



Honorable Commissioner Jeffrey D. Byron
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket Number: 2010-AFC-01

**Subject: Letter of Opposition to the Pio Pico Energy Center Power Plant Proposal
in Otay Valley Regional Park**

Dear Honorable Commissioner Jeffrey D. Byron,

The undersigned organizations represent thousands of residents who live and work in the County of San Diego. We are writing to express our opposition to the development of a natural gas power plant in the Otay Valley Regional Park near the Otay Lakes Reservoir.

We understand the energy issues facing the San Diego County region, the desire to dismantle the antiquated South Bay Power Plant, as well as the financial situation facing the City of Chula Vista. However, placing the project within the park is incompatible with efforts to conserve south San Diego County's few remaining open space areas for conservation and public recreation and sets a poor precedent for further development of these vital spaces. The undersigned organizations are not taking a position on the need for the plant itself, but rather the location of the plant.

The Pio Pico Energy Center is proposed to be located near the Lower Otay Lakes Reservoir on land owned by Chula Vista currently zoned as open space. The project is located within the boundary area of the Otay Valley Regional Park. The project would be directly adjacent to the Otay Lakes County Park, a 78-acre County-operated regional park that offers the community hiking trails, picnic areas, and a playground among other amenities. The power plant will be directly visible from the southern picnic area.

The Otay Valley Regional Park represents one of the major open space areas within the southern area of San Diego County, linking south San Diego Bay with lower Otay Lake. The OVRP Policy Committee adopted a goal statement on June 1st, 1990 that states the following goals for the OVRP:

- Provide a mix of active and passive recreation activities;
- Protect environmentally sensitive areas;
- Protect cultural and scenic resources; and
- Encourage compatible agricultural uses in the park.

The proposed power plant is incompatible with these goals. Furthermore, the power plant is proposed for an area located within the City of Chula Vista's Preserve, which is designated as a "100% Conservation Area" in the City of Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan. This designation is for land to be preserved and managed for its biological resources.

Over the past two decades, Chula Vista has continued to expand eastward, and major areas have been developed near the Otay Valley. In order to maintain a quality of life and a balance between development and open space, land within the boundary area of the Preserve as well as the OVRP must be conserved. Deliberately placing this project within the Otay Valley Regional Park sets a precedent for placing development and infrastructure projects in areas zoned as open space and set aside for conservation.

Additionally, maps generated in 2005 by HDR Engineering for the "Habitat Restoration Plan and Non-Native Plant Removal Guidelines" for the OVRP illustrate that the proposed development site as vernal pool mima mound habitat. This is one of the most endangered habitat types in Southern California and is considered to be a critical environmental resource. Several plants and animals endemic to vernal pools have been listed as federal and/or state endangered species. More than 90% of California's vernal pools have already been lost. Because of this previous designation as vernal pool mima mound habitat, this area must be protected.

In conclusion, this proposed power plant would have negative impacts to the native ecosystem and the public's ability to enjoy the Otay Lakes County Park and the Otay Valley Regional Park. We hope that you acknowledge our community's need for open space, outdoor recreation opportunities, and habitat protection by denying this project.

Thank you for your consideration.

Sincerely,

Serge Dedina, Ph.D.
Executive Director
WiLDCOAST

Joel Reynolds
Director, Urban Program
Natural Resources Defense Council

Robert García
Executive Director and Counsel
The City Project

George Hanson
Founder
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Jim Peugh
Conservation Chair
San Diego Audubon Society

Carolyn Chase
Chair
Sierra Club San Diego Chapter

Van K. Collinsworth
Executive Director
Preserve Wild Santee

Carrie Schneider
Conservation Chair, Board member
California Native Plant Society - San Diego Chapter

Cc: Representative Bob Filner, 51st Congressional District
Representative Susan Davis, 53rd Congressional District
Assemblymember Marty Block, 78th Assembly District
Assemblymember Mary Salas, 79th Assembly District
Supervisor Greg Cox, San Diego County Board of Supervisors
Supervisor Dianne Jacob, San Diego County Board of Supervisors
Supervisor Pam Slater-Price, San Diego County Board of Supervisors
Supervisor Ron Roberts, San Diego County Board of Supervisors
Supervisor Bill Horn, San Diego County Board of Supervisors
Mayor Cheryl Cox, City of Chula Vista
Councilmember Rudy Ramirez, Chula Vista City Council
Councilmember John McCann, Chula Vista City Council
Councilmember Pamela Bensoussan, Chula Vista City Council
Councilmember Steve Castaneda, Chula Vista City Council
Council President Ben Hueso, San Diego City Council
Council President Pro Tem Kevin Faulconer, San Diego City Council
Councilmember Sherri Lightner, San Diego City Council
Councilmember Todd Gloria, San Diego City Council
Councilmember Tony Young, San Diego City Council
Councilmember Carl DeMaio, San Diego City Council
Councilmember Donna Frye, San Diego City Council
Councilmember Marti Emerald, San Diego City Council
Brian Albright, Director of Parks and Recreation, County of San Diego
Stacey LoMedico, Director of Parks and Recreation, City of San Diego
Buck Martin, Director of Recreation, City of Chula Vista
Chairman John Willett, Otay Valley Regional Park Citizen's Advisory Committee