

Comment Set G0014
California Botanical Habitat
(Portions of this comment appear on DVD only)

Sunrise A.06-08-010

Statement

Southeastern Communities Review

Statements regarding the Recirculated Draft Environmental Impact Report / Supplemental Draft Environmental Impact Statement, of July 2008

**San Diego Gas & Electric Company's Sunrise Powerlink Project
(Applications A.05-12-014 and A.06-08-010)**

**To: The State of California Public Utilities Commission
and The Bureau of Land Management**

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From: CBH, P.O. Box 1032, Hemet, California 92546, August 25, 2008

California Public Utilities Commission, Public Advisor's Office at: CPUC Public Advisor, 505 Van Ness Avenue, Room 2103, San Francisco, CA 94102; or call 1-866-849-8390 or 1-415-703-2074; or email public.advisor@cpuc.ca.gov.

Provided within the comment period ending August 25, 2008, which Susan Lee of Aspen Environmental said, at the August 4th 2008 meeting in Jacumba, would be extended at least 3 days, since considerable congestion would be expected at their email servers which could block their ability to receive emailed comments. Since Acrobat's compact version of this document is 10.94 megabytes an alternate email address was provided by Mark Tangard: mtangard@speakeasy.net in case Aspen's email server failed.

This document continues with part 2, titled: The Southern Route



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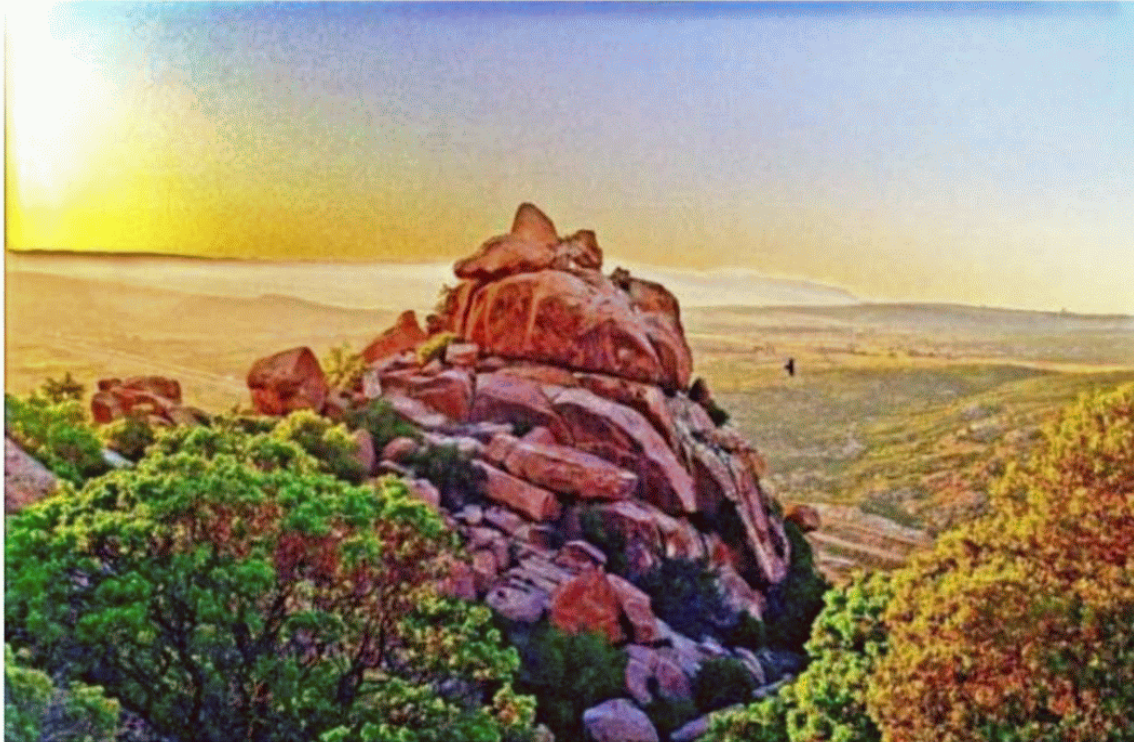
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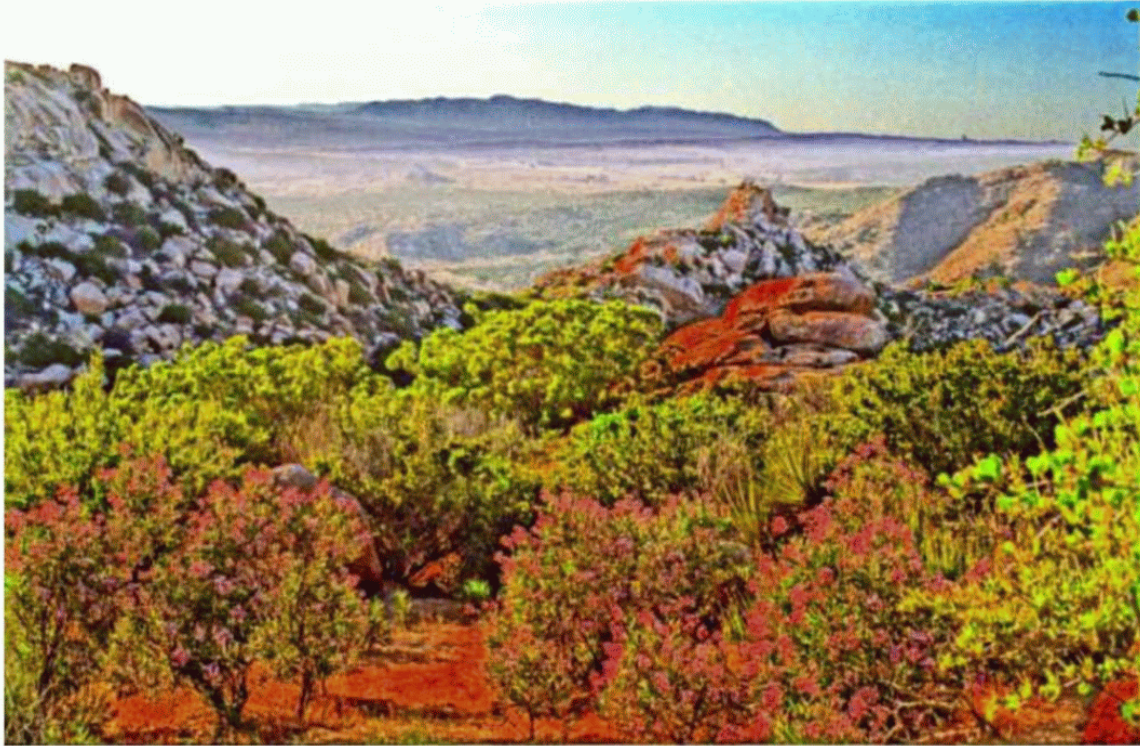
