Plant (A-4-OXN-07-096)

Date and time of receipt of communication:

Saturday, May 3, 2008 @ 3:00PM

Location of communication:

Santa Barbara

Type of communication:

Meeting

Person(s) in attendance at time of communication:

David Kay, Rick Zbur (by phone)

Susan McCabe

Person(s) receiving communication:

Dan Secord

Detailed substantive description of the content of communication:

(Attach a copy of the complete text of any written material received.)

The applicants explained the project which is an appeal of the City of Oxnard denial of a peaker power plant which is the last of five peaker plants to be constructed to provide electricity during the hot summer months statewide. They are in agreement with the staff recommendation. They covered the material in the briefing materials previously provided to the Commission staff.

Date:

Signature of Commissioner: _____



RECEIVED

MAY 05 2008

CALIFORNIA
COASTAL COMMISSION

WED 11:11:23

DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project:

Southern California Edison Oxnard Peaker Power Plant (A-4-OXN-07-096)

Date and time of receipt of communication:

Monday, May 5, 2008 @ 10:00 AM

Location of communication:

Phone call

Type of communication:

Phone call

Person(s) in attendance at time of communication:

David Kay, Rick Zbur, Susan McCabe

Person(s) receiving communication:

Bonnie Neely

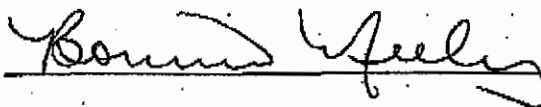
Detailed substantive description of the content of communication:

(Attach a copy of the complete text of any written material received.)

The applicants explained the project which is an appeal of the City of Oxnard denial of a peaker power plant which is the last of five peaker plants to be constructed to provide electricity during the hot summer months statewide. They are in agreement with the staff recommendation. They covered the material in the briefing materials previously provided to the Commission staff.

Date:

5-5-08

Signature of Commissioner:

**FORM FOR DISCLOSURE
OF EX PARTE
COMMUNICATION****RECEIVED**
MAY 05 2008
CALIFORNIA
COASTAL COMMISSION**Date and time of communication:**May 5th, 2008 - 3:15 p.m.

(For messages sent to a Commissioner by mail or facsimile or received as a telephone or other message, date time of receipt should be indicated.)

Location of communication:

Commissioner Neely's Eureka Office

(For communications sent by mail or facsimile, or received as a telephone or other message, indicate the means of transmission.)

Person(s) initiating communication:

ORCA/Maggy Herbelin

Person(s) receiving communication:

Commissioner Bonnie Neely

Name or description of project:

CC May Agenda Item Th12c. Appeal by Southern CA Edison from decision of City of Oxnard denying permit to construct and operate 45 megawatt "peaker" power plant on Harbor Blvd, Oxnard, Ventura County.

Detailed substantive description of content of communication:

(If communication included written material, attach a copy of the complete text of the written material.)

Met with Maggie Herbelin regarding appeal by Southern CA Edison from decision of City of Oxnard denying permit to construct and operate 45 megawatt "peaker" power plant on Harbor Blvd, Oxnard. Ms. Herbelin concerns included #1 All alternatives need to be analyzed in a full EIR; #2 Emissions need to be accurately analyzed through an EIR; #3 the project can't be considered an expansion of the existing operation because the properties are under different ownerships; and, under environmental justice, there are already so many plants there. The Halaco plant is there and it's a superfund priority site. The neighborhood is already overburdened with facilities of this nature:

Date:
Signature of Commissioner

If the communication was provided at the same time to staff as it was provided to a Commissioner, the communication is not ex parte and this form does not need to be filled out.

If communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication, complete this form and transmit it to the Executive Director within seven days of the communication. If it is reasonable to believe that the completed form will not arrive by U.S. mail at the Commission's main office prior to the commencement of the meeting, other means of delivery should be used, such as facsimile, overnight mail, or personal delivery by the Commissioner to the Executive Director at the meeting prior to the time that the hearing on the matter commences.

If communication occurred within seven days of the hearing, complete this form, provide the information orally on the record of the proceedings and provide the Executive Director with a copy of any written material that was part of the communication.

Item Th12c
Appeal No. A-4-OXN-07-096
Southern California Edison

CORRESPONDENCE



May 2, 2008

Chairman Kruer and Honorable Commissioners
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA
94105-5200

Agenda Item Th12c

Re: Appeal No. A-4-OXN-07-096 (Southern California Edison Company, Oxnard
"Peaker" Power Plant)

Dear Chairman Kruer and Honorable Commissioners:

We are writing in response to the Staff Report regarding the application by Southern California Edison ("SCE") for the above-referenced Coastal Development Permit ("CDP") for the Oxnard Peaker Project ("Project"), which is scheduled to be considered by the Coastal Commission (the "Commission") at its May 8, 2008 meeting.

The Project will provide an urgently needed and environmentally responsible solution to reliability issues facing California's electric generation and transmission infrastructure. It is consistent with and will further Coastal Act and Local Coastal Program ("LCP") policies, in addition to providing significant public and environmental benefits. Set forth below is a brief discussion of the Project's background and an explanation of why it is urgently needed and environmentally and operationally superior to alternative sites, along with an analysis of the Project's consistency with the City of Oxnard's LCP – including LCP policies concerning biological resources and sensitive habitat areas – and its consistency with climate change policies.

We appreciate Staff's hard work in analyzing the issues involved in the CDP application and agree with Staff's conclusions regarding the Project's consistency with the City of Oxnard's certified LCP and its recommendation that the Commission grant the CDP.¹ We therefore

¹ SCE and Commission Staff have been in discussion regarding minor modifications to the Special Conditions contained in the Staff Report. Any such modified Special Conditions will be contained in the Revised Staff Report. However, if SCE and Staff are unable to resolve their differences, SCE reserves its right to raise its concerns and/or issues with the Commissioners at the May 8, 2008 hearing.

respectfully request that the Commission accept Staff's recommendation and approve a CDP for SCE's much-needed Project.

I. PROJECT BACKGROUND

SCE proposes to build a 45-MW, natural gas-fired electrical generation facility, to be located on a 16-acre, SCE-owned vacant site adjacent to (and within the same Energy Coastal ("EC") subzone as) the existing, Reliant Energy's Mandalay Generating Station. The site was formerly occupied by oil storage tanks, and is separated from the ocean by the Mandalay plant to the west and northwest and by the DCOR oil processing facilities to the southwest. The Project is expected to cost more than \$50 million to build, and is therefore a "major energy facility." 14 Cal. Code Regs. § 13012.

The SCE facility would be a "peaker" plant, meaning that it would be capable of being started up and fully dispatched on very short notice (approximately 10 minutes) and would operate primarily at times of peak electricity demand or during other system strains when a major power plant or transmission line becomes suddenly unavailable. The peaker will also have "black start" capability, meaning it will have the ability to start up without any external power source. It thus will be able to provide the power needed to restart other power plants and restore electrical service during area-wide power outages, as well as provide some power for essential services while the larger, slower-starting plants come back on-line.

SCE undertook the development of this facility in response to the *Assigned Commissioner's Ruling Addressing Electric Reliability Needs in Southern California for Summer 2007* ("ACR"), issued by CPUC President Michael Peevey on August 15, 2006. The ACR directed SCE to pursue, among other things, the immediate development of up to five SCE-owned, black-start capable peaker facilities (totaling up to 250-MW), which could be on-line by the Summer of 2007. Four of the requested peaker plants (located in the cities of Norwalk, Ontario, Rancho Cucamonga and Stanton) were granted mitigated negative declarations ("MNDs") under CEQA and are now built and operational. This Project is the last of the five.

II. THE PROJECT IS URGENTLY NEEDED

The Project would provide an important and much-needed improvement to California's electric generation and transmission infrastructure. According to the CPUC, the surprising growth in electricity demand throughout the state, coupled with the July 2006 heat storm, exposed certain vulnerabilities in the electric generation and transmission infrastructure that required immediate attention to assure future reliability. The California Independent System Operator's ("CAISO") assessment for the Summer of 2006 had indicated that the system could handle a demand in excess of 48,000-MW, with limited or no impact on firm load customers. However, the peak demand during the heat wave was 51,000-MW, well above any of the scenarios that were assumed in CAISO's assessment. The Summer 2006 demand was 12% higher than 2005's record; 6% higher than the worst case scenario CAISO had analyzed in its assessment; and 38% higher than the peak demand of the crisis year 2001. Moreover, it represented a demand that was not forecast to occur for another five years. Across CAISO's service area, weighted average temperatures during the heat wave ranged between 106 and 110 degrees Fahrenheit on various days, which is higher than any temperatures recorded in the 30-

year history of temperature models used by CAISO. Even with the additional installed and anticipated new generating resources that will have come on-line between the summers of 2006 and 2008, CAISO still predicts a 10% risk that operating reserves in Southern California could be insufficient this summer. Although new resources have been procured and will continue to come on-line, SCE predicts that there remains a significant need for additional peaking resources in the future.

To improve reliability for the Summer of 2007, the ACR directed SCE to increase participation in its Air Conditioning Cycling Program, to pursue accelerated procurement of more peak load capacity from independent power plant developers, and to pursue the development and installation of up to 250-MW of SCE-owned, black-start, dispatchable generation capacity within its service territory. After a study of its entire system, SCE selected five locations within its system as best suited for siting additional peaker generation to enhance reliable operations. The Oxnard/Ventura/Santa Barbara area was identified as having the greatest need for quick start and black start capability to support local reliability, and the Mandalay-adjacent property was identified as the optimal peaker site within that region.

Oxnard and the surrounding Ventura County/Santa Barbara area are relatively vulnerable to prolonged and widespread power outages because that region's only transmission linkage to the rest of the state's power grid is through a single substation and transmission corridor. If that linkage and the existing Oxnard power plants were to be taken off-line at the same time, for example by an earthquake, the region would have no other adequate power supply route. By contrast, most other areas of the power grid, and *all* other areas of comparable population size on SCE's system, are accessible through alternate routes. On top of that region-wide vulnerability, the Santa Barbara area specifically is doubly vulnerable because its only transmission linkage with Ventura County is by a single transmission corridor that runs through an historically fire-prone, mountainous areas.

The need for the Project is thus critical and continues to grow. The Project would be used to provide power (i) to SCE's electric customers in the Oxnard area during times of peak power use, (ii) during outages of other generating or transmission equipment that normally provide power to the area, (iii) to assist in voltage regulation of the SCE electric grid in the area, (iv) to provide black start assistance to bring the Mandalay Generating Station on-line, and (v) to supply some emergency power to the Santa Barbara area, via the local distribution lines along the coast, if the inland transmission line to Santa Barbara is disabled by fire or any other factor.

The peaking and grid-reliability roles that the Project is intended to serve cannot be met by solar or other renewable resources, since it is essential that the plant be able to come on-line very rapidly, at any time of the day or night and regardless of weather conditions. The Project is not displacing renewable power plants, or otherwise inconsistent in any way with the state's move towards more use of renewable resources. On the contrary, peaker plants like the Project are expected to be even more important in the future, since their quick start-up capabilities make them ideal to supplement and "fill in behind" intermittent renewable sources like wind and solar.

III. THE PROJECT IS CONSISTENT WITH THE CITY OF OXNARD'S CERTIFIED LCP

The only rationale provided for the City Council's resolution denying SCE's CDP application is that the Project is not "coastal dependent" and is therefore inconsistent with the LCP. The City asserts that its coastal zoning ordinance prohibits any non-coastal dependent development on the site. But no provision in the zoning ordinance or elsewhere in the LCP states or can be reasonably construed to imply that an energy development must be "coastal dependent" to be permitted at the proposed site. To the contrary, as Staff concluded, the City's coastal zoning ordinance expressly allows energy development on the site and does not specify that it must be coastal dependent. The record clearly supports the Staff Report's finding that the Project may be developed at the proposed site under the LCP and coastal zoning ordinance.

The proposed development site lies entirely within the EC subzone. Pursuant to Section 17-20 of the City's coastal zoning ordinance, the EC subzone expressly allows "electrical power generating plant and accessory uses normally associated with said power generating facility." Because the proposed peaker facility is an electrical power generating plant, it is unquestionably permitted at the proposed development site under the City's coastal zoning ordinance.

The City's assertion that energy development facilities must be "coastal dependent" is not supported. Nowhere does the zoning ordinance include such a requirement; instead, it merely states that "coastal dependent energy facilities shall be *encouraged* to locate or expand within existing sites and shall be permitted reasonable long-term growth." Plainly, Section 17-20(A)'s "encouragement" that coastal dependent energy facilities locate or expand within existing energy sites, rather than occupying new areas of the coast, does not bar, and is not inconsistent with, allowing a non-coastal dependent facility to also locate within a site already specifically zoned for, and long used for, energy facilities. The siting of the peaker at the proposed site is completely consistent with the goal of concentrating energy facilities in already-used energy sites rather than occupying new areas.

Moreover, to require energy developments to be coastal dependent in order to be permitted in the EC zone is inconsistent with the overall policy objectives of the LCP. Indeed, the Coastal Act mandates that LCPs contain policies that require concentration and consolidation of industrial developments, including energy facilities, and maintain and enhance marine resources.

The City's rationale for denying the Project's CDP would bar any future, non-coastal dependent upgrade or addition to the two existing power plants within the City of Oxnard that require CDPs, and any upgrade or addition to the transmission substations within the City's coastal zone that requires a CDP. Requiring developments in the EC to be coastal dependent forces non-coastal dependent energy facilities to locate along new areas of the coast rather than locating or expanding within existing energy sites. The City's interpretation of LCP Section 17-20 is inconsistent and at odds with the LCP's policy of concentrating energy facilities.

Further, the City's interpretation of Section 17-20 conflicts with the LCP's policy of maintaining and enhancing marine life. Even if the LCP required the Project to be coastal dependent—which it does not, as Staff concluded—such a requirement would directly conflict

with the LCP's policy of maintaining and enhancing marine resources because the Project would be required to have seawater intake.

IV. THE PROJECT IS ENVIRONMENTALLY AND OPERATIONALLY SUPERIOR TO ALTERNATIVE SITES

Based on a thorough review of potential peaker sites throughout SCE's system, SCE concluded that the Project's site is optimal for a peaker, from both an environmental and an operational standpoint. First, as discussed above, the Ventura County/Santa Barbara region including Oxnard is in especially dire need of black start capable peaker generation because of the serious transmission constraints affecting that region. Siting a peaker within that general area also is desirable because the other four SCE peaker sites are in inland Los Angeles, Orange and San Bernardino counties, and it is highly preferable for grid-reliability reasons to spread the peaker locations out to the extent feasible. All of the other four sites were also selected to provide black start capability to nearby large plants that could be used to bring power back on line in their region of the electric grid.

