*Preserve Wild Santee*

October 12, 2012

Honorable CEC Commissioners
Raoul Renaud, Hearing Officer
Eric Solorio, Project Manager
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

**RE: Quail Brush Generation Project – Docket Number 11-AFC-3, Response to Cogentrix Quail Brush Genco, LLC Data Requests 1-14 (Set One)**

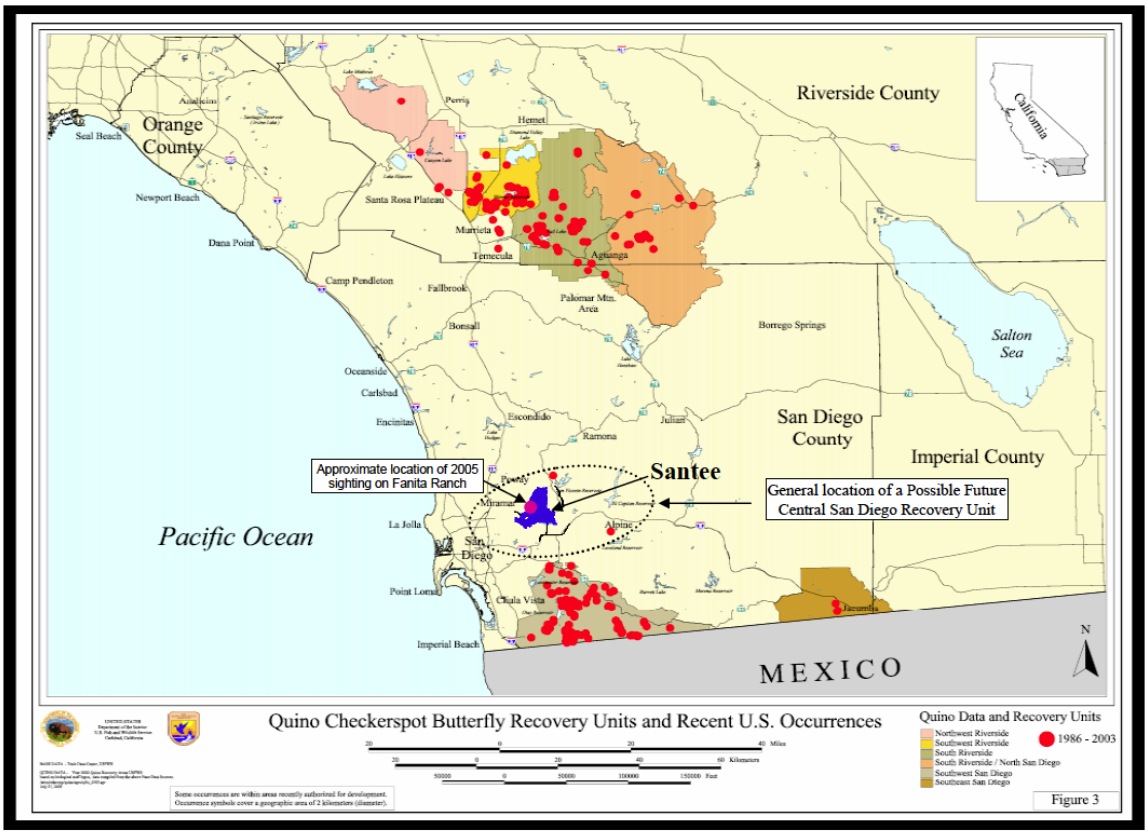
Pursuant to the provisions of Title 20, California Code of Regulations, Section 1716, Preserve Wild Santee (a community environmental organization that engages in significant land use decisions in order to protect the public interest) hereby submits the following replies to Data Requests Number 1-14, in an effort to more fully explain to the Applicant why their project is detrimental to the public interest and should be withdrawn.

As an introduction to these responses, it is also important to note that it is the Applicant that bears the burden of proof to provide data to inform the public and demonstrate that the Project will not adversely impact the public rather than community representatives burden to prove that the Project does have adverse impacts. Preserve Wild Santee (PWS) responses are from independent expert volunteers or available research. PWS does not employ consultants to prepare favorable reports. Furthermore, PWS is unaware of any volunteers provided authority to do site-specific surveys. Therefore, Preserve Wild Santee responses will provide summary data and reference links in place of providing paid consultant prepared reports.

**Data Requests 1-14 (Set One)**

**1.** Please provide detailed descriptions of and provide a map showing the exact location of Quino checkerspot habitat on the project site and adjacent off-site areas.

