

Lower Cost Alternatives to Habitat Damage

The CPUC/BLM's³ Final Notice of March 16, 2007 Regarding Conclusions describes many instances of environmental consideration, which avoided building on or causing damages to wilderness sites, including the following alternative routes and items:

1. Interstate 8 Plan: Power lines have been planned to avoid the Anza-Borrego Desert State Park (ABDSP) areas along Interstate 8. The Anza-Borrego Desert State Park is also adjacent to our wilderness preserve's eastern boundary, without obtaining any similar consideration.
2. The Western Desert Alternative provides consideration for: "...land use impacts as well as impacts to BLM Flat-Tailed Horned Lizard (FTHL) Management Area." (p.4) This route was: "Eliminated because of potential conflicts with existing land uses, greater biological impacts, and regulatory feasibility of crossing through the Desert Range height restriction and/or obstruction-free zones." (p.5) Incidentally San Diego County has also implemented similar restrictions for steel tower construction to not exceed 80 feet in height, which undoubtedly will be irrelevant.
3. Imperial Valley FTHL Alternative: "Retained because it would avoid BLM Flat-Tailed Horned Lizard Management Area." (p.5)

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4. Huff Road Bullfrog Farms Alternative "Eliminated due to information on impacts to planned development and dairy calving operations." (p.6)
5. Anza-Borrego Link Alternatives "It is recommended for retention because it would reduce visual impacts within ABDSP, and it would reduce effects on State-designated wilderness, avoids cultural resources in Grapevine Canyon..." (p.6)
6. Use of 100 foot right of way, "...retained because it would not result in direct effects on State-designated wilderness and would not require a State Park Plan Amendment." (p.7)
7. Segment 1, Imperial Valley, "Eliminated because would affect more agricultural land... and traverse a much greater distance through Flat-Tailed Horned Lizard Designated Management Areas." (p.7)
8. Segment 4, ABDSP via S2 Alternative, "Eliminated because of the high-value scenic viewshed, greater amounts of bighorn sheep habitat..." (p.8)
9. Borrego Valley Alternative, "Eliminated because ...the route would be within very valuable bighorn sheep habitat, would be highly visible in the Borrego Valley and from Highway S22 scenic outlooks..." "The U.S. Fish and Wildlife Service has provided information on the high value of the Peninsular bighorn sheep population in Tubb Canyon and has stated its strong opposition to transmission line routes that could affect this federally-listed Endangered species. (p.8)
10. SR78 Julian Alternative, "Eliminated because would require difficult construction due to steep, rocky slopes ...would create a new transmission line corridor through Grapevine Mountain Wilderness Area" (p.9)
11. Overhead SR78 to S2 Central Alternative, "Eliminated... within State-designated wilderness adjacent to highways ...through the scenic and currently undeveloped San Felipe Valley." (p.9)
12. Warners S2 to SR79 Alternative, "Eliminated due to much greater visual impacts than proposed route." (p.10)
13. Santa Ysabel Alternative, "...would reduce visibility of new 230 kV lines through Santa Ysabel Valley..." (p.10)
14. Santa Ysabel Partial Underground Alternative, "Retained because visual impacts of the new line in Santa Ysabel Valley would be reduced. ...underground route would reduce fire risk..." (p.10)

15. San Dieguito Park Alternative, "Eliminated because would place the transmission line in a new corridor on pristine County Park land that is highly visible to recreationists, would cross Santa Ysabel Open Space Preserve, and would cross two parcels of the Santa Ysabel Reservation, which could create legal feasibility issues as well." (p.11-12)
16. Volcan Mountain Alternative, "Eliminated because it would transfer impacts from ABDSP to an equally sensitive preserve area, and because it would create a new corridor across Volcan Mountain Open Space Preserve. These areas are rich in biological and cultural resources and are important watershed areas. The line would be visible from a portion of SR78 and SR79, from the preserves which have many hiking trails, and from around the town of Julian." (p.12)
17. Oak Hollow Road Underground Alternative, "Retained because it would eliminate visual impacts to residents in the valley area east of Mt Gower Open Space Preserve." (p.12)
18. Segment 10, Inland Valley SR78 Alternative, "Eliminated because it would establish a new transmission line corridor along SR78, ...through agricultural land, and through designated critical habitat." (p.12)
19. Creelman Alternative, "Eliminated because it would transfer the impacts... in more sensitive habitat." (p.13)
20. West of San Vicente Road Underground Alternative, "Eliminated because underground construction would be required through the Barnett Ranch Open Space Preserve, resulting in much greater ground disturbance and effects to important biological resources." (p.13)
21. Coastal Link Alternatives, "Retained because it offers substantial avoidance to... Los Penasquitos Canyon Preserve." (p.13)
22. Los Penasquitos Canyon Preserve Alternative, "This alternative is recommended... because it offers a viable route to avoiding the Los Penasquitos Canyon Preserve." (p.14)
23. Northwest Corner Alternative, "Eliminated because of potential conflicts with existing vernal pool complex and other biological resources impacts." (p.15)
24. Mannix-Dormouse Road Alternative, "Eliminated because of potential conflicts with vernal pools..." (p.15)
25. Segment 14, Poway Alternative, "Eliminated due to the potential for increased biological resources due to the presence of critical habitat with effects on special

