

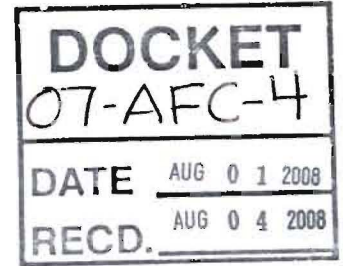


**SIERRA
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San Diego Chapter

Serving the Environment in San Diego and Imperial Counties

Main Office (619) 299-1743
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August 1, 2008

Honorable Jackalyn Pfannenstiel, Presiding member
Honorable James Boyd, Associate Member
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: OPPOSITION to the Chula Vista Energy Upgrade Project (07-AFC-4)

Dear Honorable Commissioners Pfannenstiel and Boyd:

The San Diego Chapter of the Sierra Club was founded in 1948. Our Chapter includes 15,000 members throughout San Diego County. Our mission is as follows:

1. Explore, enjoy and protect the wild places of the earth.
2. Practice and promote the responsible use of the earth's ecosystems and resources.
3. Educate and enlist humanity to protect and restore the quality of the natural and human environment.
4. Use all lawful means to carry out these objectives.

On behalf of the San Diego Smart Energy Solutions Task Force of the Sierra Club, I write today to strongly urge your denial of the application for certification of the Chula Vista Energy Upgrade project (CVEUP). The project is too close to homes, too close to schools and a community recreation center, and directly violates Chula Vista General Plan policies.

In 2005, the Chula Vista City Council unanimously passed a General Plan Update that was widely supported in the city. One of the key policies it contained was a policy designed expressly to avoid locating new and upgraded power plants within 1,000 feet of residences. Chula Vista's General Plan policies were designed to protect public health and were adopted for that reason. The CVEUP, as proposed, is 350 feet from a residential neighborhood-- a distance that is unhealthful and unacceptably close.

This project would perpetuate environmental injustice in this neighborhood. According to MMC's application, 53% of the residents living within six miles of the proposed power plant are people of color. The residents living within one mile of the project are 81% people of color, the vast majority of which are Latino. The proposed plant will continue the trend of placing polluters such as power plants in our communities.





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Unfortunately, projects like this are recurring environmental justice problem for the South Bay. An analysis developed by the Environmental Health Coalition demonstrates that the South Bay has more MW per square mile of fossil fuel burning power projects located there than any other region of the county. This is an environmental injustice and one that should be reversed and not exacerbated with more poorly sited projects like the CVEUP.

There are cleaner and healthier alternatives to siting a natural gas fired peaker plant in this location. Projects that include conservation, distributed generation, combined heat-and-power and other cleaner generation are viable alternatives. One example is the *San Diego Smart Energy 2020* plan, a 21st century roadmap to renewable energy. A large component of this plan is rooftop solar photovoltaics. In fact, Chula Vista alone has a reasonable potential for rooftop solar photovoltaic of 130 MW.

We urge your denial of this project application. It violates considered policies of the Chula Vista General Plan. It is too close to homes, schools, and recreation centers where people congregate. We need to find 21st Century alternatives to meeting our energy needs in a clean, environmentally-responsible manner while protecting our community health and reducing global warming greenhouse gases.

Sincerely,

Richard Miller, Chair

San Diego Smart Energy Solutions Task Force

CC: Mayor Cheryl Cox
Councilmember Rudy Ramirez
Councilmember John McCann
Councilmember Jerry Rindone,
Councilmember Steve Castaneda

