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A0011

**FORMAL RESPONSE TO THE
SUNRISE POWERLINK PROJECT
EIR/EIS - SCHO NO. 2006091071
SUBMITTED THIS 21ST DAY OF MARCH 2008**

Padre Dam Municipal Water District's ("Padre Dam") review of the Sunrise Powerlink Project found that issues regarding the San Diego Community Power Plant ("SDCPP") were not fully evaluated by the research for the EIR/EIS. In the review of the information provided in the EIR/EIS, Padre Dam believes that the SDCPP Alternative should be removed entirely from the list of the three "In-Area All Source Generation Alternatives."

Whether or not the Sunrise Powerlink Project moves forward, the Alternative that refers to the SDCPP Alternative has inadequate information that might lead the reader(s) of the EIR/EIS to rely on the Alternative as being viable. At the very least, the proponents of the Sunrise Powerlink Project should be directed to re-evaluate the SDCPP with full research that includes input from Padre Dam, the City of Santee, and other community interests and authorities before declaring that this Alternative and location is an adequate replacement project should the proposed Powerlink Project fail.

Statements in the EIR/EIS regarding the SDCPP Alternative to the Sunrise Powerlink Project have questionable assumptions that need to be addressed.

One particular statement in the Executive Summary which would be totally misleading, especially to those individuals who only read the Executive Summary on page ES-32, is the Title that says "6.2 The Alternatives Fully Evaluated in the EIR/EIS" that says, "Each of these alternatives is evaluated within each environmental issue area of Sections D and E of this EIR/EIS." The list of alternatives includes the New In-Area All-Source Generation. They have not been 'fully evaluated.'

- The SDCPP (as proposed by ENPEX) has not submitted a request for potable or recycled water in order for Padre Dam to research or respond to such a request.
- C.4.10.2 says the SDCPP is assumed to come online by 2008. Then in E6.1.1 the document states that the SDCPP "can feasibly be built by 2010." No applications have been submitted for certification to the CEC (although E.6.1.4 says the site has been under development since 2000), no water availability requests have been made to Padre Dam, and no engineering plans have been submitted for review.

- Future Expansion of the **SDCPP** is mentioned to potentially upgrade to 750 MW power plant without indicating what impacts such an increase might have on obvious areas such as noise and aesthetics. If the suggestion of a possible or probable expansion is made in the report, the checklist should have comments as to whether the expansion would become more significant in order to provide a true basis to the decision that the **SDCPP** is really a valid alternative to the Sunrise Project
- There is no mention in the EIR/EIS regarding whether the Alternatives would need separate EIR/EIS review should the Sunrise Powerlink fail to proceed or whether this EIR/EIS is considered 'fully evaluated' as mentioned in 6.2. The **SDCPP**, as discussed in this letter, has not been fully evaluated and should be eliminated from consideration as an Alternative all together.
- **SDCPP Major Components** discusses an existing 14-inch water main in Strathmore Road and refers to City of San Diego Municipal Water District rather than correctly to Padre Dam Municipal Water District. The section discusses that the plant connects a new 4-inch diameter pipeline to deliver 200 gallons per minute to the site. No plans or studies have been submitted or requested to Padre Dam. There has been no discussion with Padre Dam staff regarding this project to provide information as to what would be necessary to provide water, sewer, and recycled water for the plant. The expectations in this section suggest that little research was done in determining the availability and status of the existing roads, underground facilities already in place, and planned facilities that would need to be considered before making a determination.
- There is no evidence in the report of any research done by the preparers of the EIR/EIS regarding availability in the City of Santee roads (let alone the secured private road belonging to the Santee Lakes Recreation Preserve) to find out if the rights of way were already over-burdened with utilities and expected/approved utilities for the local development. The report does not refer to any attachments, appendices, reference materials or reports that disclose any research in this regard.
- **Transportation and Traffic:** The EIR assumes there is a public road called Santee Lakes Road providing a north/south access to the site. If the Santee Lakes Road referred to in the EIR is the road within the Santee Lakes Recreation Preserve, then the EIR has mistakenly assumed this is a public road in which they can install their water and gas lines. It is not. This is a secured private road used for the day-use Park and overnight RV campground that are fee based enterprises owned by Padre Dam and are part of the Water Recycling Facility system. No inquiries were made as to the current underground facilities in this road. Such questions would have disclosed that the road is used for the day-use Park and the overnight RV campground that are fee based enterprises owned by Padre Dam and are part of the Water Recycling Facility system. This road does not have sufficient room to provide for additional pipelines.

