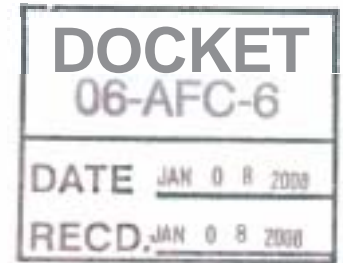




San Francisco Bay Chapter

servicing the counties of Alameda, Contra Costa, Marin and San Francisco



To: Committee Members John **Geesman** and Jeffrey Byron  
Re: AFC Docket # 06AFC-6

~~Dear~~ Commissioners,

The Southern **Alameda** County Group of the Sierra Club is opposed to the proposed **Eastshore** Power Plant.

Russell City and Eastshore plants will be **used** as **peaker** plants. Although Russell City is **designed** as a **baseload** it is being **permitted** to operate **as** a peaker plant.

The cumulative impacts have not been adequately addressed **There** has been no hot spot analysis of the Russell City plant **as** a peaker plant. Under cumulative impacts this is significant. Both **Eastshore** and Russell City will be operated as peaker plants, which produce far more toxins than the **baseload** plants.

The Hayward area has already had **annual** exceedences of the 24 hour federal standard. To offset this they are using emission reduction credits which has no relation to the impact on the environment and citizens in the **Hayward** area. We believe that this project does not meet the standards and criteria of AB32.

Natural **gas** and diesel are the two **highest** contributors to the mutagenicity of the mix of urban **particulate** matter.<sup>1</sup> Yet no **health** standard for natural **gas** particulates has been provided

There is no adequate cumulative impact **analysis** of other toxin producers in the area. The area includes several major traffic arterials including two major highways and many **industrial** roads traveled heavily by diesel operated vehicles. In addition **there** is an airport. Cumulative impacts should include the existing conditions along with those produced by the proposed project.

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<sup>1</sup> Hannigan **M.P**, Busby W.F, **Cass** GR Source Contributions to the Mutagenicity of **Urban** Particulate Air Pollution. Journal of the Air and Waste Management Assn. April 2005

Acrolein, a highly toxic air contaminant is a toxin that will **be** produced by the proposed power plant. It is by far the most acute **hazard** of natural gas. Acrolein is a major lung cancer agent in **cigarettes**.<sup>2</sup> Acrolein can cause exacerbation of asthma, tearing, and irritation of mucous membranes. It is a priority substance identified by the Children's Environmental Health Act. It is listed as a toxin at the federal and state level. **Eastshore** was exempted **from** the analysis of **acrolein** toxins **because** the State decertified its testing **method** due to underestimation of toxin levels. Yet the federal EPA does have a test (FTIR) that is certified and available and should be used to assess the levels and impacts of this highly toxic chemical before this project can **be** considered.

The **FTIR method** is a highly accurate test method. We find it disturbing that CARB does not require the EPA method, a method required by federal standards. The CEC is required to evaluate the **risk** for it **because** it is still in the California law. Using the best available science(**FTIR**) is paramount when considering a project that will threaten the health of the public. It is not a public benefit to fail to measure a toxic substance when an adequate and accurate test is available **from** the federal EPA.

State policy is to aggressively reduce emissions of greenhouse gases such that total emissions **are** back to 1990 levels by 2020. This directive by Governor **Schwarzenegger** (Executive Order S-3-05) will be virtually impossible to meet so long as new CO<sub>2</sub>-emitting power plants are permitted. Combustion of fossil **fuels** is responsible for 81% of State greenhouse **gas** emissions.<sup>1</sup>

It is the policy of this state to reduce our dependence on natural **gas**.<sup>4</sup> It will be impossible to meet this EO S-3-05 directive with continued approval of more CO<sub>2</sub> emitting plants. "Efficiency and renewable resources **are** top **priorities** in California's **electricity loading order policy**." The CEC concluded that "Reducing demand for energy is the most effective way to reduce energy costs and bolster California's economy. It would **be** far more logical and efficient to avoid construction of new plants that rely upon a toxic, dwindling and precarious source of energy. It serves the public benefit to supply the residual power that cannot be met by demand reduction with solar energy.

A high population of youth, elderly and people with respiratory conditions live in or utilize the area. The **Hayward** Regional Shoreline, an area used for education and recreation is nearby. Although the wind blows predominately from the west, there are

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<sup>2</sup> **Zhoahui Feng**, Wenwei Hu, Yu Hu and Moon-shong Tang Acrolein is a major cigarette-related lung cancer agent: Preferential binding at **p53** mutational **hotspots** and inhibition of DNA repair. PNAS, Oct. 2006

<sup>3</sup> California Energy Commission, **2006 Integrated Energy Policy Report Update**, CEC Report #100-2006-001-CTD, November 2006

<sup>4</sup> California Energy Commission, **2003 Integrated Energy Policy Report**, CEC Report #100-03-019, December 2003

stagnant air days without winds and there are days with winds blowing from the east. On those days, toxins (including ammonia) from the plant will settle into a highly sensitive habitat along the Hayward Shoreline.

We are concerned about the incomplete analysis of impacts throughout the report. Often the analysis is limited to direct impacts and does not address indirect impacts. Indirect impacts must be analyzed, especially when addressing the impacts to biological resources. For example: the impacts of the plant on local or migratory wildlife must include loss of habitat or food sources. It cannot be limited to disturbance during construction. In addition the CNDDDB should not be used as a reference for the utilization of the area by wildlife. The CNDDDB is based on reporting only. Surveys, ideally over a period of several years will give a more accurate assessment of the species that utilize the area. We believe that given the close proximity to a threatened habitat (bay marshland and associated habitats) a more thorough analysis should be conducted. Since the project is located in close proximity to a migratory flyway and major stopover for these federally protected birds where is the in depth analysis of the impact on birds? We have seen the impact on aircraft flying over the plume but the report lacks information on the potential impacts to federally protected birds.

Sincerely,

A handwritten signature in cursive script that reads "Terry Preston".

Terry Preston  
Executive Committee Member  
Southern Alameda County Chapter  
Sierra Club