



HAYWARD AREA SHORELINE PLANNING AGENCY

Hayward Area Recreation and Park District
East Bay Regional Park District
City of Hayward

December 29, 2008

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

RE: Proposed Statement of Basis and Proposed Permit Conditions for amended PSD Permit. Application #15487, Russell City Energy Center

Dear Mr. Lee,

The Hayward Area Shoreline Planning Agency (HASPA) at its regular meeting on December 11, 2008 amended its agenda for that meeting through an emergency action vote (2-0-1 with the City of Hayward abstaining) to allow discussion and action on the Bay Area Air Quality Management District's proposed amended permit conditions for the Russell City Energy Center, Hayward, CA. Our meeting was inundated with members of our Citizens Advisory Committee, who overwhelmingly supported the issuance of this letter of comment from the Trustees.

We are concerned about the impact of this power plant's estimated maximum CO2 emission rate of 684,200 lbs. per hour on the environment; this is not addressed in the Statement of Basis. There is also concern about the consistency of the current CEQA documentation in regards to CO2 emissions and the new requirements of AB 32.

We are also concerned that the impact of this plant's operation on the immediate environment can only be assessed through a full biological survey which although not "triggered" by the theoretical thresholds contained in the Statement of Basis, appears to be prudent due to the expected heating of the ambient air temperature and the noted emissions of formaldehyde, benzene, polycyclic aromatic hydrocarbons, ammonia, sulfur dioxide and precursor organic compounds, all of which will not be restricted or monitored due to the proposed amendments to the permit conditions.

Thank you for the opportunity to comment and we hope you will seriously consider these comments in the processing of the subject documents.

Sincerely,

Ms. Carol Severin, Chair
Hayward Area Shoreline Planning Agency

Cc: Agency Trustees
HSCAC members

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MANAGEMENT DISTRICT