

August 9, 2010

Mary Dyas, Compliance Project Manager
California Energy Commission
1516 9th Street, MS-2000
Sacramento, CA 95814

DOCKET	
01-AFC-7C	
DATE	<u>AUG 09 2010</u>
RECD.	<u>AUG 10 2010</u>

VIA EMAIL

**RE: Protest of inclusion of the Russell City Energy Center on the Aug.11th Business Meeting
Agenda and Request for Continuance until the following matters have been ruled on.**

Commenter Ernest Pacheco requests that the Commission remove the Russell City Energy Center (RCEC) from the August 11th Business Meeting agenda (item 5: RCEC 01-AFC-7C) and not reschedule a vote on certification of the of the RCEC requested amendments until the following issues have been fully addressed.

- 1. The Prevention of Significant Deterioration permit has *not* been issued, and the Commission has no way of knowing what the final Air Quality conditions will be. Therefore the Commission *cannot* vote on incorporating the PSD determined criteria pollutant conditions into a Commission certification at this time.**

The federal PSD permit is currently remanded and the final criteria Air Quality (AQ) conditions will not be determined until the Environmental Appeals Board (EAB) of the Environmental Protection Agency (EPA) have made a final ruling on the five separate appeals *and* all ordered actions of the EAB have been carried out.

As a simple and clear matter of law, a federal permit is not considered issued until all appeals have been ruled on by the appropriate authority, in this case the EAB. If the numerous defects in RCEC's proposed PSD permit are corrected or condoned by the EAB and the PSD permit is issued in a final adjudicated form, then and only then can the permit be said to have been issued and is clearly subject to the currently existing federal NO₂ 1-hour maximum impact rule.

- 2. The inclusion of a NO₂ 1-hour maximum impact analysis in a fossil fuel powerplant certification process is a precedent setting act and an issue of national public interest and concern. As such the Commission has the obligation to conduct a *full* public notification process and hold evidentiary hearings with the chance for full public participation.**

On the precedent setting issue of how a public agency fulfills its duty to ensure the new NO₂ 1-hour maximum impact is properly analyzed and subsequently ruled on with *full* chance for public participation, the Commission must take the following steps;

1. The Commission must inform all members of the public who have attended previous workshops and hearings on RCEC or submitted comments to the Commission during all RCEC related Commission actions, that the CEC analysis of the NO₂ 1-hour is available on the CEC website, and when and where the evidentiary hearings will be held.

2. The Commission must notice and make available the staff analysis and the modeling runs for the NO2 1-hour maximum impact on the CEC website under the RCEC docket.

The Commission has set the appropriate precedent for public access to this vital information by posting the modeling runs for the proposed Oakley Generating Station on the CEC's website. Nothing less is appropriate for RCEC (CAP would like to note that we have attempted to contact the CEC four separate times to obtain this information and have received no response).

3. The Commission must hold evidentiary hearings in Hayward.
On this precedent setting issue of widespread public interest and concern, the Commission must hold evidentiary hearings on any NO2 1-hour maximum impact staff analysis the Commission may approve in the community in which both the predicted NO2 1-hour maximum impact will occur *and* that will suffer the greatest amount of increased morbidity and mortality from the proposed RCEC.

3. Certification of this project will result in hundreds of helicopters and planes being routed by the Federal Aviation Authority directly over the adjacent Endangered Species Preserve and into the San Francisco Bay South Important Bird Area. The necessary analysis has *not* been conducted by the Commission to determine the severity of the multiple impacts this will result in.

The FAA has now codified that pilots are now to fly upwind of power plant plumes, to avoid the hazards of flying through them, in our case this routes hundreds of helicopters and airplanes directly over the adjacent Endangered Species Preserve and into the San Francisco Bay South-Important Bird Area. The Commission cannot vote to approve any new certification for the proposed RCEC until the following actions have been taken;

1. CEC Traffic and Transportation staff produce an aviation safety analysis of what the result of routing hundreds of helicopters and planes annually into the San Francisco Bay South- Important Bird Area (SFBS-IBA) for public review and comment.

