

## DOCKETED

<b>Docket Number:</b>	15-AFC-02
<b>Project Title:</b>	Mission Rock Energy Center
<b>TN #:</b>	211329
<b>Document Title:</b>	Maricela Morales Comments: CAUSE comments on environmental justice impact of proposed project
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Maricela Morales
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/2/2016 10:44:53 AM
<b>Docketed Date:</b>	5/2/2016

*Comment Received From: Maricela Morales*

*Submitted On: 5/2/2016*

*Docket Number: 15-AFC-02*

## **CAUSE comments on environmental justice impact of proposed project**

April 29, 2016

California Energy Commission

1516 Ninth Street

Sacramento, CA 95814

RE: Comments on Proposed Mission Rock Energy Center (15-AFC-02)

Dear California Energy Commission,

The Central Coast Alliance United for a Sustainable Economy (CAUSE) submits the following comments regarding the proposed Mission Rock Energy Center Application for Certification (â€œAFCâ€ ) (15-AFC-02).

CAUSE is a local nonprofit organization with a 15 year history of community organizing and policy advocacy for social, economic and environmental justice in the Central Coast region. CAUSEâ€™s membership is made up of hundreds of predominantly low-income Latino families throughout the Ventura and Santa Barbara Counties area, including Santa Paula.

CAUSE urges the Commission to reject the Calpine Mission Rock Energy Center project due to environmental justice concerns.

The Mission Rock Energy Center is being proposed by Calpine as a potential alternative to the Puente Power Project proposal in nearby Oxnard by NRG. While NRG has secured a contract with Southern California Edison, if Puente is ultimately rejected, Calpine hopes to supply power to Edison instead. These two proposals, and the long history of concentrating power plants in Oxnard to serve the Moorpark Sub-area, show a consistent pattern of the industry targeting low-income Latino communities for the sites of fossil fuel power generation in the region.

Oxnard has traditionally been the location of virtually all power generation for the Moorpark sub-area and is considered the most environmentally burdened disadvantaged community in the region. There are only two census tracts in the entire Moorpark sub-area outside of Oxnard that score above the 75th percentile on the Cal EnviroScreen, the stateâ€™s measure of disadvantaged communities disproportionately impacted by pollution. The proposed Mission Rock Energy Center in Santa Paula would be directly inside one of these two census tracts.

Santa Paula is the largest predominantly Latino community other than Oxnard in the Moorpark sub-area. Santa Paula is an agricultural community that is 80% Latino. At 19%, its poverty rate is second highest among all cities in the Moorpark sub-area. In the Santa Paula Unified School District, 87% of students qualify for the federal free and reduced lunch program.

CAUSE calculates that 8,625 Santa Paula residents live in census tracts within 6 miles of the proposed project that score above the 70th percentile in the CalEnviroScreen. The proposed project is across the street from the Ventura County Jail, and surrounded by agricultural fields where farmworkers typically work long hours six days per week. Farmworker housing for the Limoneira Company, the largest agricultural employer in Santa Paula, and Briggs Elementary School are both within 2-3 miles of the project. The project would add to the pollution burden of a site that is already reeling from the recent Santa Clara Wastewater chemical explosion being investigated by the

California Attorney General that caused crop loss due to contamination, with several city firefighters hospitalized and placed on indefinite medical leave with an unknown diagnosis. The overwhelmingly Latino and low-income population of farmworkers, jail inmates, and elementary school students near the project would bear the burden of increased pollution resulting from approval by the Commission.

The California Energy Commission should not approve this project, especially prior to the procurement process of the California Public Utilities Commission (CPUC). Under the implementation of the state's historic climate change legislation SB350, the CPUC has an even more concrete and explicit role in ensuring that renewable energy resources are preferred for projects in disadvantaged communities such as Santa Paula and Oxnard. Southern California Edison has not selected the Mission Rock Energy Center in its bidding process and is mandated by state law to assess potential environmental justice concerns during procurement. Until the clear environmental justice issues raised by this project are given thorough analysis, it is inappropriate for Calpine to move forward with this project at the CEC. We urge the Commission to reject this proposal.

