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D0124

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CPUC/BLM
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RE: *Sunrise Powerlink*

The purpose of this letter is to express my concerns, concerns that are shared by many other citizens concerned about the proposed Sunrise Powerlink project.

While I can appreciate the stated intention of San Diego Gas and Electric's proposal to bring renewable energy to the greater Southern California area by way of a power line corridor, it is my opinion that the company's approach is driven by a corporate economic imperative without due consideration given to the environment and future generations of people who will inherit an antiquated energy infrastructure destined to fall short of paying the economic, environmental, social debt necessary to bring this proposal to fruition.

My credentials do not qualify me to discuss the production, transportation, and consumption of energy. There are issues involved, however, about which I do feel qualified to comment. Admittedly, I have not invested a great deal of time researching this project in the voluminous ***Draft Environmental Impact Report / Environmental Impact Statement and Draft Land Use Plan Amendment***¹ or through public opinion. I believe the important issues are self evident and easily understood by the average citizen.

The underlying issue controlling the debate appears to be fundamentally economic. A more important question that seems obscured by this contentious debate is, "What decision regarding our energy requirements is in the best interest of our environment and our children?" As such, I will not be challenging the economic assumptions driving this project. I am not qualified and to do so would be entering into a debate that I could never win. Instead, I will express what I feel are obvious consequences of this misguided effort on the part of a powerful public utility company under duress to sustain profitability.

The issues under consideration by the Public Utilities Commission appear to fall into the categories of developing a reliable and sufficient supply of energy, conforming to state requirements to develop renewable energy sources, the cost of the project, and the impact of the project on the environment.

Developing a Reliable and Sufficient Supply of Energy

¹ (2008; <http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/toc-deir.htm>)

As I understand the proposal, solar radiation, wind, and geothermal heat will be the primary sources for conversion to electrical energy. The ambient deviation between the desert biome and the destination for this converted energy is not so different that creating the energy within the consumer service area should not be pursued. An investment in a decentralized electrical distribution system will certainly offer a greater level of reliability and functionality.

In terms of reliability, SDG&E's preferred approach to solving the problem is constructing an overhead transmission line corridor through biomes which have evolved to burn every 20 to 50 years. Any fire on par with those experienced during the past 5 years in the planned area would surely result in an interruption of service. Moreover, The Pines and Witch Creek fires are believed to have been caused by electrical lines, one being clipped by a helicopter and the other snapping in high winds, which are common along the proposed corridor.

Conforming to State Requirement to Develop Renewable Energy Sources

The pressure to shift our reliance toward renewable sources of electrical energy is long overdue. A potentially serious issue that could result from regional socio-economic dependency on a large utility company controlling the distribution of energy in the manner proposed is that the distribution system will go a long way in determining how energy is produced, where it is produced, and who will be producing the energy feeding into the distribution system. The potential for an energy monopoly inherent in this design is incongruent with the underpinnings of free enterprise, and could be a good candidate for litigation – a cost that should not be overlooked in the budget of this project.

Project Cost

Besides obvious costs involved in this project, which even SDG&E cannot confidently calculate given the number of unknowns arising out of the scope of this undertaking, there are sure to be costs presently unaccounted for. Litigation costs could be substantial. The issues are complex and resolution in the courts could take years.

Diminished property values will affect all land owners along and near the route ultimately selected. Having read the EIR comments regarding the effect of other such projects on property values, there are too many points with which I disagree to take on here one at a time.² I am a licensed California Real Estate Broker and feel qualified to dispute the generalizations that simply do not apply to the various property types that would be affected by this proposal. The section cited herein is full of misinformation regarding the permanent impact this project will have on property ownership along any corridor selected. Litigation arising out of this seriously understated impact could be substantial and ongoing.

Project delays due to a variety of litigation will likely increase project costs.

In fact, my feeling is that the project estimates of what this project will actually cost are so nebulous that nobody really understands what they will be. If SDG&E insists on taking the path of most resistance, and the Public Utilities Commission concurs, the consequence will be

² *Draft Environmental Impact Report / Environmental Impact Statement and Draft Land Use Plan Amendment: Socioeconomics, Services and Utilities Section D.14-27 & 28*

analogous to the public signing a blank check – or credit limit – for a large corporation masquerading as a public entity.

Environmental Impact of the Project

One needs to look no further than the environmental issues involved with this proposal for an understanding of how poorly conceived this proposal is in its present form.

