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November 26, 2003

To: Ellen Russell
Department of Energy

From: Jan Cortez
American Lung Association of San Diego and Imperial Counties

Re: Power Plants Built in Mexicali Border Region

The American Lung Association of San Diego and Imperial Counties (ALA SD/IC) would like to submit these comments regarding air pollution emissions and the power plants built in the Mexicali Border region. Our mission is to prevent lung disease and promote lung health. Toward that end, we have serious concerns about the border power plants and the additional air pollution they will release into the Imperial/Mexicali border region. This area already has unhealthy air quality. Both Imperial County and Mexicali have unhealthy levels of ozone, particulate matter and in some areas, carbon monoxide.

The ALA SD/IC would like to recommend the following in order to protect the public health of Imperial and Mexicali residents that will be exposed to emissions from the power plants:

1. Offsets – Air Pollution offsets should be required to offset air pollution emissions generated from power plants built by InterGen, Sempra and other U.S. Companies. These offsets could include road paving and strategies to reduce air emissions from older cars, trucks and buses. Further, strategies could be in place to reduce open burning and industrial processes from small businesses near the border as well as from Maquiladoras.
2. Dry Cooling – Dry cooling of the plants should be implemented. This will reduce particulate matter emissions and help prevent shrinking of the Salton Sea. A shrinking sea could lead to significant airborne dust generation from exposed shoreline.
3. Air Monitoring – Continuous air monitoring should be conducted to record air emissions for smog forming pollutants as well as particulate matter from the power plant projects.

4. Data Released to Public – Data gathered that captures emission levels from the power plants should be released to the public regularly and access to the data should be convenient, such as through a California Air Resources Board web site.

Thank you for your consideration of the American Lung Association of San Diego and Imperial Counties' comments. Power plants are major sources of air pollution and offsets; dry cooling, emission monitoring and release of emission data to the public are needed to protect the lung health of residents in the Imperial and Mexicali border region.

We ask for the Department of Energy's support to implement these recommendations. Should you have any questions I can be reached at (619) 297-3901 or Jan@lungsandiego.org.

Sincerely,

A handwritten signature in black ink that reads "Jan H. Cortez". The signature is written in a cursive, flowing style.

Jan H. Cortez, M.P.H.
Vice President, Research and Environmental Health