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Project Title:	Puente Power Project
TN #:	215544
Document Title:	REBUTTAL TESTIMONY OF STRELA CERVAS ON BEHALF OF THE CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE
Description:	Rebuttal testimony of Strela Cervas
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1 Application: 15-AFC-01
2
3 Witness: Strela Cervas
4 Exhibit No.: 6003
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7 **STATE OF CALIFORNIA**
8 **CALIFORNIA ENERGY COMMISSION**
9

10 IN THE MATTER OF:

DOCKET NO. 15-AFC-01

11
12 APPLICATION FOR CERTIFICATION OF
13 THE **PUENTE POWER PROJECT**

**REBUTTAL TESTIMONY OF STRELA
CERVAS ON BEHALF OF THE
CALIFORNIA ENVIRONMENTAL
JUSTICE ALLIANCE**

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Justice Alliance (CEJA)

1 I. TESTIMONY SUBMITTED ON BEHALF OF NRG FAILS TO CORRECTLY
2 IDENTIFY EJ COMMUNITIES AND INCORRECTLY CONCLUDES THERE WILL BE NO
3 IMPACTS

4 The opening testimony submitted January 18, 2017 by NRG in purports to
5 evaluate the environmental justice impacts of the proposed Puente project, and concludes that
6 there will be no impacts to environmental justice communities. My opening testimony, submitted
7 January 18, 2017, explained at length the updates to the CalEnviroScreen tool that show a more
8 accurate picture of the environmental justice communities existing in the vicinity of the Puente
9 site. CalEnviroScreen 3.0 shows that the census tract in which Puente would be located is in the
10 top 86-90th percentile.¹ It has a population of over 5,000 people that is 56% Latino and 75%
11 people of color. It is in the 94th percentile in the state for pollution burden, the 100th percentile
12 for pesticides, the 92nd percentile for cleanup sites, 92nd percentile for groundwater threats, 78th
13 percentile for hazardous waste, 91st percentile for impaired water bodies, 79th percentile for
14 solid waste, 92nd percentile for asthma, 89th percentile for low birth weight, and 92nd percentile
15 for cardiovascular rate.²

16 NRG's testimony fails to describe any of the updated data about affected communities. It
17 simply reiterates that each of its experts stands by his prior analysis that environmental justice
18 communities will not be affected. The presence of higher asthma impacts, cardiovascular rates
19 and other hazards within the census tract where Puente would be located means the closest
20 population is more vulnerable than indicated by the data reviewed by NRG's witnesses. Their
21 ongoing affirmation, based on old data, is flawed.

22 II. INCORPORATION OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE
23 COMMENTS ON PSA INTO EVIDENCE

24 I hereby sponsor the September 15, 2016 comments of the California Environmental
25 Justice Alliance on the Preliminary Staff Assessment, TN 213682, into evidence in these
26

27 ¹ CALENVIROSCREEN 3.0 MAP search result Oxnard *Available at*
28 <http://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=4560cfbce7c745c299b2d0cbb07044f5>.
² *Id.*

1 proceedings.³ I hereby further sponsor the August 11, 2016 presentation “CEJA on Preliminary
2 Staff Assessment Workshop”, TN 212739, into evidence.⁴

3 DATED: January 24, 2017

By:

/s/

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Strela Cervas

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³ Exhibit 6004.

⁴ Exhibit 6005.