The SFBS-IBA is an important nesting, feeding, and resting area in the Pacific Flyway with an estimated half million shorebirds pouring through during the Spring migration alone. The possibility of an aviation accident due to the real probability of bird strike must be considered before the Commission takes any further action on the proposed RCEC.

2. CEC Biological Resources staff produce a detailed analysis of what the impact of the routing of hundreds of helicopters and planes annually will have on the listed species who live in or migrate through the SFBS-IBA for public review and comment.

The SFBS-IBA is considered one of the ten most vital Important Bird Areas (IBA) of the over 150 IBAs in the state of California and any deteriorative impact that will result from the Commission certifying RCEC and the subsequent required change in local air traffic must be considered before the Commission takes any further action on the proposed RCEC.

3. CEC Land Use staff produce an analysis of the impact to the Hayward Area Recreation and Parks District (HARD) shoreline resources as a result of the routing of hundreds of helicopters and planes directly over the HARD shoreline trails and Shoreline Interpretive Center for public review and comment.

The impact to the experience of the HARD visitors of these aircraft to their wild shoreline experience will be negative and considerable. A survey conducted by HARD of its shoreline users demonstrate that the cumulative impacts from constructing RCEC may reduce usage of the HARD shoreline programs and resources so severely that the continued operation of the Shoreline Interpretive Resource Center may be threatened due to loss of funding.

4. CEC Land Use staff and Traffic and Transportation staff produce an analysis of what Commission certification of an unmitigateable aviation safety hazard will due to the operation of the Hayward Executive Airport.

Commission certification of a project for which the Federal Aviation Agency would require conditions that would not be acceptable to the federal Fish and Wildlife Service (such as the requirement that aircraft must fly upwind [west] of RCEC's plume and therefore into the SFBS-IBA) could possibly result in the forced closing of the westmost runway of the Hayward Executive Airport (HEA).

What the result of closing one of the HEA runways would have on the operation of the HEA and local small aircraft traffic must be considered.

- 4. The Commission did not include an analysis of RCEC's emission of over 1 billion gallons annually of tertiary treated sewer water vapor into the air and the resulting direct effect on nearby sensitive receptors or of its secondary effects on the regulated pollutants emitted by RCEC.**

The RCEC will be using a Zero Liquid Discharge/All Vapor Emission System that will emit the entirety of the Commission approved 4 million gallons a day of tertiary treated water into the air and well over 1 billion,170 million gallons every year. This Commission permitted amount when converted to lbs (using the standard 8.35 lbs per gallon conversion) equals 33 million,400 thousand lbs a day and over 12 billion,184 million lbs a year emitted into the air. The Commission cannot vote to approve any new certification for the proposed RCEC until the following actions are taken.

1. The Commission must produce an analysis of this major unaccounted for emissions impact on the Production, Chemical Evolution, Transport, Distribution and Deposition of the permitted pollutants RCEC will emit for public review and comment.

A necessary component of the Air Quality Models that are used to determine whether a project can operate within the state, federal and regional regulations that govern air quality, are of course such basic, foundational inputs as the modeled locations temperature, and relative humidity. The unexamined billions of lbs of water vapor this facility will emit will have an obvious effect on both these foundational variables. Currently the regulated pollutants are modeled and that

approved by the Commission using historical humidity and temperature inputs that have not been adjusted to simulate the condition that will actually be present when Zero Liquid Discharge/All Vapor Emission is in operation.

A wide array of modeling programs all require accurate relative humidity data to produce coherent results, a tiny sampling of models used by the EPA that incorporate humidity inputs include; Dense Gas Dispersion Model (DEGADIS), ERT Visibility Model, HOTMAC/RAPTAD, PANACHE, OBODM, Plume Visibility Model (PLUVE II), SLAB, OZIPR. This small set is offered only to illustrate the wide spread necessity of including the correct humidity data for the meteorological, chemical, dispersal and deposition models that are needed for the proper analysis of fossil fuel mega projects like the RCEC.

The use of ZLD/AVE systems is growing more common and inclusion of the ZLD/AVE emissions in the analysis of a proposed power plant's regulated pollutants is required before the Commission can vote to approve that project.

