

Via Email: planningcommission@sandiego.gov

June 20, 2012

City of San Diego Planning Commission



Protect Mission Trails
Regional Park and adjacent
communities!
Stop re-zoning and the toxic
Quail Brush Power Plant.

RE: City of San Diego Project # 270282, Quail Brush Community Plan Amendment Initiation,
CEC Docket Number 11-AFC-03 **OPPOSE**

Dear Planning Commissioners:

The three criteria (LU-D.10) used for triggering a vote to initiate a Community Plan amendment is hugely unsubstantiated and the motion should be DENIED. A reading of the criteria, General Plan, and the Navajo Community plan, would show compounding evidence against the initiation. It also reveals the weak evidence presented by Development Services (DS).

Also, a letter to the applicant (through Tetra Tech) dated August 3, 2011 by Development Project Manager Morris Dye (Project No. 242668, IO No. 24001923) clearly states the outcome of an initiation (pg 4 of 9 , Cycles Issues) as follows: ***"If initiated by Planning Commission, staff will work with the applicant to determine the best way to implement the proposed project through a change in land use and appropriate implementing zone or through identifying the specific use proposed and location of the use in the text and figures of the East Elliot Community Plan."***

So, it is clear that a vote to initiate the amendment is a farce as it would NOT allow just for the start of a collaborative review with the CEC but, as their document reveals, it will start the process of executing the changes with the applicant.

We now refute the questionable evidence used to support each of the three criteria put forth by DS in their document dated March 7 (report #PC-12-027).

Criteria 1: "The amendment request *appears to be* consistent with the goals and policies of the General Plan and Navajo Community Plan"

Note that DS does not cite the East Elliot Community Plan where this peaker plant is proposed because all goals in that document call for protection of open space. Chapter 13 of the Municipal Code governing that site clearly states no power plant allowed.

DS sites Public Facilities, Services, and Safety Element's goals stated as *"the opportunity to deliver public utility services in a cost-effective and environmentally sensitive way and ... that is sensible, efficient and could be well-integrated in the natural landscape through sensitive design."*

This peaker plant WILL NOT provide electricity in a "cost effective and environmentally sensitive way." The manner to evaluate the cost of a utility is not simply by its retail price per unit of electricity but the total cost that factors transportation, negative impacts on the environment and human health, underwriting to cover the Very High Fire Hazard Severity Zone, and ratepayer costs. When those are calculated, gas powered energy

plants should be prohibitively expensive, especially since it is the community who pays the price. Hence, there is nothing "sensible" or "efficient" about the energy that will be generated by this plant.

By comparison, solar on rooftops backed by batteries or storage utilities have a cheaper total cost and can be used 100% of the time as opposed to this peaker at 43%. It would increase supply of energy and reduce peak loads. The capture of solar is extremely close from roofs, there is no damage to environment or health, and no fire hazard posed. In addition, even with the unlevel playing field that exists in utility generation, the cost per unit of energy is the same now. See diagram attached from Dr. Bruce Butler, expert on solar power.

In San Diego, intense heat causes high energy demand, so the logic that we would need this peaker plant to back up high demand in the summer is ludicrous when solar energy would be produced in abundance. Also, energy storage and batteries are available sources of back-up power in that rare situation when a black out occurs which is NOT due to human error or faulty equipment, one of many things SDG&E needs to work on rather than simply sprout more power plants.

Considering the Nation and State's mandate to move to renewables and the desire to reduce greenhouse gasses, support should be given to decentralized solar generation rather than gas-fired power plants.

Business as usual is what you will be voting for with this initiation and you will be supporting bigger profits for shareholders of SDG&E, at the expense of the community, or the best interests of the state and country. What we need is visionary, alternative energy generation that meets demand without destroying open space or harming populations, especially the most sensitive populations – children and the elderly.

As to the plant being "*integrated in the natural landscape through sensitive design*", the Mission Trails Design District for Subarea 2 clearly states that no building should exceed 50 ft, so the eleven 70-100 ft stacks clearly break that code. **The polluting and noise generating plant can never be adequately integrated into that highly sensitive land as described on the City's own webpage for East Elliot, "It is dominated by native vegetation, including sage scrub, chaparral, native grassland, and oak and sycamore woodland. It constitutes one of the largest and biologically most important remaining open space areas in San Diego with a number of endangered and threatened wildlife species."** In addition, **Morris Dye's letter (pg 2 of Cycle Issues) says "approximately 500,000 cubic yards of grading will be required for the project. This amount of grading within a highly scenic area within environmentally sensitive lands would be considered significant under the landform alteration category."**

