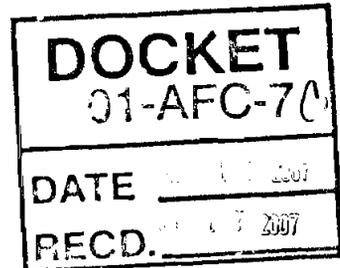


From: "Horvath, Cindy, CDA" <cindy.horvath@acgov.org>
To: "Jim Adams" <Jadams@energy.state.ca.us>, "Eric Knight" <Eknight@energy.s...>
Date: 8/17/2007 2:18 PM
Subject: ALUC: Commissioner Needle Comments on RCEC
Attachments: comments for Aug07.txt



Hello,

Here is the comment letter submitted by Commissioner Dave Needle on the RCEC Project. Please let me know if you need anything else.

Cindy Horvath
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 Staff, Airport Land Use Commission
 Alameda County Community Development Agency
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-----Original Message-----

From: Dave Needle [mailto:dave@davenmargo.com]
Sent: Friday, August 10, 2007 3:48 PM
To: Horvath, Cindy, CDA
Subject: Re: Your comments for the record

Thanks

Here and attached are my comments.

dave

510 522 7391

10 Aug 07

Comments for Russell City Energy Center.

1. Thank everyone for providing the additional information requested. While it is certainly necessary for the project to comply with the various physical requirements such as height and pollution, it is also necessary for the project to not create a hazard for aircraft. The data available at the prior meeting was not sufficient to allow for an intelligent determination of the hazard potential.

2. The FAA remains ineffective on the actual issue of the hazard of plumes. Their determination of a non-hazard based on non-reports is of no value to this determination, especially in light of the clear reports of the Blythe incidents. I have spoken with two of my FAA contacts (one retired, one at SFO) and see that they too have nothing to report in relation to heat plumes other than an unsubstantiated story regarding the existence of slight turbulence at the refinery in Richmond. Neither was aware of the Blythe incidents. I have spoken with several pilots and they too have nothing to report. I am a pilot (single engine), and I have had unexplained turbulence and did not report it. I was unaware of the Blythe incidents. So, clearly, the absence of data or reports at the FAA does not constitute an absence of hazard.

3. The Blythe pilot reports make two things clear. First, there is a hazard potential with the heat plumes. Second, the evaluation by the authorities (including the FAA) of that project was in error regarding the hazard potential.

4. The provided flight tracks show that it is reasonable to expect aircraft to fly over the stacks. This would clearly require mitigation, probably in terms of notices to the pilots and perhaps even a change to the airspace. And since an appropriate notice is not already mandatory (per discussion at the prior meeting?), it is not clear to me how such a notice would be created, and, in fact, 'noticed' by pilots both local and transient.

5. The letters from the AOPA and the CPA suggest that the hazard would be real and request that the project be not approved.

My opinion is:

1. The pressure in a cockpit of a small airplane when in the process of navigating an airport is already high. There are already too many things that need careful attention when taking off or landing. A new airspace modification or a new notice will just add to the overall risk of a problem in the moments when a problem can cause the most damage.

2. I have seen no evidence to support the conclusion that there would be no hazard. And there is evidence that there could be a hazard. At a minimum, the anecdotal evidence says that there will be some turbulence.

3. As important as energy is to our lives, I do not see any reason to ignore the potential hazard.

Therefore I recommend that the project is NOT approved.

Dave Needle