



CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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July 1, 2008

Commissioners
California Energy Commission
Dockets Unit
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DOCKET	
01-AFC-7C	
DATE	JUL 01 2008
RECD.	JUL 01 2008

Re: Application for an Extension of the Russell City Energy Center (RCEC) Construction Deadline,
Docket # 01-AFC-7C

Dear Commissioners,

The Citizens Committee to Complete the Refuge would like to thank you for the opportunity to provide comments regarding the Petition to Extend the Construction Deadline for the Russell City Energy Center Project (01-AFC-7C). The Citizens Committee to Complete the Refuge has an ongoing history of interest in wetlands protection, wetlands restoration and wetlands acquisition. The Committee was originally formed in 1965. Our senior members were part of a group of citizens who became alarmed at the degradation of the Bay and its wetlands. We joined together, and with the support of Congressman Don Edwards, requested that Congress establish a Wildlife Refuge. Our membership is now approximately 2,000 people and we have the support of 40 local and national organizations--Leagues of Women Voters, hunters, environmental groups, etc. While we are still interested in the acquisition of land for the Refuge we recognize the Bay does not exist in isolation from surrounding natural resources. Watershed protection is absolutely necessary, and we have taken an active interest in the protecting and preserving important wetland and upland habitats along the edges of the San Francisco Bay.

We urge the Commissioners to deny the request for an extension of the construction deadline. Significant issues were not adequately assessed or mitigated in the initial review of the project and additional information and legislation has been enacted since the original authorization for the project was granted. Briefly, issues that warrant further consideration include:

- night lighting impacts on migratory and resident bird populations
- impacts of providing perching habitat for nuisance species (e.g. corvids, etc. adjacent to nesting populations of shorebirds and federally listed California least tern, western snowy plover, California clapper rail, and salt marsh harvest mouse, and
- impacts of nitrogen deposition on adjacent marshes as well as sensitive plant species habitat that may be impacted as indicated by the plume modeling data.

In addition, we have questions regarding the issues of sea level rise and climate change. Is the proposed project consistent with the State's latest policies regarding the reduction of greenhouse gas emissions? How would the plant mitigate its greenhouse gas impacts? Will the infrastructure of

the site be impacted by the predicted 55" sea level rise (outfalls, intakes, etc.) or will there be additional impacts to waters of the U.S. and state that have not been identified or mitigated?

These are just a few of the many issues that remain unanswered and unresolved. As we stated earlier, we believe significant adverse impacts exist that have not been adequately assessed or mitigated. We urge the Commissioners to deny the extension of the Russell City Construction Deadline.

Sincerely,

Florence M. LaRiviere

Florence M. LaRiviere
Chairperson