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## Puente Power Project

(15-AFC-01)

## Socioeconomics: Revised Environmental Justice Review

In response to comments from Central Coast Alliance United for a Sustainable Economy (C.A.U.S.E.), submitted to the California Energy Commission (CEC) on October 15, 2015, NRG Oxnard Energy Center LLC (NRG or Applicant) has reanalyzed the minority population screening process and data presented in the P3 Application for Certification (AFC) Socioeconomics section (Section 4.10), Environmental Justice Analysis (Section 4.10.2.7). In addition, Applicant has reviewed the suggested use of CalEnviroScreen in the environmental justice analysis.

## Environmental Justice Background/Methodology

Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued in 1994 with the purpose of focusing federal attention on the environmental and human-health effects that federal actions have on minority and low-income populations; and the goal of achieving environmental protection for all communities.

The CEC has used methodology consistent with the Council on Environmental Quality (CEQ) and U.S. Environmental Protection Agency (U.S. EPA) guidelines for environmental justice analyses. The CEQ, in consultation with U.S. EPA, has developed guidance (Environmental Justice Guidance Under the National Environmental Policy Act, December 10, 1997) on the procedures to implement environmental justice analysis, which requires that minority and low-income (and Indian tribe) metrics be applied, using census data (CEQ, 1997).

## 2013 American Community Survey and 2010 Census Data

The American Community Survey (ACS) and decennial census datasets are both produced and released by the U.S. Census Bureau. The ACS is conducted every year to provide up-to-date information about the social and economic status and needs of the communities; the decennial census is conducted once every 10 years to provide an official count of the entire U.S. population to Congress (U.S. Census Bureau, 2015). The 5 -year estimates from the ACS are "period" estimates that represent data collected over a period of time. The primary advantage of using multi-year estimates is the increased statistical reliability of the data for less-populated areas and small population subgroups.

The 2013 ACS 5-year estimate dataset was used for the P3 AFC Socioeconomics environmental justice analysis screening because it provides the most current and comprehensive (minority and low-income) data-more current than the decennial Census. Both the ACS and decennial Census datasets are accepted sources of census data used for environmental justice screening, in accordance with the CEQ and U.S. EPA guidance (U.S. EPA, 1998). Attachment A of this memorandum provides the side-by-side comparison of the 2013 ACS and decennial Census data for minority data. Poverty data are not available through the 2010 Census results; therefore, only the 2013 ACS 5-year estimate poverty data are presented.

## CaIEnviroScreen 2.0 Data

CalEnviroScreen 2.0 is a screening tool that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. The California Environmental Protection Agency uses this tool to identify and designate California disadvantaged communities for investment of proceeds from the state's cap-and-trade program (i.e., greenhouse gas reduction investments to benefit disadvantaged communities).

## A=COM

The CalEnviroScreen screening factors do not follow the current established methodology (and EO 12898) for environmental justice community identification. CalEnviroScreen includes a range of socioeconomic and population characteristics in its calculations, including age, asthma rates, low birthweight rates, education levels, linguistic isolation, poverty rates, and unemployment (OEHHA, 2014). However, CalEnviroScreen does not include a measure of race/ethnicity in the calculation of a vulnerability score. EO 12898 and CEQ guidance are very specific that race, ethnicity, and poverty rates should be used to identify environmental justice populations Therefore, use of the CalEnviroScreen tool for purposes of conducting an environmental justice analysis does not comport with underlying legal and policy requirements, and was not used in the analysis.

## Minority Population Data Screening

The environmental justice analysis screening presented in the AFC applied a calculation to determine the minority population, based on:

> [RACE - Total Population (HC01_VC43)] minus [One Race White (HC03_VC49)]

On further review, it was determined that this formula can understate the minority populations, because the One Race White (HC03_VC49) includes racially white individuals, but can include individuals identifying as ethnically Hispanic/Latino, who are considered a minority group under EO 12898. This is particularly important in areas with high numbers of Hispanic residents, because many Hispanics will respond that they are racially white, but ethnically Hispanic, and therefore should be considered minorities.

