



C&H Sugar Company, Inc.

830 Loring Avenue
Crockett, CA 94525

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Hitesh.Modgil@asr-group.com

Hitesh Modgil
General Manager

November 20, 2025

Dr. Matthew Dumlao
Executive Officer
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

RE: Support for Crockett Cogeneration's Long-Term Lease Renewal

Dear Dr. Dumlao:

On behalf of C&H Sugar Company, Inc., I am writing to express our strong support for the expeditious approval of Crockett Cogeneration's long-term lease renewal, which is currently under consideration by the California State Lands Commission (the "Commission").

The C&H Sugar Refinery in Crockett, which has operated continuously since 1906, produces more than 100 grades and package sizes of sugar products and employs more than 480 people at good-paying jobs, the majority of which are union positions. An economic driver in the region, each year we invest millions of dollars in capital improvements at our facility and employ many local contractors. We value our community and support many local non-profits and other organizations in Crockett in addition to sponsoring annual events.

Crockett Cogeneration is a 240 MW natural gas-fired cogeneration facility which was purposefully co-located at the C&H site in 1996 to provide our sugar refinery with an adjacent, reliable and efficient source of steam. Without the steam provided by Crockett Cogeneration, C&H would be unable to operate. As such, C&H and Crockett Cogeneration are working collaboratively to complete another long-term steam supply contract by early 2026.

By partnering with Crockett Cogeneration—a highly efficient combined-cycle facility that produces both steam and electricity—we achieve energy efficiencies far greater than conventional power generation. This collaboration not only supports our operational reliability but also advances our sustainability goals by lowering greenhouse gas emissions associated with our production processes. Further enhancing the environmental attributes of this facility, C&H returns condensate (heated water) to Crockett Cogeneration, thereby avoiding the use of more than 100 million gallons of water a year and additional energy required to heat the water.

The lower-cost electricity produced from the steam delivered to C&H is also used to power pumps and other apparatus at the Philip F. Meads Joint Treatment Plant (JTP). The JTP provides water treatment services for both industrial wastewater and domestic wastewater from the local residential community. The electricity used at the JTP is considerably less expensive than that available from the local power grid, resulting in savings to the community.

C&H is also located on lands subject to the jurisdiction of the Commission. The Commission recently extended C&H's lease until 2047, providing much needed certainty for the future of our business. We urge you to provide the same certainty to Crockett Cogeneration, as their continued operation is critical for C&H's operations.

Thank you for considering our perspective on this matter. Should you have any questions about Crockett Cogeneration and its importance to the operations of C&H, please reach out to me.

Sincerely,

Hitesh Modgil

Hitesh Modgil
General Manager

CC: Brian Bugsch, Chief of Land Management Division
Kenneth Foster, Public Land Manager
Kelly Connor, Public Land Management Specialist
Joe Fabel, Senior Attorney
Raquel Ramirez, Community Engagement Specialist

SENATOR
TIMOTHY S. GRAYSON
NINTH SENATE DISTRICT



BANKING & FINANCIAL
INSTITUTIONS
CHAIR

COMMITTEES
APPROPRIATIONS
BUSINESS, PROFESSIONS &
ECONOMIC DEVELOPMENT
HOUSING
REVENUE & TAXATION
TRANSPORTATION

December 19, 2025

Mr. Matthew Dumlao, Ph.D.
Executive Officer
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

RE: Support for Crockett Cogeneration Project Lease Renewal

Dear Executive Officer Dumlao:

I am writing to express strong support for the Crockett Cogeneration facility and its ongoing operations. As a vital part of the Crockett community, this 240 MW natural-gas cogeneration plant, which is in my district, not only provides reliable power to the grid but also supplies the steam necessary for the historic C&H Sugar refinery. The unique partnership between the facility and C&H Sugar, the last operating sugar cane refinery on the West Coast, plays an essential role in our local heritage and economy, refining a significant portion of the nation's cane sugar each year.

The plant's efficient cogeneration process results in lower emissions and increased energy utilization, demonstrating a forward-thinking approach to environmental stewardship. With its annual property tax contributions, Crockett Cogeneration remains a cornerstone of local economic growth. Furthermore, the facility's unwavering commitment to safety, as evidenced by an exceptional record of zero lost-time incidents over seven years, sets a standard for operational excellence and workforce protection.

