



PO Box 6064, Chula Vista, CA 91909, (619) 425-5771

6/4/08

RE: Comments on Public Health Section of the PSA for the public record:

Mr. Christopher Myers:

The zip code 91911 is number **3 in the county in quantity of criteria pollutants and number 7 in toxic pollutants.** Our part of San Diego County and western Chula Vista are heavily impacted now by polluting industries. We don't want another one. The issue is not whether the proposed peaker meets minimal standards and thresholds, but that we have had enough of being dumped on. The proposed mitigation of buying emissions credits is totally unacceptable to the community. Rejecting the new plant is the only acceptable solution. Our neighbors suffer from multiple health problems already. We have a cement plant that scatters visible particulate matter around the neighborhood. The diesel truck traffic is of a regional nature. The SBPP adds particulates and an oily substance whenever it operates.

It is not adequate to use hospital records for the county. Data must be looked at by zip code. <http://www.youtube.com/watch?v=6T43FYPT1SE>

For Zip Code 91911, the rate of hospitalization of children with asthma is 112 per 100,000 children. 18 percent higher than the County Average of 95 per 100,000. For the Zip code 91910, the hospitalization rate is lower than for the County. This information is from data submitted to the state of California by each hospital in California. This particular factoid is from the 2003 data set.

Perhaps, the CEC staff could access this data base for the 91911 zip code and include in the FSA the number of hospitalizations for cancer, adult asthma, heart disease, lung disease, and other ailments caused by excessive amounts of pollution?

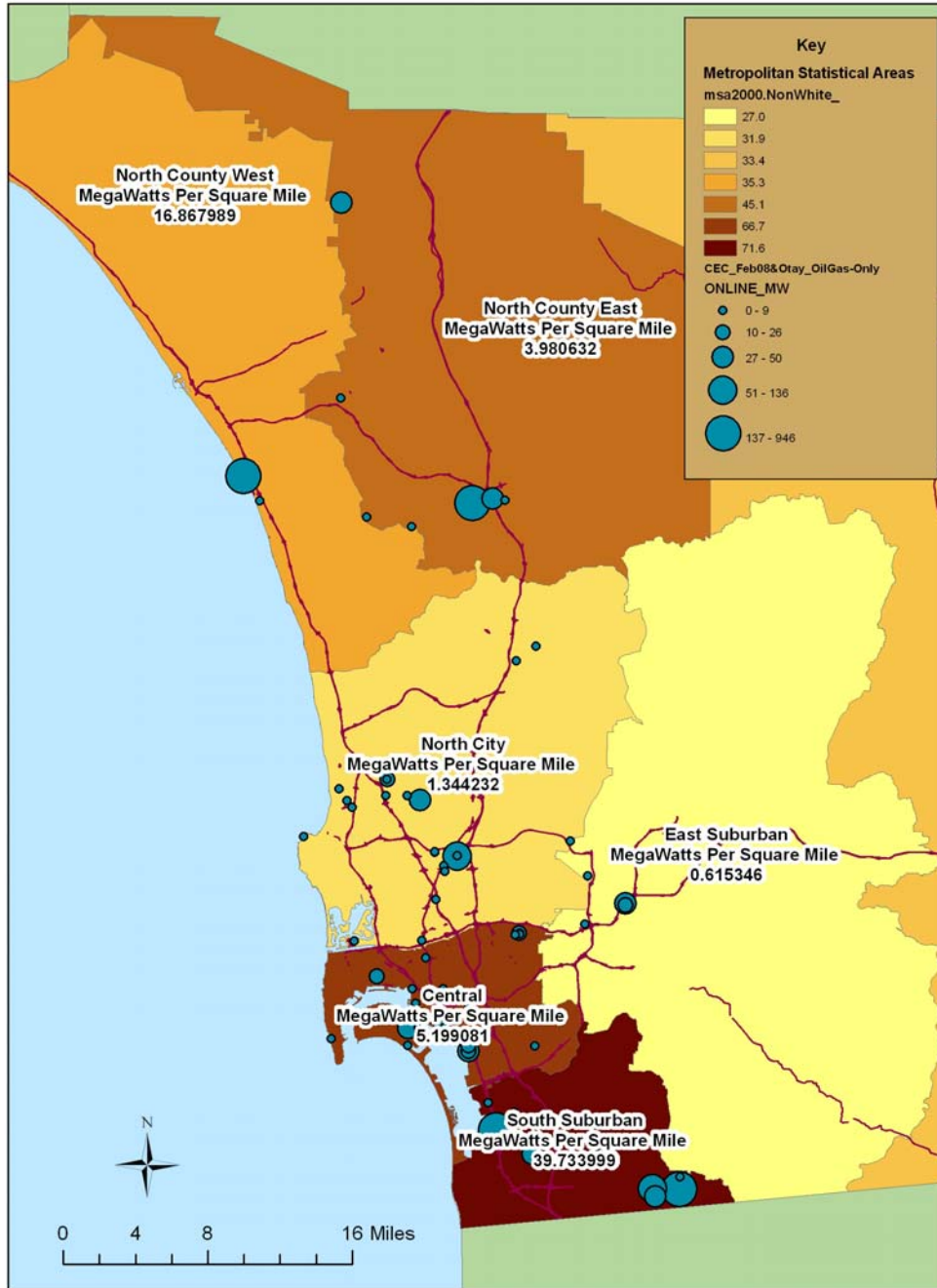
<http://www.youtube.com/watch?v=Ux2Iq9KzxT0>