The minority population screening was therefore corrected using the calculation:

## [RACE - Total Population (HCO1_VC43)] minus [HISPANIC OR LATINO AND RACE - Total Population - Not Hispanic or Latino - White Alone (HC01_VC94)]

The above calculation provides the number of minority population that is neither racially nor ethnically considered white. The population data (HISPANIC OR LATINO AND RACE - Total Population - Not Hispanic or Latino - White Alone [HC01_VC94]) include only the white population without the ethnically Hispanic population (American FactFinder, 2015). The details of how these data were obtained using Geographic Information Systems (GIS) is provided in Attachment A.

The results of the corrected minority screening using the 2013 ACS 5 -year estimated data are presented in the updated Figure 4.10.2 (Attachment B); detailed results, including comparison with the previously reported minority percentages, are provided in Table 1 (Attachment B). The corrected calculation for minority screening analysis indicates a substantially higher percentage of minority residents than previously reported, including census tracts containing greater than 50 percent minority populations, which are shown in bold. Although the Study Area (established at 6 miles from the proposed project site in accordance with CEC guidelines) contains other census tracts that do not exceed 50 percent minority population, the minority percentages in these census tracts are meaningfully greater when compared to the greater geographic scale (Ventura County), and would therefore also be considered minority populations.

Whereas no minority population was identified previously in the Study Area, the revised Figure 4.10-2 and Table 1, which show the results of the screening using the corrected data source, indicate that the majority of the Study Area comprises minority populations.

## A=СОМ

## Low-Income Populations

The P3 environmental justice analysis screening included in the AFC also presented the low-income population in the Study Area, based on U.S. Census Bureau 2013 ACS S1701 Poverty Status data (HC03_EST_VC01). This is considered appropriate for the environmental justice low-income screening, and does not require correction.

## Evaluation of Disproportionate Impacts

Section 4.10.2.7.3 of the P3 AFC socioeconomics environmental justice analysis applies the final criteria to determine whether the proposed project may potentially result in impacts related to environmental justice. The final criterion is the assessment of whether the potentially significant environmental impacts attributable to the project would fall disproportionately on the minority or low-income populations in the project Study Area, based on impacts to air quality, housing, noise, public health, public service impacts, traffic, and water quality. As analyzed in the AFC, the project would not result in significant environmental impacts accruing to any population in the study area; therefore, environmental impacts cannot accrue disproportionately to environmental justice populations (minority and/or low income) in the Study Area.

Because all potential health and safety and environmental impacts from the project will be mitigated to insignificant levels for all affected populations, including minority populations, the proposed project will not cause or contribute to disproportionate impacts on minority populations.

## References

American FactFinder, 2015. 2013 American Community Survey Data: HC01_VC94 Estimate; HISPANIC OR LATINO AND RACE - Total population - Not Hispanic or Latino - White alone. Available online at: http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t\#none.

CEQ (Council on Environmental Quality), 1997. Environmental Justice Guidance Under the National Environmental Policy Act. December 10.

Executive Order 12898, 1994. Executive Order 12898 on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. February 11.

OEHHA (Office of Environmental Health Hazard Assessment), 2014. CalEnviroScreen Version 2.0. November 10. Available online at: http://oehha.ca.gov/ej/ces2.html.
U.S. Census Bureau, 2015. ACS and the 2010 Census. September 24. Available online at: http://www.census.gov/programs-surveys/acs/about/acs-and-2010-census.html.
U.S. EPA (U.S. Environmental Protection Agency), 1998. Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses. April.

Attachment A

Attachment A: 2013 ACS Total Population and Minority Data and 2010 Census Total Population and Minority Data

