Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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July 28, 2006

DOCKET
06-AFC-3
DATE JUL 28 2006
RECD. JUL 31 2006

Mr. Bill Pfanner
Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
Phone: 654-4206
E-mail: bpfanner@energy.state.ca.us

Dear Mr. Pfanner:

Environmental Health Coalition (EHC) is a 26-year old, non-profit, environmental justice organization working in the San Diego/Tijuana region. Our Clean Bay Campaign seeks to cleanup, restore, and protect San Diego Bay and the health of residents living around the Bay. While we are exceedingly supportive of all efforts to remove the current South Bay Power Plant, are very concerned about the LS Power proposal to replace the SBPP with a plant that proposes to emit the same amount of air pollution as the current, inefficient power plant.

We understand that a data adequacy hearing is coming up. We further understand that we have an opportunity, as an interested party, to ask the California Energy Commission (CEC) to request additional data from the project applicant. We have begun our review of the Application for Certification (AFC) and note some very serious omissions from and deficiencies in sections critical to our members, many of whom live directly downwind of the plant.

Our requests are as follows:

1. **a. Request that LS Power re-run the air emission modeling analysis using local, current, meteorological data for the West Chula Vista area.**

Basis for Request:
Wind roses for the year 2000 developed by the San Diego Air Pollution Control District indicate that the wind direction and wind speed at Lindbergh field are not representative of conditions in Chula Vista. (Figures 1 and 2 attached) Also, using 1990 data is not appropriate when more current data exists. As this summer's heat wave indicates, our region may be experiencing some climatic changes that make 1990 data outdated.

We were surprised to read in the AFC that LS Power had trouble obtaining Aermod compatible Chula Vista met data from the SDAPCD, as EHC has received Chula Vista met data (for 2003) from Bill Brick of the SDAPCD as recently as this year. The CEC should encourage SDAPCD to make this data available to LS Power as soon as possible.

It is imperative that local conditions are taken into account when evaluating air quality impacts for this or any other project. The AFC should not be considered data adequate unless the modeling is re-run using current, local met data from the Chula Vista monitoring station.

b. Request that LS Power provide maps showing the geographic scope of air quality impacts for at a minimum the PM_{10} and $PM_{2.5}$ impacts for construction, commissioning, and operation air quality impacts.

Basis for Request:

The AFC contains information on the levels of air quality impacts, but does not demonstrate the geographic scope of those impacts, nor where the maximum exposed individuals are located. This is basic information that should be considered in the environmental review and should be available to the public.

c. Request that LS Power, as part of the environmental review, consider and demonstrate compliance with the lower PM standards that are being currently considered by the United State Environmental Protection Agency.

Basis for Request:

These criteria are listed at http://www.epa.gov/air/criteria.html These are not in regulatory effect yet, but reflect the most current scientific information on the health impacts of particulate matter.

2. Revise Table 9.3-1 Assessment of San Diego RMR needs and associated tables, graphs and figure throughout the AFC to reflect planned repowering of Encina.

Basis for Request:

As of July 23, 2006, Encina Power Plant owners announced their intention to replace the Encina Power plant by 2009. An news article in the San Diego Union Tribune, *New tower of power: In a move to crank up the juice and sell some land, Encina station's owner plans to rebuild farther east and put the wrecking ball to the plant,* dated July 23, 2006 Encina owners, NRG notified the CEC of plans to bring a repowered 340 ME plant online by 2009 and expanding to 640MW by 2011. The AFC should be revised to reflect this RMR power. Article attached.

3. Revise Figure 1.15-2 Contribution of In-Area Resources to Meeting Capacity Requirement and associated Table, graphs and figure throughout the AFC to reflect planned Community Power Project of ENPEX.

Basis for Request:

Federal appropriation HR 4546, Section 2831 provided for the sale of 60 acres of the Miramar Naval Air Station to ENPEX for the purposes of a power plant construction. In addition, this proposed project is Number 8 on the CaISO Queue (statewide, November, 2000), have recently completed a study on site selection with the Navy. In May, 2006 ENPEX announced that it was entering into a contract for facility studies with SDG&E. (North County Times article, May 9, 2006, *Del Mar company to study Miramar power plant.*)

4. Require analysis of additional alternatives to a large gas-fired power plant at the proposed site, at a minimum, to include the ENPEX site and several hybrid options that would draw replacement generation from more than one source of energy e.g. some pumped storage and gas—fired, or some solar and some biomass for a portion of the project in order to reduce impacts etc…

Basis for Request:

Section 9.0 in the AFC fails to analyze several known and credible alternatives, both related to site and to technology. The most glaring deficiency is the failure to mention the ENPEX site, located in close proximity to the Sycamore Substation. This project is proposed as a 750MW plant scalable to 1500MW. It is far from residential areas and close to major transmission. CEQA is clear on the requirement to analyze alternatives that *"would avoid or substantially lessen any of the significant effects of the project."* (AFC at 9-2).