Within the Ventura County/Santa Barbara region, the Project site stands out as superior for several reasons. Environmentally, it is a brownfield site, formerly occupied by oil tanks, and located immediately adjacent to (and separated from the ocean by) the much larger Mandalay power plant and DCOR oil processing facilities. The site also is almost adjacent to the SCE substation where the Project will connect to the grid, minimizing the length of new transmission lines required. Also, because of the size and configuration of the site and the width of the adjacent Harbor Boulevard, a peaker at this site can be placed further from the nearest possible residential development than at many other potential sites.

Operationally, the site is at the ideal location on SCE's electrical system to serve multiple important purposes. Its line-proximity to the Mandalay plant makes it the best and most reliable location from which to black start Mandalay, and thereby restore power to the region in the event of a regional blackout. It also is at an excellent site on the system for providing emergency, interim power to the region's main population centers of Oxnard and Ventura while the Mandalay plant and then the Ormond Beach plant return to service. In addition, if the Ventura County-to-Santa Barbara transmission link is lost, a peaker at the Project site can feed power into the local distribution system that runs up the coast, and thereby help to provide emergency power to Santa Barbara until the transmission linkage can be restored.

V. THE PROJECT IS CONSISTENT WITH LCP POLICIES REGARDING BIOLOGICAL RESOURCES AND SENSITIVE HABITAT

The proposed site of the Project is an industrial site, next to the Mandalay Bay Power Plant. The site has been graded and is devoid of any significant vegetation. Not surprisingly, Staff concluded no portion of the Project site is designated an environmentally sensitive habitat area ("ESHA"). A biological resources assessment prepared by Keane Biological Consulting ("KBC Report") did not identify any "candidate, sensitive, or special-status species" on site.

There are areas known to support several special-status biological resources near the site, but none on it. Given the proximity to of the Project site to sensitive resources, the Commission

imposed certain Special Conditions designed to protect sensitive species should they appear during construction. The Staff Report's conclusion that the Project, as conditioned, is consistent with applicable LCP policies regarding the protection of biological resources and sensitive habitat areas is amply supported by the record.

The Project proposes the installation and removal of transmission poles and lines, and the trenching and placement of an approximately 1,800 foot natural gas pipeline, on a portion of the Project site east of Harbor Boulevard that includes coastal dune scrub. This area has not been designated ESHA and the Staff Report notes that this area is substantially degraded and does not provide the same level of ecological and habitat value as more intact southern dune scrub areas. According to the KBC Report, there is a low probability that the Ventura marsh milkvetch could occur in this area and no milkvetch was observed during field surveys. The Staff Report notes a potential for certain sensitive plant species to exist in this area because of its proximity to other more intact dune scrub areas and rare plant communities. In order to ensure the protection of any isolated plants of these species that might occur, the Commission imposed Special Condition 4(b), which requires a focused survey for specified sensitive plants to be performed in each precise location where Project activities will be conducted east of Harbor Boulevard (once they are identified). If any such plants are identified within the Project's disturbance limits, this condition requires that impact avoidance plans be developed in consultation with the Commission, California Department of Fish & Game and U.S. Fish & Wildlife Service.

The southern border of the Project site is adjacent to a portion of Mandalay State Beach Park identified as ESHA in the LCP and designated as a Resource Protection sub-zone in the City's Coastal Zoning Ordinance. In compliance with LCP Policy 6, Special Condition 3(c) requires the Project's landscaping and construction activities to be separated by at least 50 feet from the entire southern boundary of the Project site adjacent to the Resource Protection area. Staff concluded that a 50 foot buffer is sufficient here given the existing 20 foot wide dirt access road that currently separates the Project site from the state park and SCE's commitment to locate all development and construction activities an additional 30 feet north of this road.

Sensitive nesting habitat for the western snowy plover and California least tern exists approximately 1,000 feet to the west and southwest of the Project site. Special Condition 3(a) requires the replacement of proposed trees in the landscape plan with native brush and shrub species that are not expected to provide nesting habitat for predatory birds of concern.

Although the Project site is not a burrowing owl habitat, historic records show that the burrowing owl once existed on the Project site. The biological surveys conducted by KBC did not observe any burrowing owls or any burrows that could feasibly support burrowing owls. Subsequently, during soil testing, one burrowing owl was seen on the site. In order to ensure that the Project will not have an adverse impact on this species, Special Condition 4(c) requires a pre-construction survey for burrowing owls to be undertaken throughout the Project area no more than 30 days before ground disturbance activities begin, and further requires appropriate impact avoidance and mitigation plans to be submitted and approved by the Executive Director if any owls are observed or any burrows are found to be actively used.

SCE has also agreed to implement measures identified in the Project's MND to minimize potential adverse effects to biological resources or water quality in the Project area. These measures include pre-construction surveys of each construction area to identify native birds, and limitations regarding the type and quantity of hazardous materials that may be stored on-site.

VI. THE PROJECT IS EXPECTED TO RESULT IN A NET DECREASE IN GREENHOUSE GAS EMISSIONS, AND SCE WILL VOLUNTARILY COMPLY WITH SPECIAL CONDITION 6 REGARDING CLIMATE CHANGE

In concert with the Commission's authority to protect coastal resources from development-related impacts, the California Air Resources Board ("CARB") is the entity authorized to protect coastal resources from emissions-related impacts, as recognized in the Coastal Act and as set forth in Assembly Bill 32, the California Global Warming Solutions Act of 2006. The Commission's role regarding greenhouse gas emissions is to minimize energy use and to assure compliance with CARB and air pollution control district requirements. Coastal Act §§ 30253(4), 30414(a); Cal. Health & Safety Code §§ 38501(a), 38510.

SCE is deeply committed to reducing greenhouse gas emissions. Based on SCE's analysis, dated April 9, 2008, the installation of the peaker plant is expected to result in a net decrease in CO₂ equivalent emissions across SCE's generation portfolio, primarily due to the line loss benefits—the reduced energy loss from the changed path and distance that electricity must travel to reach the customer—created by the Project. Special Condition 7² requires an independent analysis to be performed at the direction of the Commission and a hearing on the results of the study. If the Commission disagrees with the study, it may require SCE to submit to the Commission a Greenhouse Gas Reduction and Mitigation Plan to address those emissions, which shall be subject to Commission approval consistent with existing laws, methodologies and standard practices established by CARB and the California Global Warming Solutions Act.

VII. ADDITIONAL CONDITIONS IMPOSED BY THE COMMISSION ENSURE CONSISTENCY WITH OTHER APPLICABLE LCP POLICIES

In addition to the Special Conditions discussed above concerning biological resources and greenhouse gas emissions, the Commission has imposed further requirements on the Project designed to prevent or minimize potential environmental impacts and ensure consistency with the LCP. In this regard, Special Condition 2 provides that the CDP incorporate mitigation measures identified in the Project MND concerning air quality, biological resources, cultural resources, hazards and hazardous materials, transportation, and traffic.

Special Conditions 3(a) and (b) ensure consistency with water conservation and municipal services goals in the LCP by requiring the exclusive use of native bush and shrub species for Project landscaping (in order to reduce the potentially elevated water requirements of non-native trees and species), as well as the installation of an irrigation system that minimizes water use.

² Staff had added a new Special Condition 6. Thus, the Greenhouse Gas Emissions Special Condition is now 7.

Special Conditions 3(e)-(i) address development of the landscaping plan to minimize impacts to visual resources and ensure consistency with LCP Policy 37. Among other things, these conditions require periodic monitoring and maintenance for a specified monitoring period, the development of goals and success criteria, contingency plans, and submission of a final monitoring report that must be approved by the Executive Director.

Special Condition 5 addresses potential impacts from natural hazards by requiring SCE to implement all recommendations included in the Project's Geotechnical Investigation prepared by Kleinfelder, Inc. The recommendations in Kleinfelder's report are intended to ensure the structural integrity of the proposed facility in the event of seismic activity, liquefaction or lateral spreading at the site. Prior to issuance of the CDP, SCE must submit evidence that Kleinfelder has reviewed and approved all Project plans for consistency with its recommendations.

We appreciate the Commission's consideration of this appeal, and respectfully request that the Commission accept the Staff's recommendation and approve the CDP for the Project.

Sincerely,

Signature on File

David W. Kay
Manager, Environmental Projects



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(800) 660-5474 EXT. 6542276
E-mail: kathy.long@ventura.org

May 5, 2008

California Coastal Commission
45 Fremont, suite 2000
San Francisco, CA 94105-2219

Re: Commission Appeal No.: A-4-OXN-07-096

Dear Honorable Chair and Commissioners;

To protect valuable resources along our Ventura County coastline, I urge the Coastal Commission to deny the permit to develop the proposed "peaker" electrical generation facility plant located 251 N. Harbor Boulevard. As the County Supervisor whose District includes the Ormond Beach wetlands, I work to protect and advocate for environmental sustainability in our County. Our community takes pride in Ventura County's diverse public recreational and environmental resources ranging from the Pacific Ocean to the Los Padres National Forest. The Oxnard coastline and the wetlands are home to several endangered and threatened species such as the Western Snowy Plover, Tidewater Goby, California Least Tern and rare dune species, and must be a priority.

The Ventura County coastline is a unique scenic benefit for the community. The City of Oxnard's adoption of the Coastal Land Use Plan takes seriously the opportunity to enhance the visual character, protect sensitive sites and quality of the coastline. The City of Oxnard has expressed that by overturning their denial and approving the facility, long range plans to restore the coastline will be inhibited. There are many peaker plants located throughout the state in non-coastal areas and an evaluation of alternative sites should be done.

The project site is bounded on the north by the existing Mandalay facility and channel; on the west by an existing oil processing facility, coastal dunes, and the Mandalay State Beach and Pacific Ocean; on the east are agriculture fields and on the southeast is the 292-unit Northshore at Mandalay Bay residential development. Industrial development does not completely surround the site. The addition of an energy facility will only perpetuate facilities to continue to exist along the coast, just when these non-coastal dependent facilities are moving toward being decommissioned.

I urge the Coastal Commission to continue the priority of protecting the future of our coastland and sensitive resources and deny the permit to develop the proposed "peaker" electrical generation facility.

Sincerely,

Signature on File

Kathy Long
Supervisor Third District



Recycled Paper



DEPARTMENT OF PARKS AND RECREATION

911 San Pedro Street

Ventura, CA 93003

805-585-1850/FAX:805-585-1857

Ruth Coleman, Director

May 2, 2008

California Coastal Commission

45 Fremont, Suite 2000

San Francisco CA 94105

Subject: A-4-OXN-07-096 - Edison Peaker Plant

Dear Commissioners:

As part of the action proposed in the above referenced De Novo Review the Commission will be asked to find that the documents submitted by Southern California Edison meet the requirements of CEQA. As an adjacent property owner having stewardship responsibility for a variety of sensitive natural resources we have found that the Draft Mitigated Negative Declaration for the proposed Edison Peaker Plant, 251 N. Harbor Blvd, is deficient. The following items detail those deficiencies:

- In describing the project's location it should be noted that **Mandalay State Beach** is to the **southeast** of the proposed plant site and **McGrath State Beach** is to the northwest of the site and the Reliant Energy Plant.
- When evaluating visual impacts of the proposed project it should be noted that, "the intervening land between Mandalay State Beach and the proposed project site" is **NOT** "dotted with existing oil processing structures that are approximately 70 feet high, and the stacks of the Mandalay Power Generation Facility which is 203 feet high". All that separates Mandalay State Beach from the proposed Peaker plant site is a six foot chain link fence on the Edison property. The existing road is only a service access not formal road within the Master Plan for the Park unit and no assumption should be made that that a road will always be at that location.
- Given all projects in the immediate area (Northshore at Mandalay Development) the environmental review document fails to evaluate cumulative impacts to natural resources at Mandalay State Beach and adequate mitigations have not been addressed considered.
- The extent of the project area has not been adequately defined for pre-construction biological survey purposes.
- Given extensive restoration activities undertaken at Mandalay State Beach, a native plant palette using locally collected seed should be required for landscaping.

- The acreage of both Mandalay and McGrath State Beaches parks what remains of these habitat types and as such are protected from urban development. Construction and intensification of use in the coastal area immediately adjacent to these two State Park properties does not appear to be adequately evaluated. The MND appears to look only at the proposed site and adjacent dunes. Limited investigation of impacts to the backdune or wetland sites has been considered.

Given the vanishing open spaces and the need for coastal recreation opportunities along our southern California Coast one would like to think that there is a more appropriate location outside of the coastal zone for this proposed facility. An adequate review of alternate sites must be addressed in the environmental document.

We do not support any action on this project until an adequate environmental review has been completed. Please feel free to contact me regarding additional information at (805) 585-1848 or at bfosb@parks.ca.gov.

Sincerely,

Signature on File

Barbara Fosbrink
California State Parks
Channel Coast District

cc. Chris Williamson, Senior Planner, City of Oxnard

Alison Dettmer

From: pilawqueen@aol.com
Sent: Tuesday, April 29, 2008 1:22 PM
To: Alison Dettmer
Subject: TH May 8 Item 12-c Appeal No.: A-4-OXN 09-096

There is significant opposition to this project at this location. Contrary to the staff report, the area is not primarily industrial. While there is some oil drilling taking place and the existing power plant (which is very old and rumored to be slated for decommissioning), the surrounding area is State Campground, State Beach, Agriculture and directly across the street, approximately 290 homes are being built. Harbor Blvd is going to be expanded to 4 lanes in the exact area where this plant would be placed. None of this is mentioned in staff's report. To assert that because there is some industrial there already so that it is appropriate to place more is poor planning.

I understand the start up noise is significant and consideration should be given to that effect on birds and wildlife.

When considering this project and the MND, I was convinced that nothing could be done to mitigate the visual effect of this plant. I questioned the need for the coastal location. And, although there was some ambiguity in the LCP, it seemed clear to me that the intent was to preserve coastal energy locations for those dependent on coastal resources.

I think Oxnard has made it clear that we do not want this plant on our coastal shores. We are doing what we can to clean up the messes left by prior generations of poor decisions.

I urge a no vote.

Thank you.

Deirdre Frank
Vice Chair
Oxnard Planning Commission

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Oxnard

Chamber of Commerce

April 28, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California 94105

RECEIVED

MAY 08 2008
May 8, 2008 Agenda Item 12.c.
Appeal No. A-4-0XN-07-096
Nancy Lindholm
In Favor of Project

RE: Southern California Edison Peaker Project

Chairman Kruer and California Coastal Commissioners:

The Oxnard Chamber of Commerce supports the proposed peaker project in Oxnard. We believe Edison's proposal incorporates the best available and cleanest burning technology that will have minimal impacts to our environment and greatly improve the view corridor along Harbor Boulevard.