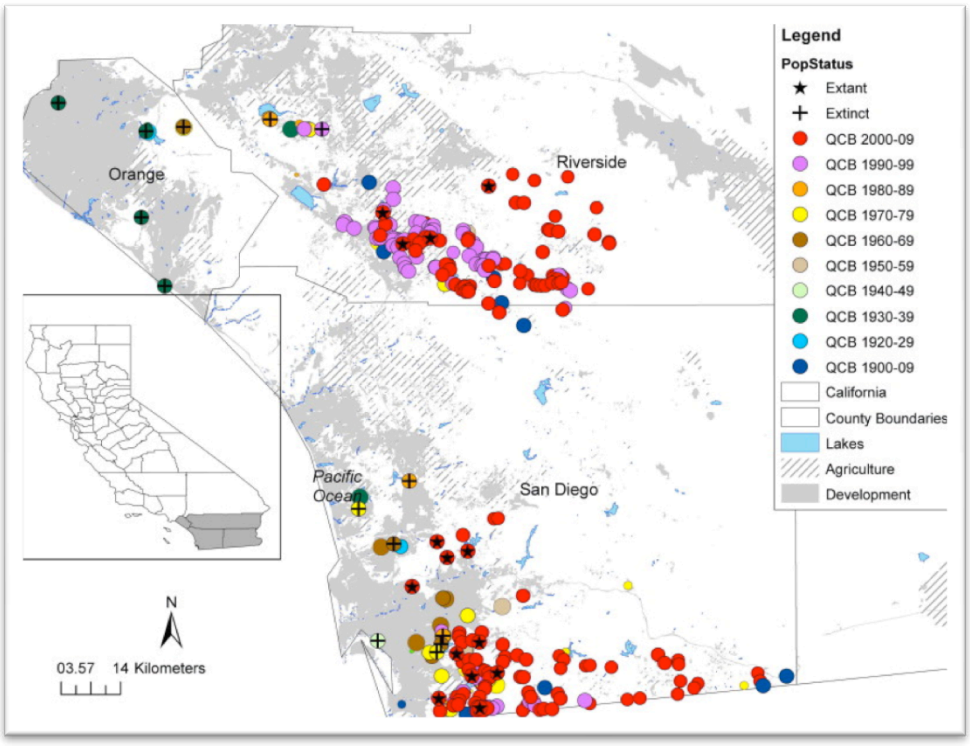
**Response:**
Reference Figure 2, Page 15 of the "Recovery Plan for the Quino Checkerspot Butterfly, USFWS. Reference the Draft Santee Subarea Plan, Predicted Distribution for Quino checkerspot butterfly.




**Location of the City of Santee in relationship to the Quino Checkerspot Butterfly Recovery Units and Recent U.S. Occurrences. Source: QCB Recovery Plan, USFWS 2003**

**030146**

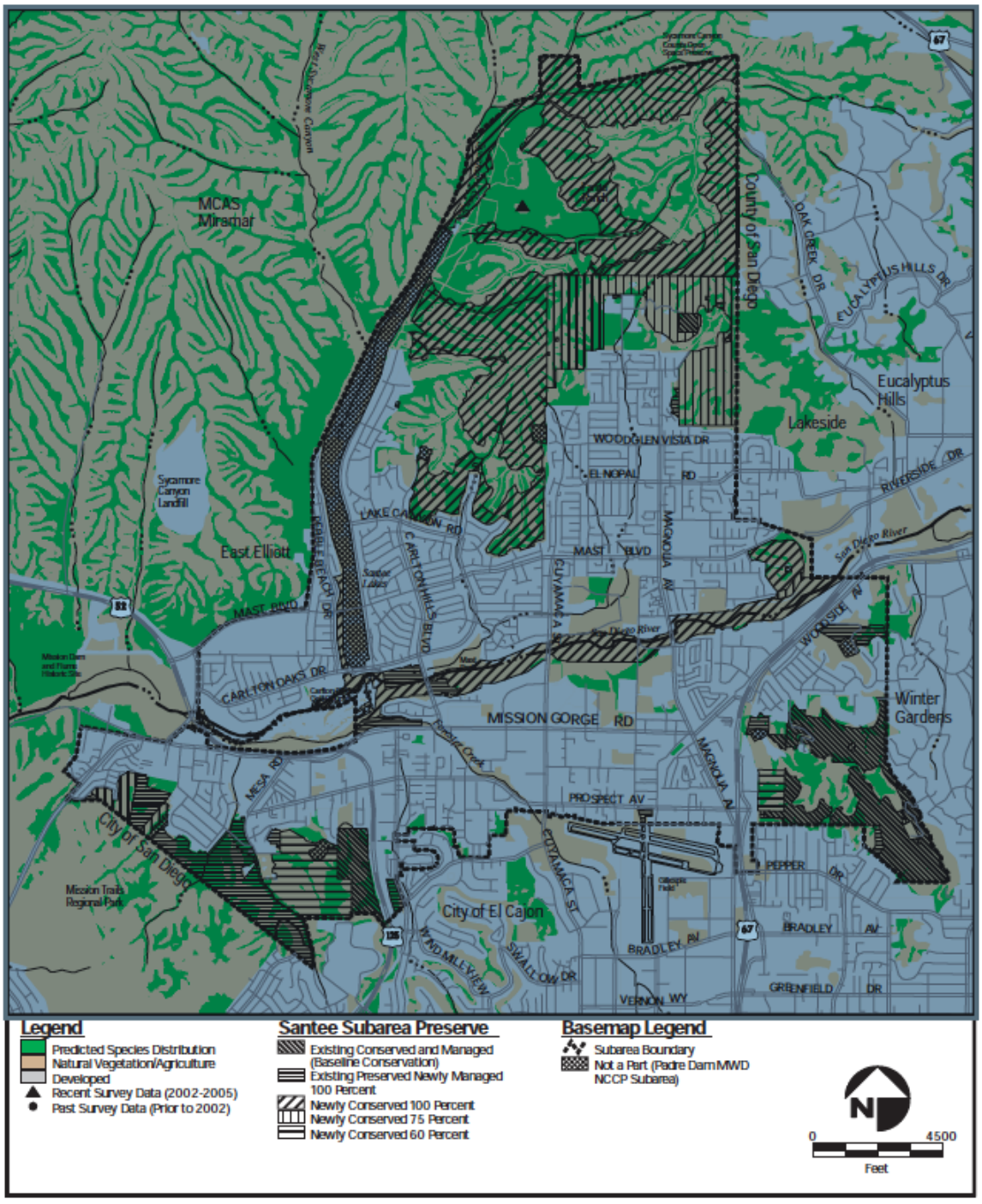
The Quail Project site would destroy suitable Quino habitat and fragment the Central San Diego Recovery Unit. Red circles represent recent Quino sightings. Nitrogen deposition from power plant emissions would directly impact Quino habitat. Greenhouse gases (GHGs) produced by the Project would exacerbate climate change and increase the probability of catastrophic wildfires that are likely to result in type conversion of Quino habitat due to invasive species encouraged by nitrogen deposition from power plant emissions.