Anthropological Nature Reserve, Research Center and Recreation Area at Bankhead Springs California, elevation 3615 feet, overlooking Interstate 8 west and the McCain Valley (BLM) in the background. Mountain tops devastated by huge pylons and array of hot sagging power lines extending 170 to 450 feet overhead crossing our valleys, continuing across the McCain Valley to damage land held in public trust.



Looking northeast at sunset toward the adjacent ABDSP

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Evening beyond the northwest valley, above the McCain Valley in the background



Southeastern communities

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Introductory Comment

As an Anthropological Nature Reserve with viewshed and boundaries which are visible by over 6 million people each year, over 3.25 miles along Interstate 8 and 4.25 miles along Old Highway 80, which is adjacent to the southern boundary of the Anza Borrego Desert State Park, we are concerned with the impacts proposed by San Diego Gas and Electric (SDGE) which would place 170 tall pylons on top of our mountains over 450 feet above our valleys, suspending array of hot sagging 500,000 volt power lines across our valleys, as well as bulldoze numerous access roads and clearings through an extraordinary and vulnerable landscape, severely and permanently devastating our wilderness, research, construction and recreational areas, all in violation of the California Environmental Quality Act (CEQA)¹, particularly when there are several easier to implement, lower cost alternatives that cause no damages, which have not been reviewed or considered by the CPUC or SDGE.