Sincerely,

Maricela Morales, M.A.  
Executive Director  
CAUSE

*Additional submitted attachment is included below.*

**Board of Directors**

President  
**Gaye T. Johnson PhD**  
*Professor UCLA*

Vice President  
**Alma Wilson**  
*Guadalupe THRIVE*

Treasurer  
**David Pollock**  
*Moorpark City Council*

Secretary  
**Tricia Keen**  
*Habitat for Humanity*

**Members**  
**Feliciano Aguilar**  
**Manuel Minjares**  
**Julie Peña**  
**Kaia Tollefson PhD**

**Staff**  
**Maricela Morales, M.A.**  
*Executive Director*  
**Cameron Yee**  
*Operations & Research*

**Lucas Zucker**  
*Policy Director*  
**Hazel Davalos**  
*Regional Community Organizing Director*

**Vicky Curtis**  
*Financial Administrator*  
**Aracely Preciado**  
*Community Organizer*

**Miguel Rodriguez**  
*Community Organizer*  
**Olga Santos**  
*Community Organizer*

**Jovita Valdez**  
*Development Director*  
**Refugio Valencia**  
*Community Organizer*

**Frank Rodriguez**  
*Community Organizer*  
**Lauren Spence**  
*Community Organizer*

April 29, 2016  
 California Energy Commission  
 1516 Ninth Street  
 Sacramento, CA 95814

**RE: Comments on Proposed Mission Rock Energy Center (15-AFC-02)**

Dear California Energy Commission,

The Central Coast Alliance United for a Sustainable Economy (CAUSE) submits the following comments regarding the proposed Mission Rock Energy Center Application for Certification (“AFC”) (15-AFC-02).

CAUSE is a local nonprofit organization with a 15 year history of community organizing and policy advocacy for social, economic and environmental justice in the Central Coast region. CAUSE’s membership is made up of hundreds of predominantly low-income Latino families throughout the Ventura and Santa Barbara Counties area, including Santa Paula.

CAUSE urges the Commission to reject the Calpine Mission Rock Energy Center project due to environmental justice concerns.

The Mission Rock Energy Center is being proposed by Calpine as a potential alternative to the Puente Power Project proposal in nearby Oxnard by NRG. While NRG has secured a contract with Southern California Edison, if Puente is ultimately rejected, Calpine hopes to supply power to Edison instead. These two proposals, and the long history of concentrating power plants in Oxnard to serve the Moorpark Sub-area, show a consistent pattern of the industry targeting low-income Latino communities for the sites of fossil fuel power generation in the region.

Oxnard has traditionally been the location of virtually all power generation for the Moorpark sub-area and is considered the most environmentally burdened disadvantaged community in the region. There are only two census tracts in the entire Moorpark sub-area outside of Oxnard that score above the 75th percentile on the Cal EnviroScreen, the state’s measure of disadvantaged communities disproportionately impacted by pollution. The proposed Mission Rock Energy Center in Santa Paula would be directly inside one of these two census tracts.

Santa Paula is the largest predominantly Latino community other than Oxnard in the Moorpark sub-area. Santa Paula is an agricultural community that is 80% Latino. At 19%, its poverty rate is second highest among all cities in the Moorpark sub-area. In the Santa Paula Unified School District, 87% of students qualify for the federal free and reduced lunch program.

CAUSE calculates that 8,625 Santa Paula residents live in census tracts within 6 miles of the proposed project that score above the 70th percentile in the CalEnviroScreen. The proposed project is across the street from the Ventura County Jail, and surrounded by agricultural fields where farmworkers typically work long hours six days per week. Farmworker housing for the Limoneira Company, the largest agricultural employer in Santa Paula, and Briggs Elementary School are both within 2-3 miles of the project. The project would add to the pollution burden of a site that is already reeling from the recent Santa Clara Wastewater chemical explosion being investigated by the California Attorney General that caused crop loss due to contamination, with several city firefighters hospitalized and placed on indefinite medical leave with an unknown diagnosis. The overwhelmingly Latino and low-income population of farmworkers, jail inmates, and elementary school students near the project would bear the burden of increased pollution resulting from approval by the Commission.

The California Energy Commission should not approve this project, especially prior to the procurement process of the California Public Utilities Commission (CPUC). Under the implementation of the state's historic climate change legislation SB350, the CPUC has an even more concrete and explicit role in ensuring that renewable energy resources are preferred for projects in disadvantaged communities such as Santa Paula and Oxnard. Southern California Edison has not selected the Mission Rock Energy Center in its bidding process and is mandated by state law to assess potential environmental justice concerns during procurement. Until the clear environmental justice issues raised by this project are given thorough analysis, it is inappropriate for Calpine to move forward with this project at the CEC. We urge the Commission to reject this proposal.

Sincerely,



Maricela Morales, M.A.  
Executive Director  
CAUSE