Six recent Quino sighting in the project vicinity (four of those considered extant populations) are designated by the map's red circles.[1] The Cogentrix consultant report fails to consider the impact of nitrogen deposition at the Project site and vicinity as identified by the surrounding red Quino locations circles of central San Diego. Nitrogen deposition cannot be ignored by hoping that the extant populations of Quino in the vicinity of the Project have been eliminated. The Federal Endangered Species Act requires that measures be taken to stabilize populations and provide for their Recovery. Nitrogen deposition from Cogentrix power plant emissions will adversely impact the requirements to stabilize and recover Quino populations.

Cogentrix consultant report fails to even mention a recent Quino siting approximately 3.5 miles from the Project site. See the map below.

[1] "Changing distribution patterns of an endangered butterfly: Linking local extinction patterns and variable habitat relationships", Kristine L. Prestona, d, Richard A. Redaka, b, Michael F. Allena, c, John T. Rotenberry[a, c]
a Center for Conservation Biology, University of California, Riverside, CA 92521, USA
b Department of Entomology, University of California, Riverside, CA 92521, USA
c Department of Biology, University of California, Riverside, CA 92521, USA
d Nature Reserve of Orange County, 15600 Sand Canyon Avenue, Irvine, CA 92618
Biological Conservation, Volume 152, August 2012, pages 280-290.




Technology Associates International Corporation

**Predicted Species Distribution for : Quino checkerspot**

*(Euphydryas editha quino)*

030165 11/30/07

Predicted Species Distribution for Quino checkerspot. Green designation over Quail Project site represents ridges and open areas suitable for Quino and Quino host plants.

**2.** Please provide the data and studies on which you base your belief that Quino checkerspot butterfly habitat on the project site or adjacent off-site areas would be significantly adversely impacted by the Project.

**Response:**
The Project would be sited on Quino checkerspot butterfly expected distribution ridges and other habitat with host plants or potential for host plants to recover upon. Development of habitat or potential habitat by the Project, fragmentation of habitat, destruction of land available for host plants, nitrogen deposition by the Project, exacerbation of CO2 concentrations with climate change from the Project all adversely impact the potential for Quino checkerspot survival and recovery. Reference the "Recovery Plan for the Quino checkerspot Butterfly, USFWS.

"*The Quino checkerspot butterfly is threatened primarily by urban and agricultural* ***development****, invasion by nonnative species, off-road vehicle use, grazing, and fire management practices (U.S. Fish and Wildlife Service 1997a). Other factors contributing to the species' population decline likely have been, and will continue to be, enhanced* ***nitrogen deposition*** *(Allen et al. 1998****), elevated atmospheric carbon dioxide concentrations*** *(Coviella and Trumble1998), and* ***climate change*** *(Parmesan 1996, Field et al. 1999, Parmesan in press). Nonetheless, urban* ***development poses the greatest threat and exacerbates other threats****. As a result, careful* ***planning that ensures maintenance of existing Quino checkerspot butterfly metapopulations will be the key to long-term conservation*** *of the species. Any activity resulting in* ***habitat fragmentation*** *or* ***removal of host or nectar plants*** *from habitat reduces habitat quality and increases the probability of extinction of the Quino checkerspot butterfly*."[2]

Development of the Project would fragment the potential "Central San Diego Recovery Unit" that specifically identifies Little Sycamore Canyon where the Project is located.

"*This possible future recovery unit in San Diego County includes vernal pool habitat on Kearny Mesa, Mira Mesa, Del Mar Mesa, and Lopez Ridge. The unit also includes inland habitat in the vicinity of* ***Sycamore and Little Sycamore Canyons****, Iron Mountain, San Vicente Reservoir, the Fortuna Mountain area, El Capitan Reservoir*, ..."[3]

[2] RECOVERY PLAN FOR THE QUINO CHECKERSPOT BUTTERFLY (Euphydryas editha quino), Region 1, U.S. Fish and Wildlife Service, Portland, Oregon, p. 55.
[3] Ibid, p. 86.