We are also concerned that if new environmental data and alternatives are not considered and that existing choices, particularly along the southern route, which have not been well researched or considered, are then implemented, that the results will be devastating to the region.

We have expended considerable efforts, to describe proven technological alternatives that are safer, nondamaging to the environment or property, and provide greater capacity,

¹ CEQA Compliance (Rule 2.4 of Article 2 of CPUC Rules of Practice and Procedure), and the California Environmental Quality Act, Public Resources Code Sections 21000 et seq. and the guidelines for implementation of CEQA, California Administrative Code Sections 15000 et seq.

² **(After governor touts Sunrise, his cause gets Sempra cash, By Bruce V. Bigelow , UNION-TRIBUNE STAFF WRITER, May 10, 2008)**

Sempra Energy gave \$50,000 to one of Gov. Arnold Schwarzenegger's pet causes last month, just days after the governor complained publicly about activists impeding the Sunrise Powerlink proposed by San Diego Gas & Electric Co. Page 6

A SDG&E spokeswoman said yesterday there is "no connection" between Schwarzenegger's

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all at a lower cost. The fact that a utility company is willing to devastate the environment, damage private property and people's lives and that the CPUC can't or doesn't inhibit those actions or compel the utility company to pay for all its damages is catastrophic to California and its people. Apparently, the review process has not addressed any of these issues, and has not so far, encouraged an economic or engineering analysis that can be implemented by SDGE or Sempra Energy so that a nondamaging power line alternative could even be defined and considered. Naturally the review process has not yet been completed, and so we are asking that the CPUC review process continue until these issues have been studied and addressed without needless damages to people, business or the environment. Placing the Commissioners conclusion ahead of completing the review process presents a predicament, and so far may not allow the consultants assembling the final environmental document to provide functional alternatives, based on a full and complete analysis, which should include a review of the environmental impacts, the technological and economic issues that can help determine if business, people and the environment will be offered any beneficial or nondamaging conclusion. Unfortunately without thoroughly understanding these issues and without any personal incentive to be considerate of the extraordinary wilderness in this region, then apparently a review based on understanding, developing nondamaging alternatives, hearing the clearly articulated needs of the people of this region, or even following the law, will become an automatic and expected impossibility.

G0014-1 cont.

These are not trivial technological or environmental issues that can be effectively addressed in the 1½ minutes that were allowed through CPUC participation, after traveling hundreds of miles, and spending thousands of hours researching and documenting the issues. So, we hope that the nondamaging alternatives, which incidentally, in total, cost less than the damages proposed, will be provided as nondamaging opportunities, hopefully to be considerate of this region and the thousands who have asked the CPUC to uphold its obligations to our extraordinary environment and the people, who have clearly asked for

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these environmental protection as defined in the California Environmental Quality Act, which incidentally has not yet occurred.

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Why would governor Schwarzenegger, Donald Felsing of Sempra Energy or the Commissioners care if the people of California want their environment protected and the laws of California upheld, after all the people are always the ones who pay for every Sempra Energy and SDG&E expense, along with the salaries of each government employee. So why would the governor choose to oppose the expressed interests and the needs of the people, in favor of causing damages that will actually cost far more? A thorough economic review is necessary to be understand the magnitude of the damages being proposed and the effectiveness of any alternatives, and while clearly is an essential requirement of the review process, it has been intentionally avoided. Nevertheless, I have only been amazed how the staff and consultants claimed they could not assemble the available economic data, not just for all the massive damages that are being proposed against the people and the wilderness of this region, but for each alternative that could both save money and completely avoid causing this extraordinarily adverse impact and permanent injury to one of the most beautiful parts of California.

