

Sch No. 2006091071
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A0011

**FORMAL RESPONSE TO THE
SUNRISE POWERLINK PROJECT
EIR/EIS - SCHO NO. 2006091071
SUBMITTED THIS 21ST DAY OF MARCH 2008**

Padre Dam Municipal Water District's ("Padre Dam") review of the Sunrise Powerlink Project found that issues regarding the San Diego Community Power Plant ("SDCPP") were not fully evaluated by the research for the EIR/EIS. In the review of the information provided in the EIR/EIS, Padre Dam believes that the SDCPP Alternative should be removed entirely from the list of the three "In-Area All Source Generation Alternatives."

Whether or not the Sunrise Powerlink Project moves forward, the Alternative that refers to the SDCPP Alternative has inadequate information that might lead the reader(s) of the EIR/EIS to rely on the Alternative as being viable. At the very least, the proponents of the Sunrise Powerlink Project should be directed to re-evaluate the SDCPP with full research that includes input from Padre Dam, the City of Santee, and other community interests and authorities before declaring that this Alternative and location is an adequate replacement project should the proposed Powerlink Project fail.

Statements in the EIR/EIS regarding the SDCPP Alternative to the Sunrise Powerlink Project have questionable assumptions that need to be addressed.

One particular statement in the Executive Summary which would be totally misleading, especially to those individuals who only read the Executive Summary on page ES-32, is the Title that says "6.2 The Alternatives Fully Evaluated in the EIR/EIS" that says, "Each of these alternatives is evaluated within each environmental issue area of Sections D and E of this EIR/EIS." The list of alternatives includes the New In-Area All-Source Generation. They have not been 'fully evaluated.'

- The SDCPP (as proposed by ENPEX) has not submitted a request for potable or recycled water in order for Padre Dam to research or respond to such a request.
- C.4.10.2 says the SDCPP is assumed to come online by 2008. Then in E6.1.1 the document states that the SDCPP "can feasibly be built by 2010." No applications have been submitted for certification to the CEC (although E.6.1.4 says the site has been under development since 2000), no water availability requests have been made to Padre Dam, and no engineering plans have been submitted for review.

IMPACTS AND MITIGATION

- Biological Resources discusses critical habitat for Willowy Monardella and California gnatcatcher and lists many other species for potential to occur. The mitigation measures shown do not adequately address these impacts. The discussion does not disclose the particularly unique makeup of Sycamore Creek or make allowances other than it will build its roads at right angles to the streambed. The discussion does not address the issue that the site eliminates a watershed that feeds Sycamore Creek and impacts Sycamore Creek with the road crossing that is suggested in the previous sections.
- Impact B-5 discusses the sensitive species that could not be reduced to less than significant. If there had been input requested by the proponent to Padre Dam, there should also have been a discussion of the impact to the NCCP wildlife corridor.
- Violation of the Migratory Bird Act would be significant during construction and even have a negative impact after construction. The EIR says this is considered mitigable to less than significant by the EIR/EIS document. Since part of the goal of the Joint Water Agencies' NCCP is to increase the number of nesting birds - especially threatened or endangered, but also general bird populations, this project reduces the success of the goals for the NCCP and the Lakes in general.

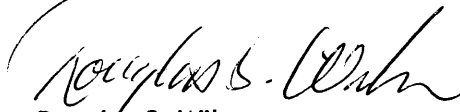
GENERAL QUESTION AND ISSUE

- Where is the discussion of use of re-circulating water in the cooling towers in respect to the connection to Legionnaires disease and using both potable and recycled water for this purpose?

Padre Dam appreciates the opportunity to respond to such a large and important project for the region. As was discussed above, all of our concerns are related to the SDCPP alternative. Given the impacts that were overlooked in the EIR/EIS and the significant negative impact on the local area, we believe that this option should be eliminated from the In-Area All Source Generation Alternatives provision.

If you have any questions or need additional information, please contact our Right of Way and Environmental Resource Agent, Mary Lindquist, at (619) 258-4651.

PADRE DAM MUNICIPAL WATER DISTRICT



Douglas S. Wilson
General Manager

DSW:ML:cc

cc: City of Santee
Barratt American

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