**3**. Please state all other endangered species for which the Project would result in habitat loss.

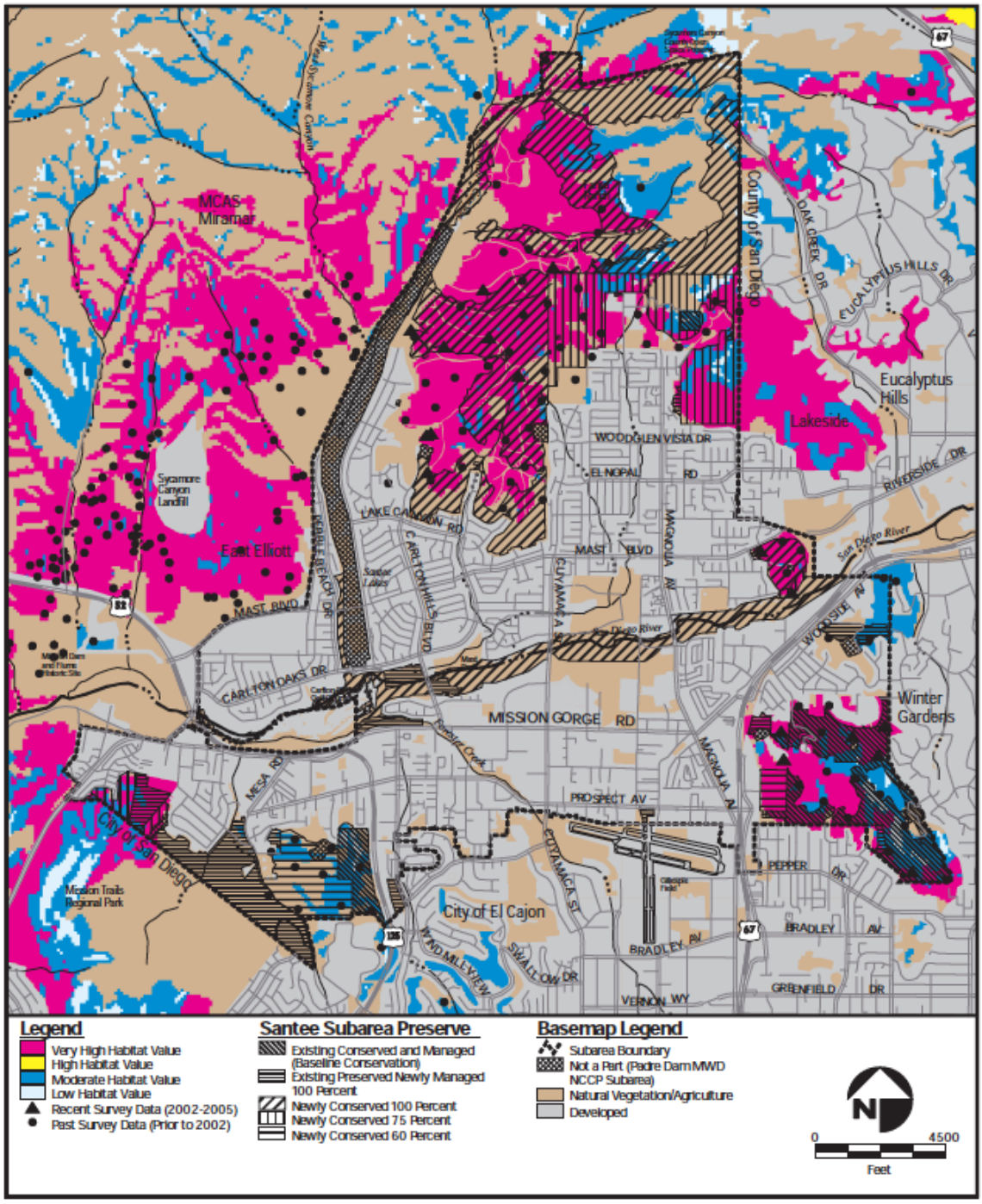
**Response:**
Cogentrix consultant Biological Survey Report, August 6, 2012, Sections 4.1.1-2 references "22 special-status plant species" and "17 special-status wildlife species determined to have a moderate to high potential to occur in the survey area."[4] Review the consultant biological report for details.
The survey area and the Project site were impacted by a catastrophic human caused fire in 2003. Multiple Species Conservation Plan (MSCP) management has been inadequate to prevent and respond to invasive species competing with natives that are slowly recovering. The Cogentrix biological report omits this significant context from their biological study. Thus, the report's conclusions are biased by a failure to consider the status context of Multiple Habitat Planning Area (MHPA) habitat and the failure of the City to fund habitat monitoring, restoration and needed land acquisitions throughout the Subarea. Failure of the MSCP program to adequately maintain habitat does not mean it is ok to abandon the plan or to industrialize parcels in need of time or resources to recover. Grading the Project site would forever preclude its intended use as a source of stabilization and recovery for endangered species such as the Quino checkerspot butterfly.

The California gnatcatcher is an example of a species that would be expected to inhabit the Project site upon recovery of site vegetation. This expectation is supported by the fact that the Cogentrix Biological Survey Report acknowledges the species current presence in the survey area. The Hermes copper butterfly has been recognized by the US Fish & Wildlife Service (USFWS) as in merit of listing when the agency gains the resources to process. The Project site is suitable for reestablishing Spiny redberry host plants. See the special status species list in the Cogentrix biological report for other examples.

4. For each endangered species you identify pursuant to data request # 3, please provide detailed descriptions of and provide a map showing the exact location of habitat for that species on the Project site and adjacent off-site areas.

**Response:**
See the maps below for the two examples selected. Similar reference materials can be obtained for other special status species.

[4] Biological Survey Report, Cogentrix Quail Brush Generation Project, Michael Brandman Associates, August 6, 2012, pages 53-54.