|  |  | 2013 ACS 5-year estimate Census Tract Total Population and Minority Data |  |  |  | 2010 Census Total Population and Minority Data |  |  |  | 2013 ACS Poverty Data | Poverty Data <br> Not Availabe in <br> 2010 census |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Dataset: Estimate; RACE- Total population (HOO1_VC13) | Dataset: Estimate; HISPANIC OR LATINO AND RACE - Total population Not Hispanic or Latino - White alone (HCO1_VC94) | MINORTTY Calculated: Total Population (HCO1_VC43) subtracted by Not Hispanic or Latino - White alone (HCO1_VC94), to get all minorities | Percent Mnority | $\begin{aligned} & \text { Total Population: Demographic } \\ & \text { Profile } 1 \text { (DP1), DPSF8. RACE } \end{aligned}$ [24] Item DP0080001 | Demographic Profile 1 (DP1) DPSF11. HISPANICOR LATINO AND RACE [17] | MINORITY Calculated: 2010 Census Tract Total Population (DP0080001) subtracted by 2010 Not Hispanic or Latino: White alone (DP0110011), to get all minorities | $\begin{array}{\|l\|} \hline 2010 \text { Census } \\ \text { Perceent Mnoority } \end{array}$ | Dataset: <br> Percent below poverty level (HCO3_EST_VCO1) |  |
|  |  | Defn, per Census Bureau: <br> 1) All people, male and female, child and adult, living in a given geographic area <br> 2) Note: Although the ACS produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties. Existing data series such as births, deaths, Federal tax returns, Medicare enrollment, and immigration, are used to update the decennial census base counts. 3) JW Note: "RACE" appears as a prefix to this dataset name, but only indicates the catagory name where this dataset was obtained. "Total Population" is the same for other demographic categories (see attachment). | Defn, per Census Bureau: Includes people who reported White and no other race group and did not report being of Hispanic origin. |  |  | Defn, per Census Bureau All people, male and female, child and adult, living in a given geographic area | Defn, per Census Bureau: Includes people who reported White and no other race group and did not report being of Hispanic origin. |  |  | Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If the total income for a family or unrelated individual falls below the relevant poverty threshold, then the family (and every individual in it) or unrelated individual is considered in poverty. |  |
| Census Tract Number Census Tract 12.02 | GEO id2 $6111001202$ | 6977 | 4858 | 2119 | 30.4 | 7191 | 5028 | 2163 | 30.1 | $6.6$ |  |
| Census Tract 12.04 | 6111001204 | 2581 | 1082 | 1499 | 58.1 | 2473 | 1197 | 1276 | 51.6 | 18.7 |  |
| Census Tract 12.06 | 6111001206 | 932 | 557 | 375 | 40.2 | 941 | 745 | 196 | 20.8 | 5.2 |  |
| Census Tract 14.01 | 6111001401 | 4454 | 2875 | 1579 | 35.5 | 3950 | 2648 | 1302 | 33.0 | 8.2 |  |
| Census Tract 14.02 | 6111001402 | 5911 | 3757 | 2154 | 36.4 | 5677 | 3617 | 2060 | 36.3 | 6.3 |  |
| Census Tract 15.02 | 6111001502 | 8832 | 4471 | 4361 | 49.4 | 8668 | 4696 | 3972 | 45.8 | 13.0 |  |
| Census Tract 15.03 | 6111001503 | 5231 | 2454 | 2777 | 53.1 | 5898 | 2975 | 2923 | 49.6 | 13.5 |  |
| Census Tract 15.06 | 6111001506 | 5151 | 3139 | 2012 | 39.1 | 5027 | 3046 | 1981 | 39.4 | 6.8 |  |
| Census Tract 15.07 | 6111001507 | 4621 | 2155 | 2466 | 53.4 | 4330 | 2228 | 2102 | 48.5 | 12.1 |  |
| Census Tract 16.01 | 6111001601 | 1017 | 512 | 505 | 49.7 | 1099 | 585 | 514 | 46.8 | 5.4 |  |
| Census Tract 16.02 | 6111001602 | 2297 | 1715 | 582 | 25.3 | 2388 | 1662 | 726 | 30.4 | 3.4 |  |
| Census Tract 17 | 6111001700 | 3607 | 3067 | 540 | 15.0 | 3531 | 2807 | 724 | 20.5 | 3.0 |  |
| Census Tract 18 | 6111001800 | 4377 | 3336 | 1041 | 23.8 | 4302 | 3404 | 898 | 20.9 | 3.1 |  |
| Census Tract 19 | 6111001900 | 3724 | 2772 | 952 | 25.6 | 3822 | 2900 | 922 | 24.1 | 8.6 |  |
| Census Tract 20 | 6111002000 | 2427 | 1953 | 474 | 19.5 | 2577 | 2141 | 436 | 16.9 | 9.7 |  |
| Census Tract 21.02 | 6111002102 | 1583 | 1301 | 282 | 17.8 | 1832 | 1439 | 393 | 21.5 | 14.6 |  |
| Census Tract 22 | 6111002200 | 6197 | 2122 | 4075 | 65.8 | 6288 | 2226 | 4062 | 64.6 | 18.1 |  |
| Census Tract 23 | 6111002300 | 6999 | 1807 | 5192 | 74.2 | 7430 | 1797 | 5633 | 75.8 | 23.5 |  |
| Census Tract 24 | 6111002400 | 2721 | 2042 | 679 | 25.0 | 2571 | 1741 | 830 | 32.3 | 21.0 |  |
| Census Tract 25 | 6111002500 | 4706 | 4092 | 614 | 13.0 | 4795 | 4041 | 754 | 15.7 | 6.2 |  |
| Census Tract 26 | 6111002600 | 3024 | 1834 | 1190 | 39.4 | 3211 | 1979 | 1232 | 38.4 | 15.6 |  |
| Census Tract 27 | 6111002700 | 4041 | 3034 | 1007 | 24.9 | 3881 | 2658 | 1223 | 31.5 | 8.4 |  |
| Census Tract 28 | 6111002800 | 6274 | 3835 | 2439 | 38.9 | 6270 | 3923 | 2347 | 37.4 | 14.2 |  |
| Census Tract 29.01 | 6111002901 | 5864 | 2078 | 3786 | 64.6 | 5455 | 1947 | 3508 | 64.3 | 4.7 |  |



