

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	206586
<b>Document Title:</b>	Central Coast Alliance United for a Sustainable Economy Comments: Inadequate Consideration of Alternatives to Project
<b>Description:</b>	N/A
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<b>Organization:</b>	Central Coast Alliance United for a Sustainable Economy/Maricela Morales
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*Comment Received From: Maricela Morales*

*Submitted On: 11/11/2015*

*Docket Number: 15-AFC-01*

## **Inadequate Consideration of Alternatives to Project**

Dear Presiding Commissioner Scott and Commissioner Douglas:

The Central Coast Alliance United for a Sustainable Economy (CAUSE) submits the following comments regarding staff's August 10, 2015 Issues Identification Report ("Issues ID Report") and the Puente Power Project Application for Certification ("AFC") (15-AFC-01). These comments are supplemental to oral comments presented by CAUSE and many of our members at the California Energy Commission's ("Commission") August 27, 2015 Environmental Scoping Meeting and Informational Hearing and the letter submitted by CAUSE on October 15th.

CAUSE agrees with staff's conclusion that NRG's AFC did not assess potential alternative locations for the project. We also believe the AFC had inadequate assessment of alternatives to the construction of a new gas-fired power plant in the region. The relatively small amount of energy that would be produced in the Moorpark sub-area by a 262 MW gas-fired plant could be achieved with some combination of renewable energy projects, energy storage and improved transmission. Building a new fossil fuel power plant that will operate for decades carries the state in the opposite direction needed to reach the higher Renewable Portfolio Standard set by SB350. Furthermore, the exploration of Community Choice Aggregation being conducted by Santa Barbara and Ventura Counties indicates that there may not be reliable local demand for a new 262 MW fossil fuel plant and that local communities are ready to move towards increased renewable energy in the region.

State law and policy lays out a Preferred Resources Loading Order which prioritizes renewable energy generation, energy efficiency measures, and other options, leaving new fossil fuel power generation as the lowest priority. Southern California Edison failed to demonstrate a reasonable effort to prioritize renewable options in their bidding process or fully examine alternatives. This is particularly troubling in an environmental justice community like Oxnard, where Southern California Edison did not "give preference to renewable energy projects that provide environmental and economic benefits to communities afflicted with poverty or high unemployment, or that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases", as required by the Public Utilities Code.

Even if the commission determines that the only viable option is constructing a fossil fuel power plant, NRG's proposed location for the Puente project should be rejected. NRG and Southern California Edison not only failed to consider environmental justice in their choice of location, this site was chosen for no other reason than that it is the same location that has historically been burdened by power plants. NRG chose Mandalay Beach because it is a brownfield where NRG currently owns the land and has transmission lines to serve the two existing power plants.

This also directly contradicts the intent of federal policy concerning brownfields that encourages environmentally beneficial developments on brownfield sites such as renewable energy projects. The Puente proposal does not improve the brownfield area or provide benefits to the overburdened community surrounding it. In fact, a new power plant would present a major obstacle to the City of Oxnard's efforts to restore its coastline. NRG claims in their AFC that the Mandalay Beach area is heavily industrialized, but in fact, the site is only industrialized by the power generation facilities at that location, and is otherwise surrounded by environmentally sensitive coastal habitat and state beach parks heavily used by local residents. The city's intent, through the current update of their Local Coastal Plan and emergency moratorium on coastal power plants, is to transition this coastal area away from being an industrial site used for power generation and towards improved public access and environmental restoration.

Allowing the placement of the Puente proposal on this site undermines the local community's intent, perpetuates environmental injustice, and continues the legacy of Oxnard being uniquely burdened by power generating facilities within the Moorpark sub-area.

Oxnard is an inappropriate location as the city is already burdened with three power plants, and is in the top 20% of environmentally burdened communities according to the Cal EnviroScreen 2.0, a status which is not shared by any other community in the Moorpark sub-area. We also strongly oppose staff's suggestion of Ormond Beach as an alternate location, as it is closer to Oxnard's most environmentally burdened and socioeconomically disadvantaged neighborhoods, already impacted by a power plant and a Superfund toxic waste site, and would fall directly inside the most ecologically significant wetlands restoration project in Southern California. The industrialized eastern edge of the city is immediately adjacent to census tracts in the top 10% most environmentally burdened in the state and would also raise environmental justice concerns. We also oppose the Calpine bid to site a power plant in Santa Paula, in one of only two census tracts outside of Oxnard in the entire Moorpark sub-area that scores above the 75th percentile on the Cal EnviroScreen. The preference shown for locating power plants in environmental justice communities like Oxnard and Santa Paula further highlights the need to prioritize renewable energy or other alternatives within the Moorpark sub-area.

We encourage the commission to consider the "No action" alternative, reassess the amount of power needed for the Moorpark sub-area, and explore meeting energy needs through a combination of renewable projects, energy storage and transmission improvements.

Sincerely,

Maricela Morales  
Executive Director  
CAUSE

*Additional submitted attachment is included below.*



Central Coast Alliance United for a Sustainable Economy

**CAUSE** regional power in action

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November 11, 2015

Commissioner Janea A. Scott, Presiding Member  
Commissioner Karen Douglas, Associate Member  
California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

**RE: Additional Comments on Proposed Puente Power Project Staff Issues  
Identification Report (15-AFC-01)**

Dear Presiding Commissioner Scott and Commissioner Douglas:

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demonstrate a reasonable effort to prioritize renewable options in their bidding process or fully examine alternatives. This is particularly troubling in an environmental justice community like Oxnard, where Southern California Edison did not “give preference to renewable energy projects that provide environmental and economic benefits to communities afflicted with poverty or high unemployment, or that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases”, as required by the Public Utilities Code.

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This also directly contradicts the intent of federal policy concerning brownfields that encourages environmentally beneficial developments on brownfield sites such as renewable energy projects. The Puente proposal does not improve the brownfield area or provide benefits to the overburdened community surrounding it. In fact, a new power plant would present a major obstacle to the City of Oxnard’s efforts to restore its coastline. NRG claims in their AFC that the Mandalay Beach area is heavily industrialized, but in fact, the site is only industrialized by the power generation facilities at that location, and is otherwise surrounded by environmentally sensitive coastal habitat and state beach parks heavily used by local residents. The city’s intent, through the current update of their Local Coastal Plan and emergency moratorium on coastal power plants, is to transition this coastal area away from being an industrial site used for power generation and towards improved public access and environmental restoration. Allowing the placement of the Puente proposal on this site undermines the local community’s intent, perpetuates environmental injustice, and continues the legacy of Oxnard being uniquely burdened by power generating facilities within the Moorpark sub-area.

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We encourage the commission to consider the “No action” alternative, reassess the amount of power needed for the Moorpark sub-area, and explore meeting energy needs through a combination of renewable projects, energy storage and transmission improvements.

Sincerely,

A handwritten signature in black ink that reads "Maricela Morales". The signature is written in a cursive style with a large, looping initial "M".

Maricela Morales  
Executive Director  
CAUSE