This is an environmental justice issue within the southern part of the county. We are a part of a southern suburban area that produces already almost 40mw per square mile, using natural gas and landfill gas. This is out of proportion with 4 out of the other five areas of the county and a local environmental justice issue since we also have the largest minority population in the county. (If the nuclear power plant in North County West almost in Orange County and on a Marine Corps base were included the mw per square mile there would be 50, but this is a totally different kind of impact and health risk. Considering only the gas fired plants this area only produces around 16 megawatts per square mile-the second highest in the county after the southern suburban.)

Neurotoxins have not been adequately dealt with as a possible public health risk.

<http://www.dontwastearizona.org/power.html>

MegaWatts Per Square Mile and Percent NonWhite Population, Natural Gas & Landfill Gas Facilities Only



Sources: CEC (Power plants)
SANDAG: MSA map layer

Feature edit map.mxd
Environmental Health Coalition, 2008.

Health Effects of Noise

Low level and high pitched noise negative health effects have not been dealt with. The current peaker can be heard in the homes as a low hum at night. The whining sound has caused headaches and other ailments among the workers at the near by design studio. They work in a quiet place and are highly sensitive to this disturbance. There is much research showing the negative health effects of low-level noise.

<http://www.youtube.com/watch?v=yFbu8tcCaWA&feature=related>

“Even low-level office noise can increase health risks and lower task motivation for workers, Cornell researchers find”

<http://www.news.cornell.edu/releases/Jan01/noisy.offices.ssl.html>.

Events that disturb and harm our physical, emotional, and mental health are called stressors. Stressors can lead to the body initiating the fight-or-flight adrenaline response. The body gets ready to fight a stressor, or flee a stressor. Boom cars, with their high-intensity/low-frequency sounds and infrasound, are a known stressor that can lead to specific, negative events in the body....

Dr. Luther Terry, a former U.S. Surgeon General, noted that "excessive noise exposure during pregnancy can influence embryo development."

"Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies."

"The U.S. study in Los Angeles found that, in addition to greater incidence of low birth weights, there was also a greater incidence of birth defects such as clefts of the lip or palate, and spinal malformations."

(Source: The Environmental Protection Agency's NOISE EFFECTS HANDBOOK)

Even chronic, low-level traffic noise at 50 - 60 dB can adversely affect children. It can cause a rise in blood pressure, heart rate, and stress hormones. In addition, it also reduces task motivation and learning.

Elevations of stress hormones are linked to the adult illnesses of "high blood pressure, elevated lipids and cholesterol, heart disease and a reduction in the body's supply of disease-fighting immune cells." (Source: <http://www.newscientist.com/news/> - Ithaca, NY, 5/22/2001

Bursts of Noise: "One burst of noise, as from a passing truck, is known to alter endocrine, neurological, and cardiovascular functions in many individuals; prolonged or frequent exposure to such noise tends to make the physiological disturbances chronic. In addition, noise-induced stress creates severe tension in daily living and contributes to mental illness." (Source: NOISE POLLUTION, Electric Library presents Encyclopedia.com) "Research shows that intermittent and impulsive noise is more disturbing than continuous noise." (Source: League for the Hard of Hearing's NOISE & HEALTH FACT SHEET)

Hospital noise has been shown to slow healing." (Source: THE SOUND AND THE FURIOUS, by Corinne Asturias)

"Disturbances may occur even though the sound pressure level during exposure is below 30 dBA.