|  |  | 2013 ACS 5-year estimate Census Tract Total Population and Minority Data |  |  |  | 2010 Census Total Population and Minority Data |  |  |  | 2013 ACS Poverty Data | $\begin{gathered} \text { Poverty Data } \\ \text { Not Available in } \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Dataset: Estimate; RACE- Total population (HOO1_VC43) | Dataset: Estimate; HISPANIC OR LATINO AND RACE - Total population Not Hispanic or Latino - White alone (HCO1_VC94) | MINORITY Calculated: Total Population (HCO1_VC43) subtracted by Not Hispanic or Latino - White alone (HCO1_VC94), to get all minorities | Percent Minority | Total Population: Demographic Profile 1 (DP1), DPSF8. RACE [24] Item: DP0080001 | Demographic Profile 1 (DP1) DPSF11. HISPANICOR LATINO AND RACE [17] | MINORITY Calculated: 2010 Census Tract Total Population (DP0080001) subtracted by 2010 Not Hispanic or Latino: White alone (DP0110011), to get all minorities | $\begin{aligned} & 2010 \text { Census } \\ & \text { Percent Minority } \end{aligned}$ | Dataset: <br> Percent below poverty level (HCO3_EST_VCO1) |  |
|  |  | Defn, per Census Bureau: <br> 1) All people, male and female, child and adult, living in a given geographic area <br> 2) Note: Athough the ACS produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties. Existing data series such as births, deaths, Federal tax returns, Medicare enrollment, and immigration, are used to update the decennial census base counts. 3) JWNote: "RACE" appears as a prefix to this dataset name, but only indicates the catagory name where this dataset was obtained. "Total Population" is the same for other demographic categories (see attachment). | Defn, per Census Bureau: Includes people who reported White and no other race group and did not report being of Hispanic origin. |  |  | Defn, per Census Bureau: All people, male and female, child and adult, living in a given geographic area | Defn, per Census Bureau: Includes people who reported White and no other race group and did not report being of Hispanic origin. |  |  | Census Bureau uses aset of money income thresholds that vary by family size and composition to determine total income for a fanily or unrelated individual falls below the relevant poverty (and every individual in it) or unrelated individual is considered in poverty. |  |
| Census Tract Number | GEO id2 |  |  |  |  |  |  |  |  |  |  |
| Census Tract 47.10 | $6111004710$ |  |  |  |  | $5089$ | $590$ | 4499 |  | 17.1 |  |
| Census Tract 47.11 | 6111004711 | 3222 | $423$ | $2799$ | 86.9 | $3432$ | $227$ | 3205 | $93.4$ | 14.3 |  |
| Census Tract 47.15 | 6111004715 | 5457 | 510 | 4947 | 90.7 | 5020 | 621 | 4399 | 87.6 | 17.0 |  |
| Census Tract 47.16 | 6111004716 | 4372 | 434 | 3938 | 90.1 | 4476 | 297 | 4179 | 93.4 | 22.4 |  |
| Census Tract 47.17 | 6111004717 | 4138 | 123 | 4015 | 97.0 | 4120 | 178 | 3942 | 95.7 | 19.4 |  |
| Census Tract 49.01 | 6111004901 | 6843 | 1029 | 5814 | 85.0 | 6249 | 1035 | 5214 | 83.4 | 5.8 |  |
| Census Tract 49.02 | 6111004902 | 4464 | 14 | 4450 | 99.7 | 5091 | 78 | 5013 | 98.5 | 23.0 |  |
| Census Tract 50.02 | 6111005002 | 2691 | 224 | 2467 | 91.7 | 3003 | 262 | 2741 | 91.3 | 26.1 |  |
| Census Tract 50.03 | 6111005003 | 7559 | 743 | 6816 | 90.2 | 8366 | 794 | 7572 | 90.5 | 18.7 |  |
| Census Tract 50.04 | 6111005004 | 5417 | 1574 | 3843 | 70.9 | 5419 | 1355 | 4064 | 75.0 | 17.6 |  |
| Census Tract 86 | 6111008600 | 8757 | 1029 | 7728 | 88.2 | 7982 | 790 | 7192 | 90.1 | 32.4 |  |
| Census Tract 87 | 6111008700 | 6141 | 969 | 5172 | 84.2 | 6424 | 942 | 5482 | 85.3 | 15.0 |  |
| Census Tract 88 | 6111008800 | 5033 | 1226 | 3807 | 75.6 | 5632 | 965 | 4667 | 82.9 | 4.7 |  |
| Census Tract 89 | 6111008900 | 3695 | 440 | 3255 | 88.1 | 3590 | 392 | 3198 | 89.1 | 6.8 |  |
| Census Tract 91 | 6111009100 | 4870 | 206 | 4664 | 95.8 | 5279 | 192 | 5087 | 96.4 | 34.2 |  |