2. The Commission must produce an analysis of what the impact of these 12 billion lbs of tertiary treated water vapor emitted from RCEC's ZLD/AVE system will have on the health of human and non human sensitive receptors for public review and comment.

The impacts of the over 12 billion lbs annual of introduced treated sewer water vapor that will be emitted from the industrial process of RCEC's 4 million gallon a day emissions has been unstudied as to its direct effects *separate* from its inevitable impacts on the 1,164,138 lbs of permitted pollutants.

This huge amount of water vapor has possible effects on the health of the workers in and around the RCEC facilities and on the habitat and health of the numerous listed species that inhabit the adjacent Endangered Species Preserve and the protected habitat of the San Francisco Bay South Important Bird Area . The impact on the local sensitive habitat and sensitive receptors must be analyzed before the Commission votes to approve an amended certification.

Sincerely,
Ernest Pacheco
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Hayward, CA
94541

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Attachment 1: Pacheco EAB
Attachment 2: HASPA letter to CEC

commenter requests Attachments 1 and 2 herein be made part of the Administrative Record

Attachment 1

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re: Russell City Energy Center

PSD Appeal No.

Russell City Energy Company, LLC
Permit Application No. 15487

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 - 2. **The District Did Not Analyze the Impacts of the Twelve Billion Pounds of H2O Vapor this Facility Will Emit from it’s Zero Liquid Discharge System Will Have on the Health of Nearby Human and Non Human Sensitive Receptors.**
- II. THE BOARD SHOULD REMAND THE PERMIT BECAUSE THE EPA-FISH & WILDLIFE CONSULTATION DID NOT STUDY OR CONSIDER THE EFFECT OF

NUMEROUS NEGATIVE IMPACTS THIS PROJECT WILL IMPOSE ON THE ADJACENT ENDANGERED SPECIES PRESERVE AND SENSITIVE SHORLINE HABITAT

- A. This Project Will Force the Federal Aviation Authority to Route Hundreds of Planes and Helicopters Directly Over the Endangered Species Preserve**
- B. The Fish & Wildlife Service Did not Consider the Effect of Numerous Negative Impacts on the Adjacent Endangered Species Preserve Before Issuing the Biological Opinion.**

INTRODUCTION

Petitioner, Ernest Pacheco is a resident of the City of Hayward, California, petitions for review of the Prevention of Significant Deterioration Permit issued from the Bay Area Air Quality Management District (District) to Russell City Energy Center, LLC. The District is authorized to administer the Prevention of Significant Deterioration permit program under the Clean Air Act pursuant to a delegation of authority by the United States Environmental Protection Agency. The permit authorizes construction of a new 600-megawatt natural gas-fired power plant in the City of Hayward. The District committed numerous procedural and substantive violations of the Clean Air Act in issuing the permit. The Board should remand the permit and require the District to correct these violations.

Petitioner requests oral argument in this matter to assist the Board in its deliberations on the issues. The issues are a source of significant public interest and oral argument would materially assist in their resolution.

THRESHOLD PROCEDURAL REQUIREMENTS

Petitioner is a founding member of Citizens Against Pollution (CAP) and satisfies the threshold requirements for filing this Petition for Review of the proposed Prevention of

Significant Deterioration (PSD) permit under 40 C.F.R. § 124. Petitioner has standing because he has participated in the public comment period on the draft permit as an individual and as a member of CAP.

ISSUES PRESENTED FOR REVIEW

1. The District erred in failing to include all necessary emission data in its analysis of this projects emissions and thus failed in its duty to correctly model the actual quantity and distribution of the regulated pollutants.

FACTUAL BACKGROUND

Russell City Energy Center (RCEC) is a 612-megawatt natural gas fired combined-cycle power plant proposed to be built in Hayward, Alameda County, California, by Russell City Energy Company, LLC. General Electric Corporation and a subsidiary of Calpine Corporation each own 35% and 65% of RCEC. The City of Hayward is home to a significantly larger non-white population than Alameda County as a whole, with over one third of Hayward residents being Latino, 19% Asian, and 12 % African American, The facility proposes to emit annually 2 million metric tons of CO₂ equivalents, 72 tons of PM, 330 tons of CO, 127 tons of NO_x, and toxic air contaminants or hazardous air pollutants such as ammonia, formaldehyde and benzene.