To be of assistance I have included our own economic summary of environmental, property, business and home losses, medical hazards and losses of life, costs of overhead AC transmission versus underground DC transmission, maintenance expense, upgrade costs, future transmission load estimates, geology and habitat restoration costs, erosion and restoration on 9,000 acres of SDG&E roads and clearings, equivalent property replacement costs, power line fire ignitions and losses that exceeded \$4 billion in 2007, aircraft hazards, affects on recreation and tourism, replacement values, attorneys, legal research and collection costs.

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We also wish to offer our respect to the people who try to open the CPUC review process toward greater understanding, along with their consideration to eliminating damages and to help reimbursing all expenditures and losses, and we suggest no form of criticism related to their efforts anywhere in our documentation. However, like anywhere else most people know that there are many more employees and consultants, who may not be as concerned about any damages being caused, nor have the time or the personal interest needed to understanding the myriad of details, nor have much regard for any nondamaging alternatives, nor any real interest in protecting the people or the environment, nor any willingness to support our beneficial laws, nor limit damages, or reconsider major injustices, perhaps in order to protect their personal time and not be inconvenienced at work, or experience social pressures. Unfortunately, their lack of consideration has clearly imprinted their tolerance of massive damages against the people and the environment of California, that some might say was complicit behavior, in order to create a massive boilerplate document that so far can be interpreted as supporting the extraordinary damages being promoted by SDG&E, which ultimately encourages an obsolete, very costly and damaging technology (overhead 500 kV, 230 kV & 69 kV high power lines), which reduce transmission efficiency, which is particularly relevant over long distances, while lowering capacity, increasing maintenance and decreasing reliability, all of which is economically damaging to the interests of SDG&E and Sempra Energy. This for example, means that 7 massive 500 kV power lines are required to do the job of 1 DC power line as is being implemented in China (6,400 megawatts at 800 kV DC), which could be installed under any of 7 different county highways.

G0014-1 cont.

No doubt most American executives would be far too busy to consider evaluating any of the technical or economic details of their \$1.4 billion dollar project, or consider how many more billions of dollars in damages that they would be needlessly inflicting against the people and the environment could be easily averted. Like yourself, I can't change human nature,

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however, I can work toward uncovering the details of a damaging situation, study a number of solutions and present those observations in a way that anyone could easily verify. Naturally, if any question might arise, I could help address any unclear or unresolved issue at your convenience. Unfortunately, damages on the scale proposed will regrettably inflict irreversible scars against our irreplaceable natural resources while seriously damaging the future of many communities in the region. So I will start by providing a few images of our paleoanthropological reserve to offer unfortunately only a very limited view of our wilderness area, its natural stone walkways, mountain gardens, sculpted caves, pure blue sky and wonderful views of distant valleys and mountains to the most distant horizons, where you can occasionally see rare and amazingly beautiful creatures that we have never seen before, and find the ancient artifacts of a humanity that understood this world intimately and knew how to live without causing the slightest damage. This is an ancient living treasure that predates our own history, with more extraordinary sculptures than in almost any museum, crafted by nature over millions of years.