The Chamber is pleased with the fact that the peaker plant's electricity will be tied into the local system for use by Oxnard customers. Many local businesses have equipment that is sensitive to fluctuations in voltage. The peaker plant will help avoid interruptions to businesses and provide power to residences during high demand periods, when existing plants may go off-line, and in the case of natural disasters such as fires, floods and earthquakes.

Unlike some public comments we have heard regarding Oxnard being forced to accommodate facilities such as the peaker plant, we believe it is prudent of the city to embrace the technology that will assure a more dependable supply of electricity for its residents and businesses.

For these reasons, we encourage the California Coastal Commission to approve the project.

Sincerely,

Signature on File

Nancy Lindholm
President/CEO



California ISO
Your Link to Power

California Independent System Operator Corporation

Yakout Mansour
President & Chief Executive Officer

Agenda Item 12(c)
Appeal No. A-4-OXN-07-096
Yakout Mansour, President & CEO
California Independent System Operator
(CAISO)
Position - In Favor

May 2, 2008

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, California 94105-2219

RE: Appeal No. A-4-OXN-07-096 (So. California Edison Co., Oxnard), Item 12-c

Dear Members of the Commission:

The California Independent System Operator Corporation ("ISO") supports the California Coastal Commission staff's recommendation to approve a Coastal Development Permit for Southern California Edison's Oxnard peaker project.

The ISO is a not-for-profit public-benefit corporation charged with operating the majority of California's high-voltage wholesale power grid. We are responsible for maintaining electric system reliability in compliance with applicable reliability standards and are the impartial link between power plants and the utilities that serve more than 30 million consumers.

The California ISO relies heavily on imports to meet electricity demand, especially on hot summer days when consumer demand exceeds what in-state generators can supply. Because of supply challenges associated with the extreme heat wave in August 2006, the California ISO urged the California Public Utilities Commission to direct the state's investor-owned utilities to procure additional quick start generation and demand response opportunities in order to increase peak supplies and enhance grid reliability. The Oxnard peaker project is one of the resulting projects.

Today, additional peaking resources are still needed. Demand growth and limitations on power plant operations in neighboring states may reduce the capacity available to California and increase the vulnerability of the power supply at critical times. The urgency of the situation post the summer of 2006 continues to demand close attention, especially in southern California.

In closing, we urge the Commission to approve the Oxnard peaker project as a necessary addition to the California electric system.

Sincerely yours,

Signature on File

Yakout Mansour
President & Chief Executive Officer



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MAY 02 2008

CALIFORNIA
COASTAL COMMISSION

April 29, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Commission Chair Kruer,

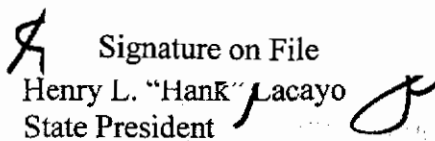
I'm writing to you as a resident of Ventura County and the State President for the Congress of California Seniors, a non-partisan broad based coalition of senior groups, whose primary responsibility is to speak out, pro or con, on issues impacting the economic interest and well being of senior citizens in the community.

We have been following closely Southern California Edison's peaker plant proposal within the confines of the City of Oxnard and want you know of our support for this project.

We urge the Commission to recognize the importance of a stable electrical source which is essential not only to our senior citizens but to the rest of the community including corresponding business concerns. The SCE Peaker Plant proposal addresses those needs and in addition will provide necessary insurance to reduce power outages and brown outs for all residents of the Oxnard plain.

We are pleased to voice support for this project and respectfully urge the California Coastal Commission to consider the need for a stable supply of energy in this community and approve Southern California Edison's peaker plant proposal.

Sincerely,


Signature on File
Henry L. "Hank" Lacayo
State President
3403 Bear Creek Drive
Newbury Park, CA 91320
805-498-7679
HankLacayo@aol.com





Ventura County Taxpayers Association

RECEIVED
APR 28 2008
CALIFORNIA
COASTAL COMMISSION

Patrick Kruer
Chair California Coastal Commission
45 Fremont Street, Suite 200
San Francisco, CA 940015

Dear Mr. Kruer:

The Ventura County Taxpayers Association is in support of the proposed Southern California Edison Peaker Plant near the Mandalay Generating Plant.

We are concerned that demand is outpacing new generation, especially with new local approved growth, on the books.

Look at the past history of rotating outages, during the energy crises and transmission line problems.

Couple that with the expected hot summer usage [expected fire dangers], again the increased demand. We are looking at a potential disaster.

There is mis-information out there. The Peaker is tied into the local distribution system and can only be used by the local community.

The proposed Peaker Plants are the best available cleanest burning technology and will have minimal impacts to the environment and costs.

The Ventura County Taxpayers Association recommends the California Coastal Commission approve the Peaker Plant that will help maintain quality electric service to Oxnard residents and business.

Sincerely;

Signature on File

Don Facciano
President
Ventura County Taxpayers Association

5156 McGrath Street
Ventura, CA 93003

805.644.3291
fax: 805.644.9208
email: vcta@jetlink.net

HONORABLE ANTHONY C. VOLANTE
2534 OCEANMIST COURT
PORT HUENEME, CALIFORNIA 93041

May 5, 2008

Patrick Kruer, Chair
California Coastal Commission
45 Fremont St., Ste. 2000
San Francisco, California 94105

Re: Southern California Edison Peaker Project Support Letter

Honorable Chairman Kruer and California Coastal Commissioners:

I am writing to you as a resident of Ventura County and a former three term Mayor for the City Of Port Hueneme strongly supporting and urging you and the Commission to recognize the importance of a stable electrical source which is essential not only to the residents of Port Hueneme but to the rest of Ventura County, Santa Barbara and to our businesses.

I and my neighbors have been following closely Southern California Edison's peaker plant proposal within the confines of the City of Oxnard and want you to know of our support for this project.

My support is based on the fact that this facility is proposed for a site that is designated for energy production and supports the existing Reliant energy generating facility, which is a coastal dependent industrial use.

The proposed peaker plant complies with the adopted local Coastal Plan for the Oxnard area. It is a highly beneficial use for Ventura County's and Santa Barbara County's coastal and inland communities. Southern California Edison's proposal addresses many of the concerns of the community, and I know addresses them appropriately. They have worked hard to reduce the environmental and social impact of building and maintaining the plant while striving to provide the highest quality service possible.

I am pleased to voice without reservation my strong support for this project and respectfully urge the California Coastal Commission to adopt this proposal.

Sincerely, 

Signature on File

Honorable Anthony C. Volante
805-984-8066, E-mail volantet@aol.com

BY FAX 415.904.5400

California Coastal Commission Hearing - May 8, 2008

Agenda Number 12.a Appeal No. A-4-OXN-07-096

SCE Peaker Project

J. R. & Leslie M. Braun - Qualified Support of Project

4 May 2008

California Coastal Commission

RE: SCE Mandalay Peaker Project

Honorable Commission Members:

We live within 2 miles of the proposed project. We would like Southern California Edison (SCE) to improve their canal area for pedestrian access and more importantly convert the SCE weir adjacent to Westport to a pedestrian bridge, either now or in the immediate future.

We believe a unique opportunity now exists for our city to work with Southern California Edison (SCE) to provide additional community benefits as well as supplementary power during periods of high demand. Now that the Westport & Seabridge areas have become a reality, we think it to be a relatively simple matter to connect their pedestrian walks & paths to that of Mandalay Bay & Oxnard Beach Park areas.

We are suggesting a pedestrian path along the west side of the Edison Canal from Eastbourne to the Edison weir, modifying the weir for pedestrians and tying into the Westport park at the corner of Chesapeake Dr. If necessary, we would suggest constructing a new small footbridge to connect both sides of the channel. This could provide greatly enhanced pedestrian trails with access all the way from Oxnard Beach Park (including Embassy Suites, Hollywood Beach & Oxnard Shores) to the shopping & dining at Seabridge on Victoria and beyond. Although pedestrians should be the highest priority, the path should accommodate bicycle traffic. This type of alternative travel opportunity can help mitigate local area growth, provide economic benefits and enhance community character.

We are surprised that the City of Oxnard has not already made this an objective, as pedestrian/bike paths seem to be an important part of community planning in many areas. We believe them to be a goal of the General Plan Circulation Element as well as mentioned by SCAG and national planning standards. Nevertheless, this would be a perfect time for all parties to work together to provide this tremendous benefit. If desirable, we are happy to meet with representatives to look at the proposed route from land and/or water side.

Thank you for the opportunity to comment. We would support the Peaker project with the trail improvements noted.

Jay & Leslie Braun
4563 Gateshead Bay
Oxnard CA 93035
jrlmb.ci@gmail.com

Alison Dettmer

From: shorebreak50@aol.com
Sent: Sunday, April 27, 2008 12:57 PM
To: Alison Dettmer
Subject: Peaker Plant

Dear Coastal Commission,

I cannot believe your commission is supporting installing a Peaker Power plant here at Mandalay Beach in Oxnard. As a resident living in Oxnard for the last 30 years I have witnessed one battle after another as industry continues to push these ugly, unneeded utilities on our waters and beaches. Protecting our environment is what I admired and thought the job of the Coastal Commission was always about.

Not only is this proposed project right in the path of an airport runway and nesting grounds of many local birds, it will be unsightly and noisy when in constant use to cool not the people in our communities but inland areas. Why put it here at our beautiful coastline? It does not need ocean water to exist. I also feel it will open up the door to installing the LNG plant off our coast. Here in Oxnard, they have enough of these types of industries in our backyards. Enough is enough; we have pulled our weight over the years, establishing Oxnard and Port Hueneme as almost a dumping ground. I know many Californians think Oxnard people do not care and will put up less of a fight. This is the mentality of many Californians. They are wrong: Oxnard is changing; we do care about our local environment.

Why is the Coastal Commission taking a stand against our Oxnard City Council and Planning Commission? Explain it to me please, I just do not understand. I have always felt the Coastal Commission was on the side of what is best for the environment.

Sincerely,
Phyllis Singer

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4/28/2008

Alison Dettmer

From: Michelle Smith [Michelle.Smith@ventura.org]
Sent: Monday, April 28, 2008 9:44 AM
To: Alison Dettmer
Subject: Comments - ITEM 12-c Appeal No. A-4-OXN-07-096 (Southern California Edison, Oxnard)

In regards to the subject item scheduled to be heard by Coastal Commissioners on May 8, 2008.

It is my understanding that Coastal Commission staff plans to recommend approval of this project regardless of the fact that the City of Oxnard City Council and the Oxnard City Planning Commission denied the project and strong opposition from residents. I would like to remind the Commission and their staff of the following concerns:

1. Oxnard is already is home to 2 full scale power plants, 1 at Ormond Beach and the Mandalay Beach plant, which are both operated by Reliant Energy. There is also 1 co-generation power generator operating in Central Oxnard that is owned by Sithe Energies.
1. Endangered birds (Snowy Plover) have nesting sights at the property commonly known and referred to as Mandalay Beach, which is located only several hundred feet from the proposed Peaker Plant site. Mandalay Beach is an undeveloped State owned property that the Ventura County Parks Department oversees on their behalf. Construction and operation of another power generator at Mandalay Beach will surely impact the environment and would be a detriment to the Snowy Plover and all birds and wildlife in the area.
3. In the future, it is expected that the two existing Reliant plants will soon be decommissioned. They are old, inefficient, and do not need to be located on the coast. The Reliant plants were previously owned by Southern California Edison (SCE) prior to deregulation, and it is likely that SCE will attempt to build a large new power plant on the site when the Reliant Mandalay plant is decommissioned. Approval of the Peaker plant at this site would set a precedent. Oxnard has been a "dumping ground" for undesirable projects that are harmful to the natural environment for many years now. Residents and concerned others seek to change that.
5. A peaker power plant is basically a natural gas-fired jet engine generator that does not use seawater for cooling and does not need to be located on the coast.
6. The peaker would be located in the Coastal Zone. The City of Oxnard's position is that the Local Coastal Plan does not allow non-coastal dependent energy facilities in the Coastal Zone.
7. The City of Oxnard has played host to power generators on our coastline for the last 40 + years. It's time for another city to be selected for these type of environmentally disturbing projects.
8. SCE representatives claim that Michael Peevey, president of the California Public Utilities Commission, is requiring them to build peaker plants, but there is no requirement that one be located in Oxnard, or in the coastal zone.

I urge the Coastal Commission to deny this project wholeheartedly. Please consider the lives of coastal animals and the residents of Oxnard and Port Hueneme when making this most important decision.

Submitted respectfully.

Michelle J. Smith
801 Trinidad Way
Oxnard, CA 93033
Homeowner and 40 year resident of Oxnard

Alison Dettmer

From: Glen Aalbers [glen42@roadrunner.com]
Sent: Monday, April 28, 2008 5:07 PM
To: Alison Dettmer
Subject: Peaker Plant Oxnard

I am a resident of Oxnard Shores Mobile Home Park and I am in favor of the Peaker Plant. It will be a big assist for our power supply.

Glen L. Aalbers
5540 West 5th Street
Unit 134
Oxnard Shores, CA
805-815-0151
Livin at and enjoy'n the beach!

Alison Dettmer

From: Oxnardbutterfly@aol.com
Sent: Sunday, April 27, 2008 10:17 PM
To: Alison Dettmer
Subject: Peaker Plant at SCE in Oxnard: Appeal of Denial

Agenda Item: 12-C Appeal No. A-4-Oxn-07-096
(Southern California Edison, Oxnard)
Nancy Pedersen

I am opposed to the Peaker Plant because Oxnard already has two electric plants on its coastline. Other cities in Ventura County have beaches without power plants, why has Oxnard been blighted with not just the two plants (at Ormond Beach and this one off Harbor Blvd) but also a Super Fund site at Halaco. Environmental Justice would demand that Oxnard not be targeted for yet another unsightly blight on its coastline.

Many businesses in Oxnard have their own peaker plants. More are being built so there is obviously another solution to the need for more power. With all these peaker plants there is even less need for this one to be built on the Oxnard coast.

This peaker plant is not coastal dependent. If it is needed, which is doubtful, it could just as easily be built inland where the demand for new power is greater. Why not build it in a community that has no power plants?

I urge you to deny this appeal and stop this peaker plant from being foisted upon a community that is united against it.