" Low-frequency noise will penetrate walls and barriers more readily than high frequency noise. (Source - GUIDELINES FOR COMMUNITY NOISE: ADVERSE

HEALTH EFFECTS OF NOISE)

An Introduction to Sound Basics. This "... document is useful to persons interested in finding out more about what Noise Pollution is and what its effects are, as well as how they may accurately measure the amount of noise in their environment." Article Online Source: [Noise Pollution Clearing House](#)

The 1999 report from the Census Bureau, titled AMERICAN HOUSING SURVEY FOR THE UNITED STATES, stated that noise is America's number one complaint about their neighborhoods. It is also the main reason for wanting to move to another location. Noise levels have increased 6 fold in major U.S. cities in the last 15 years. Automobiles are the largest source of noise.

Noise: A Health Problem. This 1978 document "... is a somewhat dated but still very helpful EPA document about noise and health." Article Online Source: [Noise Pollution Clearing House](#)

Uninterrupted sleep is known to be a prerequisite for good physiological and mental functioning of healthy persons. Whereas sleep disturbance is considered to be a major effect of environmental noise, data on the effects of environmental noise on sleep are limited. Recent research on sleep disturbance has been conducted for aircraft noise, road traffic, and railway noise. For example, road traffic noise in excess of 30 dB disturbs sleep. The probability of being awakened increases with the number of noise events per night. When background noise is low, noise exceeding 45 dB should be limited; for sensitive individuals, an even lower level is preferred. ...

Other factors that influence the problem of night-time noise include its occurrence in residential areas with low background noise levels, combinations of noise and vibration such as that produced by trains and heavy duty vehicles, and sources with low-frequency components which are more disturbing, even at very low sound pressure levels. These low-frequency components have a significant detrimental effect on health. ...

Mental health is defined as the absence of identifiable psychiatric disorders according to current norms. Environmental noise is not believed to be a cause of mental illness, but it is assumed to accelerate and intensify the development of latent mental disorders. The adverse effects of environmental noise on mental health include the following catalog of complaints; anxiety, emotional stress, nervous complaints, nausea, headache, instability, argumentativeness, sexual impotency, changes in mood, increase in social conflicts as well as neurosis, hysteria, and psychosis. Population studies have suggested associations between noise exposure and mental health indicators such as rating of well-being, symptom profiles, use of psychoactive drugs and sleeping pills, and mental hospital admission rates. There may be great differences in the ability of various populations to cope with noise pollution; particularly vulnerable groups may include, children, the elderly, and those with preexisting disease, especially depression.”

<http://www.nonoise.org/library/whonoise/whoresponse.htm>

The current peaker is a source of significant noise. A large peaker operating more hours is more likely to cause the development of some of these ailments which MMC needs to be held accountable for.

Conditions of Approval

This peaker should not be approved, but in the event it is in total disregard of the negative consequences to our community, we have a few suggestions for conditions of approval:

1. The generators and pollution control equipment must be upgraded every two years to the best technology then available. This is to protect the community from the unfortunate situation we now suffer with the SBPP. (This was a condition of approval of the current plant, but it was shut down instead of being refurbished.

2. All residents and businesses within 1,000 feet must receive a list in Spanish and in English of all possible health impacts from the peaker plant. (Those that cause the sign to be required to be posted on the gate.) For each negative health effect the possible cause also must be listed. Precautions the company will take to minimize these risks can be included in this information. The company should take out insurance to pay claims from residents and near-by workers if anyone in their families develops one or more of these illnesses that the state requires the company to notify residents and businesses in the vicinity about.

3. A notice needs to be given to every business and residence advising them in English and Spanish of the city's Noise Ordinance:

19.68.030 Exterior noise limits. B 3. In the event the alleged offensive noise, as judged by the enforcement officer, contains a steady, audible sound such as a whine, screech or hum, or contains a repetitive impulsive noise such as hammering or riveting, the standard limits set forth in Table III shall be reduced by five dB.

People need to be instructed whom to report this problem to. Also a sound meter needs to be made available to every person who complains so that they can verify the violation. If anyone's doctor verifies the development of one or more of the ailments caused by repetitive, low level noises MMC needs to acknowledge its responsibility, since it has been forewarned of the potential problem and pay for medical expenses.

4. Considering the high percentage of lower income people in the vicinity of this proposed peaker with no or inadequate insurance it is important that MMC provide a copy to all residents and businesses within 1,000 feet of an insurance policy adequate to pay the medical expenses of any and all people who become ill from the negative effects (including psychological) of having a facility such as this in such close proximity.

Sincerely,

Theresa Acerro
President of Southwest Chula Vista Civic Association.