DS also cites that the initiation "*appears to be consistent with the Conservation Element's goals stated under Section 1. Sustainable Energy and they cite one of 13 policies (CE-I.12) that supposedly supports the amendment.* **The Sustainable Energy section is enclosed in its entirety as an attachment to show that the aims and intent (goals and policies) of this section clearly DO NOT support the initiation of this polluting peaker plant.** Natural gas is by no means "clean" when compared to solar on rooftops, and it is not renewable. Also simply replacing one power plant with another is not the community's idea of the best justification for reducing green house gases. Items in bold clearly support solar on rooftops, which is supported by the community, several elected officials, environmental groups, and even the Navy (SDG&E's largest single customer). In addition, this peaker plant is by no means "small" as it will cover 21.6 acres, not including the 1 mile transmission line, offsite gas lines, and utility switchyard.

Criteria 2: The proposed amendment provides additional public benefit as compared to the existing land use designation, density/intensity range, plan policy or site design.

First, electricity and grid experts have said that there is sufficient power in San Diego even during peak periods. The justification for this plant has not even been proven at the CPUC where litigation is currently going on since SDG&E went outside of its contract to solicit this agreement with Cogentrix. This peaker, if licensed by the CEC, will only go online in 2016 or 2017. If the press release by SDG&E, CEC, and CPUC this month clearly stated that there is sufficient power without San Onofre to get through the peak periods this summer, and with the move to solar on rooftops with batteries increasing with time, what would be the "public benefit" of this plant? We only see a profit motive for shareholders at the expense of the community.

That land designated as open space is used by sports enthusiasts and nature lovers, and is well loved by the community. It provides a beautiful view and escape from daily stresses through recreational use. It is adjacent to the Mission Trails expansion area: city funds invested to expand the park for recreational use. That would go to naught with a polluting plant there as it would reverse the positive effects of recreation to be breathing in highly polluted air that is known to cause a reduction in lung capacity, cardiac problems and cancer.

Criteria 3: Public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.

With the factually unsubstantiated issue of need addressed above, it seems to be a moot point that reference is made to the proximity of transmission lines and natural gas lines. We also note that there is existence of a thriving city and population less than a third mile from the site and that the pollution dispersment area would impact the communities of Tierrasanta, the Navajo area communities, El Cajon, Lakeside, and all areas downwind. Families with children frequent Mission Trails Regional park from all over the county and their health will be impacted. This far outweighs the proximity of gas and transmission lines that would only make it cheaper for the company to build their plant while guaranteeing the highest profits for their shareholders. All costs involved in this ill-gotten venture will undoubtedly be passed to the ratepayers for the construction, negative health impacts particularly to developing lungs, destruction to beloved open space with highly sensitive habitat and Federally endangered species, while the community lives in fear that another severe wildfire in that area will make it even more difficult for the neighboring communities to escape unharmed.