Beyond its economic and operational achievements, Crockett Cogeneration consistently invests in community development, having supported the Crockett Community Foundation for over three decades. These contributions have enabled numerous projects that benefit residents and enhance the quality of life in Crockett.

For these reasons, I wholeheartedly support the Commission's renewal of its lease to the Crockett Cogeneration facility. Its contributions to the local economy, environmental responsibility, and community partnerships are invaluable. I urge you to continue your advocacy for this important project, ensuring its positive impact can be sustained for years to come.

Sincerely,

A handwritten signature in black ink that reads "Timothy S. Grayson".

Timothy S. Grayson
Senator, 9th District

Assembly
California Legislature



ANAMARIE AVILA FARIAS
ASSEMBLYMEMBER, FIFTEENTH DISTRICT

December 23, 2025

The Honorable Malia Cohen
California State Controller
300 Capitol Mall, Suite 1850
Sacramento, CA 95814

RE: Support for Crockett Cogeneration Project Lease Renewal at the State Lands Commission

Dear Controller Cohen,

I am writing to express my strong support for the lease renewal for the Crockett Cogeneration facility and its ongoing operations. Located within my Assembly District, this 240-megawatt natural gas-fueled cogeneration plant is a critical asset to both the regional energy system and the Crockett community. In addition to providing reliable power to the grid, the facility supplies the steam required to operate the historic C&H Sugar refinery.

The C&H Sugar refinery is the last remaining cane sugar refinery on the West Coast and it employs 19 direct jobs and 14 union jobs. Each year, it refines a substantial share of the nation's cane sugar, made possible through an integrated co-generation partnership that is both unique and irreplaceable essential to the facility's continued operation. Together, these operations reflect an important part of California's industrial heritage while supporting ongoing economic activity in our region.

The Crockett Cogeneration facility demonstrates efficient energy production through its cogeneration process, resulting in greater energy utilization and lower emissions. This approach reflects a responsible balance between energy reliability and environmental stewardship. The facility also contributes meaningfully to the local economy through its annual property tax payments thus, reinforcing its role as a stable economic anchor.

The facility's commitment to workplace safety and operational excellence is further reflected in its record of zero lost-time incidents over the past seven years. Additionally, Crockett Cogeneration has demonstrated a sustained commitment to community investment, supporting the Crockett Community Foundation for more than three decades and helping fund projects that enhance quality of life for local residents.

For all of these reasons, I strongly support the State Lands Commission's renewal of the lease for the Crockett Cogeneration facility. Its economic contributions, environmental performance, and community partnerships provide lasting value to the region and the state. I respectfully urge the Commission to approve the lease renewal to ensure these benefits continue well into the future.

Sincerely,

A handwritten signature in blue ink that reads "AnaMarie Ávila Farías". The signature is fluid and cursive, with the first name "AnaMarie" and last name "Ávila Farías" clearly distinguishable.

Assemblymember AnaMarie Ávila Farías
California State Assembly, District 15

Cc: Executive Officer Matt Dumlao, Ph.D.
Deputy State Controller Kristina Kunkel

Assembly California Legislature



ANAMARIE AVILA FARIAS
ASSEMBLY MEMBER, FIFTEENTH DISTRICT

December 23, 2025

The Honorable Eleni Kounalakis
Lieutenant Governor of California
1021 O Street, Suite 8730
Sacramento, CA 95814

RE: Support for Crockett Cogeneration Project Lease Renewal at the State Lands Commission

Dear Lieutenant Governor Kounalakis,

I am writing to express my strong support for the lease renewal for the Crockett Cogeneration facility and its ongoing operations. Located within my Assembly District, this 240-megawatt natural gas-fueled cogeneration plant is a critical asset to both the regional energy system and the Crockett community. In addition to providing reliable power to the grid, the facility supplies the steam required to operate the historic C&H Sugar refinery.

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Sincerely,

A handwritten signature in blue ink that reads "AnaMarie Ávila Farías". The signature is fluid and cursive, with a large initial 'A' and 'F'.

Assemblymember AnaMarie Ávila Farías
California State Assembly, District 15

Cc: Executive Officer Matt Dumlao, Ph.D.
Karl Larson, Policy Director

Assembly
California Legislature



ANAMARIE AVILA FARIAS
ASSEMBLYMEMBER, FIFTEENTH DISTRICT

December 23, 2025

Joe Stepenshaw
Director of the Department of Finance
1021 O Street, Suite 3110
Sacramento, CA 95814

RE: Support for Crockett Cogeneration Project Lease Renewal at the State Lands Commission

Dear Director Stepenshaw,

I am writing to express my strong support for the lease renewal for the Crockett Cogeneration facility and its ongoing operations. Located within my Assembly District, this 240-megawatt natural gas-fueled cogeneration plant is a critical asset to both the regional energy system and the Crockett community. In addition to providing reliable power to the grid, the facility supplies the steam required to operate the historic C&H Sugar refinery.

