

## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	211999
<b>Document Title:</b>	Request for Extension of Public Review Period
<b>Description:</b>	Letter to Shawn Pittard re Request for Extension of Public Review Period
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June 28, 2016

Shawn Pittard  
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Re: Puente Power Project (15-AFC-01); Request for Extension of Time Period  
for Public Review and Comment on Preliminary Staff Assessment

Dear Mr. Pittard:

I am writing on behalf of the City of Oxnard to request an extension of time to comment on the preliminary staff assessment for the Puente Project proposed by NRG. We appreciate the opportunity to review and comment on the 1,200+ pages of the preliminary staff assessment. However, the time provided for the public comment period of 45 days is simply too short to allow meaningful review and comment on such a massive document.

Under the California Environmental Quality Act, 45 days would be the *minimum* time period for public review of a draft environmental impact report of this scope. Pub. Res. Code § 21091(a). The preliminary staff assessment serves as the functional equivalent of a draft environmental impact report and should be treated similarly for the purposes of determining an appropriate public comment period. The City and many lead agencies routinely extend public comment periods for large and complex Draft EIRs. Moreover, here, the City has taken efforts to make the PSA more accessible to the public by compressing the PDF files and segmenting them into smaller files for better public access. The City has just posted these more accessible documents to its own webpage.

The Puente Project will impact a number of important environmental resources, including coastal wetlands, it will affect a community that is already overburdened by the impacts of numerous industrial facilities, and it presents complex technical issues regarding air impacts and impacts resulting from sea level rise and other coastal hazards. Furthermore, the comment period extends over the summer and fourth of July holidays, when many people are on vacation and will not have adequate time to devote to the

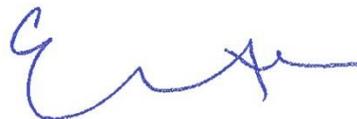
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review of the preliminary staff assessment. And, while your agency has translated the PSA notices, the PSA itself is not translated into Spanish. Forty-three percent of our residents speak a language other than English at home, mostly Spanish (Census, ACS, 2015). Additional time is needed for this large segment of the City's population to review and understand the documents.

We can appreciate the tremendous effort that has obviously been devoted in preparing the preliminary staff assessment, and would like opportunity to review the documents and provide thorough and meaningful comments. This is an important opportunity to engage the public in the review process. Therefore, we respectfully request that the comment period be extended to allow for a public review period of 90 days, with the comment period closing on September 19, 2016. At the very least, the Commission should extend the public comment period to 60 days, which is routinely provided for complex environmental documents such as this one.

Very truly yours,

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