Sincerely,



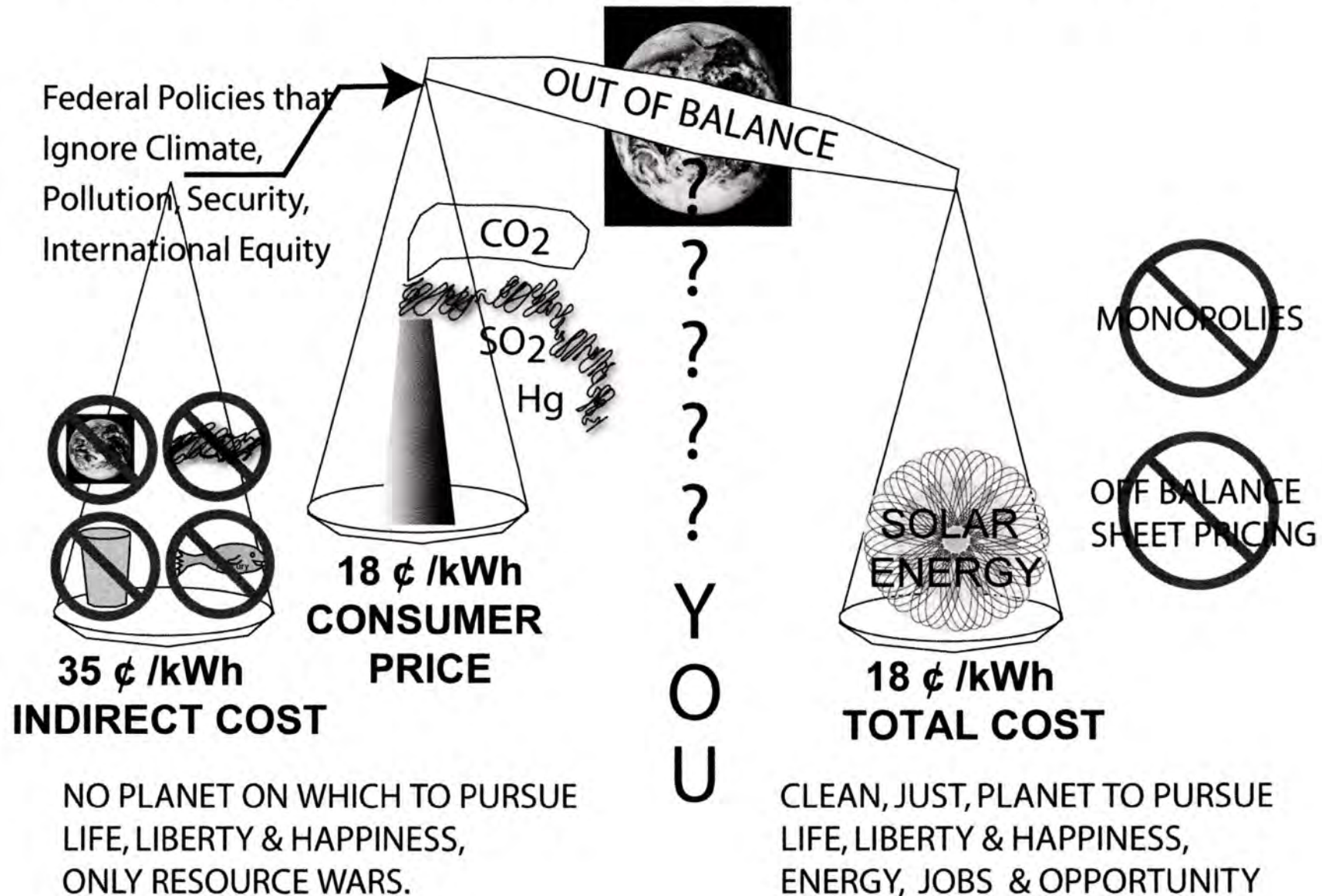
Roslind Varghese
On behalf of Steering Committee
Save Mission Trails

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Attachment 1:

PRICE OF ¢ / kWh DOES NOT REFLECT TRUE COST



Attachment 2:

Section I: Sustainable Energy

California's energy supply has fluctuated in its ability to meet demand over the last 30 years, notably during peak economic growth periods. San Diego's main drivers of energy demand are population, economic development, housing, and land use. Establishing more local energy sources, with an emphasis on clean, renewable sources, will provide increased economic stability and environmental benefits. Using **renewable energy sources reduces dependence on fossil fuels and also helps to reduce carbon dioxide and other gases in the atmosphere.** Water conservation also helps reduce energy use, as almost 60 percent of the energy used by the City organization goes for pumping water and sewage. Energy efficient land use and transportation policies are addressed in this section, as well as in the Land Use and Mobility Elements.

Policies

- CE-I.1. Maintain a centralized Energy Conservation and Management Program and Comprehensive Plan for all City operations.
- CE-I.2. Coordinate City energy planning programs with federal, state and regional agencies. Maximize energy efficiency, use of clean renewable resources, and demand response.
- CE-I.3. Pursue state and federal funding opportunities for research and development of alternative and renewable energy sources.
- CE-I.4. Maintain and promote water conservation and waste diversion programs to conserve energy.
- CE-I.5. Support the installation of photovoltaic panels, and other forms of renewable energy production.**
 - a. Seek funding to incorporate renewable energy alternatives in public buildings.**
 - b. Promote the use and installation of renewable energy alternatives in new and existing development.**
- CE-I.6. Develop emergency contingency plans, in cooperation with other local agencies and regional suppliers, to assure essential energy supplies and reduce non-essential consumption during periods of energy shortage.
- CE-I.7. Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.**
- CE-I.8. Improve fuel-efficiency to reduce consumption of fossil fuels.**
- CE-I.9. Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.
- CE-I.10. Use renewable energy sources to generate energy to the extent feasible.**
- CE-I.11. Collaborate with others to develop incentives to increase the use of renewable energy sources or reduce use of non-renewable energy sources.**
- CE-I.12. Use small, decentralized, aesthetically-designed, and appropriately-sited energy efficient power generation facilities to the extent feasible.
- CE-I.13. Promote and conduct energy conservation education.