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Sincerely,



Assemblymember AnaMarie Ávila Farías
California State Assembly, District 15

Cc: Executive Officer Matt Dumlao, Ph.D.
Chief Deputy Director Michele Perrault



SHANELLE SCALES-PRESTON SUPERVISOR, DISTRICT V
CONTRA COSTA COUNTY, BOARD OF SUPERVISORS

Antioch (North)
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Alhambra Valley
Bay Point
Briones
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Concord (North)
Mt. View
Pacheco
Port Costa
Rodeo
Tormey
Vine Hill

January 15, 2026

Mr. Matthew Dumlao, Ph.D.
Executive Officer
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Dear Executive Officer Dumlao:

I am writing to express my strong support for the renewal of the lease for the Crockett Cogeneration Facility, which is located within Contra Costa County's Fifth Supervisorial District. The continued operation of this facility provides important and lasting benefits to the regional power system, the local economy, and the Crockett community.

Crockett Cogeneration operates a 240-megawatt natural gas cogeneration plant that delivers reliable electricity to the regional grid while also producing steam used by the adjacent C&H Sugar refinery. This integrated operation supports the last remaining sugar cane refinery on the West Coast—an industrial asset that processes a significant share of the nation's cane sugar and remains deeply connected to Crockett's economic and historical identity.

The facility's cogeneration design promotes efficient energy use and reduced emissions compared to conventional power generation. In addition to its environmental performance, Crockett Cogeneration contributes annually to the local tax base and has demonstrated a strong commitment to workplace safety, maintaining a record of zero lost-time incidents for more than seven years.

Equally important is the facility's longstanding relationship with the Crockett community. For more than three decades, Crockett Cogeneration has supported the Crockett Community Foundation, helping fund community-based projects that enhance quality of life for residents. This sustained engagement reflects a clear commitment to being a responsible and invested neighbor.

Renewal of the lease will allow these economic, environmental, and community benefits to continue. Crockett Cogeneration has consistently demonstrated operational reliability, environmental responsibility, and meaningful community partnership. For these reasons, I strongly support approval of the lease renewal by the California State Lands Commission.

Thank you for your consideration.

Sincerely,

Shanelle Scales-Preston
Contra Costa County Supervisor, District V

Ph: 925-608-4200

Fx: 925-608-4209

190 East 4th Street Pittsburg, CA 94565



**P.O. Box 155,
Crockett, CA
94525**

Phone: (510) 787-9708

Friday, January 30, 2026

Yessica Ramirez
Kelly Connor
Raquel Ramirez
California State Lands Commission
100 Howe Ave., Suite 100
South Sacramento, CA 95825

**Re: Crockett CoGeneration Lease Renewal – Request for Continuation of
Community Benefit Agreement**

Dear Ms. Ramirez, Mr. Connor, and Ms. Ramirez,

Thank you for reaching out to the Crockett Community Foundation. Our Board Members are very interested in the potential for a new lease agreement with Crockett CoGeneration ("CoGen") and strongly believe that any new agreement must address the same issues that led to the creation of the Crockett Community Foundation ("CCF") in the first place.

The town of Crockett had significant concerns about another industrial facility in such close proximity to homes as well as the aesthetics of a plant being on the water impacting views and access when the 1993 agreement was worked out. It was only the willingness of the CoGen plant leadership to engage with the community and commit to a redesign to remove large water-view obstructions and the substantial community benefit payments that made the project acceptable.

The gas lines—running through neighborhoods—that feed the power plant remain a concern, especially considering that they are now 30 years older. The proximity to active railroad tracks also poses an ongoing risk; a derailment could potentially impact the gas lines, which remains a concern for our community's safety.

We want to begin by acknowledging the California State Lands Commission's important stewardship role and expressing our appreciation for your willingness to engage with community stakeholders. We also recognize and appreciate Crockett CoGeneration's 30-year track record as a responsible operator and reliable community partner. This letter is written in the spirit of continuing and strengthening that partnership for the benefit of all parties.