In addition, the AFC dismisses any alternative that meets all but one objective when the California Environmental Quality Act (CEQA) clearly states that alternatives should be analyzed that *"could feasibly attain* ***most of the basic objectives*** *of the project…"* (emphasis added) (AFC at 9-2 and 9-30) This would require that several of the solar technologies be analyzed for some or part of the project such as several hybrid options that would draw replacement generation from more than one source of energy e.g. some pumped storage and gas—fired, or some solar and some biomass for a portion of the project in order to reduce impacts etc…

5. Require LS Power to assess an alternative of a non-duct-fired power plant.

Basis for Request:

The practice of duct firing or burning is the process of injecting heat into a boiler for additional steam generation, reduces efficiency and raises emissions. It effectively turns a more efficient base-load plant into a far less efficient, large peaker plant. According to a GE report, eliminating duct-firing dramatically reduces cooling load and size of a dry cooling system, thereby making a smaller footprint possible. An unfired baseload plant results in the smallest ACC and minimum visual bulk and fewer emissions thus is a credible alternative that reduces impacts from the plant.

Thank you for the opportunity to comment on this very important project in our community.

Sincerely,
ORIGINAL SIGNED BY

Laura Hunter, Director
Clean Bay Campaign

Melanie McCutchan
Research Associate

ATTCH:

Figure 1.Wind Rose for Lindberg Field, Year 2000 from the San Diego Air Pollution Control District.

Figure 2. Wind Rose for the Chula Vista Monitoring Station, Year 2000 from the San Diego Air Pollution Control District.