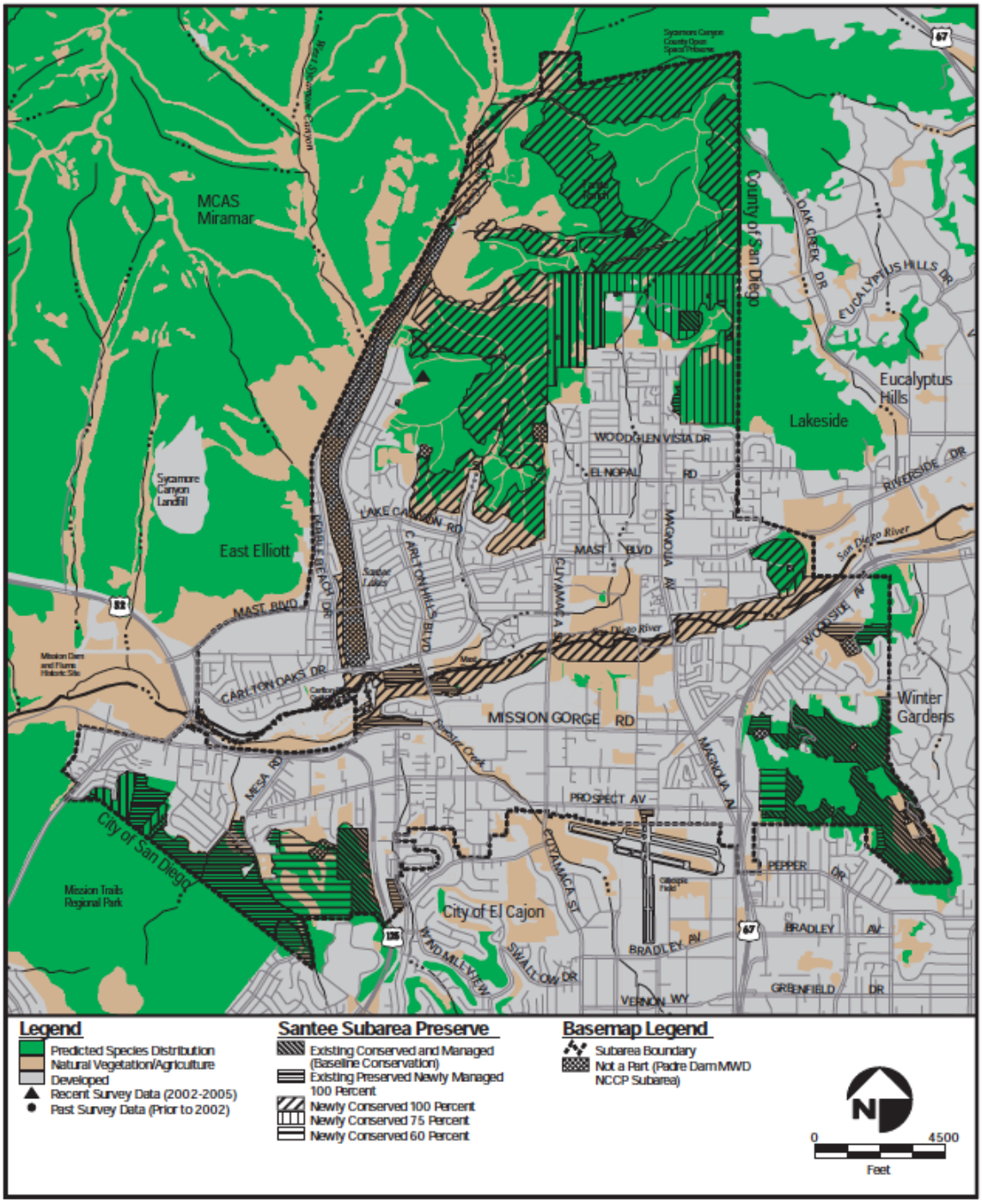



Technology Associates International Corporation

**MSCP Subregional Plan**
**California Gnatcatcher Habitat Evaluation Model (1998)**

/gis/projects/mscs/santee/plots/figures/gnatcatcher_model

**030135** 12/03/07




Technology Associates International Corporation

**Predicted Species Distribution for : Hermes copper**
*(Lycaena hermes)*

/gis/projects/mscp/santee/plots/figures/species_dist

**030152** 11/30/07

The Project site is within the green predicted distribution area suitable for reestablishing host plants.

**5**. For each endangered species you identified pursuant to Data request # 3, provide the data and studies in which you base your belief that habitat for that species on the project site or adjacent off-site areas would be significantly adversely impacted by the Project.

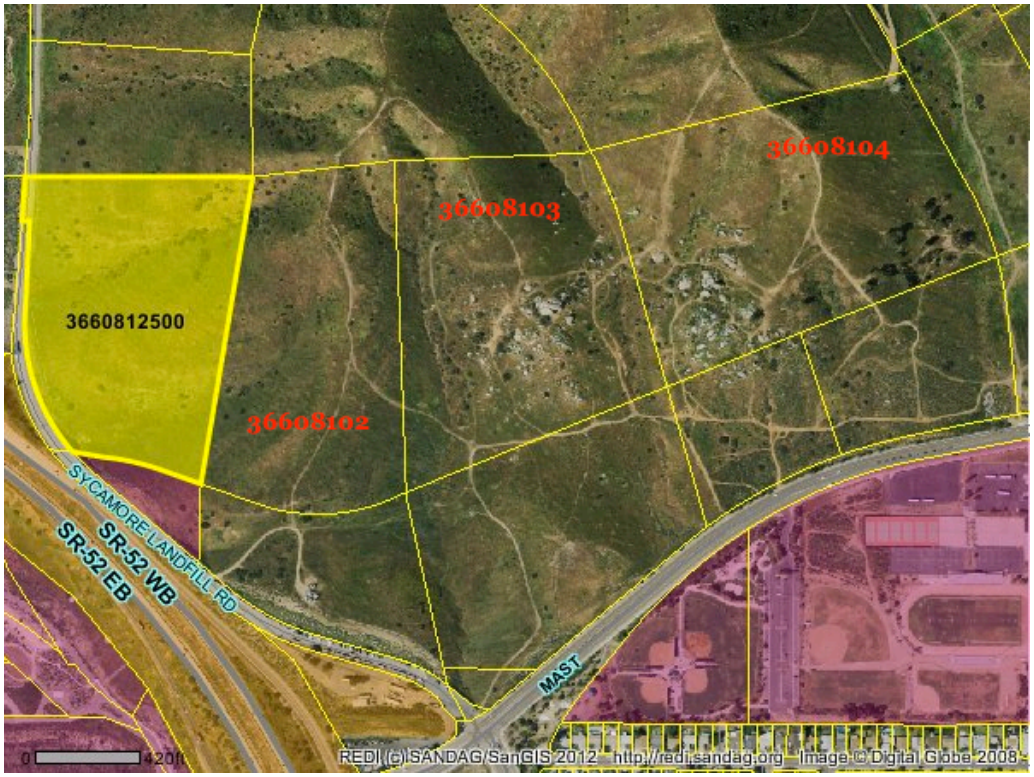
**Response:**
Review the data and reference links presented in Responses 1-4.