We are writing to formally request that any new lease agreement between the California State Lands Commission and Crockett CoGeneration include provisions requiring continued funding to the Crockett Community Foundation consistent with the payment structure and escalation formula established in the original 1996 Agreement executed pursuant to California Energy Commission Docket No. 92-AFC-1, continuing from the current escalated payment amount.

Specifically, we request that the funding commitment continue at or near the current escalated rate of approximately \$702,000 per fiscal year (representing Year 30 of the original 3% annual escalation from the \$300,000 base), with continued annual escalation that maintains the real value of the community benefit, for the full duration of any new lease term. We recognize that the specific payment structure may be subject to negotiation, but believe that any revised formula should reflect the documented intensification of risks and environmental justice burdens our community bears, as well as CCF's proven 30-year track record of effective fund stewardship. This community benefit commitment is essential to maintaining the social license for this facility's continued operation in our impacted community and should be established as a material condition of the lease, with appropriate mechanisms to ensure the continuity of these important commitments.

Background: The Original Agreement signed in 1993—A Regulatory Commitment Reflecting Community Partnership

The original Agreement, executed to satisfy California Energy Commission Condition SOC-8, required Crockett Cogeneration to pay \$300,000 per fiscal year to the CCF for 30 years, with payments escalating by 3% per year and made semi-annually on November 10 and May 10. That 30-year term concluded in fiscal year 2025, with the final Year 30 payment totaling approximately \$702,000, reflecting the cumulative effect of 3% annual escalation over three decades designed to maintain the real value of the community benefit in the face of inflation.

These payments were established as mandated community benefit conditions and have evolved into a valued partnership between CoGen and our community, imposed by the California Energy Commission as a certification requirement in response to legitimate community concerns about safety, environmental impacts, and the risks of siting an industrial cogeneration facility in a small residential community. The Agreement specifically states its purpose was "to satisfy condition SOC-8 of the Decision in Docket No. 92-AFC-1 of the California Energy Commission."

Why Crockett Qualifies as an "Impacted Community" Requiring Continued Mitigation

As you evaluate this lease renewal, we urge you to consider that Crockett is formally designated as an "Impacted Community" under California Senate Bill 1000 in the Contra



Costa County 2045 General Plan—defined as unincorporated communities disproportionately impacted by pollution and negative health outcomes. The County employs specific environmental justice criteria, and Crockett meets the threshold due to its concentration of industrial hazards and vulnerable populations.

The data paints a stark picture of our community's environmental justice burden:

- Parts of Crockett rank at the 97th percentile for density of hazardous waste facilities and generators compared to the rest of California—meaning our small community has a higher concentration of hazardous facilities than 97% of the state.
- The median household income in Crockett is \$73,296—significantly lower than the Contra Costa County median of \$103,997—indicating economic vulnerability.
- Average life expectancy in Crockett is 78 years, compared to 81 years countywide—a three-year gap that reflects the health impacts of environmental exposure and economic stress.
- Our community demographics show 63% White, 18% Hispanic or Latino, 8% Asian and 10% Black or African American residents—with Hispanic/Latino and Black residents bearing disproportionate pollution burdens consistent with statewide environmental justice patterns.

These are not abstract statistics—they represent real health disparities and environmental inequities that our approximately 3,500 residents experience daily. The County General Plan explicitly recognizes that Crockett's environmental justice concerns "relate to its industrial roots—past and present," citing both legacy contamination from the Selby Smelting and Lead Company (with arsenic, lead, and cadmium still being remediated) and ongoing risks from active industrial facilities.

This official "Impacted Community" designation under SB 1000 reinforces that continued community benefit payments are not merely voluntary goodwill, but a necessary and appropriate mitigation measure for ongoing environmental concerns facing our residents.

CCF's 30-Year Track Record of Community Investment

Over the 30-year period of the CoGen's agreement, the CCF has served as the designated community representative non-profit foundation to receive funds from Crockett CoGen and disburse them through a rigorous process managed by an elected board to improve the lives of Crockett residents. The impact of these funds on our small community of approximately 3,500 residents cannot be overstated.

The CCF has been recognized in the County's own planning documents as one of the "committed, civic-minded local organizations" that strengthen Crockett's tight-knit



community. This recognition by County planners underscores the critical role CCF plays in community resilience and quality of life.

