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April 9, 2008

CPUC/BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104

Regarding: SDG&E's Proposed Sunrise Powerlink Project

Dear Commissioner Grueneich;

Ninth District PTA is part of the California State PTA and the National PTA. Our Mission is to advocate for the more than 800,000 children and youth of San Diego and Imperial Counties. Ninth District PTA membership consists of over 80,000 volunteers who work to promote the education and well-being of all children and youth in the home, in the school and in the community.

Many of our members have expressed concerns over the Sunrise Powerlink project and asked Ninth District PTA to study the issue. After devoting hundreds of hours to this effort, two major areas of concern have surfaced: the increased risk of fire and the adverse impact the project may have on air quality. These both have the potential to profoundly affect many children, youth and families in San Diego and Imperial Counties. The evidence we uncovered during the course of our investigation has also caused us to question the motivation behind the Sunrise Powerlink project, particularly the claim that it will increase access to renewable energy sources.

### **Renewable Energy Claim**

SDG&E states that a primary goal of the Sunrise Powerlink is to increase access to renewable energy. We found many reasons to question this claim, including the fact that SDG&E made this same argument during the hearings for the Southwest Powerlink. If its intent is to bring in solar generated energy from the Imperial Valley by 2010, why did SDG&E pick Stirling's unproven technology? While large solar facilities have been producing energy in other parts of the state for over a decade, the Stirling facility that SDG&E has contracted for is dependent on technology that is not yet commercially viable, and the lengthy formal review process for this project has still not been initiated. SDG&E's recent testimony in January 2007 that they can reach their 2010 and 2020 renewable targets without the Sunrise Powerlink casts additional doubt on the renewable argument.

### **Air Quality**

The cross-border transmission lines from the two U.S.-owned fossil-fueled plants in Mexicali are currently at half capacity, and they connect into the same Imperial Valley substation where the Sunrise Powerlink would originate. The revelation last year by SDG&E that the Sunrise Powerlink has an expandability option to the north has increased our concern that the underlying motive for this project is to transmit energy from fossil-fueled power plants in Mexico to Los Angeles. Ninth District PTA is concerned that the Sunrise Powerlink will result in the construction of additional fossil-fueled power plants in Mexicali, further degrading the air quality of the Imperial Valley.

Air pollutants from fossil fuel-fired power plants are known to trigger asthma attacks and cause other respiratory problems in children and sensitive adults. They can also weaken human cardiovascular systems and are associated with premature mortality. The Imperial Valley has one of the highest hospitalization rates for childhood asthma in the state. It is also one of the poorest counties in California and its families have sharply limited health care options.

The American-owned power plants in Mexicali received Presidential Permits through the U.S. Department of Energy (DOE) to transmit into California, over the objections of health and air quality officials. While the DOE dismissed the concerns raised during the review process, a subsequent report by the U.S. Government Accountability Office found that the emissions from these facilities were not adequately evaluated and could be underestimated. One of the owners maintained their plant met California standards, but the other did not. It was only through intense political lobbying, pending legislation and a lawsuit that officials were successful in getting the non-compliant plant retrofitted to reduce emissions.

Although the estimated emissions from these plants may be comparable with similar facilities recently permitted in California, because the Imperial Valley's air quality is already so impacted, had these plants been built three miles north, inside California's boundaries, their owners would have been required to "offset" 1.2 tons of existing Imperial Valley pollution for every ton generated. This could have included paying for cleaning up truck diesel engines or paving dusty roads. Local officials are concerned that additional power plants will be built to meet the energy requirements of a growing border population, and without stricter requirements, they will cause increasingly higher levels of air pollution in the Imperial Valley.

The Mexicali power plants also have the potential to cause irreparable harm to the Salton Sea because they utilize evaporative cooling systems rather than employing state-of-the-art dry-cooling. The existing cooling process diverts water from the New River, which feeds into the Salton Sea. A significant amount is lost to evaporation, which reduces the flow to the Salton Sea, causing its water level to drop and the salinity level to rise, further threatening its fragile ecosystem. This also exposes more shoreline, which is polluted, increasing the potential for polluted airborne dust.

In addition, the likelihood that these plants will burn imported LNG from the recently permitted Costa Azul plant, which may contain a higher concentration of pollutants, is cause for additional concern. It has been reported that this imported LNG contains compounds that could cause substantially more pollution than the North American natural gas now being used in California. Air quality officials say the imported LNG could increase emissions from residential gas-burning devices and in-state power plants by 50%.