STANDARD OF REVIEW

The final PSD permit for RCEC may be set aside if it is based on a clearly erroneous finding of fact or conclusion of law, or involves an important matter of policy or exercise of discretion that warrants review. *See* 40 C.F.R. § 124.19.

ARGUMENT

I.

THE BOARD SHOULD REMAND THE PERMIT BECAUSE THE EMISSIONS MODELING FOR THE CRITERIA POLLUTANTS WAS NOT CONDUCTED WITH ALL THE NECESSARY DATA INPUTS TO ENSURE CORRECT MODELING AND COMPLIANCE WITH THE CLEAN AIR ACT

A. The District Violated the Requirements of the Clean Air Act by Not Including the Largest Emission of the Proposed Russell City Energy Center as a Factor in its Emissions Modeling, Where Such Information Is Critical to Determining the Compliance with the Clean Air Act.

1. The District's Emissions Modeling Did Not Include the Twelve Billion Pounds of H₂O Vapor this Facility Will Emit from its Zero Liquid Discharge System in its Analysis of the Production and Chemical Evolution, as Well as the Transport, Distribution and Deposition of Any of the Permitted Pollutants

The RCEC will be using a Zero Liquid Discharge system that will emit the entirety of the PSD permitted 4 million gallons a day (1) of tertiary treated water into the air and well over 1 billion,170 million gallons every year.

This permitted amount when converted to lbs (using the standard 8.35 lbs per gallon conversion) equals 33,400,000 lbs a day and 12,184,138,000 lbs a year. Again, the entirety of this incredible amount of vapor will be emitted into the air.

To provide some understanding of the enormity of these emissions it is helpful to look at them in relationship to the other emissions this facility will produce; the criteria pollutants PM, NO_x, CO, SO₂, as well as the Toxic Air Contaminates (TACs); formaldehyde (CH₂O), benzene (C₆H₆), and other large emissions; Sulfuric Acid Mist (SAM) and Precursor Organic Compounds (CH₄).

The combined total of the main permitted pollutants equals 1,164,138 lbs a year, and for just the criteria pollutants the total is 1,082,000 lbs a year (2). The ratio of water vapor emitted from the RCEC to the main pollutants will be a ratio of over 10,466 lbs to one, and breaking out just the criteria pollutants the ratio rises to over 11,260 lbs to one.

Even this facility CO₂ emissions of 4,250,912,457 lbs a year is dwarfed by this staggeringly large emission of 12,184,138,000 lbs of water vapor every year.

It is important to clarify that this huge quantity of emitted water vapor is a not part of the H₂O emissions that are produced in the combustion process of the fossil fuel the RCEC will burn , but a separate and unaccounted for emission.

A necessary component of the Air Quality Models that are used to determine whether a proposed project can operate within the federal, state and regional regulations that govern air quality, are of course such basic, foundational inputs as the modeled locations, temperature, and relative humidity. The unexamined billions of lbs of water vapor this facility will emit will have an obvious effect on both these foundational variables.

A wide array of modeling programs all require accurate relative humidity data to produce coherent results, a tiny sampling of models used by the EPA that incorporate humidity inputs include; Dense Gas Dispersion Model (DEGADIS), ERT Visibility Model, HOTMAC/RAPTAD, PANACHE, OBODM, Plume Visibility Model (PLUVE II), SLAB, OZIPR. This small set is offered only to illustrate the wide spread necessity of including the correct humidity data for the meteorological, chemical, dispersal and deposition models that are needed for the proper analysis of fossil fuel mega projects like the RCEC.

The District did not include this significant consideration in the running of the Air Quality Models for the RCEC and accordingly the Board should remand the permit back to the District so that the models can be run with the correct and necessary data, and those results (and the method the District used to run the models) are available for public review and comment before any final PSD permit is issued.