Here are specific examples of major projects that have directly impacted our community:

- CCF's grant program provided \$100,000 to augment HUD funding to build Senior Housing. The 3-story, 36-unit apartment community was built in 1997 and continues providing homes for citizens aged 62+ with very low income.
- In 2001, CCF purchased some blighted property at 707 Loring, tore down the building, and granted the property as well as \$20,000 in startup funding so Habitat for Humanity could build 6 low-income housing units with the priority going to low-moderate income Crockett residents.
- In 2023 Crockett's Volunteer Fire Department received a new Water-Tender Firetruck funded in part with a \$250,000 grant from the CCF. This truck was replacing a 30 year old truck and supports the town's ability to get water to wildfires at surrounding parklands and open space as well as support CalFire when requested.
- Over \$443,000 supporting youth education grants supporting Crockett and Port Costa students in the John Swett Unified School District over the last 10 years alone, for a variety of projects including Marching Band, Senior Year diversions, Garden Science classes, Field Trips, Technology, and Crockett Scout/Girl Scout activities.
- Preservation of historic buildings (The Old Homestead, Odd Fellows Hall, Veterans Memorial Building, Port Costa School, and others) has always been important, as current municipal and other significant Crockett/Port Costa buildings were largely built in the 1890-1920 era. Since 2015, over \$1M has been granted in support of this ongoing obligation.
- Town beautification grants (\$333,000) and community infrastructure/recreation grants (\$594,000) over the last 10 years have kept our town colorful and bright during the winter holidays and flowers/patriotic banners hanging proudly in the summer, sponsored townwide clean-ups and e-waste drives, supported waterfront/street/art fairs, kept the swimming pool up to code and maintained.

The CCF has supported nearly every non-profit and community organization in the Crockett, Tormey, and Port Costa area. The following is a sample of local groups that have received grants for their work in the community since 2015:

Alfred Zampa Memorial Bridge, Carquinez Women's Club, Carquinez Toy Train Operating Museum, Carquinez Regional Environmental Education Center, Carquinez Model Railroad Society, Carquinez Middle School PTSA, Contra Costa Resource Conservation District, Contra Costa County Library (Crockett Branch), Crockett



Carquinez Fire Protection District, Crockett Scouts, Crockett Community Services District (Crockett Sanitation, Port Costa Sanitation, and Crockett Recreation), Crockett Historical Society & Museum, Crockett Public Services, Crockett Recreation Association, Crockett Swim Team, Girl Scouts of Northern California, John Swett Education Foundation, John Swett High School Senior Class, John Swett High School Band Boosters, John Swett High School PTSA, John Swett Unified School District, Little Roses Preschool, Meals on Wheels Diablo Region, Mindful Life Project, Port Costa Conservation Society/Port Costa Museum, and St. Rose of Lima's and St. Mark's Community Halls.

Over the past 30 years, beginning with the first payment in fiscal year 1996 at \$300,000 and escalating at 3% annually, the CCF has received approximately \$14.2 million to distribute to local organizations and initiatives. The current annual payment (Year 30) was approximately \$702,000. These funds have been managed with full transparency and accountability with public reporting to our community on a monthly basis. This track record demonstrates both the profound significance of these funds to our small, economically vulnerable community and CCF's proven capacity to continue serving as the designated community benefit recipient under any renewed lease agreement.

Risks Have Not Diminished—They Have Intensified

We want to acknowledge and appreciate that Crockett CoGen has been a responsible operator, with no major incidents, and that the company has maintained its commitment to funding improvements to community life. At the same time, the fundamental concerns from the townspeople that sparked the 1993 agreement remain as valid today as they were then, with the critical added reality that 30 years have passed and risks have compounded.

Considering that even after the original agreement was signed by the Crockett CoGen the town of Crockett experienced disaster from a serious Catacarb spill from then-Unocal (now Phillips 66 Rodeo) plant that greatly impacted our town and its people and resulted in \$3M in civil and criminal fines and stemming from the prolonged Catacarb leak Aug. 22 through Sept. 6, 1994. In 1995 Unocal ultimately agreed to pay \$3 million in civil and criminal fines after pleading guilty to 12 misdemeanor charges of creating a public nuisance and failing to notify state or county officials during the release and also paid \$80 million to settle lawsuits by more than 6,000 West Contra Costa County residents sickened by the odorless chemical compound.

