

April 30, 2009

SUBMITTED BY E-MAIL

weyman@baaqmd.gov

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:

I am writing on behalf of Citizens Against Pollution to request the District to consider an April 3, 2009 paper by Dr. Jacobson called "The enhancement of local air pollution by urban CO2 domes." *See* <http://www.stanford.edu/group/efmh/jacobson/PDF%20files/CO2loc0409.pdf>. A related paper was cited in the initial comments. This April 3, 2009 paper concludes that "reducing locally-emitted CO2 will reduce local air pollution mortality even if CO2 in adjacent regions is not controlled." As part of this analysis, Dr. Jacobson models the increased local mortality due to locally emitted CO2.

We request that the District evaluate the Jacobson methodology as a method for estimating the increase in local mortality due to locally emitted CO2 when evaluating the Russell City Energy Center (RCEC) proposed permit. This methodology could be used to predict some of the effects the RCEC will have in Hayward and the surrounding communities during its proposed 30 year initial license, which would emit billions of pounds of greenhouse gases every year. In addition, this same methodology should be used to analyze the effects the RCEC will have on each of the listed endangered and threatened species. Since the physiology of the various listed species differ dramatically from species to species; respiration rate, body temperature regulation, kidney and liver function etc, a separate study must be done for the Salt Marsh Harvest Mouse (*Reithrodontomys raviventris*), Western Snowy Plover (*Charadrius alexandrinus nivosus*), California Black Rail (*Laterallus jamaicensis coturniculus*), Red Legged Frog (*Rana aurora draytonii*), etc.

We request the District not approve permits for the RCEC or any other fossil fuel power plant adjacent to an endangered species preserve, and of a city of 149,000, until the completion of your evaluation and analysis of the Jacobson effect.

Sincerely,
Ernest A. Pacheco
Citizens Against Pollution
(510) 677 8452

CC:

Anita Lee

Gerardo Rios

Deborah Jordan US EPA

Ryan Olah

Melisa Helton

Cay Goude

James Browning US F&WS

Mary Ann Showers

Lyann Comrack CA DFG

FW letter to BAAQMD re RCEC from CAP.txt

-----Original Message-----

From: VACATIONPOMBO@aol.com [mailto:VACATIONPOMBO@aol.com]

Sent: Thursday, April 30, 2009 8:41 PM

To: Weyman Lee

Cc: Lee.Ani.ta@epamail.epa.gov; Ri.os.Gerardo@EPA.gov; Jordan.Deborah@EPA.gov;
Ryan_Olah@fws.gov; Cay_Goude@fws.gov; melisa_helton@fws.gov; james_browning@fws.gov;
mshowers@dfg.ca.gov; Icomrack@dfg.ca.gov

Subject: letter to BAAQMD re RCEC from CAP

Dear Mr. Lee,

Please consider the attached comments, on behalf of Citizens Against Pollution, regarding the increase in deaths the Russell City Energy Center will cause in both the human and listed species populations of Hayward if the District grants a Prevention of Significant Deterioration permit to RCEC LLC.

Please feel free to contact me with any questions or concerns.

Sincerely,

Ernest Pacheco
Citizens Against Pollution
(510) 677-8452
VacationPombo@aol.com

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