2. The District Did Not Analyze the Impacts of the Twelve Billion Pounds of H₂O Vapor this Facility Will Emit from its Zero Liquid Discharge System Will Have on the Health of Nearby Human and Non Human Sensitive Receptors.

The absence for modeling the impacts of the 12 billion lbs annual of introduced water vapor that will be emitted from the industrial process of RCEC's 4 million gallon a day emissions has been unstudied as to its direct effects separate from its inevitable impacts on the 1,164,138 lbs of permitted pollutants.

This huge amount of water vapor has possible effects on the health of the workers in and around the RCEC facilities and on the habitat and health of the numerous listed species that inhabit the adjacent Endangered Species Preserve and the protected habitat of the San Francisco Bay South Important Bird Area (4). The impact on the local sensitive habitat and sensitive receptors must be analyzed before a final PSD permit can be issued.

III. THE BOARD SHOULD REMAND THE PERMIT BECAUSE THE EPA-FISH & WILDLIFE CONSULTATION DID NOT STUDY OR CONSIDER THE EFFECT OF NUMEROUS NEGATIVE IMPACTS THIS PROJECT WILL IMPOSE ON THE ADJACENT ENDANGERED SPECIES PRESERVE AND SENSITIVE SHORLINE HABITAT

A. This Project Will Force the Federal Aviation Authority to Route Hundreds of Planes and Helicopters Directly Over the Endangered Species Preserve

The FAA has codified that pilots are now to fly upwind of power plant plumes, to avoid the hazards of flying through them, in our case this routes hundreds of helicopters and airplanes directly over the adjacent Endangered Species Preserve and into the San Francisco Bay South Important Bird Area. No analysis has been conducted to determine the degree of impact this will have to the adjacent listed species.

B. The Fish & Wildlife Service Did not Consider the Effect of Numerous

Negative Impacts on the Adjacent Endangered Species Preserve Before

Issuing the Biological Opinion.

Petitioner submits the following comments on this issue: From: East Bay Chapter of the California Native Plant Society

Re: In Support of Your Petition for Review to the Environmental Appeals Board of the Bay Area Air Quality Management District's PSD permit (Permit Application #15487) to Calpine for the Russell City Energy Center Power Plant

Dear Ernie:

The East Bay Chapter of the California Native Plant Society (EBCNPS) has previously participated in public comment to the Bay Area Air Quality Management District regarding the PSD permit for the Russell City Energy Center (see our letters of February 6, 2009 and April 9, 2009). We submit this letter as an addendum to CAP's Petition for Review to the EAB regarding BAAQMD's PSD permit to Calpine for the Russell City Energy Center power plant. The California Native Plant Society is a non-profit organization of more than 10,000 laypersons, professional botanists, and academics in 32 chapters throughout California. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, education, and conservation.

Our specific comments on this project have always been set within the general context of the implausibility of siting a major power plant in the immediate vicinity of an extremely sensitive natural resource. In this case, the public is being asked to believe that there will be no major impacts to the salt marsh habitat and wildlife at Hayward Regional Shoreline from the Russell City Energy Center. It is being asked to accept such a notion based on blind faith in the regulatory agencies rather than actual scientific data. As recently as two days ago, the US Fish & Wildlife Service admitted in an article on Bay Nature Magazine's website that it had not made a site visit. Such a casual approach to regulation belies the fact that endangered species of wildlife reside a few thousand feet from the proposed plant site.

Rather than invoking the precautionary principle that states that in such cases where the threat to the environment is highly likely because of large amounts of toxic emissions and the proximity of sensitive receptors, the regulatory agencies have dismissed the public's legitimate concerns. And they have done so without meeting any scientifically valid standard for concluding that there will be no significant impacts to these species.

BAAQMD stands behind its modeling protocols for determining potential impacts to the environment from the power plants that it regulates. Yet, the protocols do not address such important impacts as how toxic emissions affect small mammals and birds. Since the modeling protocols themselves are not representative of true exposure—a one-year chronic exposure limit is used despite the fact that the plant will operate for decades, and background levels of toxic emissions are not included to determine cumulative impacts of such compounds such as benzene, acrolein, and others—there is absolutely no scientific basis for concluding that the plant will not have significant impacts on the nearby wildlife or on the human population.