- There is also no discussion in this section as to how the **SDCPP** would get from Fanita, west to the **SDCPP** site. There is an existing **SDG&E** easement that supports the existing towers. However, to alter this crossing to a road to be used daily has not been discussed and needs to be addressed in relation to the concept of overburdening the easement with respect to interference with the use of the land that the easement crosses. The easement, if being considered as the access to the site, also contains a major drainage channel and riparian habitat and crosses the Sycamore Creek which has its own special concerns for mitigation which have not been discussed.
- **SDCPP** construction talks about onsite and offsite parking for between 240 and 350 individuals, but does not say where that parking would be located. If the construction parking impacts the Santee Lakes Recreation Preserve area, there is a large concern about security and safety as well as littering and leaks from vehicles, etc. The damage by heavy equipment to the Park area for a two year span will negatively impact the campground revenues as well as taking its toll on the path of the equipment. Padre Dam's facilities, as well as consideration for the RV campground sites, are not addressed in this section. Construction starting at 6:00 a.m. is not allowed in Santee and would not be appropriate within Padre Dam's property given the considerations as stated.
- **Impact S-5 Decrease in Property Values** - this section seems to use faulty logic in stating that since **MCAS Miramar** will not be developing anything else, that there would be no changes to property values? This does not address the impact of the three towers and plant and administration building being proposed in the **SDCPP** and impacts to the neighborhood in the City of Santee. The negative impact would be highly significant. It would also be a highly significant impact to the value of the RV Campground that has already spent nearly \$7 million to construct and improve. The value and effectiveness of the **NCCP** wildlife corridor would be greatly diminished by the construction and operation of the facility being proposed in **SDCPP**.
- The document says that impacts cannot be clearly defined until project specific features and final engineering is complete. But even the general impacts to the creek, watershed, and drainage channel are not discussed even though they say the 'Impacts to jurisdictional areas are significant but mitigable to less than significant with implementation of the mitigation measures listed.' If they have not been clearly defined, how can the mitigation measures listed be enough to reduce the impacts? Referring once more to **ES 6.2**, is it correct to say that the **EIR/EIS** states that the Alternatives have been fully evaluated?
- The **Sunrise Powerlink Project** is an extremely large and long term project. The discussions and mitigations in the **EIR/EIS** seem broad-based rather than site specific. The mitigations suggested are cursory. There would be much more detail and scrutiny required if the project was only the construction of the **SDCPP** or only the construction of a shorter distance of powerlines. The scrutiny seems to be minimized, distorted or lost because of the enormity of the entire project. The requirements for site specific research should be the same for this project as they are for smaller scale projects. The mitigation for adding a permanent creek

crossing says that the crossing shall be perpendicular to the flow? Smaller projects seem to get more microscopic scrutiny and harsher mitigation requirements than these large, sweeping projects, even though the overall impacts in a large project such as this are significantly greater.

FULL EVALUATION OF THE SDCPP ALTERNATIVE WOULD HAVE REVEALED:

- A need for discussion regarding the site being outside the Padre Dam service area and the possible need for annexation with LAFCO, Metropolitan Water, and the County Water Authority approvals.
- The recycled water produced by Padre Dam is used first to provide recycled water to customers within the City of Santee and the Padre Dam service area and then, as available to customers outside the service area. This would have also disclosed the current commitments and ongoing negotiations for future commitments to the supply available. Padre Dam would need to evaluate the requirements for SDCPP and determine whether there is sufficient available capacity to provide the needed water for the operations on a consistent basis.
- Visual Elements discuss the lighting issues and use of overhead hoods, etc., but does not address the visual problems of 150 foot towers and a 100 foot tall plant on a hillside that sits directly across from the new extension of the RV campground in Santee Lakes Recreation Preserve and just south of the planned wildlife corridor that is part of the mitigation for the Fanita Ranch Development. This wildlife corridor has been in design since 1998 and would have been disclosed to Enpex, or the Marine Corps or SDG&E should they have inquired as to the location or water availability. Since the development of the Water Recycling Facility in the early 1960s, the area has strived to develop the area into an aesthetically pleasing park that could be utilized by the City and the region while at the same time providing the necessary utilities of water and wastewater treatment. The visual and biological impacts of such a large complex greatly diminish 50 years of effort. The years and nearly \$500,000 expended toward establishing a regional NCCP where the wildlife corridor is a keystone to Padre Dam's participation would be wasted. The goals anticipated by both the Wildlife Agencies and the NCCP partners would not be attainable with the plant located so close to the wildlife corridor. Again, not enough research was done for this alternative for the EIR/EIS. Inquiries at Padre Dam would have revealed many of these questions for discussion in the document.
- A good indication that Padre Dam was not involved in evaluating the water supply availability for this site is the use of the term 'gray water' for the 'process water makeup requirements.' There is a distinction of levels of purity in wastewater treatment. The water that is produced from the Padre Dam facility is purified to a level to be called recycled water. Grey water is a lower level of treatment that is only allowed for irrigation purposes. Padre Dam does not produce 'gray water.'

IMPACTS AND MITIGATION

- Biological Resources discusses critical habitat for Willowy Monardella and California gnatcatcher and lists many other species for potential to occur. The mitigation measures shown do not adequately address these impacts. The discussion does not disclose the particularly unique makeup of Sycamore Creek or make allowances other than it will build its roads at right angles to the streambed. The discussion does not address the issue that the site eliminates a watershed that feeds Sycamore Creek and impacts Sycamore Creek with the road crossing that is suggested in the previous sections.
- Impact B-5 discusses the sensitive species that could not be reduced to less than significant. If there had been input requested by the proponent to Padre Dam, there should also have been a discussion of the impact to the NCCP wildlife corridor.
- Violation of the Migratory Bird Act would be significant during construction and even have a negative impact after construction. The EIR says this is considered mitigable to less than significant by the EIR/EIS document. Since part of the goal of the Joint Water Agencies' NCCP is to increase the number of nesting birds - especially threatened or endangered, but also general bird populations, this project reduces the success of the goals for the NCCP and the Lakes in general.

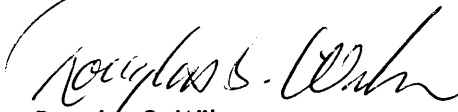
GENERAL QUESTION AND ISSUE

- Where is the discussion of use of re-circulating water in the cooling towers in respect to the connection to Legionnaires disease and using both potable and recycled water for this purpose?

Padre Dam appreciates the opportunity to respond to such a large and important project for the region. As was discussed above, all of our concerns are related to the SDCPP alternative. Given the impacts that were overlooked in the EIR/EIS and the significant negative impact on the local area, we believe that this option should be eliminated from the In-Area All Source Generation Alternatives provision.

If you have any questions or need additional information, please contact our Right of Way and Environmental Resource Agent, Mary Lindquist, at (619) 258-4651.

PADRE DAM MUNICIPAL WATER DISTRICT



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General Manager

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