

DOCKETED

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Project Title:	Roseville Energy Park Compliance
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Document Title:	CEC Response to Ms Pittman Comments on the Turbine Upgrade PTA
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Filer:	Anwar Ali
Organization:	California Energy Commission/Elizabeth Huber
Submitter Role:	Commission Staff
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March 25, 2021

Ms. Mary T. Pittman

**ROSEVILLE ENERGY PARK (03-AFC-01C) - STAFF RESPONSES TO
COMMENTS ON THE STATEMENT OF STAFF APPROVAL OF PROPOSED
CHANGE**

Dear Ms. Pittman:

Thank you for your comments submitted on March 18, 2021, regarding inaccuracies in Table 2 (Low Income Data within the Project Area) of the Statement of Staff Approval of Proposed Change, which was docketed on March 10 2021.

The California Energy Commission (CEC) staff has carefully reviewed your comments and provides the following responses.

Comment: Roseville Joint Union High School District, which operates in Roseville, Placer County and the Antelope area of Sacramento County, was not taken into consideration and their numbers are not included.

Staff Response: When staff represents the low income status of populations within the six mile radius of a project site, we do not always use all of the school district boundaries in the radius. The purpose is to identify and represent the presence or absence of a low income population and therefore all school district boundaries and associated data within the project radius may not be necessary or most representative in identifying presence or absence. Staff aims to use the smallest geographies that can be fit together like puzzle pieces to represent the population's low income status for the smallest area (to get more focused data, geographically speaking) and most closely aligned with the radius (to reduce the data being skewed by a large population within the district but outside of the project radius).

In the case of the Roseville Energy Center, the Roseville Joint Union High School District has one of the larger school district boundaries in the area and as mentioned by the commenter, operates in the Roseville and Granite Bay areas of Placer County and the Antelope area of Sacramento County. The Roseville City Elementary district overlaps the high school district, but is smaller and more closely aligned with the six mile radius around the project site. Because the Roseville Joint Union High School District may not be as representative of an indicator of the presence of Environmental Justice (EJ) populations based on low income status within the six mile radius, the Roseville City Elementary district, which does constitute an EJ population based on low income status, was used for the purpose of this analysis.

Additionally, an EJ population was identified based on race and ethnicity within the project radius, as shown in Figure 1. Staff has considered how the project would affect this population. Staff's impact conclusions would not be affected whether or not the low income status for the Roseville Joint Union High School were included.

Comment: Numbers for Enrollment for Meals & Free and Reduced Price Meals in Sutter County cannot be accurate as listed, and appear to be reversed.

Staff Response: The percentages reported were correct; however, the raw number for enrollment for meals was inadvertently reversed with the raw number for reduced price meals, as shown in the revised table below.

Table 2
Low Income Data within the Project Area

PLACER COUNTY SCHOOL DISTRICT IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Dry Creek Joint Elementary	6,681	2,869	42.9%
Rocklin Unified	14,145	2,496	17.6%
Roseville City Elementary	11,487	3,301	38.7%
Western Place Unified	9,712	3,233	33.3%
REFERENCE GEOGRAPHY			
Placer County	75,217	21,117	28.1%
SACRAMENTO COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Center Joint Unified	4,258	2,729	64.1%
Elverta Joint Elementary	312	203	65.1%
REFERENCE GEOGRAPHY			
Sacramento County	249,542	150,025	60.1%
SUTTER COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Pleasant Grove Joint Union	165	52	31.5%
REFERENCE GEOGRAPHY			
Sutter County	14,897 23,308	23,308 14,897	63.9%
Source: CDE 2020. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2019-2020, < http://dq.cde.ca.gov/dataquest/ >.			

We would like to assure you that CEC ensures that all proposed project changes are accomplished in accordance with the CEC conditions of certification, and laws, ordinances, regulations, and standards thereby avoiding any significant environmental impacts.

Ms. Mary T. Pittman
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If you have any questions or concerns, please contact Anwar Ali, Compliance Project Manager, at (916) 698-7498, or via e-mail at anwar.ali@energy.ca.gov

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Huber". The script is cursive and fluid.

Elizabeth Huber
Manager, Office of Compliance,
Monitoring, and Enforcement
Siting, Transmission, and Environmental
Protection Division