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April 10, 2008

CPUC/BLM
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VIA ELECTRONIC AND REGULAR MAIL

SUBJECT: CITY OF SANTEE'S WRITTEN COMMENTS ON DRAFT EIR/EIS FOR THE SUNRISE POWERLINK TRANSMISSION PROJECT (SCH NO. 2006091071; DOI CONTROL NO. DES-07-58).

Dear Lead Agencies:

The City of Santee ("Santee") submits these written comments on the Draft Environmental Impact Report/Environmental Impact Statement ("DEIR/DEIS") prepared by the California Public Utilities Commission ("PUC") and the U.S. Department of Interior, Bureau of Land Management ("BLM") for San Diego Gas & Electric Company's ("Applicant") Sunrise Powerlink Transmission Project ("Project"). This letter refers to the PUC and the BLM collectively as the "Lead Agencies."

I. INTRODUCTION AND SUMMARY OF SANTEE'S POSITION

Santee has not taken a formal position on the Project. In addition, Santee does not categorically oppose a local area reliability plan, including, as appropriate, new in-area generation that emphasizes "green" power and is sited in close coordination with local agencies. However, Santee is very concerned about the DEIR/DEIS because it includes ENPEX Corporation's proposed "San Diego Community Power Project" (the "ENPEX Project") in the "New In-Area All-Source Generation Alternative" (the "Alternative"). The general components of the Alternative and the general location of the ENPEX Project in relation to Santee are depicted in Figure E.6.1-1 of the DEIR/DEIS. This comment letter focuses exclusively on the Alternative in general and the ENPEX Project in particular.

Santee believes that the Lead Agencies' decision to include the ENPEX Project in the Alternative is both legally and factually deficient. Santee contends that the ENPEX Project must be removed from the Alternative. Santee objects to the inclusion of the ENPEX Project in the Alternative because: (1) the ENPEX Project is not feasible and therefore is not a legally viable component of the Alternative; (2) the ENPEX Project

III. THE ENPEX PROJECT CONFLICTS WITH SANTEE'S LONG-STANDING GENERAL PLAN

Since City incorporation in 1980, the Santee General Plan Land Use Element has identified the compatibility between adjacent land uses as foundational to achieve a safe, livable and functional community and ensure a high quality of life. The General Plan provides an Adjacent Land Use Compatibility Guide to ensure compatibility with land uses which includes land use changes that occur on the City's borders and surrounding areas. The General Plan also considers areas beyond the City limits and pursuant to California Government Code 65300 established a Planning Area over territory west of the City that bears a relationship to City plans.

The ENPEX Project can be characterized as a general industrial land use that the City of Santee's General Plan's "Adjacent Land Use Compatibility Guide" establishes as incompatible with residential development and public uses. The location of the ENPEX Project would be adjacent to the existing single family neighborhoods and the existing regional park facilities of the Padre Dam Lakes Recreation Area, clearly in conflict with the Land Use Compatibility Guide. In addition, the General Plan characterizes the 2,600 acre Fanita Ranch area of the City as providing a significant number of move-up residential homes to support the City's high technology and office campus being constructed as a key component to the municipal economy. The "Fanita Project" for a 1,400 dwelling unit master plan community was approved by Santee in December 2007. The two potential ENPEX Project locations would be directly adjacent to the Fanita residential villages as well as Fanita's community-serving public parks in clear conflict with the General Plan Land Use Compatibility Guide.

Therefore; the ENPEX Project is fundamentally inconsistent with Santee's General Plan. The DEIR/DEIS must analyze this inconsistency.

IV. THE ENPEX PROJECT CONFLICTS WITH AN APPROVED FEDERAL STATE AND LOCAL WILDLIFE CORRIDOR AND LOCAL RECREATION TRAILS

Part of the mitigation for the Fanita Project is the construction of a wildlife corridor through the area proposed for the power plant. The location, size and critical importance of this wildlife corridor has been discussed extensively with the state and federal wildlife agencies. This wildlife corridor is not only a mitigation measure on the Fanita Project but also a key element of the Multiple Species Conservation Program ("MSCP") Subregional Plan, Santee's draft MSCP Subarea Plan and the draft MSCP Subarea Plan of Padre Dam Municipal Water District.

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As far back as 1998, through the original MSCP Plan for southern San Diego County, federal, state and local authorities contemplated that a key wildlife corridor would be preserved through the Fanita property, with the corridor serving as an important biological connection between land in the County of San Diego and land on MCAS Miramar.

This key wildlife corridor is a fundamental part of both Santee's draft MSCP Subarea Plan and the Padre Dam Municipal Water District's draft MSCP Subarea Plan. It is anticipated that mammals (such as the southern mule deer, mountain lion and American badger), amphibians and reptiles (such as the orange-throated whiptail, San Diego horned lizard and arroyo toad) and birds (such as the Cooper's hawk, tri-colored blackbird, rufus-crowned sparrow and western bluebird) will use this vital wildlife corridor. Construction and preservation of this key wildlife corridor is a required mitigation measure for the approved Fanita Project. Therefore, it is infeasible to construct the ENPEX Project at either of the proposed locations because it would block this federal, state and locally approved wildlife corridor. The DEIR/DEIS must analyze this inconsistency.

The ENPEX Project, as described in the DEIR/DEIS, is also inconsistent with the recreational trails plans for the County of San Diego, the City of San Diego and Santee. A key recreational trail known as the Stowe Trail runs parallel to Santee's northwestern boundary line. The Regional Stowe Trail connects the Mission Trails Regional Park located in the City of San Diego with both the Sycamore Canyon Preserve and Goodan Ranch in the County of San Diego. The proposed locations for the ENPEX Project would block this regionally significant recreational trail. The DEIR/DEIS must analyze this inconsistency.

V. THE DEIR/DEIS' ANALYSIS OF THE ENVIRONMENTAL IMPACTS OF THE ENPEX PROJECT ARE LEGALLY DEFICIENT

If constructed, the ENPEX Project would have direct and cumulative impacts on the environment in the following areas: Biological Resources, Visual Resources, Land Use, Wilderness and Recreation, Noise, Public Health and Safety, Air Quality, Hydrology and Water Resources, Fire and Fuel Management, and Socioeconomics. The DEIR/DEIS' analysis of these impacts is deficient, however. The deficiencies in the DEIR/DEIS are described below by issue area.

Biological Resources: The ENPEX site, whether 1D or 1B/1C, is fully comprised of 60 acres of undisturbed natural habitat. While the DEIR/DEIS does contain some discussion of biological impacts that would result with the construction of the ENPEX site, the analysis is not sufficiently site specific and the identified mitigation measures are inadequate to address the site and species specific biological impacts that would result from construction of a 60 acre major facility in the environmentally sensitive area. In fact, the DEIR/DEIS discloses that, either studies were not done at all, or that the