

PALA-PAUMA SPONSOR GROUP

P.O. Box 599
Pauma Valley, CA 92061

September 19, 2008

Ms. Felicia Miller
Project Manager
California Energy Commission
1516 9th Street, MS-15
Sacramento, CA 95814-5512

DOCKET	
08-AFC-4	
DATE	SEP 19 2008
RECD.	SEP 24 2008

**SUBJECT: CALIFORNIA ENERGY COMMISSION DOCKET NO. 07-SPPE-2
(ORANGE GROVE ENERGY, L.P.) SAN DIEGO COUNTY
CASE NO. P07-009 (ORANGE GROVE MAJOR USE PERMIT)**

Dear Ms. Miller:

The Pala Pauma Sponsor Group is the local Community Planning Group appointed by the San Diego County Board of Supervisors to advise them and the County Planning Department of local community concerns and issues regarding land use, zoning, and development issues within the Pala Pauma Sub-Regional Planning Area which includes the above referenced project. Our Planning Group has held a public hearing on the subject application, but has withheld a formal action pending additional information.

This letter is sent in specific response to our review of the Visual Resources Report prepared for this project. The report appears to be based upon erroneous information, and as such does not present a thorough or factual analysis of the project upon existing community and/or regional visual resources. Similarly proposed mitigations are either inadequate or lacking to meet community concerns or C.E.Q.A. requirements.

The Visual Resources Report incorrectly states that Highway 76 is not an eligible or designated scenic highway. State Route 76 is identified by the State of California as an eligible State Scenic Highway Route. Recently, our Community Planning Group as part of the County of San Diego's ongoing General Plan Update process requested that the Board of Supervisors begin the formal application process to bring this eligible highway into the State Scenic Highway system. The County Planning Commission and the Board of Supervisors approved this request and we have begun the formal application process, which includes implementing certain scenic corridor protection measures.

A thorough analysis of the effect of the construction of two high turbines (50 ft. to 80 ft. high) as well as the industrial look of the proposed facility and its ancillary parking on the existing scenic views experienced by viewers utilizing State Route 76 is necessary. The siting and construction of this facility should not preclude the designation of this route as scenic.

Although the use of native plant materials to revegetate manufactured slopes is appropriate biologically. These plantings will do little to screen the project from view. Large/tall Evergreen trees will be necessary to accomplish this, and they will need to be placed closer to the highway, not on project slopes, to be effective.

The report mistakenly states that the project is not near any park or regional trail system although the existing San Luis Rey River Park is approximately located 5 miles to the west. This park is Phase I of a proposed regional park that will extend along the San Luis Rey River from this point then proceed to the east past the subject site to eventually reach Mt. Palomar and Lake Henshaw. Coincidentally with this a regional riding and hiking trail is identified on the County of San Diego Trail and Pathway Master Plan which follows this same route along Highway 76. Additionally, Highway 76 is identified as the location for a Class I Bicycle Trail by SANDAG and CalTrans along its route. All of these facilities will be impacted visually by the proposed power plant and an analysis is required. The effect on the overall community character of our region is impacted by the siting of this industrial land use in an otherwise rural location.

In locations where the proposed gas line will be placed within existing easements offsite and to the west of the project, outside of the Highway 76 alignment and/or in the existing SDGE 69 KV easement. An analysis should be done to determine if the future regional trail location might share the same location. It would appear to be a mitigation that was appropriate to address the long term growth inducing impacts this project created by providing additional energy to areas east of the current project which could not otherwise be developed without this new power source.

Currently, no 69 kv line runs eastward past the existing interconnect of the Pala Sub-Station with the high voltage north-south power lines located approximately one quarter mile to the east. The siting of these future facilities, although probably necessary, should be coordinated closely with the various stakeholders of the region to avoid future degradation of existing visual resources and the existing community character.

Finally, we believe the proposed access to this project would be more appropriate if it came off of Camino Del Norte rather than Highway 76 itself. Thus minimizing potential project traffic interference with the existing congested traffic flow on this highway.

Should you have any questions regarding our Planning Group's comments,
please do not hesitate to call the undersigned.

PALA-PAUMA SPONSOR GROUP



Joe Chisholm, Chair
760/745-3501

cc: TRC, Joseph Stegner
DPLU, Jarrett Ramatta
CalTrans, Jacob Armstrong