



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

January 14, 2021

Brenda Cabral
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105



Re: Cumulative Environmental Impacts in Alviso: Los Esteros Critical Energy Facility (B3289) Title V Major Facility Permit Revision (1515 Alviso-Milpitas Road, San Jose, CA)

Dear Ms. Cabral,

The Sierra Club Loma Prieta Chapter (SCLP) and the Santa Clara Valley Audubon Society (SCVAS) are environmental organizations active in Santa Clara County. Our members and supporters are greatly concerned with impacts of air and water pollution on disadvantaged communities and sensitive habitats and species. We are also concerned with the ongoing use of natural gas in our cities and in power plants, due to the high environmental impacts of the extraction and distribution of natural gas.

We write in response to the Bay Area Air Quality Management District's (BAAQMD) proposed significant revision to the Major Facility Review permit for the Los Esteros Critical Energy Facility. This review is based on an approval by the California Energy Commission (CEC) for a petition for a post-certification change to incorporate reductions in monitoring. The maximum rated capacity for the S11 Cooling Tower is being increased from 73,000 gpm to 90,000 gpm. This revision increases the potential to emit for PM10 by 1.12 tons per year.

We believe that the permit should not be modified to allow for the expansion of the cooling tower and reduced mitigation absent a new and comprehensive Environmental Impact Report. In addition, we encourage the BAAQMD to ask for alternatives to this project.

The abundance of solar energy has resulted in the elimination of nuclear, hydro and gas-fired generators. In 2020 a heatwave caused gas fired peaking plants to overheat and shut down, resulting in blackouts. The state addressed the issue by requiring efficiency. Large data centers switched to virtual data centers to conserve power in Silicon Valley. Consequently, last year the Public Utilities Commission ordered Edison, PG&E and other utilities to buy thousands of megawatts of new power capacity. Most of this capacity is expected to be four-hour lithium-ion batteries that can store solar energy during the afternoon and distribute it when the sun goes down. We strongly believe that our region should transition away from gas-fired power plants that are unreliable in heat waves and unhealthy to local communities while accelerating climate change.

The Project will also increase the amount of water used for cooling. The warm water will be discharged into Coyote Creek and be likely to raise the temperature of the creek water with potential harm to Coyote Creek flora and fauna. Gas-fired peaking generators sit idle for much of the year because of abundant solar energy and come online in the summer, the season when the creek is at its lowest. This is the time when the additional heat from the cooling towers is most harmful to wildlife and habitat in the creek and the San Francisco Bay.

Please consider lithium-ion battery storage as an alternative to the gas-fired expansion. A battery farm is offered as an alternative to the Calpine Metcalf plant in San Jose <https://www.esvolta.com/hummingbird> and a similar solution is needed in North San Jose to protect the community, Coyote Creek, the San Francisco Bay, and wildlife in the Don Edwards National Wildlife Refuge. Avoiding gas-fired infrastructure will reduce air pollutants and will protect our Bay habitats. A Battery farm would benefit consumers and increase resilience, protect the community of Alviso from added particulate air pollution and protect Coyote Creek from an increased discharge of heated water.

Modifying the permit will also impact the community of Alviso, exposing this low-income community to an increased load of particulate air pollution. Will the expanded capacity of the cooling tower affect either pollution dispersal or the amount and chemical composition of the pollution? In particular, how will it impact PM, PM2.5, PM10 emissions? PM2.5 emissions are harmful to humans and to wildlife, and we are greatly concerned with impacts to Alviso residents, burrowing owls in Alviso, and other avian species in Coyote Creek, the Don Edwards National Wildlife Refuge and the Bay.

SCLP and SCVAS support the letter submitted by Mr. Espinoza, President of the Organización Comunidad de Alviso, requesting that certain reports and documents related to community health be made available for community review.

Respectfully,



Gladwyn d'Souza, Conservation Committee Co-Chair, Sierra Club Loma Prieta Chapter



Shani Kleinhaus, Ph.D., Environmental Advocate, Santa Clara Valley Audubon Society