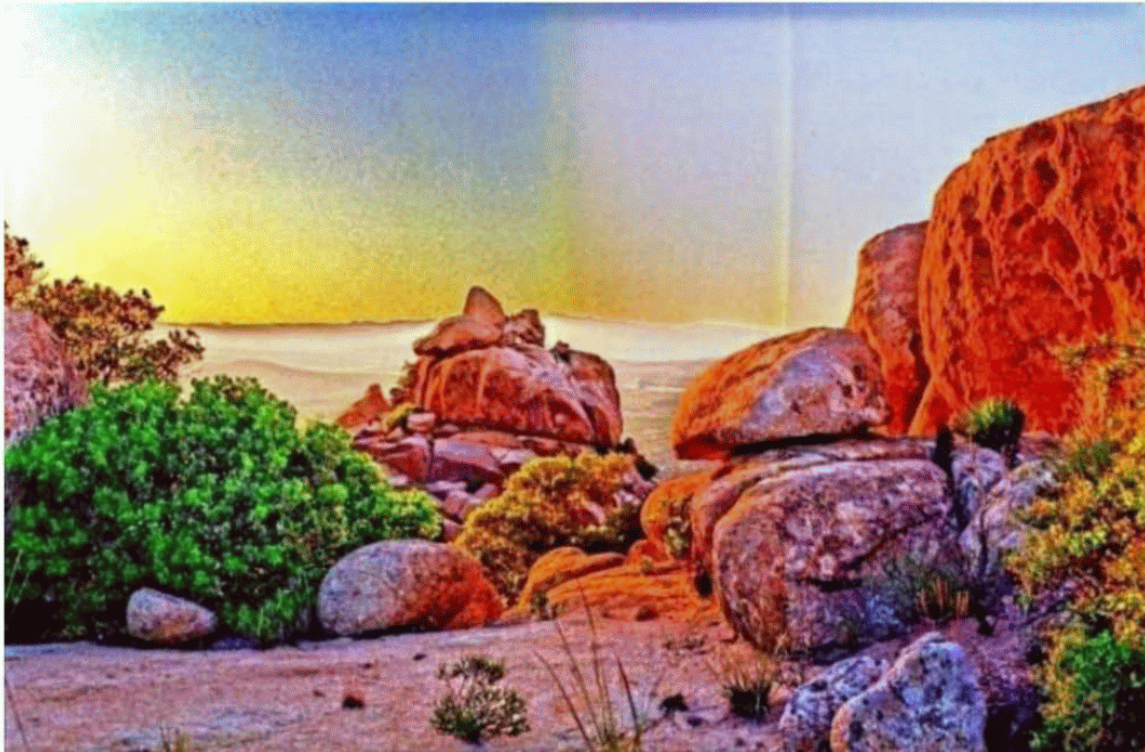
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Manzanita and flat granite

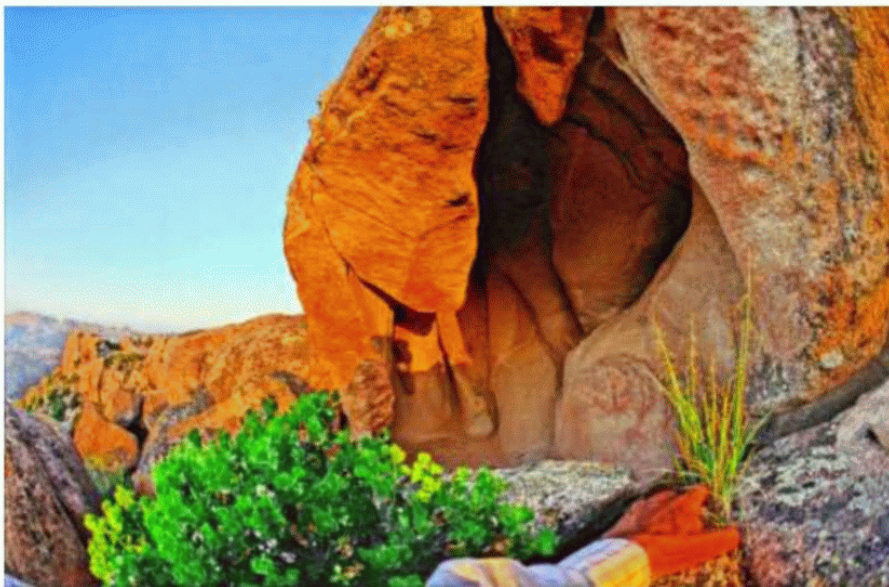
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Western point illuminated at sunset, above McCain Valley in the background



