



Honorable Chair Karen Douglas  
 California Energy Commission  
 1516 Ninth Street  
 Sacramento, CA 95814

**Docket Number: 2010-AFC-01**

<b>DOCKET</b>	
<b>10-AFC-01</b>	
DATE	
RECD.	OCT 20 2010

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

Dear Honorable Chair Karen Douglas,

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, 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 1<sup>st</sup>, 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.

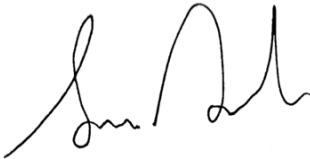
Over the past two decades, Chula Vista has continued to expand eastward, and major areas have been developed near the Otay Valley. In order to maintain a quality of life and a balance between development and open space, land within the boundary area of the Preserve as well as the OVRP must be conserved. 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 is 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,



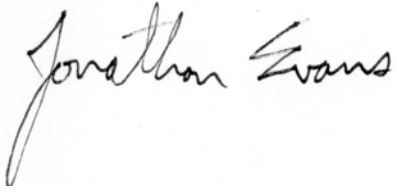
Serge Dedina, Ph.D.  
Executive Director  
WILD COAST



Robert García  
Executive Director and Counsel  
The City Project



Jerre Stallcup  
Conservation Biologist  
Conservation Biology Institute



Jonathan Evans  
Staff Attorney  
Center for Biological Diversity



Rob Hutsel  
Executive Director  
San Diego River Park Foundation



Carolyn Chase  
Chair  
Sierra Club San Diego Chapter




Joel Reynolds  
Director, Urban Program  
Natural Resources Defense Council



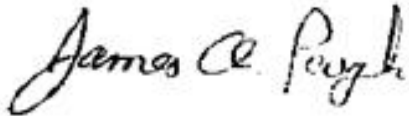
George Hanson  
Founder  
Friends of the OVRP



Dan Silver  
Executive Director  
Endangered Habitat League



Michael Beck  
President  
Endangered Habitat Conservancy



Jim Peugh  
Conservation Chair  
San Diego Audubon Society



Van K. Collinsworth  
Executive Director  
Preserve Wild Santee



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

A handwritten signature in black ink, appearing to read 'Elizabeth Goldstein', followed by a long horizontal line extending to the right.

Elizabeth Goldstein  
Executive Director  
California State Parks Foundation

A handwritten signature in black ink, appearing to read 'Michael McCoy', written in a cursive style.

Michael McCoy  
Board President  
Southwest Wetland Interpretive Association