Beyond the immediate health concerns of increased air pollution, LNG will undermine California's efforts to curb greenhouse gasses. The lifecycle greenhouse gas burden of LNG, including its processing, liquefying, transport, and regasification, is approximately 25 percent

higher than North American natural gas and will nullify the greenhouse gas reductions projected by SDG&E over the next decade.

### **Power Lines and Fires**

San Diego faces a quandary. As its population grows, the need for energy increases, thereby increasing the amount of power lines, resulting in an increased risk of power line associated fires.

Southern California is prone to Santa Ana conditions. Their high winds can cause power lines to vibrate, arc, snap, and ignite dry vegetation resulting in wind driven, fast moving fires. Historically power lines have caused less than 3% of the fires in California but they have been larger and more devastating than fires started by other causes. In San Diego County, power line fires are also relatively rare but destructive; they have resulted in 17% of all burned areas since 1960.

Three of California's 20 largest wildfires, as measured in acres between 1932 and 2006, were sparked by downed power lines – not big transmission lines that the Sunrise Powerlink would carry but low-voltage distribution lines. One of these was the 175,000-acre Laguna fire in September 1970. Power lines also were a factor in the October 2007 fires. The California Department of Forestry and Fire Protection, also known as CalFire, is still investigating the circumstances, but has concluded that wires sparked the 198,000-acre Witch Creek fire, the fourth-largest in state history, and the 9,400-acre Rice fire.

Removal of fuel along a power transmission line's path can reduce fire risk, but it is unsightly and interferes with the existing eco-system. Burying of transmission lines is an alternative but can damage fragile environments and cultural sites. It is also very expensive, estimated at approximately \$1 million per mile, which is passed on to consumers, and in California we already pay the highest energy rates in the nation. Buried lines are also more costly to repair. SDG&E has stated that it would be impossible to bury the power lines in many of the rugged areas that the Sunrise Powerlink would traverse.

Ramona is an area of particular interest when considering the risk of wildfires for a number of reasons. Its geographic location makes it prone to weather conditions that allow for the rapid spread of a wind driven fire. It is also the only area where all of the proposed "Sunrise Powerlink" transmission lines will converge. Additionally, Ramona is home to an active air space including a California Department of Forestry air attack base, experimental aircraft, a helicopter training school, marine attack helicopters and ultra-light aircraft, all of which generate low altitude air traffic creating yet another hazard to power lines.

In January, 2008, a draft environmental impact report (EIR) was issued on the Sunrise Powerlink. It noted that the construction of the Sunrise Powerlink "would increase the probability of igniting a catastrophic wildfire above base-line conditions." The impact would be particularly significant around Ramona and Poway "due to the extremely high risk of fire in these areas and due to the unacceptably high number of homes at risk even during normal weather conditions." The Sunrise Powerlink itself isn't the main problem, but rather the things that would follow in its wake, such as maintenance roads that open up new areas for campers to smoke or light campfires.

As a result of these findings, the administrative law judge for the CPUC has ordered SDG&E to give an accounting on the cost of mitigating fire risks, the impact of those risks on insurance and

maintenance cost, and the financial liabilities to which SDG&E and its customers will be exposed to by the October wildfires and possible future fires caused by their power lines as well as the need to consider alternate routes or put more power lines underground as a result of the fires. The judge also ordered SDG&E to report on the costs and methods of responding to the loss of major transmission links during the October wildfires, the extent to which SDG&E relied on power from Baja California during the wildfires, and the duration of simultaneous fire-caused outages of both the Southwest Powerlink and existing transmission lines around the proposed route for the Sunrise line.

Ninth District PTA believes the public should have adequate time to review this information and provide input to the CPUC on the findings, and that the CPUC should take this input into account prior to issuing a final ruling on the Sunrise Powerlink proposal.

Ninth District PTA believes that the health and fire risks by themselves are compelling arguments against the Sunrise Powerlink. The draft EIR offers further proof that this project is fatally flawed. This exhaustive report found the Sunrise Powerlink will have 50 significant, unmitigable impacts and five of its six alternatives are environmentally superior. In conclusion, Ninth District PTA believes the Sunrise Powerlink project is not the best choice to meet the energy needs of our community, and it has the potential to significantly and negatively impact the health and well being of our youngest and most vulnerable community members – our children and youth.

Sincerely,



Carol Green  
Vice President, Community Concerns



Rebecca Hernandez  
Vice President, Health



Lorene Joosten  
Vice President, Legislation

CC: Dian Grueneich, CPUC Commissioner  
Steven Weissman, CPUC Administrative Law Judge