Sincerely,

Nancy Pedersen
514 East Kamala Street
Oxnard, CA 93033

Need a new ride? Check out the largest site for U.S. used car listings at [AOL Autos](#).

Cassidy Teufel

From: Norman Eagle [greeneagle2@verizon.net]
Sent: Tuesday, April 29, 2008 1:34 PM
To: Cassidy Teufel
Cc: bterry@webtv.net
Subject: Southern California Edison Appeal A-4-oxn-07-096

Dear Mr./ Ms. Teufel:

We urge you to reject the Southern California Edison Company appeal A-4-oxn-07-096, on the following grounds:

The location for the peaker plant is inimical to population health

It is expected that thousands of tons of CO2 will be emitted from the plant which is exactly what is NOT needed at this perilous time of encroaching global warming,

The SCEC should be encouraged to use this investment to explore less dangerous approaches to energy production.

Is the Commission aware that work has just begun on the construction of a residential development of OVER 200 UKNITS – JUST ACROSS THE STREET from the proposed Plant. I repeat: JUST ACROSS THE STREET. This alone should disqualify the proposal.

We trust the Commission will do the right thing for our people, and our planet.

Norman and Betty Eagle
2037 Majorca Dr
Oxnard, 93035
(805) 382-0969.

May 8, 2008 Agenda Item 12-c
Appeal No. A-4-oxn-07-096
Opposed

Shirley Godwin
3830 San Simeon Ave.
Oxnard, CA 93033
April 28, 2008

Attn: Alison Dettmer
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105-2219

RE: Appeal No. A-4-oxn-07-096 (So. California Edison Co., Oxnard) Item 12-c

Members of the Commission:

I am writing on behalf of the Oxnard community group, the Saviers Road Design Team. The name of our group comes from the name of a major road in Oxnard. We are all local volunteers in our community who are working to revitalize and improve our City. Because Oxnard is bordered by the ocean on both the south and west, one of our major focuses is the coast. We see our coastal areas as key to improving our quality of life and economic vitality.

We urge the Coastal Commission to deny the appeal. Members of our group attended the Southern California Edison Open House, the Oxnard community meeting, the Oxnard Planning Commission and the Oxnard City Council hearings on this Peaker project. Edison officials also made a special presentation to our group, and we asked them many questions.


The written and oral staff reports at the Oxnard hearings were extensive and discussed at length. We do not believe that any substantial issues remain that were not already thoroughly covered at the Oxnard hearings regarding the relevant Local Coastal Plan sections and the definition of "coastal-dependent energy facility." Certainly Oxnard officials would be the most knowledgeable about the intent of the language in the LCP.

The ruling by PUC President Michael Peevey, the assigned commissioner, states "... SCE should pursue the development and installation of up to 250 MW of black-start, dispatchable generation capacity within its service territory for summer 2007 operation." The ruling does not require a peaker plant specifically in Oxnard, and it definitely does not require a peaker in the coastal zone.

It is important to note that there was no action taken on the MND by the Oxnard Planning Commission or the Oxnard City Council and that a number of speakers at the Oxnard hearings addressed the inadequacy of the MND and the need for a full EIR. The speakers stated that any industrial facility, especially a power generating facility, located in the fragile and sensitive coastal zone, must have full environmental review.

- Alternative sites must be evaluated in an EIR. Edison officials have stated in public meetings that the Mandalay Beach site was their preferred site but not the only alternative. For example, since the Peaker is not coastal dependent, the SCE substation in Moorpark, and other inland alternatives that are not in the Coastal Zone, must be evaluated.
- Peaker plant emissions must be accurately evaluated in an EIR. SCE's statement that the Peaker will result in a slight decrease in emissions because of a local source must be questioned, because the electricity will first be transmitted to the Santa Clara Station in Ventura, CA before any distribution to the Oxnard area or to other local areas. SCE's emissions projections are calculated and averaged on a yearly basis rather than a daily basis of actual days of Peaker use, which understates the emissions during actual use.
- The Mandalay Beach site cannot be presumed to be an expansion within an existing site because this site and the neighboring Reliant Generating Station site are under separate ownership. In addition, the Independent System Operator is studying the Reliant Mandalay Generating Station as not essential to the grid and not suitable for repowering, and it is anticipated that it will be decommissioned.
- Environmental Justice must be addressed in an EIR. Oxnard has a significant minority population. Oxnard is already home to two power generation plants at Mandalay Beach and Ormond Beach as well as several cogeneration plants operated by private companies. The Halaco metals recycling Superfund Priority listed site is also in Oxnard.

Sincerely,

 Signature on File

Shirley Godwin, Chairperson
Saviers Road Design Team - Oxnard, CA



Haas Automation, Inc.

May 1, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105

Dear Chairman Kruer:

Haas Automation, an Oxnard-based employer of 1500 people strongly supports Edison's proposed peaker power plant. Our future growth is dependent on this project.

Over the past 10 years in which Haas Automation has been an Oxnard resident, we have suffered hundreds of thousands of dollars in downtime and damaged equipment due to interruptions in electricity. This is an unnecessary burden on our company. We are already under great pressure to improve efficiency and better compete with offshore competitors.

While alternative sources of power are preferred and supported by Haas, the fact is that those alternative sources do not exist today and without them we are being unnecessarily penalized. I urge you to consider Southern California Edison's peaker project. This immediate and relatively clean source of power is needed today.

Sincerely,

Signature on File _____

Peter Zierhut
Director of Corporate Relations
Haas Automation, Inc.

Thomas C. Nielsen
994 East Collins Street
Oxnard, CA 93036

May 1, 2008

Patrick Krueger, Chair
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Re: Oxnard (McGrath Beach) Peaker Plant

Honorable Chair Krueger:

This letter is written in support of the Coastal Commission's staff recommendation that you overturn the decision of the City of Oxnard and issue a Coastal Development Permit for this electrical generation facility.

My support is based upon my understanding of the function of the proposed facility and the need for its energy production to be included in the state's power grid. The site that is proposed is currently designated to be used for the production of electrical power and has done so in its past. The need for this facility to be located at McGrath Beach is well founded due to location of this county in relation to the overall power grid, we have found ourselves near the "end" of the power grid.

My support is also based upon my understanding of the duty cycle (of power energy production) that this facility will be asked to undertake during its operational life, and this understanding is critical for the local residents to comprehend. The complex function and operation of the current grid is based on interdependent power generation facilities and the supported population centers, in order for the population centers to be assured of an adequate supply of un-interrupted power, the utility has to have energy plants it can call upon in times of extreme need. This means that old facilities need to be replaced by modern and more efficient ones. This modular facility is an example of a new generation plant being placed next to old technology, for the purpose of start up, support and one day replacement of that older equipment.

In closing, as a long time resident of Oxnard, I would like to point out that the general community is under the misconception that our two old existing power plants (within the Oxnard sphere of influence) are fully operational and are generating at their full power capacity for the grid, this could not be further from the truth, the technology they currently have (as you are aware) does not allow them to do so, as the local air quality would then be seriously degraded and the lawsuits to shut them down would follow. The belief that this peaker plant is an unnecessary addition to an already plentiful energy supply is false, and arguments made to this point are also false. We are in need of this upgrade (as well as many others) to our states electrical grid. We will be the recipients of this improvement, so I ask that the commissioners act for the good of the state as well as the residents of Ventura County. I urge you to issue a Coastal Development Permit for this facility.

Sincerely,

Signature on File

Thomas C. Nielsen



May 5, 2008

Mr. Patrick Kruer
Chairman- Cal. Coastal Commission
45 Fremont St. Suite 2000
San Francisco, Ca. 94105

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MAY 05 2008

CALIFORNIA
COASTAL COMMISSION

Dear Chairman Kruer,

As the Public Relations Director for six large automobile dealerships, we are always looking for ways to conserve energy and electricity. Currently we operate three dealerships in the city of Oxnard, Ca.

From everything I've heard and read about Southern California Edison's proposal to build a peaker plant here, it seems to be a win-win for local business who strives to maintain a profit in these tough challenging times.

There have been cases in the past when, during particular busy selling weekends, we have lost power and consequently lost business due to inability to process much needed paperwork.

As I understand it, the proposed peaker plant would provide added power directly to Oxnard.

And with much of the needed infrastructure already in place, I urge you and the commission to look favorably on this project.

Best regards.

Signature on File

Shane Morger
PR Director
Bunning Automotive Group



VCEDA's Mission Statement: To advocate for policies, legislation and programs that stimulate business and a vital economy as the foundation for a vibrant quality of life in Ventura County.

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Amgen, Inc.
Dave White

May 2, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

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MAY 02 2008
CALIFORNIA
COASTAL COMMISSION

Re: SCE Proposed Peaker Plant in Oxnard

Dear Chairman Kruer:

The VCEDA Board of Directors is in support of Southern California Edison's proposed Peaker Plant near the Mandalay Generating Station in Oxnard.

VCEDA recognizes the importance of stable electricity to residents and businesses in Ventura County. We believe this peaker plant will help ensure that outages and brown outs will be reduced this summer and beyond.

Also, the peaker plant will help provide higher quality electricity to local companies with equipment sensitive to voltage fluctuations.

We urge the California Coastal Commission to approve this application that will help maintain quality electric service to Oxnard residents and businesses.

Respectfully,

Signature on File

Bill Buratto
President/CEO

National Environmental
Respect Award Winner

May 2, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont St., Ste 2000
San Francisco, CA 94105

Dear Chair Kruer.

AG RX is an Oxnard based employer with 125 employees. We have been headquartered in Oxnard for over 50 years. We strongly support Edison's application for the proposed peaker plant.

AG RX cannot be exposed to grayouts or blackouts caused by a lack of available electricity. This peaker plant will be at the end of a transmission line and would directly benefit our community when the need arises. Their proposal is to construct it next to an existing and operating facility and would be on property designated for this type of use for over 35 years

Please give Edison's application favorable consideration.

Sincerely,

Signature on File

Joseph E. Burdullis

CFO, AG RX

OFFICES

OXNARD: 751 South Rose Avenue • P.O. Box 2008, Oxnard, California 93034 • Phone (805) 487-0696 Fax (805) 483-6146
FILLMORE: 186 East Telegraph Road, Fillmore, California 93015 • Phone (805) 524-2687 Fax (805) 524-1412
SOMIS: 3250 Somis Road, Somis, California 93066 • Phone (805) 386-2674 Fax (805) 386-1234
GOLETA: 6150 Francis Botello Road, Goleta, California 93117 • Phone (805) 681-1686 Fax (805) 681-1689

May 1 2008
1917 N Dwight Av
Camarillo CA
93010-3852
(805) 482-5282

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont St. Suite 20000
San Francisco, CA 94105
Fax (415) 904-5400

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MAY 02 2008
CALIFORNIA
COASTAL COMMISSION

Subject: So. CA Edison's Oxnard peaker project

Chairman Kruer and Commissioners:

I am associated with Calleguas Municipal Water District.

Calleguas M W D serves approximately 550,000 people in the cities of Simi Valley, Moorpark, Thousand Oaks, Camarillo, Port Hueneme, both Navy bases and Oxnard.

Water is the life blood of all communities.

Electricity is necessary for pumping, purifying and distribution of potable water.

The proposed peaking generation plant at Oxnard will assure that Calleguas' water will be delivered to our customers.

I encourage the California Coastal Commission to approve the peaker project in Oxnard.

Sincerely

(Signature on File —

Don Hauser
Calif.C E 20406



May 1, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

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CALIFORNIA
COASTAL COMMISSION

Dear Chairman Kruer and Commissioners,

The hospitality industry within the Oxnard and Ventura County is a major contributor to the economic vitality of our community. Our guests expect the comforts of home as well as not experiencing down time to their business day or their recreational time.

As our community grows the demand for electrical power will continue to increase and the loss of power due to over extending usage. Natural disasters are always another possibility for curtailing our electrical power availability. We believe the approval and construction of the Oxnard Peaker Plant will provide the backup power needed in the event these two situations arise.

Oxnard tourism continues to grow as we become a destination for our beaches, sporting activities and weather. We believe the proposed site along Harbor Blvd. is an ideal location as it has an established Southern California Edison plant already in place.

We sincerely hope a solution is reached to expedite the current proposal of the Oxnard Peaker Plant.

Sincerely,

Signature on File

Patrick L. Mullin, CHA
General Manager

McDonald's

®

Wood & Wood Enterprises
P.O. Box 21655
Oxnard, CA 93034
(805) 487-3333
Fax: (805) 486-1999

May 2, 2008

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CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
Mr. Patrick Krueger, Chairman
45 Fremont Street Suite 2000
San Francisco, CA. 94105-2219

Dear Mr. Krueger:

As a resident of Ventura County and a business owner in Oxnard this letter is written in support of the Coastal Commission's Staff recommendation that you overturn the decision of the City of Oxnard and issue a Coastal Development Permit for this electrical generation facility.

The City of Oxnard is currently undergoing expansion in both the commercial and residential arenas. This dramatic expansion must lead us to review our energy needs. I believe the SCE Peaker Project can be a valuable tool in maintaining a safe, reliable and low impact flow of electricity to the City.

The rolling blackouts required in the past years may be avoided with this peaker plant in place. In case of interruptions of service caused by earthquakes or other natural disasters, the peaker plant could provide critical service to Oxnard's businesses, hospitals and homes.

Southern California Edison's proposal addresses many of the concerns of the community, and I believe them appropriately. They have worked hard to reduce the environmental and social impact of building and maintaining the plant while striving to provide the highest quality service possible.

I'm pleased to voice support for this project and respectfully urge the California Coastal Commission to consider the need for a stable supply of energy in the community and approve Southern California Edison's peaker plant proposal.

Sincerely, /

Signature on File

Christopher Wood
Owner / Operator
McDonalds

Commission Appeal No. A - 4 - OXN - 07 - 096
Nancy Symons

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CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

**Coastal Commission
South Central Coast District Office
89 South California Street, Ste 200
Ventura CA 93001**

April 29, 2008

Re: Commission Appeal No. A - 4 - OXN - 07 - 096

Dear Commissioners:

I have lived in the coastal area of Oxnard for over 7 years. I do not believe the proposed Edison Peaker Plant is an appropriate use for the coastal region of Oxnard. There will be negative visual, noise and biological environmental impacts to this proposed plant that will not be able to satisfactorily be mitigated.

Please protect our precious coastal area from further negative impact.

Thank you.