Among the most important overlooked impacts is the potential for acid rain to degrade habitat. Acid rain is not an unknown or unfamiliar phenomenon. RCEC will produce some 14,000 lbs. of sulfuric acid mist every year. What evidence has any regulatory agency used to conclude that there will not be a significant impact from acid rain or mist on *Salicornia* (pickleweed), an important food for the federally endangered Salt March Harvest Mouse? This is but one example of many unknown and unexplored impacts.

Our detailed letters of comment to BAAQMD on February 6, 2009 and April 9, 2009 discuss the many inadequacies of the environmental review of this complex project. They are part of the public record, and we refer the EAB to them for further information.

The East Bay Chapter of the California Native Plant Society believes that the Environmental Appeals Board must review the record of scientific evidence used by BAAQMD, USFWS, and the California Department of Fish and Game to conclude that RCEC will not produce major significant impacts to the sensitive receptors at the Hayward Regional Shoreline or to nearby human populations. We believe that proper indepth review will reveal an absence of actual data as well as an absence of appropriate models or even attempts to determine critical impacts. Finally, we strongly urge the EAB to apply the precautionary principle in its review and uphold its wisdom. Siting a major power plant a stone's throw from endangered species and their habitat defies common sense.

Sincerely,

Laura Baker, M.A, Ecology and Systematic Biology
Conservation Committee Chair
East Bay Chapter of the California Native Plant Society

I herby certify under penalty of perjury that the forgoing is true and correct.

Ernest A. Pacheco
22650 Main St.
Hayward, CA 94541
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email: VacationPombo@aol.com

Attachment 2



HAYWARD AREA SHORELINE PLANNING AGENCY

Hayward Area Recreation and Park District
East Bay Regional Park District
City of Hayward

December 24, 2009

Ms. Mary Dyas
Compliance Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

RE: **Petition for Amendment No. 2, Russell City Energy Center (01-AFC-7C)**

Dear Ms. Dyas,

The Hayward Area Shoreline Planning Agency (HASPA) at its regular meeting on December 17, 2009 was informed of the consideration by the California Energy Commission (CEC) of the Petition for Amendment No. 2 for the Russell City Energy Center (RCEC), Hayward, CA. Coincidentally, the agency Board of Trustees had just heard a presentation by hydrology consultant Phillip Williams and Associates (PWA) who was commissioned by HASPA to report on the affect of projected sea level rise on the Hayward Shoreline. The basis for the PWA presentation was an inundation map developed for the San Francisco Bay Conservation and Development Commission (BCDC) by the USGS (Knowles 2008), that I have attached for your information and use.

As you may already know, the RCEC project is located on a site that will be affected by the projected rise in sea level and although the floor elevation of the energy center may be built higher than actual flood level, the increase in groundwater levels at this site must also be considered in the design of underground pipelines and conduits in this area. However, nothing in the Amendment No. 1, or in the recently produced Amendment No. 2, addresses how the RCEC building foundation, underground gas and water lines, conduits, cabling, etc, will be engineered to deal with this rise in the level of the groundwater both at and nearby the RCEC site. As the engineers from PWA pointed out in their presentation to HASPA, the rise in groundwater levels associated with sea level rise, will present serious problems for infrastructure that has not been designed to withstand the corrosive effects of being situated below groundwater level.

We are concerned that this issue has not been adequately addressed by RCEC, LLC and request that the CEC require RCEC, LLC to provide a clear statement on their strategy to address the rise in groundwater levels and the potential inundation of the RCEC site. Depending upon the strategy chosen, the need for an environmental assessment and a determination of what will be the affect of their strategy on the interests of the agencies that compromise HASPA may also be required.

We are also concerned about the intense; omni-directional perimeter lighting required for the RCEC by the FAA, whose affect on the adjacent environment has yet to be determined. The CEC must require RCEC, LLC to produce a lighting plan for the energy center and make an assessment of the environmental impact of these lights.