The infrastructure and environmental risks that justified the original community benefit agreement have intensified:

1. **Aging Infrastructure:** The PG&E natural gas lines that feed the plant are now over 30 years old and approaching or exceeding their designed operational lifespan. The original 1996 concerns about these lines running through residential



neighborhoods—including many historic homes built before 1940—are now magnified by three decades of aging and wear. Even well-maintained facilities experience equipment malfunctions over time, as demonstrated by a 2019 pressure valve incident at the CoGen plant that required emergency steam releases.

2. **Transportation Hazards:** Railroad tracks still run directly past the CoGen plant, carrying hazardous materials and presenting ongoing derailment risks. Any derailment impacting the facility or gas lines could result in catastrophic consequences.

These concerns are not hypothetical— a major train derailment did happen. On Sunday March 16th of 2003 a Union Pacific freight train derailed in Crockett near 550 Loring Ave. (close to the CoGen Plant) sending a gaseous cloud into the air. The gas was believed to be anhydrous ammonia -- a mix of nitrogen and hydrogen that can be lethal if inhaled potentially hazardous materials, prompting authorities to issue a warning to local residents to stay inside their homes. Crockett citizens were lucky as there were no long-term effects. Incidents like these though can also lead to the contamination of the Carquinez Strait, be a major fire risk to residential areas, and potential evacuation of our entire community of 3,500 residents.

3. **Documented Climate and Natural Hazard Vulnerabilities:** The County's own General Plan identifies the Crockett CoGen Powerplant as specifically vulnerable to sea level rise, landslides, and debris flows. These risks, which were theoretical in 1996, are now documented realities requiring active mitigation. The County planning documents list Crockett's hazard profile as including:
 - Coastal flooding and sea level rise
 - Extreme heat events
 - Increased wildfire risk (demonstrated by the 2019 Sky Fire that forced Carquinez Bridge closure and resident evacuations)
 - Landslides and debris flow
 - Seismic hazards
 - Human health hazards from industrial operations
4. **Cumulative Industrial Risk:** Our community already bears an extraordinary industrial burden. In 2019, fires at the nearby NuStar petroleum storage facility forced Crockett residents to "shelter in place" and "put the community at risk of evacuation and toxic airborne particulates." Additionally, in November 2019, a pressure release valve malfunction at the CoGen plant itself created loud noises and steam releases



that alarmed residents as far away as Vallejo and Benicia.

While this incident did not result in danger to the public, it demonstrated how equipment malfunctions at aging industrial facilities can create community concern and disruption, reinforcing the need for continued community benefit commitments. This recent incident—occurring three decades into CoGen's operation—demonstrates that industrial risks in Crockett have not decreased, but remain acute. Townspeople are also subjected to almost daily Level 1 Community Awareness Warnings from Contra Costa Health regarding the refineries in Martinez, Chevron, and Phillips 66, a constant reminder that refineries are very near and always impacting the air.

The County's own General Plan identifies the Crockett CoGen Power-plant as specifically vulnerable to sea level rise, landslides, and debris flows. These risks, which were theoretical in 1996, are now documented realities requiring active mitigation. Our community already bears an extraordinary industrial burden. In 2019, fires at the nearby NuStar petroleum storage facility forced Crockett residents to "shelter in place" and "put the community at risk of evacuation and toxic airborne particulates." Additionally, in November 2019, a pressure release valve malfunction at the CoGen plant itself created loud noises and steam releases that alarmed residents as far away as Vallejo and Benicia. While this incident did not result in danger to the public, it demonstrated how equipment malfunctions at aging industrial facilities can create community concern and disruption, reinforcing the need for continued community benefit commitments. This recent incident—occurring three decades into CoGen's operation—demonstrates that industrial risks in Crockett have not decreased but remain acute. Townspeople are also subjected to almost daily Level 1 Community Awareness Warnings from Contra Costa Health regarding the refineries in Martinez, Chevron, and Phillips 66, a constant reminder that refineries are very near and always impacting the air.

The County General Plan notes that remediation plans are "underway" for legacy contamination from the Selby Smelting site, where arsenic, lead, cadmium, and other compounds continue to pollute land and groundwater and leach into San Pablo Bay. Our community lives with both the legacy of past industrial operations and the ongoing risks posed by current operations, including the CoGen facility.

These evolving and compounding risks have not diminished over 30 years—they have intensified and been officially documented by County planners.

The continuation of Crockett CoGen's financial commitment to the community is not only appropriate but necessary as fair compensation for the ongoing and increased risks our community bears. These funds are essential investment in community resilience, emergency preparedness, health and wellness programs, and quality-of-life improvements



that help offset the burdens of hosting industrial operations in our small, vulnerable, officially designated Impacted Community.