**6.** If applicable, please provide the names, titles, credentials, and work addresses of each expert to conduct the studies noted above.

**Response:**
Reference the footnotes and data pertaining to each data response 1-4.

**7.** Please identify rock climbing areas and trails that are "directly adjacent to the site," and provide maps and other supporting documentation.

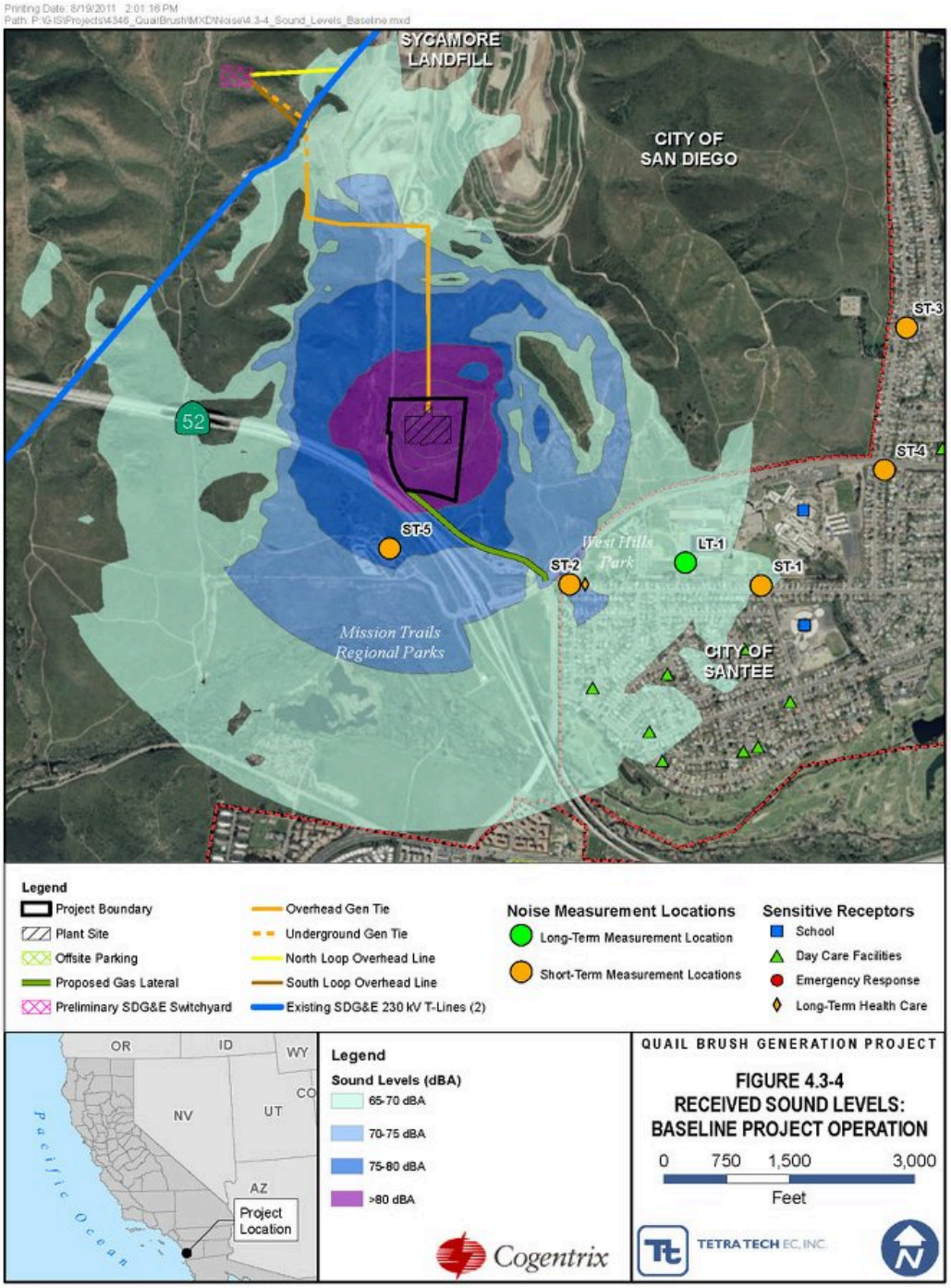
**Response:**
Review aerial photography for parcels 366-081-02-00, 366-081-03-00 and 366-081-04-00, which clearly show rock climbing areas and trails adjacent to the proposed Project that is located on parcel 366-081-25-00.




**8.** Please specify what significant noise impact would be caused by the Project, considering that the AFC illustrates that the project will result in only "faint" or "quiet" noise on neighboring properties.