There is also the likelihood that the FAA will in the first quarter of next year, codify its policy that pilots must circle *upwind* of power plant plumes. As the Hayward Airports current "overflow" flight path is basically over the top and east (downwind) of RCEC this would result in an increase in the number of planes and helicopters circling directly over the Snowy Plover, Black Rail and Salt Marsh Harvest Mouse habitat found at the Hayward Shoreline. This seems to pose some obvious reasons for concern that should be weighed by the CEC staff as they consider the new amendment, as well as the USEPA and USF&WS.

Thank you for the opportunity to comment and we hope you will seriously consider these comments in the processing of the subject documents.

Sincerely,



Ms. Carol Severin, Chair
Hayward Area Shoreline Planning Agency

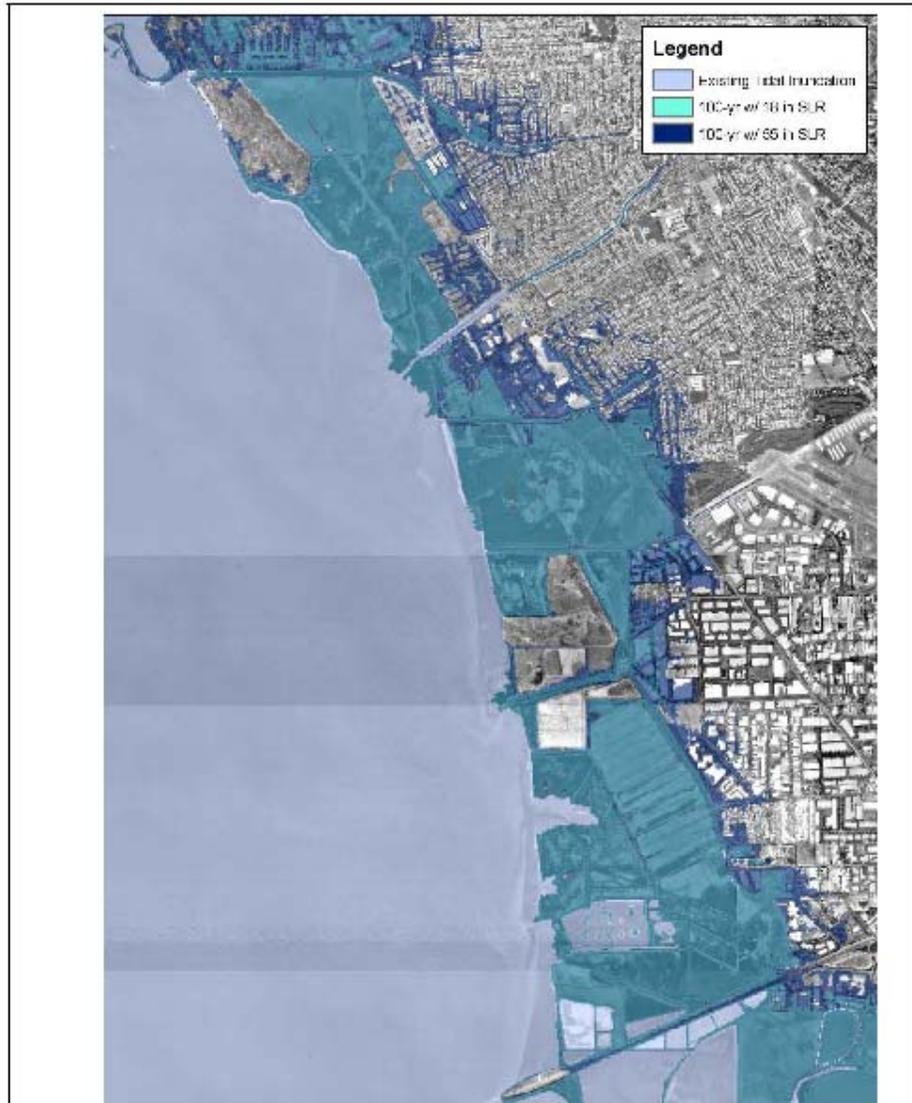
Cc: Agency Trustees

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Source: Knowles 2008

figure 3.1
HASPA Sea Level Rise Study

100-yr Water Level Inundation Map

PWA Ref# 1955.00