Alignment with County Planning Goals

The Contra Costa County 2045 General Plan establishes clear guiding principles for Crockett, including that "Crockett should be a resilient community, with residents who are informed and well-prepared for emergencies and hazards." The continued funding of CCF directly supports this County planning goal by providing resources for:

- Emergency preparedness programs
- Community resilience initiatives
- Public health and wellness programs
- Infrastructure improvements that enhance safety
- Educational programs that keep residents informed about risks

Requiring continued community benefit payments as a condition of lease renewal is entirely consistent with the County's own stated planning principles for Crockett.

Formal Request to the State Lands Commission and Proposed Lease Conditions

The CCF Board respectfully requests that the California State Lands Commission consider including, as an important condition of any lease renewal with Crockett CoGeneration, continued funding to the Crockett Community Foundation at levels consistent with the current escalated amount under the original 1993 agreement—specifically, continuing from a baseline approximating the current Year 30 payment of approximately \$702,000 per fiscal year with annual escalation that preserves the real value of the community benefit over time, for the full duration of the renewed lease term. While we recognize that the precise payment structure and escalation formula may be subject to negotiation among the parties, we believe any agreement should reflect both the documented environmental burdens our community bears and the proven effectiveness of the CCF funding model over three decades, with such payments to be secured by appropriate financial guarantees or bonding to ensure continuity of funding regardless of operational changes, ownership transfers, or financial difficulties of the lessee.

The precedent is clear: when the California Energy Commission certified this project in 1993, it determined that community benefit payments were an appropriate and necessary condition of approval. The rationale for that determination has not changed; if anything, it has been strengthened by:

1. 30 years of successful CCF operation, demonstrating effective stewardship of community benefit funds and official County recognition of CCF's community role



2. Crockett's formal designation as an "Impacted Community" under SB 1000 in the County General Plan, with documented environmental justice burdens ranking at the 97th percentile for hazardous facility density
3. Official County documentation of increased climate-related and natural hazard risks, including specific identification of the CoGen plant's vulnerability to sea level rise, landslides, and debris flows
4. Demonstrated ongoing industrial risks, including the 2019 NuStar facility fires that forced shelter-in-place orders
5. Documented health disparities, including lower life expectancy and income levels compared to the broader county
6. Aging infrastructure (30+ year old gas lines and historic housing stock built before 1940), increasing vulnerability

The community accepted significant ongoing risks when this facility was initially approved; continued financial commitment to community benefit is both fair compensation for documented environmental justice burdens and essential for maintaining the social license to operate in our officially designated Impacted Community under California law.

We understand that structuring community benefit commitments in a lease renewal context may present different considerations than the original Energy Commission certification process. We are open to discussing various mechanisms for ensuring continued community support, including payment structures, escalation formulas, and administrative frameworks that work for all parties while maintaining meaningful benefit to our impacted community.

We appreciate your consideration of these critical community concerns and welcome the opportunity to meet with you at your convenience to discuss them in greater detail. We would be grateful for a response to this letter and hope to present our perspective at any public hearing or commission meeting where the Crockett CoGeneration lease renewal will be considered. We are also prepared to provide additional documentation, including detailed funding histories, letters of support from grant recipients, testimony from community members on the importance of CCF funding to Crockett's quality of life, and excerpts from the County General Plan that substantiate our Impacted Community status and risk profile.

The State Lands Commission plays an important role in ensuring that lease renewals on state-owned land serve the public interest and align with California's environmental justice policies, including the requirements of Senate Bill 1000 and Government Code Section 65302(h). We believe that continued community benefit payments to mitigate documented environmental justice impacts in an officially designated Impacted



Community would represent meaningful public interest protection and support responsible industrial operations in a small, vulnerable community like Crockett.

We look forward to your thoughtful consideration of this request and welcome the opportunity for continued dialogue, which we believe serves the interests of environmental justice, community resilience, and responsible industrial operations in California.

Sincerely,



Brian Montgomery

President, Crockett Community Foundation





Dr. Matt Dumlao
Executive Officer
California State Lands Commission
[100 Howe Avenue, Suite 100](#)-South
Sacramento, California 95825

March 25, 2026

Re: Crockett Shoreline Project and Public Trust Benefits

Dear Dr. Dumlao:

On behalf of the Contra Costa Resource Conservation District, I am writing to express our strong support for the Crockett Waterfront Project and to emphasize the public benefit of the proposed contribution from Crockett Cogeneration related to its lease renewal.