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MAY 02 2008

CALIFORNIA
COASTAL COMMISSION

Signature on File

Nancy Symons
5222 Sandpiper Way
Oxnard, CA 93035
805-985-1177

SHERMAN N. MULLIN
665 MANDALAY BEACH ROAD
OXNARD, CALIFORNIA 93035-1051

TEL. 805-985-1413
EMAIL: MOON1@ROADRUNNER.COM

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CALIFORNIA
COASTAL COMMISSION

April 28, 2008

California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Reference: Appeal No. A-4-OXN-07-096

Ladies and Gentlemen:

We strongly oppose the proposed Southern California Edison peaker power plant at 251 N. Harbor Boulevard, Oxnard, CA, for the many reasons which follow.

The proposed plant does not require cooling water, as does the adjacent Reliant Energy power plant, so it need not be ocean adjacent.

The proposed site is surrounded by pristine prime state owned coastal land, to which the proposed plant would be a permanent eye sore.


The site is in an area where a major remediation effort has been made to restore land to its natural state. This is true of land across the street and also of many acres to the north. The proposed plant would be a blatant reversal of this major initiative.

The current Reliant Energy plant is fully capable of supplying electrical power on a peaking basis.

In summary, allowing an electrical power plant to be established in this prime coastal location would be an outrageous reversal of the fundamental stated objectives of the California Coastal Commission. Please live up to your sober obligations to the people of California and reject Southern California Edison's appeal.

Yours truly,

(Signature on File
Judia B. Mullin


Signature on File
Sherman N. Mullin

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MAY 05 2008

CALIFORNIA
COASTAL COMMISSION**May 8, 2008 Agenda Item 12-c**
Appeal No. A-4-OXN-07-096
OpposedPatricia Einstein
2014 Long Cove Dr.
Oxnard, CA 93036
April 29, 2008Attn: Alison Dettmer
California Coastal Commission
45 Fremont St., Suite 2000
San Francisco, CA 94105-2219**RE: Appeal No. A-4-OXN-07-096 (So. California Edison Co., Oxnard) Item 12-c**

Members of the Commission:

I am writing on behalf of the children of Oxnard. I am a teacher and resident in Oxnard. I teach my second grade students numerous California teaching standards as well as the difference between right and wrong behavior.

One thing they are reminded of daily is the fact that I am here to help them and protect them. If I have any reason to believe someone is doing harm to them, I am required by law to report it to the proper channels to be investigated.

Today I am here to report to you that these children have a right to go the beach and enjoy its' natural beauty. Oddly, that is not so in Oxnard. Oxnard has been a victim of coastal neglect and abuse since before the Coastal Act was established. The majority of its residents are lower class Hispanics and the city is seen as prey to big business.

The city of Oxnard's Planning Commission and City Council said no to this peaker plant!

Consider this analogy:

A small child isn't sure how to stop an adult from abusing it, but the child does its' best to say no! Can the adult go around another way and get permission to abuse the child? In my book, NO means No. Don't assist Edison and allow the molestation of the Oxnard coast to continue.

Luckily, the Coastal Act was established. I'm positive that the members of the California Coastal Commission are familiar with the reasons it was established. Let's just look at portions it.

30001.5. The Legislature further finds and declares that the basic goals of the state for the coastal zone are to: (a) **Protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.**

30001.2. The Legislature further finds and declares that, notwithstanding the fact electrical generating facilities, refineries, and **coastal-dependant developments**, including ports and commercial fishing facilities, offshore petroleum and gas development, and liquefied natural gas facilities, may have significant adverse effects on coastal resources or coastal access, it may be necessary to locate such developments in the coastal zone in order to ensure that inland as well as coastal resources are preserved and that orderly economic development proceeds within the state.

30260. Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.

30264. Notwithstanding any other provision of this division except subdivisions (b) and (c) of Section 30413, new or expanded thermal electric generating plants may be constructed in the coastal zone if the proposed coastal site has been determined by the State Energy Resources Conservation and Development Commission to have greater relative merit pursuant to the provisions of Section 25516.1 than available alternative sites and related facilities for an applicant's service area which have been determined to be acceptable pursuant to the provisions of Section 25516.

The Edison Company wants to put a peaker plant in the coastal zone when it is not a coastal-dependent development.

I could not find any reference in the Coastal Act to a new non-coastal dependent energy development. This peaker plant does not need to be placed here. There are alternative sites. Edison is in process of building peaker plants in Norwalk, Ontario, Rancho Cucamonga, and Stanton. Please don't think I am just being another N.I.M.B.Y. Here in Oxnard we have two other power plants in our back yard and feel we have our share of coastal eyesores.

I truly have faith that the commission is here to protect the coast and will not favor Edison because they were smarter and found a loophole.

Environmental Justice should be addressed in an EIR. Oxnard has a significant minority population. Oxnard is already home to two power generation plants at Mandalay Beach and Ormond Beach as well as several cogeneration plants operated by private companies. The Halaco metals recycling Superfund Priority listed site is also in Oxnard.

Will another power plant be placed here and the public kept in the dark to the degree of contaminants or environmental damage that will occur because of the lack of an EIR? There must be a reason why no plants or animals exist on this Edison site.

At least make Edison go back and complete an Environmental Impact Report so the human health factors of stirring up the sand and the other effects of the Peaker plant can be studied. How do we know it's not another Halaco?

Sincerely,

Signature on File

Patricia Einstein
Teacher at Brekke Elementary
Oxnard, CA
(805) 889-5680

Attn. Alison Dettmer,

Can you please replace my personal 3 page the letter I faxed on Friday, May 2nd with this one and attach it to the 18 student letters. I was in such a rush that I forgot to sign, proof read and change it to legal size.

Thank you so much,
Patricia Einstein

May 19 2008

Dear Commissioners,

Please protect the beach and the plants and animals that live on the beach. We want the beach left alone.

The Edison Plant can go some where else.

Your friend,

Oscar Sosa

May 1, 2008.

Dear Commissioner,

We want to protect the beach. We don't want anything to happen to the animals on the beach. I want to protect all of the fish. Please vote no on the Edison power plant.

Your friend,

Anthony Alzate.

May 1st, 2008

Dear Commissioners,

We want the beach to look the way God made it. We don't want the Edison plant because it will hurt the birds. And it will give pollution to people that go to the beach. We want you to take all the power plants out.

Your friend,

Jordyn Chevalier

May 15 2008

Dear Commissioners,

We want the beach to look the way God made it. We don't want the birds to get hurt. We don't need the Edison plant. We don't need the Edison plant because the people in Oxnard will get pollution.

Your friends,

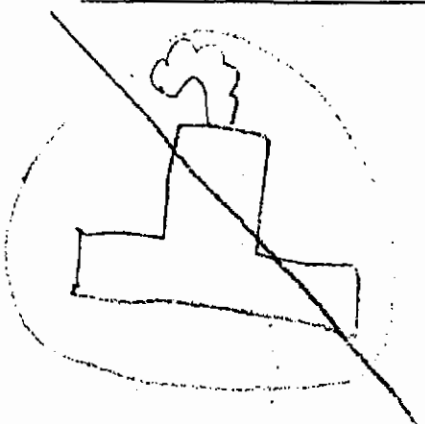
Christian Gostales

May 1, 2008

Dear Commissioners,

We want the
beach to look the way
God made it. We don't
need the Edison plant.

We don't want the birds to
get hurt. The people don't
want the Edison plant. God
would not like this on the
beach.



Love,

Miriam Covarrubias

May 1, 2008

Dear Commissioners,

We want to protect
the beach. It is not fair.
We already have 2 power
plants. We want the
beach to look the way
God made it. The people
in Oxnard don't want
it. The birds will fly away
from it.

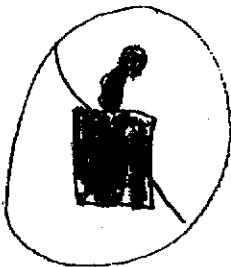
Love,

Kylie DeLeon

May 1, 2008

Dear Commissioners,

We want the beach
to look the way God
made it. I don't want
the fish to die or birds
to be hurt. I hate the
power plant. It's not
fair and we want you
to take all the power
plants down.



Love,

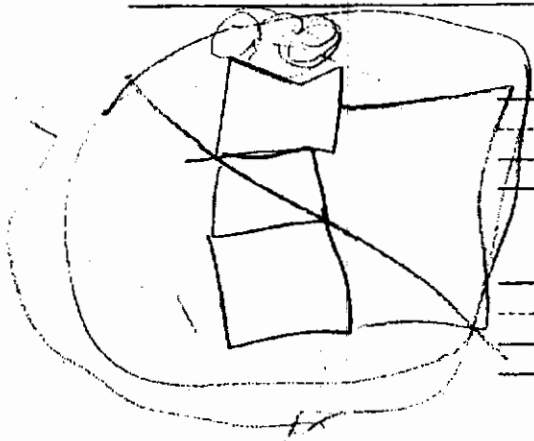
Mia Espinoza



May 1, 2008

Dear commissioners,

I want the beach
to be clean. We
want the beach
natural. I don't want
the birds to get
hurt. It's not fair
because this won't keep
the beach clean.



Your friend,

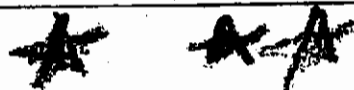
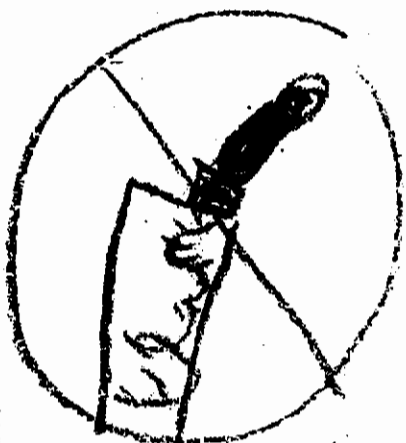
Alec Gonzalez



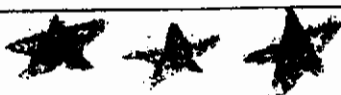
May 1, 2008

Dear Commissioners,

We want to protect
the beach. We don't want
it because it will hurt
our birds. It is not fair
We want you to take all
of them down. Please don't put
another one in Oxnard.
We want to protect our
beach.



Your friend,



Rebeckah Guevara



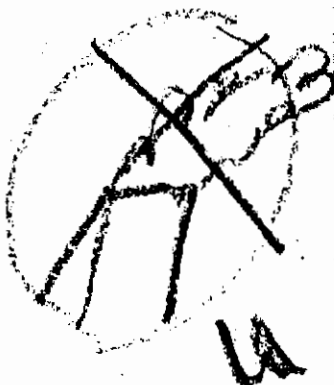
W

D

A

May 4, 2008Dear Commissioners,

We want to protect
the beach. I want the
beach to be natural. We
don't want the beach ugly.
The Edison plant will
hurt the birds. It is not
fair. Take all of the
power plants down.

Your friend,Angel Herrera

D

A

A

A

A

A

A

A

A


May 1, 2008

Dear Commissioners,

We want to protect
the beach. We do not want the
Edison plant because the smoke
will hurt the birds. We want you
to take down all the power
plants. The smoke will hurt people.

Love,

Bryson Jaramilla



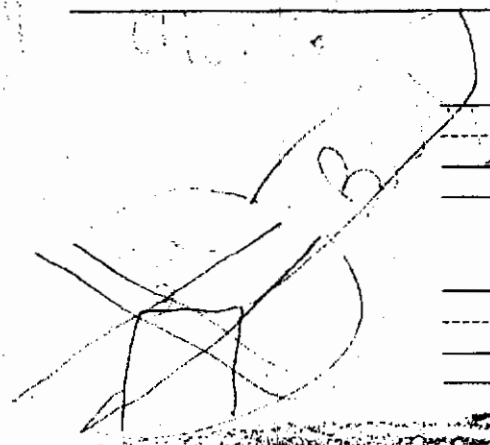
May 1, 2008

Dear Commis. pers.



2008

We want to
protect the kitchen.
The bus will not
look like a kitchen
th. Kitchen plan.
We don't like the
smoke from the power
plant. We want to
Please



May 1, 2008

May 1, 2008

Dear Comissioners,

We want the
beach to look the way
God made it. We want to
see the birds and we
want you to take all the
power plants down. We don't
need the Edison plant. Vote
no on the peaker plant.



Your friend,

Celest Martinez

(A)

May 1, 2008

Dear Commissioners,

We want the beach
to look the way God made
it. The birds will fly away
from it. We want to
protect the beach. It is
not fair. We already have
two power plants. We want
you to take all the power
plants down.

Your friend,

Xena Ordaz

May 1, 2008

Dear Commissioners,

We want to protect

the beach. We want the

beach to be natural.

We don't want the Edison

plant. We want the beach

to look the way God made it.

The people in Oxnard

don't want it.

Love,

Isaac Pillado

May 12, 2008

Dear Commissioners,

We want to protect
the beach. We want it the way
God made it. We want to see
the birds. We don't want the
people to get sick. And we don't
want the people to get hurt.

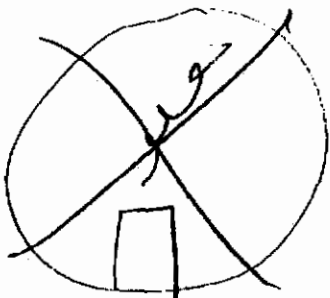
Your friend,

Victor Santander

May 29 2008

Dear Comissioners,

The people in Oxford
don't want the power plant.
I want the birds to
fly and be happy forever.
another Power Plant ever
again. I want the animals
be happy forever.



Love

Miguel Soto

May 1, 2008

Dear Commissioners,

We want to protect
the beach. It's not fair
we already have 2
power plants. It will
make the plants die.
We don't need 3
power plants. Vote no.

Love,

Alex Suarez

**MARC L. CHARNEY
P. O. BOX 9100
OXNARD, CA 93031-9100**

RECEIVED

MAY 02 2008

**CALIFORNIA
COASTAL COMMISSION**

April 28, 2008

Patrick Kruer, Chair
California Coastal Commission
45 Fremont St., Ste. 2000
San Francisco, CA 94105

Re: Oxnard (McGrath Beach) Peaker Plant

Honorable Chair Kruer:

This letter is written in support of the Coastal Commission's staff recommendation that you overturn the decision of the City of Oxnard and issue a Coastal Development Permit for this electrical generation facility.

My support is based on the fact that this facility is proposed for a site that is designated for energy production in the approved Oxnard Local Coastal Plan and supports the existing Reliant energy generating facility, which is a coastal dependent industrial use. If this facility cannot be sited at a location already designated for such use under the Coastal Plan, then where can it be sited?