**Response:**

Cogentrix/Tetratech Quail Brush Generation Project Figure 4.3-4 Received Sound Levels: Baseline Project Operation shows the rock climbing and trail areas potentially within the 65->80 dBA noise contours. Review Figure 4.3-4 pasted below. The same Figure 4.3-4 shows inhabited neighboring properties and schools potentially within the 65-75 dBA contours. Cogentrix question fails to demonstrate any concern for wildlife, recreational users or the West Hills High School cross country team that utilizes adjacent parcels. Cogentrix ambivalence is demonstrated by the failure to faithfully respond to intervener Dorian Houser, who was told that his concern about operational noise impacts and low frequency noise impact "is not relevant to the proceeding and not reasonably relevant for the CEC to render a decision on the AFC." (Cogentrix Response to Dorian Houser, May 29, 2012, Response # 12). Rather than explaining how noise will be mitigated and "without specifying the way such mitigation must be accomplished", Cogentrix expects us to have faith they can meet some performance standard without providing any evidence of its ability to do so. The expectation is unreasonable. Also see the Mission Trails Regional Park Master Plan Update for trail plans through the Project site.




**9.** Please provide the data and studies on which you base your belief that there would be noise impacts on the rock climbing areas and hiking trails adjacent to the site as a result of the proposed Project, considering that the only known public hiking trails in this area are in the vicinity of Route 52, and thus are already impacted by freeway noise.

**Response:**
SR-52 is further from the recreational site and lower in elevation than the proposed Project at the closest points. Parcels 366-081-02-00, 366-081-03-00 are planned for dedication to Mission Trails Regional Park (MTRP) if the owner can design a Project footprint for holdings outside of the MHPA capable of gaining regulatory approvals. Trail improvements are under consideration throughout the East Elliot [MTRP] Expansion Area. Trails E11-14 are likely to be routed through or in close vicinity to the power plant parcel.[5] Quail ignores the East Elliot Community Plan, The Mission Trails Regional Park Master Plan and attempts to impose inconsistent land uses on adjacent parcels. Also see the Response to Data Request 8.

| East Elliott Expansion Area | |
|---|---|
| E1 | Reroute the Southwestern Spring Canyon Trail |
| E2 | Add a New Oak Canyon to Ridgeline Trail |
| E3 | Add a New Oak Canyon to Spring Canyon Trail |
| E4 | Reroute the Western Spring Canyon to Utility Road |
| E5 | Add a Western Spring Canyon Utility Road Connector Trail |
| E6 | Add a New Northwestern Spring Canyon Lower Trail |
| E7 | Add a New Northwestern Spring Canyon Upper Trail |
| E8 | Add a New Northeastern Spring Canyon Lower Trail |
| E9 | Add a New Northeastern Spring Canyon Upper Trail |
| E10 | Add a New North Landfill Trail |
| E11 | Add a New Landfill to Stowe Trail |
| E12 | Provide a Santee Overlook Trail |
| E13 | Add a New Santee Boulders Trail |
| E14 | Add a New Spring Canyon to Santee Boulders Trail |
| **West Sycamore Expansion Area** | |
| W1 | Provide a New West Sycamore Staging Area |
| W2 | Add a Extensiong to the Beeler Canyon to Ridge Trail (Trans-County Trail) |
| W3 | Add a New Beeler/Sycamore Canyon to Ridge Trail |
| W4 | Add a New Sycamore Canyon to Ridge Trail |
| W5 | Add a New Ridge to Goodan Ranch Trail |
| W6 | Add a New North Segment of Southern Loop Trail |
| W9 | Add a New Central Segment of Southern Loop Trail |
| W10 | Add a New Southern Segment of Southern Loop Trail |
| W11 | Add a New Western Loop Trail |

[5] Potential project list, Mission Trails Regional Park Master Plan Update. City of San Diego, City Planning and Community Investment Department.

**10.** Please provide the data and studies on what you baser belief that there would be visual impacts on rock climbing areas and hiking trails adjacent to the site as result of the proposed project, considering that the undulating terrain of Mission Trails Regional Park blocks the Project site for many places in the Park and that higher elevation viewpoints already include high-voltage transmission lines and Sycamore Landfill.

**Response:**
Review the aerials presented in Data Response 7. Individuals traveling to and recreating on trails and rock climbing areas will be subjected to the industrial plant and or the 70-100 feet stacks and new gen-tie infrastructure. Recognize that it has been PWS goal to support the acquisition of all private parcels in East Elliot for the expansion of Mission Trails Regional Park and that that goal has been significantly supported and invested in by the City of San Diego by securing in excess of 700 acres. The City of San Diego states, "A Mission Trails Regional Park Master Plan Update is currently in process and is proposing inclusion of the entire E. Elliot community within the park boundaries. Public Workshops were conducted and trails within the E Elliot community have been identified for inclusion within the Update."[6]

**11.** If applicable, please provide the names, titles, credentials, and work addresses of each expert to conduct the studies noted above.

**Response:**
Reference the footnotes and data pertaining to each data response 7-10.

**12.** Please explain in detail the basis for your conclusion that the project would contribute to lower water quality entering the San Diego River and its tributaries, considering that this conclusion is not supported by the applicants proposed design or related analysis.

**Response:**
The Project proposes the grading of an unnamed intermittent San Diego River tributary. Reference aerial photography, topographical maps and photographs of the site. The beneficial uses of the natural drainage would be replaced with graded fill, impermeable surfaces, industrial operations and related site runoff. In short the natural watershed that provides clean water and flood protection would be converted to another source of water pollution in the San Diego River watershed.

