

## DOCKETED

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<b>Project Title:</b>	Cogentrix Quail Brush Generation Project
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*Comment Received From: Doug Rosaaen*

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## **Deny Suspension, Void Application**

Please deny the suspension the Quail Brush Power Plant AFC (11-AFC-03). We do not want an unnecessary power plant to destroy the public wildlife reserve that San Diego County citizens frequently visit to escape the city for the clean fresh air of undisturbed wilderness. For many years, my family has run, biked, or hiked on the trails that this power plant company is proposing to shut down and bring visual, audible, and environmental pollution to.

The City Of San Diego (in their letter to property owners on 13 January 2014 from Melissa Garcia - Senior Planner) has sought to secure Route 52 as a "Scenic Highway" designation. The proposed Power plant and it's accompanying infrastructure would now be along this exact stretch of highway. The City of San Diego stated in their letter that the typical land protection measures required as part of the designation process (i.e. ordinances, zoning, and/or planning policies) would NOT be required because the City has "adequate protection policies" in place. Therefore the City is NOT proposing any land use regulation changes. This is in direct conflict with the Quail Brush project as the projects basis is inconsistent with the City of San Diego LORS. Allowing any agency or company to change the zoning from 'Open Space' to "Heavy Industrial" is absurd. This alone should be a reason to deny the power plant.

The Quail Brush project is incompatible with the region's long-standing plans for open space and limited development in the East Elliott Multi Habitat Planning Area, part of San Diego's Multi Species Conservation Program (MSCP) open space area. The proposed project location within the sensitive Mission Trails Regional Park conflicts with the designation of much of the surrounding environment as Multiple Habitat Planning Area and would cause habitat loss for endangered species. Located near homes, schools, hospitals, and recreation areas, emissions from the proposed project would create public health concerns for nearby residents; and visual impacts of the proposed plant would add to significant quality of life concerns that accompany the proposed project.

This project was already denied by the City of San Diego Planning Commission, the San Diego City Council, and the City of Santee. The project is inconsistent with the City of San Diego LORS. The San Diego Planning Commission and the San Diego City Council have both rejected requests to initiate zoning and land use changes to accommodate the project. In addition, the California Public Utilities Commission has denied San Diego Gas & Electric Company the authority to enter into a purchase power tolling agreement with Quail Brush.

The Mission Trails Regional Park Task Force opposes the siting of the power plant. The Quail Brush project failed in providing real "alternatives" in/on other sites. The top 3 "alternatives" that received in-depth analysis are all located in the East Elliot area within a few square miles of the proposed site (and all on/adjacent to the land of Mission Trails zoned as "Open Space"). This area an area has existing protections against such a venture, and yet the community has been forced to fight for the enforcement of those protections.

The proposed project site Cogentrix wants to build the power plant on is adjacent the natural gas lines run along nearby Mast Blvd. As they would have to fund and finance any infrastructure modifications, this is of great financial benefit to Cogentrix at the cost of the residents of the area and patrons of MTRP.

The technology proposed in this power plant is extremely dated (1950s era) and is not anywhere near as efficient and clean as current technologies. California's progressive energy approach requires the use of future leaning and renewable technologies. There are so many other choices in power production and we cannot continue to pretend like they're not viable solutions.

The cumulative air quality impact to MTRP and lowâ€ lying Santee is not acceptable, no matter what mitigation the power plant offers. There is no zero emission technology for this type of plant. There will NEVER be an appropriate time to build a natural gas power plant in an environmentally sensitive open area, in a very high risk fire zone, proximal to homes, schools and parks.

In a letter dated 31 October 2012 (TN# 63811), Cogentrix's Quail Brush project manager Eric Solario, requested "Confidential Treatment for Proposed Air Mitigation Plan" citing "proprietary data", "loss of competitive advantage", and the "public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." Assuming that most San Diego County citizens find breathing to be in the "public interest" and that competitive advantages on equipment based on 1950's technology are likely non-existent, this effort by Cogentrix and the Quail Brush project to blatantly hide air quality data is highly suspect and likely egregious.

This project has already caused tremendous community grief, aggravation, and countless hours of effort by hundreds of San Diego County Citizens. We individuals, united by this common cause, have worked long and hard against Cogentrix, a large company equipped with vast resources and staffers who were paid to fight.

Please, DO NOT ALLOW ANOTHER SUSPENSION. The CEC previously determined that Cogentrix could not justify Quail Brush before and they will not be able to justify it a year from now. It's time to end this. Cogentrix is using these suspensions as a mechanism of wearing people down. The CEC should not allow them to "kick the can down the road". Future generations of Californians who live, work, and play in this region (at the schools, homes, and parks all within 1 mile of the proposed site) are depending on the CEC denying this request for a 2nd suspension and vacating/voiding the application.

Respectfully,  
Doug Rosaaen  
San Diego