My support is also based upon the fact that this peaker plant is needed to protect coastal communities from Southern Ventura County through Santa Barbara County from brownouts, blackouts, and the risk of long term power outages. Whether such occurrences are the result of natural disasters or excess demand on a region-wide or statewide-basis, they present real threats to the health (especially the health of the infirm), welfare (especially the welfare of the most needy) and economy of our community. By supplanting the coastal energy supply and providing a means of quick startup for the Reliant energy facility, the peaker plant can moderate, if not prevent, these occurrences.

One final matter of importance. During the course of the hearings that have occurred prior to the Coastal Commission hearing, several individuals who have opposed this application have stated that they speak for the Oxnard beach community. I am a member of that community and they do not speak for me. I find it presumptuous and offensive that these individuals purport to speak on behalf of persons with whom they have never consulted and from whom they have never received authorization. I trust that the Commissioners will recognize that their statements deserve no credence.

Patrick Kruer, Chair
April 28, 2008

The proposed peaker plant complies with the adopted local Coastal Plan for the Oxnard area. It is a highly beneficial use for Ventura County's and Santa Barbara County's coastal and inland communities. It presents no significant unmitigated environmental risk. I urge you to issue a Coastal Development Permit for this facility.

Sincerely,

Signature on File

/ Marc L. Charney

117 Eagle Rock Avenue
Oxnard, California 93035
April 28, 2008

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MAY 02 2008

CALIFORNIA
COASTAL COMMISSION

Mr. Patrick Kruer, Chair
CALIFORNIA COASTAL COMMISSION
45 Fremont Street, Suite 2000
San Francisco, California 94105

Dear Mr. Kruer:

I am writing in support of Southern California Edison's appeal of the Oxnard City Council denial of a permit to build a peaker generation plant at the site of the already existing generation plant in Oxnard. I am the Chief Financial Officer of a local bank, a board member of the Ventura County Economic Development Association and live approximately five miles from the site of the proposed peaker. I pass the site every day on my way to work in Ventura. To the extent someone is likely to be impacted by additional emissions or visual impacts I would fit in that category.

The State of California has recognized the need for additional generation capacity and the CPUC directed SCE to build 5 peaker plants. The local areas of Ventura and Santa Barbara counties do not differ from the rest of California in that they have the same electricity generation limitations and will suffer the potential of brownouts/blackouts in times of peak usage. Because of this it is logical to place additional generation capability in the local geographic area.

While I understand the hesitance of any city to having large industrial plants built in their jurisdiction, the construction of this facility should be approved for the following reasons:

1. Construction of this facility complies with the Coastal Act.
2. The additional environmental impact of this facility would not be significant.
3. The site is already zoned for power generation. The current facility isn't a visual delight, but it won't be significantly worse with the addition of the peaker plant.
4. The peaker plant will provide additional peak generation capabilities and could in times of emergency be a primary source of electricity for critical loads in the local community.

While I will not be able to attend the Coastal Commission hearing on this appeal on May 8, 2008, I do wish to express my support of the appeal and for approval of construction of the peaker plant at McGrath Beach in Oxnard.

Very truly yours,

Signature on File

Gerald I. Rich

BEARDSLEY & SON

CUSTOM DRY & LIQUID FERTILIZERS

(805) 485-2113

2473 CAMINO DEL SOL
P.O. BOX 135
OXNARD, CALIFORNIA 93030

Fax (805) 485-3364

April 24, 2008

California Coastal Commission
Mr. Patrick Kruer, Chairman
45 Fremont Street Suite 2000
San Francisco, CA 94105-2219

RECEIVED

MAY 01 2008

CALIFORNIA
COASTAL COMMISSION

Dear Mr. Kruer:

As the owner of a business located in Oxnard, I am writing in support of the Proposed SCE Peaker Project.

The City of Oxnard is currently undergoing rapid expansion in both the commercial and residential arenas. This dramatic expansion must lead us to review our energy needs and determine the best way this increased need might be met. I believe the SCE Peaker Project can be a valuable tool in maintaining a safe, reliable and low impact flow of electricity to the City.

The rolling blackouts required in past years may be avoided with this peaker plant in place. In case of interruptions of service caused by earthquakes or other natural disasters, the peaker plant could provide critical service to Oxnard's businesses, hospitals and homes.

Southern California Edison's proposal addresses many of the concerns of the community, and I believe addresses them appropriately. They have worked hard to reduce the environmental and social impact of building and maintaining the plant while striving to provide the highest quality service possible.

I urge you to help serve the needs of the City by moving to adopt this proposal.

Thank you for your consideration.

Sincerely,

Signature on File

Thomas S. Beardsley, President
Beardsley & Son, Inc.

TSB/cm



ENTERPRISES, INC.

LIC. NO. 314958 P.O. BOX 802, CAMARILLO, CA. 93011 (805) 485-7723 981-4312

~~3803 VENTURA BOULEVARD, OXNARD, CALIFORNIA 93030~~

620 Graves Avenue, Oxnard, CA 93030

April 27, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 200
San Francisco, CA 94105

RE: SCE Proposed Peaker Power Plant

Dear Mr. Kruer:

DFD Enterprises, Inc. has been in the Oxnard plain for many, many years. We have experienced several electrical outages and brown outs especially during the summer months. We recognize the importance of stable electricity to the residents and the business community. Stable electricity is crucial to the overall operation of our business.

To this end, DFD Enterprises, Inc. strongly supports Southern California Edison's Peaker Project at 251 N. Harbor Blvd. This project is located on SCE land adjacent to generating station formerly occupied by station fuel tanks. The area is parcel zoned and designated for Energy Production in Oxnard. We feel the City Oxnard should do everything within its powers to prevent power interruptions as a result of any unforeseen natural disaster, such as earthquakes, fires, etc. Quick start generation to provide energy is urgently needed.

The business community, the City of Oxnard and its residents all need backup sources of electricity now. We urge you to support this most important project.

Sincerely,

< Signature on File

Florence LaManno
President/CEO

DFD Enterprises, Inc.

Cc: Rudy Gonzales, SCE

MANDALAY SHORES COMMUNITY ASSOCIATION, INC.
Suite 316
3844 W. Channel Islands Blvd.
Oxnard, CA 93035



May 8, 2008 Agenda Item 12-c
Appeal No. A-4-OXN-07-096
Opposed

CALIFORNIA
COASTAL COMMISSION

MAY 05 2008

RECEIVED

May 4, 2008

Attn: Alison Dettmer
California Coastal Commission
San Francisco, CA 94105-2219

RE: Appeal No. A-4-OXN-07-096 (So. Calif. Edison Co., Oxnard, CA.) Item 12-c

Members of the Commission:

We, the Board Members of the Mandalay Shores Community Association and the Oxnard Shores Neighborhood Council, representing over 1400 residences, within a quarter of a mile of the proposed Edison Peaker plant, oppose this project because of its potential negative environmental impact.

Our main focus is the health and welfare of our beach community. The proposed site of this Peaker plant project is an abandoned fuel tank field, which may contain contaminated soil. Peaker plant emissions and noise also a concern.

Our understanding is that the proposed plant does not require an E.I.R., thus we have no way of knowing what air quality residents will be breathing during and after the construction of this plant. And let's not ignore our natural habitat. How will emissions and the noise of this plant affect the native birds that migrate annually to this nesting area.

Mandalay Beach is already the home of one of the two power generation plants located in Oxnard, CA. An additional Peaker plant and its noise would be aesthetically displeasing, not only to local residents, but also to visitors and vacationers that come to enjoy our tranquil coastal area.

Help preserve our coastal zone. Edison officials have publicly stated that Mandalay Beach is their "preferred" site and that there are alternative sites, not located in a Coastal Zone. Since, the proposed Peaker plant is not coastal dependent, we urge that these alternative sites be considered.


Respectfully,

Signature on File

Larry McGrath
President, M.S.C.A and O.S.N.C.
Julie Pena
M.S.C.A. Secretary

Mildred A. Miele
3107 South Harbor Blvd.
Oxnard, CA 93035

May 5, 2008

California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

RECEIVED

MAY 05 2008

CALIFORNIA
COASTAL COMMISSION

RE: Peaker Power Plant, Harbor Blvd, Oxnard
Commission Appeal No: A-4-OXN-07-096

It is time the California Coastal Commission begins considering the welfare of the citizens of Oxnard and not special interest groups. Several years ago I attended a Coastal Commission meeting where members extended the Ventura County dump which was located in Oxnard, far beyond the timeframe it should have been in operation. No consideration was given the citizens of Oxnard who were affected by the pollution from the dump. Now the California Coastal Commission is again using Oxnard as a dumping ground overturning the decision of the City of Oxnard to deny the construction and operation of a 45-megawatt "peaker" power plant on our beautiful coastline.

Following are some of the many reasons this plant should NOT be built:

1. Volatile chemicals will be stored at the Edison sight at close proximity to residences.
2. Exhaust release stack will be high enough to affect the flight plan of planes flying to/from Oxnard Airport.
 - a. Will planes be dangerously redirected to fly over homes? Several small planes with engine problems have already made emergency landings on our streets.
3. Oxnard citizens have had more than their share of polluting operations in our area:
 - a. When Raytheon's Oxnard location was closed, pollutants were left in the ground.
 - b. A business on 5th Street between Harbor and Victoria left contaminated soil when it closed its' operations.
 - c. Oxnard is the home of the Ventura County Naval Base and Point Mugu which are generators of pollutants. I was employed for a government contractor and was appalled when I worked on documents for testing missiles on the bases which included nuclear energy and its hazardous waste.
4. The Ventura County dump was located in Oxnard, polluting our air and soil much longer than should have been allowed thanks to the California Coastal Commission.
5. There is a Reliant Energy Plant operating right next to the proposed site of the peaker power plant. There are already enough chemicals and pollutants involved in this operation.
6. There is a marine sanctuary right off our coast. Oxnard is home to many species of wild life. Their safety should also be taken into consideration.
7. **THE ENERGY WILL NOT EVEN BE USED FOR OXNARD.** Why not locate the plant away from homes and in the area where the energy will be used.

Would members of the California Coastal Commission care to live so close to this plant??? I think NOT!! It is time Oxnard is considered more than just a dumping ground for pollutants.

Mildred A. Miele

RECEIVED

MAY 05 2008

5/4/08

CALIFORNIA
COASTAL COMMISSION

FAX - 415-904-5400

5/5/08
Ventura
office suggested
I call.

TO: CALIFORNIA COASTAL COMMISSION

89 South California Street, Suite 200

Ventura, CA 93001-2801

(805) 585-1800

(SF office)

FROM: BILL MILEY, 919 NO. SIGNAL STREET, OJAI CA 93023

Bill Miley

SUBJECT: COMMISSION APPEAL NO.: A-4-oxn-07-096, Southern California Edison Company, Construction and operation of a 45-megawatt "peaker" power plant. Commission meeting 5/7-8-9/08. (I request this appeal be denied)

I would like to make several points in defence of the denial of the appeal by Southern California Edison for their Peaker Power Plant to be located next to the current Reliant Mandalay Generating Plant on Harbor Boulevard in Oxnard, Ca.

1. After reading the staff report of the Commission and seeing that they found a "hole" in the Oxnard City Local Coastal Plan which they interpret as allowing power plants even though they are not coastal dependent, it seems this was never the intent of the city of oxnard to allow new or additional "anykind" of power plants on its coastal dune structures. As populations expand, coastal areas which for the most part are open and still sandy and with residual dunes were intended to be protected. **STAFF FINDING A "LOOPHOLE" IN THE OXANRD LCP SEEMS TO VIOLATE THE INTENT OF CCOA OF PROTECTING OUR NATURAL AND IRREPLACEABLE RESOURCE.**

2. I don't believe the required section on ALTERNATIVES TO THE PROJECT was adequately done or considered by the staff in their recommendation. The PEAKER PLANT is a stand-alone facility as long as space is available for supporting structures and access to transmission lines is available. It certainly is in other areas of ventura county, such as Moorpark. I would suggest that Edison is trying to save money on land acquisition or lease by using the Mandalay site. **This site is not appropriate as it is a one-of-a-kind Pacific Ocean Coastal area and shouldn't be cluttered with a sound generating, visual contaminating non-coastal dependent power generating facility which could be placed relatively easily some place else (by a power generating company which does this as a business).**

3. TURBINE NOISE -- I am sure somewhere in all of the documents for this application, there is commentary about the sound levels which will be generated by this Peaker Plant Facility.

But I did not find anything that spoke to the sound/noise production when it is operating. SOUND GENERATION BOTH AT GROUND LEVEL AND AIRBORNE LEVEL WILL BE AN ADVERSE ENVIRONMENTAL ISSUE. The current Mandalay Reliant Plant when operating does not produce any, beyond ambient sound, as my family experiences on the beach have noticed. What is the staff thinking when their only "key" to recommending approval is the "loophole" in the Oxnard City LCPlan and totally failing to address the noise level of this turbine, with no comment or adverse mitigation for this sound generating Peaker Plant Facility.

Lots of sound gets generated by the gas turbine exhaust. According to this website (http://poweracoustics.com/Tech%20Papers%20PDF/NoiseCon_2003_Paper.pdf) POWER ACOUSTICS, INC, ORLANDO, FL ,

"Gas turbine based power generation facilities require customized noise abatement features to achieve various community noise standards or regulations. While many sound sources exist within these facilities, the most complex and costly to silence is typically that related to the gas turbine exhaust."

4. THE NOISE PROBLEM -- SINCE THE PEAKER PLANT IS A GAS POWER TURBINE ENGINE AND WILL GENERATE EXHAUST SOUND FROM ITS OPERATION THIS ENVIRONMENTAL ADVERSE EFFECT MUST RECEIVE VERY CAREFUL ENGINEERING STUDY AND CONCLUSION.

A. MY OPINION AND IT IS A STRONG OPINION BASED ON WHAT I KNOW ABOUT CEQA, IS THAT NO SOUND GENERATING POWER GAS TURBINE SHOULD BE LOCATED IN A COASTAL ZONE UNLESS THERE IS NO OTHER PLACE TO PUT IT AND IT IS A LIFE AND DEATH NECESSITY.

THIS ISN'T!!! IT CAN BE LOCATED OUTSIDE THE COASTAL ZONE, AND LOCATED IN A PLACE TO TOTALLY MITIGATE TURBINE EXHAUST NOISE.

B. ANIMALS, ESPECIALLY BIRDS AND PEOPLE SHOULD NOT HAVE TO EXPERIENCE THE EXHAUST GAS NOISE FROM A PEAKER PLANT TURBINE ON OUR CALIFORNIA COAST.

