



City of
HUNTINGTON PARK california
 COMMUNITY DEVELOPMENT DEPARTMENT

6550 MILES AVENUE
 HUNTINGTON PARK, CA 90255

January 11, 2007

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

DOCKET	
06-AFC-4	
DATE	JAN 11 2007
RECD.	JAN 16 2007

VIA FAX & U.S. MAIL

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.

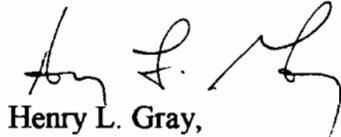
Currently, operators of EGFs can offset their emissions by purchasing/acquiring emission reduction credits (ERCs). ERCs can be acquired from anywhere in the South Coast Air Basin, so long as they can be purchased on the open market or have access to the Air Quality Management District (AQMD) Priority 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.

PROOF OF SERVICE (REVISED _____) FILED WITH
 ORIGINAL MAILED FROM SACRAMENTO ON 1/16/07
[Handwritten initials]

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 offsetting quantities from within the project's area of impact prior to the issuance of permits.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Henry L. Gray". The signature is fluid and cursive, with a large, stylized initial "H" and "G".

Henry L. Gray,
Director of Community Development

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE VERNON POWER PLANT PROJECT
BY THE CITY OF VERNON

DOCKET NO. 06-AFC-4
PROOF OF SERVICE LIST
(REVISED 10/4/06)

INSTRUCTIONS: All parties shall (1) file a printed, original signed document plus 12 copies OR file one original signed document and e-mail the document to the Docket address below, **AND** (2) all parties shall also send a printed OR electronic copy of the document, plus a proof of service declaration, to each of the entities and individuals on the proof of service list:

CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 06-AFC-4
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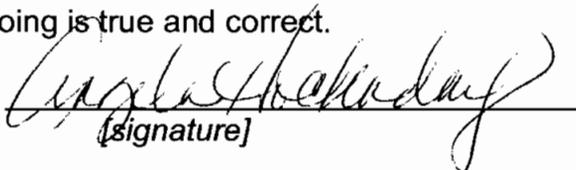
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DECLARATION OF SERVICE

I, Angela Hockaday, declare that on January 16, 2007, I deposited the required copies of the attached Letter from Henry L. Gray/City of Huntington Park California to James W. Reede Jr. dated January 11, 2007 Re: Preliminary Comments for the Vernon Power Plant Project, in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


(signature)