

**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT**

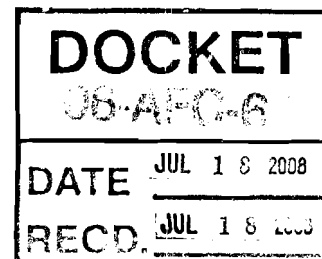
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Anthony Iton, MD, JD, MPH
Director and Health Officer

July 18, 2008

Commissioner Jeffrey Byron
Commission Docket Unit
1516 Ninth Street, MS-15
Sacramento, CA 95814



Subject: Eastshore Energy Center (06-AFC-6)

Dear Commissioner Byron,

The Alameda County Public Health Department recommends that the California Energy Commission consider the findings of a new California Air Resources Board study released in draft form May 22, 2008. CARB scientists concluded that fine particle emissions carry a much greater risk of premature death than they had previously estimated. Therefore, the Alameda County Public Health Department requests that the Energy Commission postpone approval of any new power plant proposals until the findings of this report receive full review and consideration by the community, the environmental science and public health community, and other interested parties.

This study, entitled *Methodology for Estimating Premature Deaths Associated with Long-term Exposures to Fine Airborne Particulate Matter in California*, is more far-reaching in its conclusions than the West Oakland Health Risk Assessment in that 1) it estimates pollution-related mortality regionally in California, and 2) it estimates the effect of fine particle pollution, not limited to diesel particulate matter, and 3) it estimates the ultimate health outcome, death. We understand from speaking with CARB staff that their focus in this report on mortality impact of PM_{2.5} will be expanded to include PM_{2.5} impact on morbidity (including cancer incidence and other non-cancer health effects such as respiratory and cardiovascular disease hospitalizations).

The new CARB study employed a panel of experts reviewing many epidemiological cohort studies conducted worldwide in recent years. The CARB report issued two important findings. The first was that PM_{2.5} exposure increases the risk of death in the population by 10% for every 10 microgram per cubic meter increase in concentration. The previous estimate was 6%. Therefore the estimated effect was increased by 66.7%, which translated to a doubling or tripling of the number of deaths due to PM_{2.5} exposures depending on the level of certainty

employed. CARB estimated that 8,200 premature deaths occurred annually in California because of PM2.5 in 1999-2000. Based on current pollution levels, which are much improved since then, and the new effect estimate, the number of deaths due to PM2.5 exposure is estimated to be between 14,000 and 24,000 per year (a 70% to 292% increase).

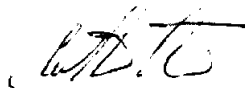
The second important finding in the new report was that there is no evidence in the literature for a threshold below which exposure is safe. While the science to date has not documented effects below 7 micrograms per cubic meter, the consensus of the scientific panel was that there is no reason to assume safe levels exist above the background level of 2.5 micrograms per cubic meter. Thus the new threshold recommended is a range between 2.5 and 7 micrograms per cubic meter of fine particle concentration. In contrast, the prior standard employed by CARB was the established state standard of 12 micrograms per cubic meter. This new threshold represents a huge reduction in what exposure is considered safe, a reduction of 40% to 80%.

The California Energy Commission should keep in mind prior Environmental Justice testimony by Dr. Sandra Witt of the Alameda County Public Health Department. In this testimony she concluded that citing the Eastshore Power Plant in Hayward would disproportionately impact an area not only home to a comparatively large non-white population, but also one already burdened by existing poor health outcomes. We clearly address this phenomenon in our recently released executive summary, *Life and Death from Unnatural Causes: Health and Social Inequity in Alameda County* (full report in press):

Access to proven health protective resources like clean air, healthy food, and recreational space, as well as opportunities for high quality education, living wage employment, and decent housing, is highly dependent on the neighborhood in which one lives. These inequities cluster and accumulate over people's lives and over time successfully conspire to diminish the ultimate quality and length of life in these neighborhoods. (p. 1)

Surely, if we have new evidence showing that vulnerable populations are more adversely affected by air pollution than previously thought, then the California Energy Commission should be conservative in its approach to this issue. The conclusions of this new CARB study may have major significance for how health risk assessments are conducted in the future. It is therefore critical that the implications of this study be given full consideration by scientists and community members alike.

Sincerely,



Anthony Iton, M.D., J.D., MPH
Director and Health Officer

cc: Eastshore POS

Enclosures

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE EASTSHORE ENERGY CENTER
IN CITY OF HAYWARD
BY TIERRA ENERGY

Docket No. 06-AFC-6

PROOF OF SERVICE
(Revised 4/21/2008)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

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DECLARATION OF SERVICE

I, Dalia Liang, declare that on July 18, 2008, I deposited copies of the following:

1. Letter dated **July 18, 2009**, and authored by:

Anthony Iton, M.D., J.D., MPH,
Director and Health Officer
Alameda County Public Health Department

With the following enclosures:

- A) Methodology for Estimating Premature Deaths Associated with Long-Term Exposures to Fine Airborne Particulate Matter in California;
- B) Life and Death from Unnatural Causes, Health and Social Inequity in Alameda County, Executive Summary;

in the United States mail at Oakland, California, in sealed envelopes, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of the California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


Dalia Liang