

CAP comments RCEC PSD Permi t.txt

From: VACATI ONPOMBO@aol .com

Sent: Wednesday, September 16, 2009 11: 38 PM

To: Weyman Lee

Subject: CAP comments RCEC PSD Permi t

Attachments: CAP RCEC PSD comments Sept. 09.doc

Dear Dr. Lee,

Attached are CAP's comments on the latest iteration of the proposed RCEC PSD pemi t. Please contact me if I you have any questions or comments.

Ernest Pacheco

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September 16, 2009

VIA ELECTRONIC MAIL

Mr. Weyman Lee  
Senior Air Quality Management District  
Bay Area Air Quality Management District  
939 Ellis St.  
San Francisco, CA 94109  
weyman@baaqmd.gov

Dear Mr. Lee,

I am writing to urge you in the strongest manner, to include the Jacobson Effect in the analysis of locally emitted Greenhouse Gas Emissions (GHGE) and their significant impact on the morbidity and mortality of local human populations in your analysis of the Russell City Energy Center (RCEC).

The proposed Russell City Energy Center ,a 600 Megawatt, natural gas power plant currently seeking a federal Prevention of Significant Deterioration permit (PSD), to operate adjacent to the ecologically sensitive habitat of the Hayward shoreline and directly upwind to a city of 149,000 people, will produce more GHGE than the combined, inventoried total of Hayward's municipal, industrial, residential, commercial and transportation GHGE, this out of a space the equivalent of a single city block.

The assumption by the District that an increase of billions of pounds a year of locally emitted GHGE will have no effect on the health of the local population, has been disproven by Prof. Mark Z. Jacobson's studies of the last few years, that demonstrate not only that there is a quantifiable effect, but that the effect is significant.

As the vector of death and morbidity illustrated by the Jacobson's methodologies are federal criteria pollutants, the analysis of what the increase in PM, and Ozone for the proposed RCEC will be due to the Jacobson Effect must be quantified by the District to determine if their impact is significant to the health of the human population, and in compliance with the National Ambient Air Quality Standards for Ozone and PM, and all Clean Air Act requirements.

Without the data provided by a full emissions analysis including the Jacobson Effect, neither the Environmental Protection Agency (EPA), or the U.S. Fish and Wildlife Service (F&W) will have adequate information to even consider concurring with a PSD permit should the District once again attempt to issue one for this project.

Using Jacobson's methodologies is necessary if the District wishes to fulfill its legal requirement to quantify the increase in tonnage of PM and Ozone as a result of this fossil fuel power plants operation. Quantifying the Jacobson Effect of the RCEC will also

produce the predicted increase in death, morbidity, and ER visits that will occur as a result of the effects of the increase in amount, and toxicity of the criteria pollutants; PM and Ozone, due to the significant increase in local CO2 concentrations. This analysis must be done by the District.

The health and well being of the citizens of the City of Hayward and the surrounding communities are a primary and heartfelt concern to Citizens Against Pollution as is the necessity to ensure no negative impacts to those endangered and threatened species of the immediate area who's continued survival rests completely on our responsible stewardship of that tiny bit of remaining habitat we have left to them. Citizens Against Pollution insists that the Bay Area Air Quality Management District make no more excuses for its repeated, poor and partial analysis, and now commits to takes every step in a responsible and complete analysis before considering whether it is appropriate to attempt to grant a PSD permit to this fossil fuel mega-project.

Again, Citizens Against Pollution demand that the District responsibly administer it's obligation to safeguard the health and welfare of the citizens of the San Francisco Bay Area regional air basin, and insist that you include the Jacobson methodologies in your analysis of Ozone, PM and GHGE for the proposed RCEC project.

Sincerely,  
Ernest A. Pacheco  
Citizens Against Pollution

Cc: (via Email)  
EPA: Deborah Jordan  
Anita Lee  
F&W: Cay Goude  
Ryan Olah