Attachment B

TABLE 1
MINORITY DATA SHOWING PREVIOUS AND CORRECTED STUDY AREA MINORITY SCREENING RESULTS

| Study Area Census Tract | Total Population, Average 2009-2013 | Previously Reported (Incorrect) Minority Population (\%) | CORRECTED Minority Population (\%) |
| :---: | :---: | :---: | :---: |
| 12.02 | 6,977 | 15.0\% | 30.4\% |
| 1204 | 2,581 | 22.4\% | 58.1\% |
| 12.06 | 932 | 20.1\% | 40.2\% |
| 14.01 | 4,454 | 16.0\% | 35.5\% |
| 14.02 | 5,911 | 20.\%\% | 36.4\% |
| 15.02 | 8,832 | 23.5\% | 49.4\% |
| 15.03 | 5,231 | 35.4\% | 53.1\% |
| 15.06 | 5,151 | 18.7\% | 39.1\% |
| 15.07 | 4,621 | 37.8\% | 53.4\% |
| 16.01 | 1,017 | 25.8\% | 49.7\% |
| 16.02 | 2,297 | 16.2\% | 25.3\% |
| 17 | 3,607 | 6.4\% | 15.0\% |
| 18 | 4,377 | 11.9\% | 23.8\% |
| 19 | 3,724 | 17.9\% | 25.\%\% |
| 20 | 2,427 | 10.4\% | 19.5\% |
| 21.02 | 1,583 | 14.0\% | 17.8\% |
| 22 | 6,197 | 30.7\% | 65.8\% |
| 23 | 6,999 | 35.4\% | 74.2\% |
| 24 | 2,721 | 11.5\% | 25.0\% |
| 25 | 4,706 | 10.2\% | 13.0\% |
| 26 | 3,024 | 21.1\% | 39.4\% |
| 27 | 4,041 | 13.7\% | 24.9\% |
| 28 | 6,274 | 21.4\% | 38.9\% |
| 29.01 | 5,864 | 28.6\% | 64.6\% |
| 29.05 | 5,714 | 31.4\% | 75.9\% |
| 30.1 | 3,172 | 26.3\% | 83.9\% |
| 30.11 | 5,893 | 20.3\% | 93.0\% |
| 30.12 | 404 | 7.2\% | 90.8\% |
| 30.13 | 5,123 | 26.4\% | 76.3\% |
| 31 | 16,107 | 32.4\% | 89.4\% |
| 3201 | 3,685 | 20.9\% | 99.4\% |
| 33 | 8,305 | 21.0\% | 83.2\% |
| 36.05 | 9,117 | 31.7\% | 715\% |
| 36.08 | 4,296 | 33.1\% | 85.8\% |
| 36.09 | 5,823 | 14.5\% | 19.0\% |
| 36.12 | 3,902 | 11.\%\% | 17.1\% |