- status species. This alternative would also potentially affect natural resources within County of San Diego's Blue Sky Canyon Ecological Preserve. (p.16)
26. Scripps-Poway Parkway Alternative, "Avoids use of Los Penasquitos Canyon Preserve." (p.17)
 27. Mataguay Substation Alternative, "Existing roads would be used and less grading and earthwork would be necessary, resulting in less temporary and permanent habitat impacts and less of a potential to encounter known and unknown cultural and archaeological resources." (p.18)
 28. Mataguay Substation Alternative, "Eliminated due to new information about unmitigable impacts to Stephens' kangaroo rat..." (p.18)
 29. Warner West Substation Alternative, "Eliminated because of... high density of historical and archaeological sites..." (p.18)
 30. Route D Alternative, "This route would be about 6 miles shorter than the proposed route and is recommended for retention primarily because it would avoid Anza-Borrego Desert State Park." (p.19)
 31. BCD Alternative, "Recommended for retention because it would avoid Anza-Borrego Desert State Park..." (p.20)
 32. West of Forest Alternative, "Recommended for retention because it would avoid Anza-Borrego Desert State Park, as well as National Forest lands and other protected areas." (p.20)
 33. Route B Alternative, "Recommended for elimination because of the high scenic value..." (p.21)
 34. Serrano, Valley Central Alternative, "Eliminated because it would create a new corridor through highly sensitive areas of the Cleveland National Forest, resulting in substantial ground disturbance and visual impacts. This alternative would have environmental impacts as severe as those of the Proposed Project." (p.26)
 35. Valley-Rainbow Alternatives, "Due to potential land use impacts to national monuments, Roadless Areas on national forest lands, Indian reservations, the Beauty Mountain Wilderness Study Area, and ABDSP, no corridors are available that would reduce impacts in comparison to those of the Proposed Project. (p.26)
 36. Valley-Central Alternative, "Due to potential land use impacts to the Southwest Riverside County Multi-Species Reserve... a feasible corridor for this alternative has not been identified." (p.27)

We have identified no less than 36 occurrences where overhead high-power lines have been reconsidered to avoid wilderness sites. Apparently this is a standard policy, except in our case. We would appreciate knowing why this significant wilderness-nature preserve has not been afforded any consideration whatsoever, in spite of offering a number of suggestions and requests in person, as well as in written form that could encourage viable alternatives by establishing underground AC or DC power line routes under our highway easement and pavement, as well as by implementing any of several alternate overhead alternative routes.

Naturally we do not believe that a complete economic analysis will show that damages or environmental losses inflicted against San Diego County's wilderness areas, through the construction of approximately seven-hundred 160 foot high extra high voltage power line structures, will save any money compared to utilizing completely underground high-voltage DC alternatives. Only by declaring that all property in eastern San Diego County is of little or no value, including lands along Interstate 8 and other scenic highways, can 160 foot high power pylons specifically designed to support the sagging overheated aluminum cables be considered economical.

The full replacement or restoration value of wilderness habitat can be thousands of times higher than the commercial value of the same land. Naturally commercial appraisers will substantially ignore species diversity and habitat valuation, not being trained in botany, species restoration or habitat replacement cost evaluation. In fact extraordinarily few botanist have ever had any experience with successful habitat restoration. Such efforts can take decades of experienced labor to accomplish along with reliable automated soil monitoring and irrigation systems. The selection, boxing and transplantation of one large oak tree can easily take over a year to confirm its survival and cost over \$35,000 to monitor, transport, lift and transplant each tree, along

Powerlink environmental impacts, costs and overhead vs. underground AC and DC alternatives with at least a decade of continuous soil monitoring and a well-maintained automatic irrigation system, based on deep wells and significant electric resources or storage capabilities. With 80 such trees or clusters of native plants and natural objects on any acre, the cost of restoration could easily exceed \$3,000,000 per acre, and considerably more should there be any errors in judgment or lapse in maintenance. Nature makes billions of such decisions over millions of years to integrate a range of diverse species on every acre. Obviously the most carefully evaluated restoration plans might not come close to duplicating the complex interactions between the adaptation of species, climate and terrain, as exists in a wilderness setting.

Since such wilderness habitats are not commercially replaceable, the full restoration cost of this one preserve alone could easily exceed \$2.4 billion and take at least a century of intensive labor to organize and accomplish, which is mentioned just to put the nature of the impacts being proposed by San Diego Gas and Electric (SDG&E) into economic perspective, based on current habitat restoration and labor costs. Further if over 676 new pylons are utilized, plus access roads through wilderness regions to these 160-foot tall structures, with each impacting an average of only 2 acres, the environmental damages alone could exceed \$4 billion dollars, depending on terrain specifics.⁴ Of course we have noticed power lines in the Campo area, which have caused 5 times that impact, or about 10 acres of devastation per pylon. In addition even more extensive viewshed damages to wilderness areas may affect many hundreds of additional square miles of wilderness in some of the world's most extraordinary natural landscapes, which may exceed \$1 billion in losses, along with the commercial degradation of over 300 square miles adjacent to power lines, which may

⁴ On an area basis, undoubtedly some acreage will be considerably less costly to evaluate and implement restoration efforts, while trees for example in more difficult arid environments, which we experience in most of San Diego County, may require multiple attempts to establish along with a diverse native plant community, all of which has rarely been attempted or successfully accomplished.