5. COASTAL COMMISSIONERS: PLEASE LOOK AT THE BIG PICTURE. REJECT THE STAFF RECOMMENDATION AND DENY THIS APPEAL.

THANK YOU

BILL MILEY

Law Office of Tim Riley

MEMBER OF THE
NEW YORK BAR

5246 OUTRIGGER WAY
~ CHANNEL ISLANDS HARBOR ~
OXNARD SHORES
CALIFORNIA 93035

MEMBER OF THE
CALIFORNIA BAR

TELEPHONE (805) 984-2350 • FACSIMILE (805) 984-2FAX • WEBSITE TimRileyLaw.com • EMAIL Tim.Riley@gte.net

California Coastal Commission

Hearing Date: May 8, 2008

Th12c De Novo Review Appeal # A-4-OXN-07-096

PRAYER: DENY

The Appeal Should Be Denied.

Common sense and the integrity of our precious California Coast should prevail.

This appeal should not be granted based upon SCE's untimely and impractical rationale.

Conceded Issues:

Southern California Edison, at prior public hearings, has conceded:

1. The peaker plant can be built inland and does not need sea water for cooling or operation;
2. Optional inland locations for the plant do in fact exist;
3. The plant is primarily intended to provide inland power during peak need.
4. Belatedly, SCE proposes this project in response to an order with a deadline which has passed.

Argument and Reasoning:

The integrity of our coast should be protected by the integrity of our commonsense - not squandered by untimely or impractical rationales. Since the peaker plant does not require seawater for operation or cooling, it would be misguided to permit another power plant on our coveted coast when the same power plant, admittedly, can be built inland. This is true, even more so, where the power generated is intended to service inland communities. Moreover, the 2007 CPUC deadline has passed, and SCE needs a time-machine to "more fully" comply.

Conclusion:

Where coastal resources are so limited, only sound and pressing reason should prevail - not belated or impractical rationales. The proposed peaker plant is not physically or practically dependant on the coast for its operation. SCE should consider building the peaker plant at an available inland site where the power generated is intended for inland use.

Respectfully, please deny the coastal power plant.

Sincerely,

Law Office of Tim Riley

Timothy Clifford Riley
TCR/me

ORE
OCTAVIO R. ELIAS

1080 MANDALAY BEACH ROAD • OXNARD SHORES • CALIFORNIA 93035

RECEIVED

MAY 05 2008

CALIFORNIA
COASTAL COMMISSION

May 1, 2008

ITEM 12-c

Appeal No. A-4-Oxn-07-096

So. Cal Edison, Oxnard

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

Dear Commissioners:

What is your mandate? **To protect California's coastline** from unneeded and unnecessary development, blight and degradation.

Errors were made many, many years ago with the approval to Edison of the old, existing Reliant Energy power plant on Harbor Bl. that has been polluted the air and interrupted the ecosystem. It was water-cooled and probably less expensive to run which justified its location on the shoreline. The old plant is now obsolete and due to be decommissioned.

The proposed Peaker Plant could be with us forever. It is not coastal dependent. My understanding is that the City of Oxnard has offered other more appropriate sites with minimal red tape. Besides the aesthetic issue, Ventura County is 15th in the nation for smog. To site an industrial facility where the winds will carry particulates to the general population is absurd.

So much has been accomplished in that general area over the past few years with the *privately-funded cleanup of toxic substances* at the North Shore development at the corner of 5th & Harbor. The discovery and propagation of the 'extinct' milk vetch plant has been a success. It is a slap in the face to us all to contradict all the good that we have worked for.

You have a once in OUR lifetime opportunity to Restore the Beach.

Sincerely,

Signature on File

Octavio and RoseMarie Elias

Item Th12c

Appeal No. A-4-OXN-07-096
Southern California Edison

CORRESPONDENCE



Sierra Club

Los Padres Chapter

Santa Barbara and Ventura Counties

Arguello Group

Conejo Group

Santa Barbara Group

Sespe Group

Alan Sanders
Conservation Chair
232 N. Third St.
Port Hueneme Ca. 93041
805-488-7988
alancatdaddy@aol.com

Feb. 6, 2008

Th12c

RECEIVED
MAY 07 2008
CALIFORNIA
COASTAL COMMISSION

Peter Douglas, Director
California Coastal Commission
South Central Coast Area
89 South California Street, Suite 200
Ventura, Ca 93001

RE: A-4-OXN-07-096; Southern California Edison

Dear Mr. Douglas and Commissioners;

The Los Padres Chapter, ("LPC") of the Sierra Club, (the "Club") recommends denial of approvals for the above referenced project. The Commission, is being asked to take **two** actions regarding the Peaker Plant Project, ("Project"). **First**, is a determination on the City of Oxnard's ("City") conclusion that the Project is not Coastal Dependent rendering it an inappropriate use within the Coastal Zone. The **second** action is to reach a decision that if the City erred, then it, and more importantly the public trust, has forfeited all rights to pursue all other aspects of the lawful decision making process.

Southern California Edison, ("SCE") appealed the City denial on the basis of the City's interpretation relating to Coastal Dependent uses. However, the appeal did not apply to other reasons that the City used in making its determination. Therefore, for all of those other applicable reasons that were relevant to the City's decision, the appeal must be denied. SCE did not appeal on the basis of other Article3 policies nor did it appeal on the basis of the California Environmental Quality Act, ("CEQA") determinations for which the statutes of limitations may now be tolled.

The Club believes that at this time the Commission should only be determining if the City's interpretation relative to citing coastal dependent uses is applicable. But the Commission should not be deciding on the validity of all of the other relevant issues including CEQA compliance. The Club disagrees with the determination by the Commission's staff that the actions taken by the Commission, for the above referenced project are sufficient to comply with provisions of the CEQA. If the Commission is to rule on the project without remanding the CEQA issues back to the City the public will lose its lawful role in bringing forth relevant information.

The Commission has failed to engage in meaningful impact analysis or to consider alternatives and cumulative impacts. Commission staff has not provided the considered analysis or public participation consistent with CEQA. Instead, it has merely outlined some of the issues without allowing the public an opportunity to rebut as would be expected in a legal environmental review. In this instance, Commission's staff is not using its CEQA equivelance to supplement holes in the City's environmental review, but to replace it entirely, without public

participation. Because of this, the public is being denied the procedural requirements for notice and participation normally found in an environmental review. The Commission's staff must consider the whole of all impacts associated with this project as well as all alternatives and reasonably foreseeable projects within the vicinity.

The City did not act to certify an environmental document. Therefore, it is still unknown whether a full Environmental Impact Report ("EIR") would be sufficient. The staff report doesn't even come close to discussion on the diversity of issues that would be expected to be considered within a full EIR.

Additionally, Coastal Act Guidelines that require protection of sensitive biological resources, coastal views and access at Mandalay Beach will also be violated if the Project is approved by the Commission.

The staff Report assumes that the only reasons for rejecting the project are based upon the City Council's interpretation of the provisions for coastal dependent land uses. However, the City was presented with evidence critical of the project on many topics. For example, the U. S. Fish and Wildlife Service and California State Parks provided information regarding sensitive habitat areas and wildlife. Therefore, any part of the decision to reject the project based upon resource issues is not affected by the issue of land use designation. In the same way, the City Council had the discretion to deny the project for any of the other issues presented at the Council hearing, including everything contained within the public record at that time. It is entirely possible that even if the City agreed that non coastal dependent uses are permitted it could still reject this same project for impacts on biological resources, coastal views, coastal access, recreation, environmental justice or failure to conform with other provisions of the policy on coastal energy facilities.

The LPC does not support staff recommendations to vote yes on the appeal to the Peaker Plant project as amended. Furthermore, we believe that even if the Commission finds that the project is consistent with the City of Oxnard's language on coastal dependent uses, it must allow the City to rule on the other Article 3 policies that apply to this project. The City must be allowed to determine whether the project complies with all 6 major policy divisions. The City must also be allowed to comply with the project's CEQA requirements.

Oxnard's CLUP

Staff has failed to provide the Commission with several passages within the City CLUP that support the City's decision. Section 1.2 lists six broad Coastal Act policies. Staff is recommending that the Commission sacrifice the objectives of four of these policies, (public access, recreation, sensitive habitats and commercial developments) because of the policy relating to energy facilities. However, the Report substantially misinterprets and under estimates negative impacts upon the energy facility elements within the CLUP. The present Mandalay Generating Station may soon lose its permitting, thereby forcing its closure. That would leave the Peaker plant as a stand alone facility, violating the policy on consolidation of energy developments.

Regardless, when conflicts arise, "the most protective policy shall prevail," (CLUP page I-2).

Section 3.1 Local Coastal Policy 1. States: "If policies of this plan overlap or conflict, the most protective policy of coastal resources shall prevail."

The Project substantially violates provisions of Section 30240 (a) and (b).

(a). Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

Because the project is not coastal dependent the areas considered to be ESHAs must be protected from the project. Substantial evidence from USFWS and State Parks show that listed species may be placed in jeopardy.

Staff notes : "The key subsection of the Coastal Energy Facility Sub-zone (Coastal Zoning Ordinance Section 17-20), states that "coastal dependent energy facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth, where consistent with this article." This subsection is the only one that specifically refers to "coastal-dependent" facilities, and it only "encourages" such facilities to locate within this zoning designation and does not prohibit non-coastal dependent facilities;..." However the staff interpretation that the use of "shall" merely "encourages" rather than "prohibits" does not conform with the City's intention in using that language. Throughout the relevant documents the differentiation between "may" and "shall" is the definitive use of language to separate "encourages" from "mandatory".

Additionally, the Report fails to elaborate on the most important clause in the subsection: "where consistent with this article." Clearly, the project is inconsistent with 30240 and other Sections of Article 3.

In another passage staff offered "Other subsections of Coastal Zoning Ordinance Section 17-20 apply generally to "energy related developments," not exclusively to "coastal-dependent" developments. Additionally, these subsections are all subject to the overarching provision of Section 17-20(A), which states that this zoning designation allows "power generating facilities and electrical substations" and is therefore not limited to "coastal-dependent" facilities." However, at the time the Zoning Ordinance was written most electrical substations in Ventura County were essentially Coastal Dependent due to their locations and cooling systems. Therefore the language here is consistent with that understanding. Peaker plants had not been invented, so decision makers could not have been envisioning such projects.

The following passage suffers from the same mistake: "One of the four types of developments that can be conditionally permitted within the Coastal Energy Facility Sub-zone is an 'Electrical power generating plant and accessory uses normally associated with said power generating facility,' such as the project proposed by SCE." Again, in speaking about "electrical power generating plant" it was understood that they must be coastal dependent.

(b). Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Clearly, the siting of this project conflicts with ESHA and with the McGrath State Park.

Alternatives

The staff report fails to contain an alternatives analysis. Instead it makes a claim that is not supported by substantial evidence that no impacts exist that are not adequately mitigated. Therefore, alternatives, cumulative impacts, growth inducing impacts, environmental justice and a thorough impact analysis are not contained in the Report.

This omission prevents the decision makers from seeing options that would minimize impacts more efficiently than the policy of allowing impacts and attaching mitigation measures.

Southern California Edison has just announced a new energy project documented in the Ventura County Star on May 1. The article, **EDISON IS PROPOSING SOLAR POWER PROGRAM** by Alison Bruce documents how the Utility would install 250 megawatts of solar panels in 1 and 2 megawatt increments.

This is a viable alternative to the proposed Project.

Additionally, an Oxnard company EF Oxnard Inc. volunteered to provide a site within the City of Oxnard to locate the proposed Project adjacent to its own energy producing facility. Use of that location would prevent impacts associated with the coastal zone.

Many other alternatives were not discussed by the staff report in violation of CEQA and the Coastal Act.

SECTION J

Section J states that: "Section 13096(a) of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. The Commission finds that, the proposed project, as conditioned, will not have significant adverse effects on the environment, within the meaning of the California Environmental Quality Act of 1970. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA and the policies of the Coastal Act."

The finding is not supported by substantial evidence. In fact the comments made by the public on the Mitigated Negative Declaration are not answered by Staff. Instead all that is offered is a general statement that no impacts exist. This violates Section 21080.5(d)(2)(A) because feasible alternatives exist, including those listed in this letter.

Club comments to the City during its Project review included comments that the MND must be replaced with an EIR. These comments were supported by substantial evidence, including comments made by other witnesses. The Report fails to consider our comments and asks the Commission to circumvent the lawful CEQA process that has not been allowed to reach its logical conclusion. The Commission must, therefore, allow the City to pursue its lawful role in the CEQA process.

IMPACTS HABITATS AND WILDLIFE

The Club disagrees with the Report's conclusions regarding biological resources. Please refer to our comments to the City. We hereby incorporate by reference all comments made by all other parties and adopt them as our own.

SPECIAL CONDITIONS

The LPC cannot support the staff recommendation for approval of the Project because the conditions required to mitigate specific impacts are either missing or inadequate.

SUMMARY

The Public Utilities Commission does not have the authority to suspend CEQA or the Coastal Act. Your staff has failed to support the public trust by using a possible error on the part of the City of Oxnard, (which we dispute) to suspend other, more important provisions of the Coastal Act and CEQA.

We recommend that the Commission support the City's decision to deny the project.

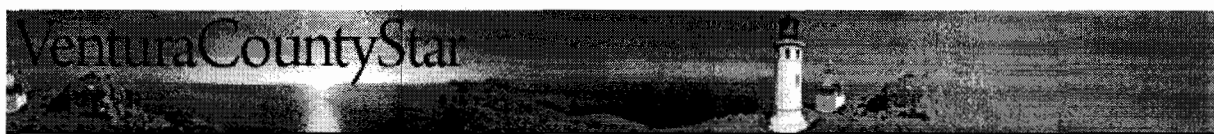
Sincerely,

Signature on File

Alan Sanders

Alan Sanders
Conservation Chair
Sierra Club, Los Padres Chapter

cc. adettmer@coastal.ca.gov, cteufel@coastal.ca.gov,
chris.williamson@ci.oxnard.ca.us



Th 12c

Edison is proposing solar power program

By Allison Bruce
Thursday, May 1, 2008

Southern California Edison Co. is pushing a proposal that would expand its reach into solar power, which has put some in the solar industry on the defensive.

The utility company has put forth a program that would install at least 250 megawatts of solar panels in the next five years. The company would own these panels and the 1 to 2 megawatts of power generated by each installation, which would feed directly into the power "grid" that the utility's customers draw from.

A 2 megawatt installation generates enough power for 1,300 homes, said Gil Alexander, a spokesman for Southern California Edison. Alexander said the project makes use of a lot of unused real estate — large rooftops.