| Study Area Census Tract | Total Population Average 2009-2013 | Previously Reported (Incorrect) Minority Population (\%) | CORRECTED Minority Population (\%) |
| :---: | :---: | :---: | :---: |
| 37 | 6,409 | 28.5\% | 94.6\% |
| 38.01 | 4,796 | 31.5\% | 98.1\% |
| 38.02 | 3,014 | 25.4\% | 95.4\% |
| 39 | 7,491 | 22.2\% | 95.5\% |
| 40 | 6,244 | 31.5\% | 928\% |
| 41.01 | 7,087 | 18.8\% | 93.6\% |
| 42 | 5,330 | 32.4\% | 820\% |
| 43.04 | 6,809 | 19.7\% | 67.7\% |
| 43.05 | 2,520 | 32.9\% | 44.8\% |
| 44 | 7,141 | 36.5\% | 63.0\% |
| 45.03 | 4,815 | 36.4\% | 94.6\% |
| 45.04 | 5,647 | 39.5\% | 93.3\% |
| 45.05 | 2,121 | 34.2\% | 88.9\% |
| 45.06 | 7,425 | 20.9\% | 94.4\% |
| 47.1 | 4,607 | 33.2\% | 87.8\% |
| 47.11 | 3,222 | 42.6\% | 86.9\% |
| 47.15 | 5,457 | 36.1\% | 90.7\% |
| 47.16 | 4,372 | 29.9\% | 90.1\% |
| 47.17 | 4,138 | 33.5\% | 97.0\% |
| 49.01 | 6,843 | 33.4\% | 85.0\% |
| 49.02 | 4,464 | 13.8\% | 99.7\% |
| 50.02 | 2,691 | 14.2\% | 917\% |
| 50.03 | 7,559 | 14.9\% | 90.2\% |
| 50.04 | 5,417 | 27.1\% | 70.9\% |
| 86 | 8,757 | 25.0\% | 88.2\% |
| 87 | 6,141 | 29.0\% | 84.2\% |
| 88 | 5,033 | 29.2\% | 75.6\% |
| 89 | 3,695 | 18.3\% | 88.1\% |
| 91 | 4,870 | 30.3\% | 95.8\% |
| Ventura County, Total | 839,620 | 15.0\% | 15.0\% (no change) |
| California, Total | 38,332,521 | 26.5\% | 26.5\% (no change) |



LEGEND

| 47.11 | Census Tract |  |
| :--- | :--- | :--- |
| $86.9 \%$ | Percent Minority (Population) | $=$ |
| 6-mile Radius from Project |  |  |


| $\square$ | Site |
| :--- | :--- | Minority Populations $<50 \%$

Minority Populations $>50 \%$
Oxnard City Boundaries

MINORITY POPULATION DISTRIBUTION BY CENSUS TRACTS WITHIN 6 MILES OF PUENTE POWER PROJECT SITE

NRG
Puente Power Project
FIGURE 4.10-2.

