

May 20, 2007

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

Re: Previous EIR Comment on Sunrise Powerlink, 2/20/07
to make correction and EIR Comment on Modified Rte D

Dear Billie Blanchard and Lynda Kastoll,

To follow up please, on the nineteen page EIR Comment that you recieved on the Alternative Sunrise Transmission Routes, from my husband and I, is of legal concern. On page 14, in the last paragraph was concern expressed for migrating flocks of birds mistaking tower lights for the stars that they use to navigate, and crash into the towers or lines. Instead of Nation Magazine, it is The Week Magazine, issue 288 and the Los Angeles Times that published the story. Causing the death of up to 50 million, not 500 million birds. Because, so many of the Alternative Routes are close to the border, and structure lights preventing helicopters from Border Patrols, (are going to be in the way of the birds at night) from crashing into them will be of necessity. Fire from helicopters are a factor in those remote areas as well.

Please be aware of the fact that I talked on the phone to someone from your office named Chen (?) who pulled our letter out of the file. He was given permission by me to white out the 2 corrections as to the quantity of the birds and the source. And to write in the correct information. Having this detail taken care of before the NOP process was completed from your office, assured us that the correct facts would be published in the draft. It is a minor detail in regards to the summary you acknowledged. There were concise points that we asked questions about and hope you realized the effort we made deserved the courtesy of being answered in the EIR. After all we may lose valuable property and a life's work should Sunrise Powerlink Transmission Route D be approved.

There is now a new "Modified Additional EIR/EIS Alternative Route D" that we just received in the mail postmarked May 16, 2007. The letter's says that we must comment by June 14th of 2007. You, the CPUC and the BLM are deceptive and not fair after the fact that "D" Route had been considered and eliminated. Not only had the fact that "D" Route south of Interstate 8 been announced as not on

the Alternative Routes, but it was publicly proclaimed in the San Diego Union Tribune Newspaper. I have written in my last comment letter about the fairness of how the CUPC and BLM are conducting this EIR/EIS process in getting the information out to the public in order to analyze data and contribute environmental concerns in compliance with the CEQA and NEPA. Statedly it is not fair to add this, just as you did before. Again, the deadline is too short. On this Modified Route D Alternative map, you have new areas where the people who own land, that can be taken by S.D.G.E. by eminent domaine, have absolutely no idea that you are proposing this for the Sunrise Powerlink Transmission Line. It's simply too late... This way you don't have to do any more work before the EIR Draft comes out. In which you will most likely lay down the ground rules that those question that you have decided are "Less than Significant Impact" will not be analyzed further in the EIR for the Final Draft. Therefore, you legally have set it up, to be off of any liable questions from late comers concerns, and are remiss.

This late "Modified Route D Alternative" is irresponsible. For the new areas you can bet that S.D.G.E. is not going to get a new scoping out and it looks like you are not going to, as well, in time to communicate environmental concerns before June 14, 2007. The gross map, you mailed us does not show the detail of the parcels affected. Do you or S.D.G.E. plan to contact all of these owners individually? This is America and it is not fair to the common citizen. It's difficult to understand the process.

Enclosed please find another 19 page document letter that we sent you on Feb. 20, 2007, on this new Modified D Route Alternative, parts of this may not apply. Certainly the argument about the environmental habitat for wildlife and the proximity to Wilderness, Cleveland National Forest and Bureau of Land Management lands are very important. Here, they (the species, Endangered and Special Concern, Rare) are doubly protected by cooperation with U.S. Fish and Wildlife and should be included on the EIR/EIS.

Please, would you include in the EIS/EIR document a study on vegetation? Would you please cover all sensitive species in the vicinity of the 300 foot clearance for the 40ft. deep structures that support the lines, maintenance line roads, and temporary access roads for construction? Please include the proposed 40 acre substation about 2 miles south of Modified Route D's western intersection with I-8. Please include the vegetation where the underground construction in Viejas Reservation and near and in Alpine Boulevard. Also from above the Manzanita Indian Reservation over to BCD-19.5 and the underground Buckman Springs Option of BCD routes. Again you are going through Cleveland Nation Forest has this been amended on the Forest's 2005 Land Management Plan? Because you added more on this map that is new, compared to the last Figure 8 map. It looks like you lowered the line between BCD-25 and BCD-15. It also looks like you changed B-C to Boulevard Substation and C south of I-8 to Campo's Cameron Substation to be part of Modified D Alternative Route. All the changes should

be re-evaluated for the Draft. Could you please include all the new changes, not just Modified D but all the other changes, like BCD that you have put in this new Modified D Alternative Map? In your EIR/EIS could you please include:

- Birds and Mammals
- Botany Plants
- Entomology
- Geology
- Herpetology
- Marine Invertebrates
- Mineralogy
- Paleontology
- Arthropods
- Reptiles and Amphibians
- Faults and Earthquakes
- Geology
- Wilderness Ethics ?

On this "CPUC/BLM Notice Regarding an Additional EIR/EIS Alternative to the Proposed Powerlink Sunrise Project", you state that comments that were received on "Route D Alternative" and the "West of the Forest Alternative" (with the exception of D Route North of 1-8) were eliminated because of risk of wildfires. Can you please pull all the eliminated comments back for this Addition?

Would you please include this Additional Modified Route D EIR/EIS the plant species know to this area as AcanthoMentha, AcanthoMentha provides delicate habitat supporting Quino Checkerspot Butterfly (Federally listed as Endangered)?

Would you please also include Calochortus dunnii, Dunn's Mariposa Lilly, which is also found in the areas of Route D and is listed Federally Species of Concern and California State Rare? Found in Chaparal and Closed Cone Forest.

Please have your team of Certified Biologists walk the entire route to check for these plants. Have them look for Nolina Interata, Dehesa Beargrass, Federally Listed Species of Concern and California State Endangered Listed; you will find this in the Mixed Chaparal areas and the Charmise Chaparal areas along D route.

Also look for Packeraganderi, the Senecio variety, commonly named Gander's Butterweed. This is a Federally Listed Species of Concern and a California State Rare Listed Species that the same Chaparal areas along D Route can be found.

The New Modified D Route is again (as mentioned in the 19 page previous letter) the habitat for many species that are Endangered.

The Southwestern Willow Flycatcher, the Least Bell's Vireo, the Coastal California Gnatcatcher, the Bald Eagle, the Golden Eagle (of which we only have 35 pair nests in the County), the Peregrine Falcon, the Cattle Egret, ^{and} the Least Bittern are of concern. With these birds any presence may effectively evict them from their habitat. A frightened bird may abandon its home permanently. Eggs left even for a short time in this area may spoil on exposure to the ambient temperature. Hatchlings also are susceptible to temperature changes and parents may not return to feed them. Moreover, eggs can be preyed upon by predators when the parents are frightened from the nests. That nesting time can be anywhere from February to September for some of these species.

This is of concern for the Arroyo Toad, Federally Endangered which we mentioned on pg. 13 and 14 of our previous 19 page letter.

Again, we are oppose to the Sunrise Powerlink Transmission Line and all Alternatives.

Sincerely, Bill Davis and Shannon Davis

Bill and Shannon Davis
1185 East Lane
Imperial Beach, CA 91932

Feb. 20, 2007

Attached was a copy of the Davis' February 20, published in the March 2007 Scoping Report. We have reproduced the first page only.

Kastoll, BLM

235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Billie Blanchard and Lynda Kastoll,

We wish to express our opposition of the S.D.G.E. Sunrise Powerlink Transmission Lines and all of the Alternative Routes. Not only the ethical questions of why we believe it should not be approved, but also our concerns of possible environmental impacts in the location areas of each of the alternatives. We also are concerned about the response time for commenting on the Alternative Routes, with a deadline of Feb. 24, 2007 for the EIR/EIS.

In all fairness to the average citizen, who may have property, that could be "taken" on an existing 69 kv electrical line Right of Way, and is not aware of the Proposed Alternative Routes of the Sunrise Powerlink Project, more adequate time is needed for understanding, in order to respond. Presentations by S.D.G.E., in which some Community Planning Groups became aware of the Alternative Routes running through their Communities has barely been completed, when a new round of Alternative Routes has now come out as of Feb. CPUC and BLM Scopings. Some of the Communities got their first looks at maps, not showing specific details, too late to respond on