The company would install panels on roofs that typically would not be used for private solar panel systems, such as large warehouses. Still, it notes it would not stick exclusively to such sites.

That has independent solar companies worried.

Every time a utility-owned system goes up on a roof, that takes away the possibility of private panels in that location — and can mean a loss of business for companies that sell and install those private systems. They argue it would effectively kill the solar industry, creating a monopoly for Edison and making it impossible for them to compete.

The program also would let Southern California Edison install systems that are bigger than what the California Solar Initiative offers incentives to build — that program stops at 1 megawatt.

Sue Kateley, executive director for the California Solar Energy Industry Association, said the Edison application validates what solar businesses have been saying — that there is a demand for larger systems and there should be a program in place to encourage those systems.

She said she worries that private solar businesses will be shut out if the Edison program is approved.

A protest letter from Cooperative Community Energy Corp. in San Rafael notes: "They would own the equipment, provide the installations, own the electricity, be subsidized by Ratepayer Public Goods Charges, and then sell the electricity back to the ratepayers in their utility district at full price, while not using any of the electricity to reduce on-site demand and relieve pressure from the grid."

Alexander said Southern California Edison felt the project would benefit all aspects of the solar industry, including boosting business for independent companies.

"We have hoped this project would bring renewed attention to the potential of rooftop solar to

homeowners and business owners who might have given up on the idea," he said.

The program would accelerate the amount of solar energy installed in the state and could bring in more solar manufacturing and jobs, he said.

The company argues that the large scale of the project would be good for consumers because it would bring down installation costs and improve technology and pricing. The electricity generated should cost less than current solar power, Alexander said.

The program would create new power generation in areas of growing demand. It also would generate more power at peak demand times and offer clean, renewable energy.

That's a bonus for the state as well because it invests in renewable energy without carbon emissions, Alexander said.

Edison would raise the \$875 million for the project from investors and then increase its rates less than 1 percent to help pay back that investment over time. The rate change must be approved by the state Public Utilities Commission, or PUC.

Alexander said customers are willing to pay a little more to support renewable energy, but independent solar businesses say that burden should not be placed on ratepayers.

The California Solar Energy Industries Association commends Southern California Edison's interest in advancing solar power in the state, but raises the concern that the plan could put additional strain on supply, making it harder for the private solar sector to compete.

Kateley said that could translate into increased costs for someone who wants to install a solar energy system at their home or business.

The association also suggested that Edison's initial project be carefully evaluated through an independent review before the program is approved in its entirety. The review would include close inspection of costs.

Another suggestion is a parallel private sector project that would be used as a point of comparison.

"We're hopeful that when the PUC looks at the comments, they will recognize there's an effect on the private sector that needs to be considered," she said.

Southern California Edison announced its plan in March. Those with concerns about the program can file complaints with the PUC.

The next step is for Edison to file its response to the comments, which it will do May 8.

After that, hearings will be held, additional filings will follow and the PUC will eventually make a decision. A deadline for a decision has not been set, according to a PUC spokeswoman.

Alexander said Southern California Edison is not waiting on that decision to move ahead with its solar project. It plans to have the first panels generating power by August.

The company is willing to take that risk because it believes in the value of the project, he said.

"The more we looked at it, the more we came to believe this was a very special and significant project," he said.

On the Net:

<http://www.cpuc.ca.gov>

<http://www.sce.com>

<http://www.calseia.org>



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RECEIVED
MAY 05 2008

CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

May 3, 2008

Re: Commission Appeal A-4-OXN-07-096

To Whom It May Concern:

I am asking you to not approve the above appeal to construct and operate a larger power plant. I do not believe the environmental concerns have been adequately addressed as far as the effect on water quality, wetlands destruction and most importantly the air quality for the nearby population.

Once this project is approved, there is no turning back and the damage can be irreversible. We and the commission have an obligation to help protect this valuable area for future generations and to protect the public health.

Please do not approve the above appeal.

Thank you,

Signature on File

Lloyd Pilch
5207 Whitecap St.
Oxnard, CA

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MAY 05 2008

Office of the
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

Angela Slaff
5131 Wavecrest Way
Oxnard, CA 93035

May 4, 2008

California Coastal Commission
South Central Coast District
89 South California Street, Suite 200
Ventura, CA 93001-2801

What a disappointment to read in the Ventura County Star newspaper that the California Coastal Commission is recommending approval of a 45-megawatt "peaker" power plant at 251 North Harbor Boulevard, Oxnard, CA.

Please consider all of the hazards that such a plant would bring to our neighborhoods. Not only is the tower that is included in the building plans right in the flight path of Oxnard Airport, but more importantly the pollutants put out by this plant will add substantially to our already overburdened atmosphere.

We already have Reliant Energy next door to this proposed plant. One can see the steady stream of pollutants streaming out of its smoke stack daily.

It is my understanding that most of the energy this plant will provide is not for Oxnard area, but for cities quite a ways away from here. Why not build plant in not so populated area.

In closing, let me ask you this: If you lived within a few blocks of this proposed "Peaker" plant, would you approve this plant in your back yard?

Sincerely,

Signature on File

Angela Slaff



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MAY 06 2008

CALIFORNIA
COASTAL COMMISSION

May 1, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Ste. 2000
San Francisco, CA 94105

Dear Chairman Kruer and Commissioners,

The hospitality industry within the Oxnard and Ventura County is a major contributor to the economic vitality of our community. Our guests expect the comforts of home as well as not experiencing down time to their business day or their recreational time.

As our community grows the demand for electrical power will continue to increase and the loss of power due to over extending usage. Natural disasters are always another possibility for curtailing our electrical power availability. We believe the approval and construction of the Oxnard Peaker Plant will provide the backup power needed in the event these two situations arise.

Oxnard tourism continues to grow as we become a destination for our beaches, sporting activities and weather. We believe the proposed site along Harbor Blvd. is an ideal location as it has an established Southern California Edison plant already in place.

We sincerely hope a solution is reached to expedite the current proposal of the Oxnard Peaker Plant.

Sincerely,

Signature on File

Patrick L. Mullin, CHA
General Manager

Courtyard by Marriott
Oxnard Ventura

600 E. Esplanade Drive, Oxnard, CA 93036
Telephone (805) 988 3600 Facsimile (805) 485 2061
Marriott.com/OXRVO

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EL CONCILIO
del Condado de Ventura

Guadalupe Gonzalez Ph.D., M.P.H.
Executive Director

TO: Patrick Krueger, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
Oxnard, CA 94105

Fax (415) 904-5400

FROM: Guadalupe Gonzalez 
Executive Director
El Concilio del Condado de Ventura
Phone: (805) 486-9777 X 228

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MAY 06 2008

CALIFORNIA
COASTAL COMMISSION

Attached please find letter of support. If you need any additional information, please contact me at 805-486-9777 X228.

Thank you.



EL CONCILIO

del Condado de Ventura

Board Officers and Directors

Armando Lopez
Board President
Plaza Development Partners, LLC.

Maria de la Luz Flores
Vice President
Cal State Channel Island

Tom Cady
Treasurer
Oxnard Police Department- Retired

Virginia Espinoza
Secretary
Bank of America

Dr. Jose Marichal
Member at Large
Cal. Lutheran University

Ednardo Miranda
Latino Peace Officers

Frank Moraga
Ventura County Star

Gloria Chinen
St. John's Medical Center

Maricela Morales
Central Coast Alliance
United for Sustainable
Economy

Olivia Obregon
Lazer Broadcasting

Michele Pettes
The Gas Company

Maria L. Pelaya
Citibank

Rudy Gonzales
Southern California Edison

May 5, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: SCE Peaker Project Proposal

Dear Mr. Patrick Kruer,

The board of El Concilio del Condado de Ventura has reviewed Southern California Edison's peaker proposal and has taken a position to SUPPORT the project.

Electricity is essential to the constituents we serve and to our own daily operations. The proposed plant will provide additional local resources that are needed as the community of Oxnard continues to grow. It will provide added insurance that our city will not have to experience rotating outages.

We respectfully request that the California Coastal Commission APPROVE Southern California Edison's peaker project.

Sincerely,

Signature on File

Guadalupe González, Ph.D., M.P.H.
Executive Director
El Concilio del Condado de Ventura



Tom Waddell, CLU
State Farm: Providing Insurance and Financial Services
License #0452893
1851 N Lombard St Ste 203
Oxnard, Ca 93030
Office: 805-604-1800 or 800-326-2033
Fax: 805-604-1877

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MAY 06 2008

CALIFORNIA
COASTAL COMMISSION

May 2, 2008

Mr. Patrick Kruer, Chair
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: SCE Proposed Peaker Power Plant

Dear Mr. Kruer:

I support the construction of the proposed peaker power plant by Southern California Edison. I am dismayed by the negative reception this project has incurred.

The plant will generate electricity that is tied into the local electrical system and used in Oxnard and Ventura County. As a business person in Oxnard, I have had too many occasions where our power has either gone down during office hours or over the weekend. The problems associated with these power outages for a business that relies heavily on electronic data and systems are many. The rotating power outages that we have all faced in the past will grow as the demand increases. We have also experienced many power outages in our home in Camarillo. In addition to providing the necessary electricity at peak times, the plant would utilize the cleanest burning technology and would have minimal impacts to the environment.

I believe that there are little or no alternatives to provide the necessary power to Ventura County and Oxnard other than the proposed plant. As we continue to grow, the importance of reliable, safe, and clean energy is paramount. My local State Farm associates and business colleagues will be very unhappy if this project is rejected. We hope and trust that you and your colleagues will agree with our viewpoint and approve the construction of this power plant. I believe the failure to take advantage of this opportunity would be a mistake.

Thank you for this opportunity to share my views.

Sincerely,

Signature on File

Tom Waddell

Cc: Rudy Gonzales, SCE

May 3, 2007

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MAY 05 2008

CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

California Coastal Commission
South Central Coast District
89 South California St., Suite 200
Ventura, CA 93001-2801

Ladies and Gentlemen:

I am writing to express my discontent with the proposed Peaker Power Plant. I fail to understand why this plant needs to be put in this area!! The plant should be put in the area where the power is needed—somewhere where the air conditioners are running day and night!

We have bought expensive property in this area because we need the cool breezes and clean air for our health. Many of the homeowners in this area moved here because they wanted out of the hot, smog-infested valleys. This plant will affect our air quality negatively. Even the Edison literature states that there are emissions of nitrogen oxide, volatile organic compounds, ammonia, and carbon monoxide! Do we want this in our pristine beach community??

The city of Oxnard denied the construction of this “peaker” plant, and I fail to understand why the Coastal Commission recommends its approval. **I thought the Coastal Commission was all about preserving the beauty, accessibility, and pristine condition of our coastline. What are you thinking? Obviously, you’re not!!!**

Sincerely,

Signature on File

Art & Janice Serote
5020 Amalfi Way
Oxnard, CA 93035

Mildred A. Miele
3107 South Harbor Blvd.
Oxnard, CA 93035

May 5, 2008

California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

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MAY 05 2008

CALIFORNIA
COASTAL COMMISSION

RE: Peaker Power Plant, Harbor Blvd, Oxnard
Commission Appeal No: A-4-OXN-07-096

It is time the California Coastal Commission begins considering the welfare of the citizens of Oxnard and not special interest groups. Several years ago I attended a Coastal Commission meeting where members extended the Ventura County dump which was located in Oxnard, far beyond the timeframe it should have been in operation. No consideration was given the citizens of Oxnard who were affected by the pollution from the dump. Now the California Coastal Commission is again using Oxnard as a dumping ground overturning the decision of the City of Oxnard to deny the construction and operation of a 45-megawatt "peaker" power plant on our beautiful coastline.

Following are some of the many reasons this plant should NOT be built:

1. Volatile chemicals will be stored at the Edison sight at close proximity to residences.
2. Exhaust release stack will be high enough to affect the flight plan of planes flying to/from Oxnard Airport.
 - a. Will planes be dangerously redirected to fly over homes? Several small planes with engine problems have already made emergency landings on our streets.
3. Oxnard citizens have had more than their share of polluting operations in our area:
 - a. When Raytheon's Oxnard location was closed, pollutants were left in the ground.
 - b. A business on 5th Street between Harbor and Victoria left contaminated soil when it closed its' operations.
 - c. Oxnard is the home of the Ventura County Naval Base and Point Mugu which are generators of pollutants. I was employed for a government contractor and was appalled when I worked on documents for testing missiles on the bases which included nuclear energy and its hazardous waste.
4. The Ventura County dump was located in Oxnard, polluting our air and soil much longer than should have been allowed thanks to the California Coastal Commission.
5. There is a Reliant Energy Plant operating right next to the proposed site of the peaker power plant. There are already enough chemicals and pollutants involved in this operation.
6. There is a marine sanctuary right off our coast. Oxnard is home to many species of wild life. Their safety should also be taken into consideration.
7. **THE ENERGY WILL NOT EVEN BE USED FOR OXNARD.** Why not locate the plant away from homes and in the area where the energy will be used.

Would members of the California Coastal Commission care to live so close to this plant??? I think NOT!! It is time Oxnard is considered more than just a dumping ground for pollutants.

Mildred A. Miele

Robert L. Duarte
2081 N. Oxnard Blvd #191
Oxnard, CA 93036

RECEIVED
MAY 05 2008
CALIFORNIA
COASTAL COMMISSION

Patrick Kruer, Chair
California Coastal Commission
45 Fremont St, Stc 2000
San Francisco, CA 94105

RE: Oxnard Peaker Plant

Honorable Chair Kruer,

This letter is written in support of the Coastal Commission's staff recommendation that you overturn the City of Oxnard and issue a Coastal Development Permit for this electrical generation facility.

My support is based on the fact that this facility is proposed for a site that is designated for energy production the approved Oxnard Local Coastal Plan and supports the existing Reliant energy generating facility, which is a coastal dependent industrial use. If this facility cannot be sited at a location already designated for such use under the Coastal plan - where can it be sited?

My support is also based on the fact that this peaker plant is needed to protect coastal communities from Southern Ventura County to through Santa Barbara County from brownouts, blackouts & the risk of long term power outages. Whether such occurrences are the result of natural disasters or excess demand on a region-wide or state-wide basis, they represent real threats to the health (especially the health of the infirm), welfare (especially the welfare of the most needy) and the economy of our community. By supplanting the coastal energy supply and providing a means of quick startup for the reliant Energy facility, the peaker plant can moderate, if not prevent, these occurrences.

I am a resident of Oxnard & the individuals who have spoken in opposition of the peaker plant do not speak for me. I find it presumptuous that these individuals purport to speak on behalf of persons like me - who they have never consulted.

Sincerely,

Robert Duarte