Environmental Health Coalition

COALICION de SALUD AMBIENTAL

401 Mile of Cars Way, Suite 310 ♦ National City, CA 91950 ♦ (619) 474-0220 • FAX: (619) 474-1210
ehc@environmentalhealth.org ♦ www.environmentalhealth.org

DOCKET
06-AFC-3
DATE AUG 16 2006
RECD. AUG 16 2006

of Laura Hunter, Environmental Health Coalition
Before The California Energy Commission, Data Adequacy Hearing
For The South Bay Replacement Plant
August 16, 2006

Thank you for the opportunity to address you today on an issue that is very significant for our region—the replacement of the South Bay Power Plant. My name is Laura Hunter and I am a Campaign Director with Environmental Health Coalition. EHC is a 26 year old non-profit environmental justice organization working in the San Diego/Tijuana region to improve the environmental health or residents in our communities. EHC has dealt with issues related to the power plant since the early 80's. We participated in the South Bay Power Plant Working Group and are members of the Citizens' Advisory Committee for the Chula Vista Bayfront Master Plan. Our members live in large concentration downwind of the power plant. This decision is all the more important given that it is a decision that we, as a community, only get to make once every 50 years. It is very important that we make the right decision, and to do that we need full information so we thank you for holding this hearing today.

Before I discuss the areas that we believe are deficient, we want to make clear that we support removal of the current power plant and the inclusion of dry-cooling in any proposed new plant. However, locating a large single energy replacement plant directly upwind of densely populated western Chula Vista, where childhood hospitalizations for asthma are already 20 percent higher than the county average, would result in impacts to air quality and community health that could be avoided through the pursuit of other, viable alternatives.

We would like to give you a sense of the location of this project. Western Chula

Vista is a classic environmental justice community. Downwind of the plant the community is 70% Latino with over 30% living below poverty nearby the plant. Depending on the area of air impact, which is not yet identified in the AFC, there could be up to 60 schools and preschools in the area of concern. It is of deepest disappointment that the SBRP proposes **no discernible reduction in the most dangerous types of air** pollution from the new plant. (0.1% reduction in PM and 2.4% reduction in NOx). Also, the replacement plant includes no mitigation, as the shutdown of the SBPP is being used essentially as an offset for the SBRP's pollution—leaving us with the same polluted conditions our members suffer from today.

As this is a data adequacy hearing, we made several recommendations in our letter of July 28th where we believe the data presented is inadequate for the staff to develop the fully informed analysis that can meet the standards of a CEQA review. First, we noted that the air modeling was deficient and some of the same deficiencies were also raised by the recent letter from the Air Pollution Control District. We urge the CEC to require LSPower to revise their air modeling section 1) to use representative meteorological and monitoring data, 2) to reveal the geographic scope of the impacts, and 3) to demonstrate compliance with the lower PM standards that are being currently considered by the United States EPA. These should be addressed before this AFC should be determined to be adequate. Although these are not yet in regulatory effect, they reflect the most current scientific information on the health impacts of particulate matter and were recommended by the scientific advisory committee. We understand that while the Local Air District does not feel they have regulatory authority to require consideration of the new standard, however we think that this is key information for your staff to have to do a fully informed analysis.

The next major area of inadequacy of AFC is the severe deficiency of the analysis of alternatives. We point to the Title 20 Chapter 5 of the Public Resources Code standard that requires, for adequacy, a range of reasonable alternatives which would feasibly

attain most of the basic objectives but would avoid or lessen any of the significant effects of the project.

In addition to technology alternatives, it is also important to analyze all credible sites for a project that would lessen the impacts. A third area would be hybrid solutions. None of this was adequately done or, in some cases, done at all in the current AFC. In our letter, we outlined several credible alternatives that meet the objectives, and significantly lessen the impacts and so should have been analyzed. Another credible alternative is an un-fired plant.

Further, we believe that the alternative of a simple cycle peaking plant was inappropriately rejected even though such a plant could serve to close the RMR gap and the resulting aggregate air impacts would be greatly reduced for the community. This alternative should be put back on the table. **We ask that the CEC find the AFC deficient in the quality and viability of the alternatives they considered and direct the proponents to provide information on all alternatives.**

This issue of alternatives is key for the community. At the May 3 workshop Environmental Health Coalition presented the Port with close to 100 postcards from downwind residents supporting cleaner alternatives to a large power plant. I can talk more about the specific alternatives if time allows or if it is appropriate at this point.

Last, the analysis that summarizes the Contributions of In-Area Resources to Meeting Capacity Requirement is deficient in that it fails to reflect the viable and expected projects in the region, most notably the 750MW proposed Community Power Project of ENPEX. This project has made considerable progress in development of the site including: a position on the ISO Queue, the required authorization from the Department of the Navy to proceed with the conveyance of the MCAS Miramar property to the ENPEX for the purpose of an electrical generating plant, the completion of a site assessment and the

determination of three possible sites, and the initiation of a interconnect study with SDGE. This 750MW plant could easily close the 54MW RMR deficiency in 2010 noted in the AFC. This project site is also a credible alternative site to the SBRP and should be analyzed as such.

In closing, western Chula Vista is not a case where a community moved in next to a power plant. The homes were there first and then the power plant came. For the past 45 years Western Chula Vistans have borne, and continue to bear the air pollution burden from a power plant that serves the region. When can residents expect an improvement in the air they breathe if we do not require new facilities to pollute less than the old? This community deserves a full and fair vetting of cleaner alternatives that meet the objectives and will provide an upgrade in their air quality along with an upgrade in energy production..

We urge a finding of not adequate for the AFC and request that the CEC direct LSPower to amend their application with the information noted above.

We have more details and background material that form the basis of our requests. We would be happy to provide this information if requested by the Commission.

Thank you for the opportunity to provide these comments today. We look forward to working with the Commission and your staff.