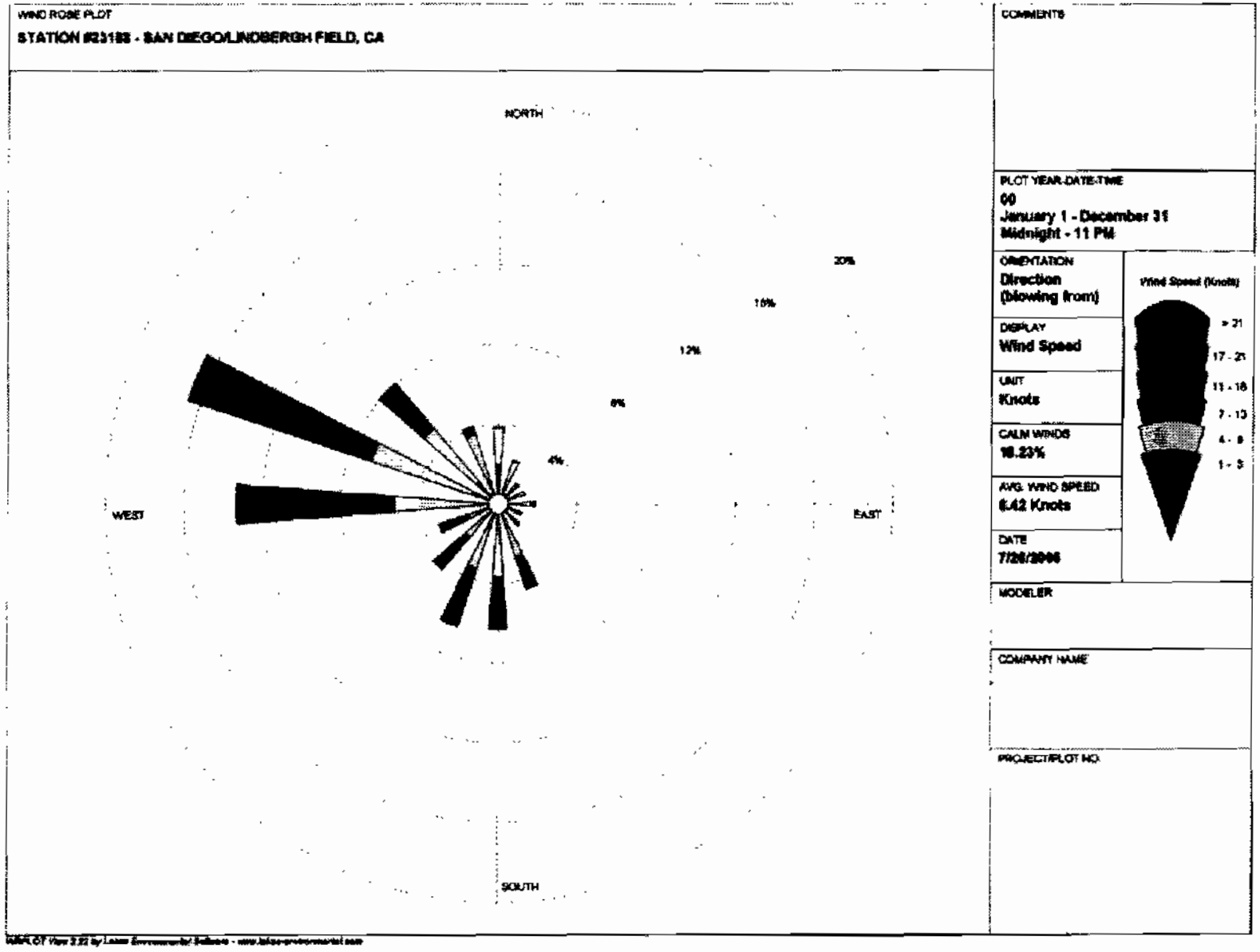

Figure 3.Wind Rose for Lindberg Field, Year 2000 from the San Diego Air Pollution Control District.

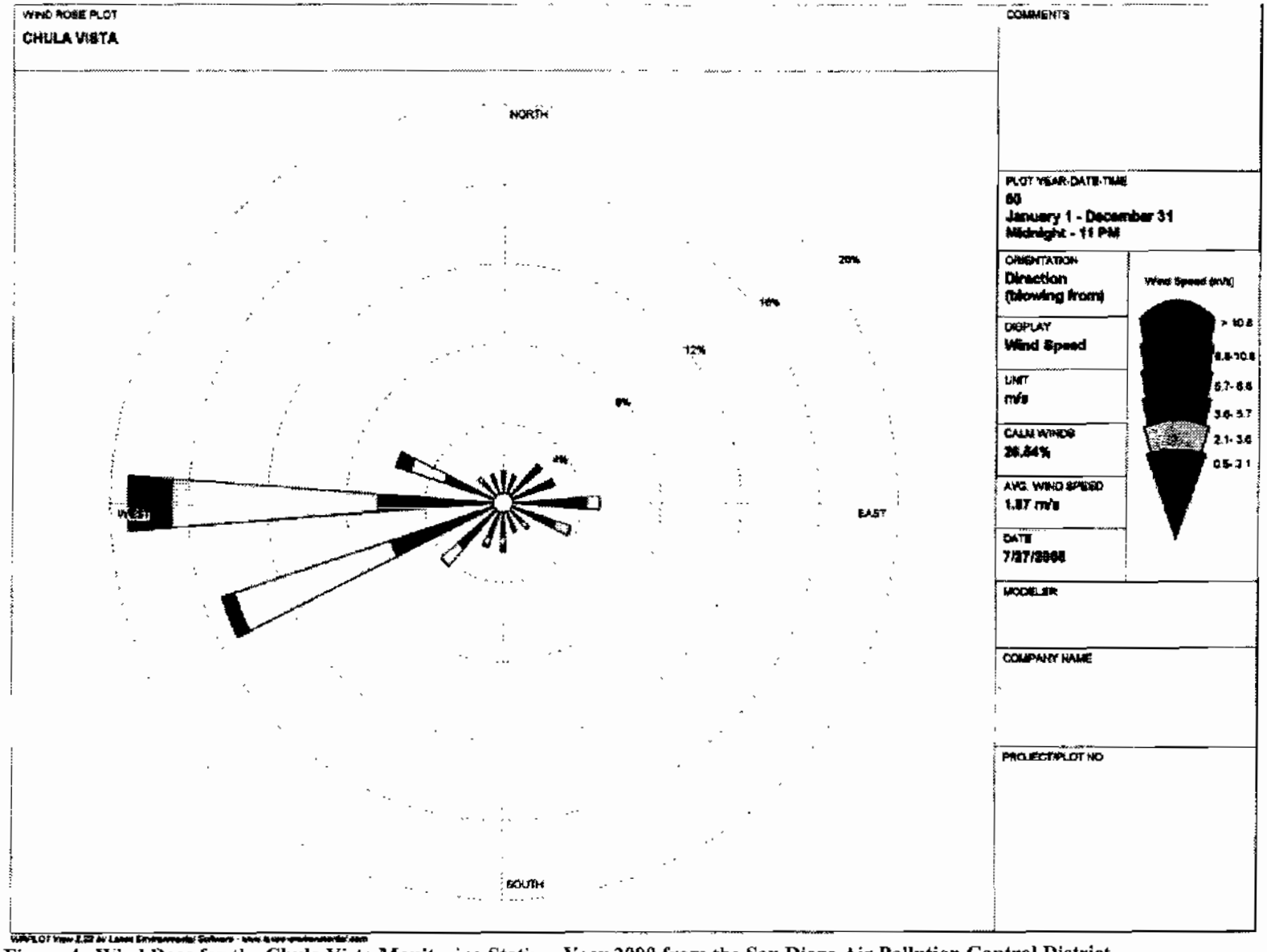

Figure 4. Wind Rose for the Chula Vista Monitoring Station, Year 2000 from the San Diego Air Pollution Control District.