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[6] San Diego Development Project Manager Morris E. Dye, letter to Connie Farmer, Tetra Tech, August 3, 2011, City of San Diego "Cycle Issues Report" L64A-003A attachment, page 8 of 9. CEC Docket 12/14/2011

**13.** Please provide any data and studies used to arrive at this contrary conclusion that the Project would result in lower water quality entering the San Diego River and its tributaries.

**Response:**
Reference the City of San Diego "Cycle Issues Report" attached to San Diego Development Project Manager Morris E. Dyes letter to Connie Farmer, Tetra Tech, August 3, 2011. The issues summary references "500,00 cubic yards of proposed grading…considered significant for the landform alteration category", etc.[7] The grading will destroy a San Diego River tributary and its beneficial function to provide clean water and flood protection through rainfall absorption. Review the project maps, Figures and aerial photos that show the conversion of natural resource functions into developed industrial surfaces. Reference Project maps or utilize Google Earth to recognize the short distance of ½-mile from the site to the San Diego River. Recognize that the Project Site is surrounded by MHPA habitat and there is no way to avoid all runoff from the site from going into MHPA habitat (Cycle Issue #10, page 9).

**14.** If applicable, please provide the names, titles, credentials, and work addresses of each expert who conducted the studies noted above.

**Response:**
Reference the footnotes pertaining to each data response. Also note my position as the Resource Analyst/Executive Director of Preserve Wild Santee, education and experience as described below.

Van K. Collinsworth obtained a Master's degree with Geographic emphasis in 1986 from Humboldt State University, a Bachelor's in Geography in 1982 and teaching credential in 1983, HSU. Natural Resource and Geographic studies include: Biology, Botany, Zoology, Ecology, Geology, Soil Science, Hydrology, Range Management, Environmental Impact Report Writing, Natural Resource Economics, Economic Geography, Physical Geography, Urban Geography, Mountain Geography, Cartography, Air Photo Interpretation, Resource Planning & Environmental Design, Environmental Policy, Conservation Geography, Environmental Engineering. Completion of various fire behavior and suppression courses with the US Forest Service. Related professional experience includes resource interpretation, land management and fire suppression assignments with the USDA-Forest Service between 1980 and 1992. Founded Preserve Wild Santee in 1994. Voluntarily analyzed numerous CEQA and NEPA documents submitting comments that helped

[7] Manager Morris E. Dyes letter to Connie Farmer, Tetra Tech , August 3, 2011, page 2 and City of San Diego "Cycle Issues Report" L64A-003A attachment, page 2 of 9. CEC Docket 12/14/2011.

to improve development projects within the San Diego County. Monitored compliance with mitigation requirements, ordinances and plans. Provided a region-wide source of environmental education. In 2003, participated in the founding and educational activities of the San Diego Fire Recovery Network. Produced "Preventing Firestorm Disaster" Powerpoint utilized as the basis of educational exhibits in public buildings. Specific fire suppression experience includes: Participation in the planning and execution of sage land and pine forest control burns. Drove and operated fire engines. Engine assignments included everything from small initial response to engine strike teams dispatched to large wildland fires throughout the western United States. Large fire response was also often as a member of a hand crew actively building fireline, backfiring and burning out. I was also transported on initial attack by helicopter and worked with helicopters on water drops, or when equipped with a helitorch. Guided from the ground safe landings and take-offs at high altitudes. Knew and utilized the Incident Command System. Performed as Incident Commander on initial attack and transitioned to other roles as warranted including assisting Operations and Air Operations Officers. Sized-up fires upon initial attack and ordered other resources from dispatch necessary to suppress fires. Briefed superior officers/ICS Teams to the location of all incident resources upon transition. Extensive line building in steep chaparral topography that included backfiring operations where I used a drip-torch in coordination with a helitorch above to successfully ignite fires that ran into and contained the main fire. I voluntarily used this experience to assist structure protection when the Cedar Fire burned to Santee's wildland/urban interface in 2003. Total professional fire assignments ranged diversely from coastal to alpine environments that included natural and human ignitions under various climatic conditions within diverse plant communities.

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

| | | |
|---|---|---|
| In the Matter of: | ) | 11-AFC-03 |
| | ) | |
| Quail Brush Generation Project | ) | **DECLARATION OF SERVICE** |
| _____ ) | | |

I, Van Collinsworth of Preserve Wild Santee declare that on October 12, 2012, I served and filed copies of the attached ***Preserve Wild Santee's Responses to Cogentrix Quail Brush Genco, LLC's Data Requests 1-14 (Set One)***, accompanied by a copy of the most recent *Proof of Service* list with the Docket Unit and all parties in this proceeding (as shown on the *Proof of Service* list), in the following manner:

**FOR SERVICE TO THE APPLICANT AND ALL OTHER PARTIES:**

__X___ sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery or by depositing in the United States mail at [location: city and state]_____with first-class postage thereon fully prepaid and addressed as provided on the *Proof of Service* list above to those addresses **NOT** marked "email preferred."

***AND***

**FOR FILING WITH THE ENERGY COMMISSION:**

__X___ sending an electronic copy, via e-mail, to the address below;

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

10/12/2012

_____ _____

Name Date

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA**
**1516 NINTH STREET, SACRAMENTO, CA 95814**
**1-800-822-6228 – WWW.ENERGY.CA.GOV**

***APPLICATION FOR CERTIFICATION FOR THE QUAIL BRUSH GENERATION PROJECT***

**DOCKET NO. 11-AFC-03**
**PROOF OF SERVICE**
***(Revised 10/08/2012)***

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*indicates change

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