City of
HUNTINGTON PARK california
COMMUNITY DEVELOPMENT DEPARTMENT
6550 MILES AVENUE
HUNTINGTON PARK, CA 90255

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VIA FAX & U.S. MAIL

January 11, 2007

Mr. James W. Reede, Jr.
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5112

Subject: Preliminary Comments Regarding Proposed Vernon Power Plant Project

The City of Huntington Park, which abuts the City of Vernon, is very concerned about the air quality that exists in our area and the negative impacts that will result from additional emissions produced by new electrical generating facilities (EGFs). The City urges the California Energy Commission to further limit or restrict EGFs from establishing in heavily polluted areas, such as the City of Huntington Park.

The United States Environmental Protection Agency (EPA) has designated the Los Angeles County region as a non-attainment area. Non-attainment areas are those areas of the country where air pollution levels persistently exceed the maximum National Ambient Air Quality Standards established by the EPA as necessary for the health of area residents. Permitting EGFs in non-attainment areas would cause the negative effects of increased levels of harmful emissions that would further endanger the health of persons within our City and surrounding areas. The area already contains some of the worst air quality in the region. Therefore, the City strongly urges that the CEC preclude the permitting of EGFs in any area where the area of impact would be defined as a non-attainment area.

Currently, operators of EGFs can offset their emissions by purchasing/acquiring emission reduction credits (ERCs). ERCs can be acquired from anywhere in the South Coast Air Basin, so long as they can be purchased on the open market or have access to the Air Quality Management District (AQMD) Priority Reserve. This system does not reduce air pollution in our area, but rather increases air pollution while reducing air pollution elsewhere. Therefore, the City urges that operators of EGFs proposing to locate in non-attainment areas be limited to acquiring ERCs only available within the area of potential impact and within a three (3) mile radius of the project site.

The City of Huntington Park and surrounding communities are low-income areas with the majority of the population being minority people. Locating new EGFs in our area creates an environmental injustice since the public, including minority and low-income populations, would be treated unfairly, and caused to experience disproportionately high and adverse health conditions or environmental effects from increased harmful emissions.

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For these reasons, the City of Huntington Park respectfully requests that the CEC accept these preliminary comments and ensure that no permits be granted for the proposed Vernon Power Plant Project unless ERCs are acquired in equal off setting quantities from within the project's area of impact prior to the issuance of permits.

Respectfully Submitted,

Henry L. Gray,
Director of Community Development