The Crockett Shoreline Project represents a community-led effort to restore and revitalize an underutilized segment of the Carquinez waterfront on lands held in public trust. Developed through extensive local feedback, the project aims to improve environmental conditions, expand equitable public access, and create a safe and welcoming shoreline for residents and visitors alike.

The project directly supports the State Lands Commission's public trust mandate. By increasing shoreline access, enhancing water quality through green infrastructure, and restoring habitat, it promotes key trust goals like environmental stewardship, recreation, and public access to navigable waters. These improvements will transform a degraded site into a valuable and accessible public resource.

The proposed contribution is vital for advancing the next phase of this project. These funds will support key implementation elements, including additional green infrastructure to filter stormwater runoff, improvements to ADA-accessible parking and site access, and other enhancements needed to realize the community's vision. Without this funding, progress on these tangible public benefits would be greatly limited.

We appreciate the Commission's careful consideration of how this project enhances the long-term value and accessibility of sovereign lands. The Crockett Shoreline Project exemplifies how targeted investment can provide lasting environmental, recreational, and community benefits that align with the public trust doctrine.

Thank you for your continued leadership and stewardship.

Sincerely,

A handwritten signature in black ink that reads "Heidi Petty".

Heidi Petty
Watershed Program Manager
Contra Costa Resource Conservation District
e: hpetty@ccrcd.org | c: 510-478-7402

[Letter from Association of Western Pulp and Paper Workers Local No. 916]

The Honorable Malia M. Cohen

California State Controller
Commissioner, California State Lands Commission
300 Capitol Mall, Suite 1850
Sacramento, CA 95814

The Honorable Eleni Kounalakis

Lieutenant Governor of California
Commissioner, California State Lands Commission
1021 O Street, Suite 8730
Sacramento, CA 95814

The Honorable Joe Stephenshaw

Director, California Department of Finance
Commissioner, California State Lands Commission
1021 O Street, Suite 3110
Sacramento, CA 95814

To the Members of the California State Lands Commission:

On behalf of the Association of Western Pulp and Paper Workers Local No. 916, we write in strong support of the renewal of the Crockett Cogeneration (Cogen) facility lease. Our members work in industries directly connected to and supported by the continued operation of both the Cogen plant and the adjacent C&H Sugar refinery, and we recognize the critical importance of this facility to local employment, community stability, and statewide infrastructure reliability.

The Commission has already approved the C&H Sugar refinery lease (PRC 7659) through 2047, affirming that its continued operation serves the public interest. Because the refinery cannot operate without the steam supplied by the Crockett Cogeneration facility, renewal of the Cogen lease is essential to fulfilling that determination. The lease itself identifies the provision of steam to C&H as essential to its purpose.

The Cogen plant also plays a vital role in maintaining grid reliability as California transitions toward a clean-energy future. Current CPUC and ISO modeling continues to show that flexible natural-gas-fired facilities will be required through at least 2035 to ensure grid stability during extreme weather and renewable intermittency. Crockett's 240 MW of resource adequacy capacity provides precisely the kind of fast-ramping reliability that state planners identify as most needed. Recent Commission actions—including the

Diablo Canyon and Ormond Beach lease extensions—recognize the importance of retaining such facilities for statewide reliability.

The facility has also been a longstanding, responsible neighbor in Crockett. The Cogen plant maintains an excellent compliance and safety record, including over seven years without a lost-time incident.

Our Local represents union workers who depend on stable, long-term industrial employment. Maintaining the Cogen plant not only preserves high-quality union jobs but also protects the broader economic ecosystem that relies on the refinery's continued operation. Together, the refinery and cogeneration facility support hundreds of direct and indirect jobs and bolster the economic health of the region.

For these reasons, Local No. 916 wholeheartedly supports the Commission renewing its lease to the Crockett Cogeneration facility. Its contributions to the local economy, environmental responsibility, and the stability of our local labor market are invaluable.

We urge you to support this important project, ensuring these positive impacts are sustained for years to come.

Respectfully,

A handwritten signature in black ink that reads "Lisa Reilly". The signature is written in a cursive, flowing style.

Association of Western Pulp and Paper Workers

Local No. 916

Cc:

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kkunkel@sco.ca.gov

Matthew.Dumlao@slc.ca.gov