

Sierra Club

San Francisco Bay Chapter
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DOCKET 01-AFC-7C
DATE SEP 23 2007
RECD. SEP 24 2007

Sept. 23, 2007

Mr. Paul Kramer Hearing Officer
California Energy Commission

RE: Russell City Energy Center

Dear Mr. Kramer

The Sierra Club opposes the Russell City Energy Center in Hayward California for the following reasons:

- Sensitive populations live near by. Children, the elderly and people with asthma as well as hikers, birds and wildlife at the Hayward Shoreline Rec. Area would all be affected by emissions from the proposed power plant, especially because those emissions add to existing stressors in the area causing a cumulative impact.
- Global warming needs to be considered. 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 CO2-emitting power plants are permitted. Combustion of fossil fuels is responsible for 81% of State greenhouse gas emissions.¹
- The proposed power plant uses non-renewable fuels. State policy is to increase the percentage of renewable power in the state to 20% by 2010 and to 33% by 2020.² Adding new non-renewable generation moves further away from State goals rather than towards them.

Sinks: 1990 to 2002 Update, CEC Report #600-2005-025, June 2005

¹ California Energy Commission, *2006 Integrated Energy Policy Report Update*, CEC Report #100-2006-001-CTD, November 2006

- California is overly dependent on natural gas and imports 87% of its natural gas supply. State policy is to reduce dependence on natural gas.³ Adding new natural gas generation runs counter to State goals of reducing reliance on this increasingly-imported and ever-more-precarious source of energy.
- More cost-effective and environmentally sustainable ways exist to meet demand than by adding new power stations. “Reducing demand for energy is the most effective way to reduce energy costs and bolster California’s economy,” concludes the California Energy Commission. “Reducing demand also reduces the likelihood of supply shortages that can cause costly price spikes and affect reliability...Demand response programs are the most promising and cost-effective options for reducing peak demand on California’s electricity system...Efficiency and renewable resources are top priorities in California’s electricity loading order policy.”⁴ (Emphasis supplied.) Since the sun shines brightest when peak demand is highest, it makes the most sense to supply the residual power that cannot be met by demand reduction with solar energy.
- Alameda County Supervisors have not had an opportunity to review this project.
- FAA has grave issue with this plant regarding safety to air craft and potential loss of two runways as well as the 1000ft thermal plume and attendant 230 KV transmission lines.
- This proposed plant is 600 megawatt (largest built is 800) The plant built in Pittsburg CA by Calpine & another in Blythe have had releases of hazardous materials requiring emergency responses directing the public to stay indoors for miles around.
- Hayward and the surrounding region are already at an unacceptable level of particulate matter.
- Circumstances since 2001 have changed: Calpine is in bankruptcy and the County as well as all cities are now under new & different obligations as mandated by AB32.

We are asking Calif. Energy Commission to reject this project until the County of Alameda, FAA, and the public has proper time to review all issues and concerns.

Sincerely Diana Hanna Chair Southern Alameda County Sierra Club

³ California Energy Commission, *2003 Integrated Energy Policy Report*, CEC Report #100-03-019, December 2003, Page 25.

California Energy Commissions, *2005 Integrated Energy Policy Report*, CEC Report #100-2005-007CMF, November 2005, Page 4.

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

Amendment to the APPLICATION
FOR CERTIFICATION OF THE
RUSSELL CITY ENERGY CENTER
POWER PLANT PROJECT

Docket No. 01-AFC-7C
PROOF OF SERVICE
(Revised 7/6/07)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

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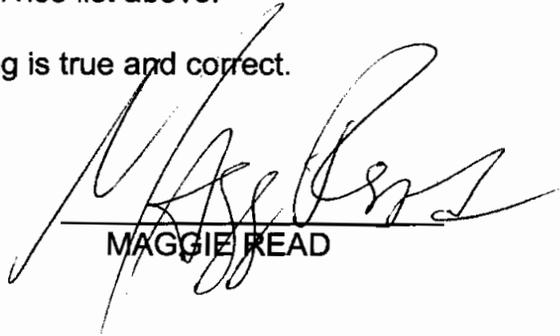
DECLARATION OF SERVICE

I, Maggie Read, declare that on September 24, 2007, I deposited copies of the attached 9/23/07 letter from Diana Hanna Chair Southern Alameda County Sierra Club in the United States mail at Sacramento, California 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 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.



MAGGIE READ