

February 6, 2009

Weyman Lee, P.E., Senior Air Quality Engineer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: Draft PSD Permit for Russell City Energy Center

Dear Mr. Lee:

Communities for a Better Environment (“CBE”) submits this letter in opposition to the proposed Prevention of Significant Deterioration (“PSD”) Permit for a potential power plant in Hayward, CA, known as Russell City Energy Center.

CBE is a unique organization, employing community organizers, researchers, and lawyers to serve the cause of environmental justice by empowering underrepresented communities. Established in 1978 in California, CBE works with community members in low income communities of color to fight pollution. CBE’s members in the Bay Area suffer disproportionately from the impacts of local and regional air pollution. Specifically, CBE works with communities in Alameda and Contra Costa counties, where industrial pollution sources exacerbate the impacts from goods movement and mobile sources from ports and the freeways that bisect these traditionally disempowered communities. Residents of the communities where CBE works, such as East Oakland and Richmond, are predominantly people of color whose voice is not heard by those who decide how much pollution they will breathe.

CBE has long worked statewide to ensure that new sources of energy are as clean they can be, and to prevent new power plants from exacerbating existing environmental injustice. CBE has specific concerns around construction of new fossil-fueled power plants in this era of increased awareness of impacts from particulate matter, carbon monoxide, VOCs and hazardous air pollutants. In addition to these concerns, the Russell City project is a step in the wrong direction in addressing green house gas emissions. We particularly object to the prospect of locating this new, dirty power plant in this part of the Bay Area, using old equipment not designed for the job it will perform.

CBE incorporates by reference the comments submitted by Citizens Against Pollution, Sierra Club, and other members of the Hayward and Bay Area communities, and joins them in asking you to perform a new analysis and circulate for public comment a new draft permit that meets the requirements of state and federal law.

Sincerely,

/s/

Shana Lazerow
Staff Attorney, Communities for a Better Environment