The aesthetic issue of having 100' towers lined up across the landscape is not what anyone wants. Engineering an overhead transmission line is unsightly and hazardous to human health and the environment.

As I have already mentioned, at least two of California's historically significant fires are the direct result of downed electrical transmission lines. There are probably more cases known wherein fires were created by overhead lines igniting fires in California.

I believe that electromagnetic radiation is a health hazard irresponsibly addressed by the EIR. The fact that some studies regarding the effects on the biotic environment from electromagnetic field radiation generated by high voltage power lines are inconclusive does not mean that these studies conclude that such effects are safe.³ Some studies demonstrate that there are risks from this type of radiation.⁴ A simple reversal of the criterion for measuring public safety is in order: prove that electromagnetic field radiation generated by high voltage power lines is safe, rather than relying on inconclusive evidence that such radiation is not harmful. The health of all life in the path of this project is at stake. I am curious how many electrical engineers would choose to live in the path of electromagnetic field radiation generated by high voltage power lines?

What is even more curious to me is that SDG&E's preferred route is the route among all alternatives with the highest total of mitigation issues. This fact alone expresses the level of concern SDG&E has for the environment. What does it mean when individuals must comply with environmental standards from which corporations can be exempt on the basis of a project being for the highest good of the general population? This is hypocrisy in action at the highest level of government.

Without question, California's steadily increasing population has created an increased demand for energy. However, California's diverse and fragile ecosystem should be considered above all other factors when decisions impacting future generations are being made. Short-sighted, economically inspired decisions based on proposals from benefiting entities have in the past created aesthetic blights on the landscape, unforeseen hazards arising from a lack of consideration for the environment, while encouraging unmanageable growth exceeding natural resource development

³ *Draft Environmental Impact Report / Environmental Impact Statement and Draft Land Use Plan Amendment: Public Health and Safety Section D.10-152*

⁴ http://www.mercola.com/article/emf/emf_dangers.htm
<http://www.sunrisefarms.org/emf.htm>
<http://www.nzine.co.nz/features/neilcherry.html>
<http://www.shareguide.com/radiation.html>

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for the sole purpose of economic prosperity. The time has come for people in power to take a step back and seriously consider long-range solutions for California's many emerging crises, such as a sufficient water supply, vanishing farm land in favor of housing development, and renewable energy, to name but a few. A simple shift in consciousness from an economic-driven paradigm toward an environmentally-driven paradigm will lead to solutions that are sustainable, reliable, and healthy for present and future generations.

How feasible is an approach that considers the environment first? When one considers the incredible advances in the worlds of biochemistry and information technology, one has to believe that engaging the same caliber of creative genius that has advanced these fields over the past 30 years could certainly produce a set of solutions that make much more sense to the general populous than the line of reasoning and resultant options presently being debated.

It is my opinion that this project should go back to the design phase. Engage creative thinkers from outside Sempra's engineering department. Patience and an investment in human intellect not conditioned or otherwise influenced by California's current energy paradigm will likely produce different questions leading to different solutions. For example, I read in the newspaper that to meet an energy demand of 1,000 megawatts of renewable electricity through an alternative system would require roughly 400,000 individual consumer solar installations at an approximate cost of \$30,000 each, a hypothetical notion proposed by Michael Niggli, chief operating officer of SDG&E, for the purpose of demonstrating the magnitude of the demand and associated costs involved with alternatives to SDG&E's preferred solution.⁵ Assuming these assumptions, a total investment of \$12,000,000,000 would be required to achieve renewable, sustainable, and reliable energy for the consumer. The decentralized configuration would distribute maintenance costs, as well as the initial investment, across the general population. The State of California could make this plan a reality through incentives to individual consumers and contracts with installers. The staggering sum, however justified downward, would likely exceed SDG&E's initial investment, although that amount is not known. However, such an equity investment in California's inevitable energy future now would probably be the most direct path to achieving the stated goals of California's energy mandate, while divesting Sempra of the energy monopoly toward which they are angling. Furthermore, it is quite possible that, when labor and maintenance costs are amortized into the initial investment of a consumer-based energy production system, the costs may ultimately be lower when compared to SDG&E's proposed solution.

Thank you for considering my comments.

Respectfully,

Donn Bree

⁵ *State Panel To Hold Powerlink Meetings*; San Diego Union Tribune, Harry Jones, 24 February 2008.