Mountain top cavity, northeast view, with ABDSP to the left, photo May 1993

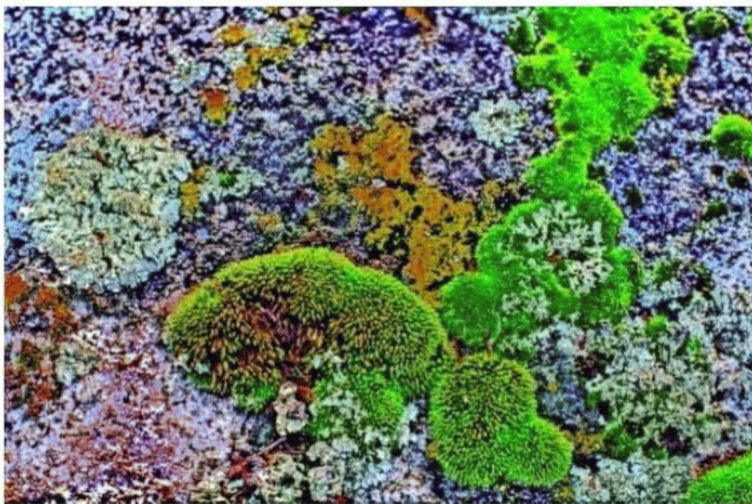
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Mountain top garden after sunset, looking west toward Boulevard California, Old Highway 80 in the upper left, 3585 foot elevation, 180 degrees diagonal view



Soft rock coverings: Lichen symbiosis, an algae/fungal partner & photobiont

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Statements

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There are several significant matters that have been omitted from consideration by the CPUC documentation titled: Environmental Impact Report / Supplemental Draft Environmental Impact Statement.

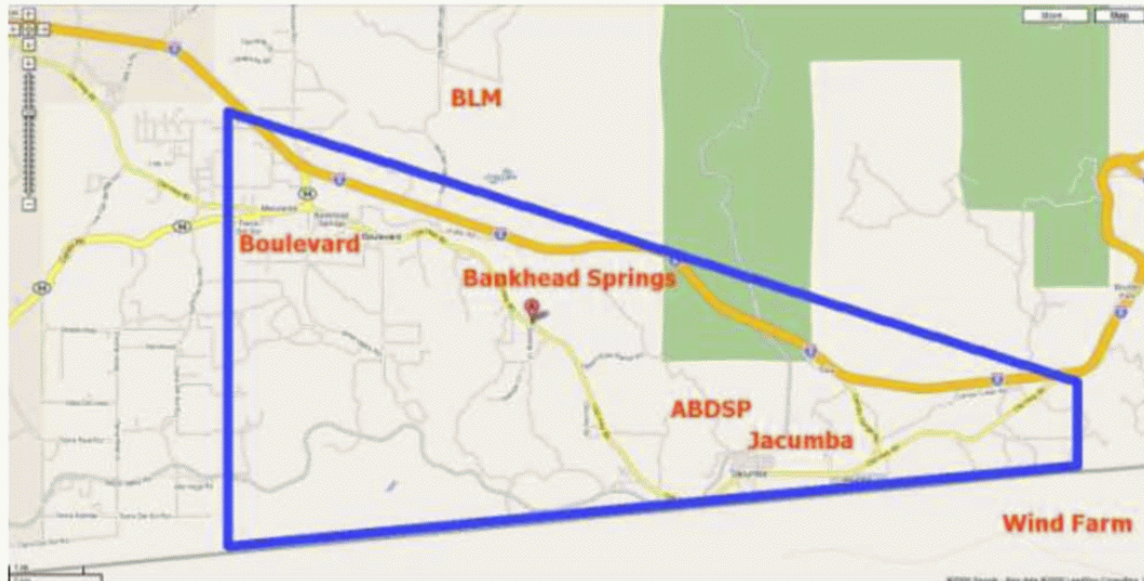
Measurements of environmental and property impact, including equivalent replacement costs, full restoration costs, health risks or number of lives that will be lost as a result of electromagnetic fields (EMF) and exposure to ionized pollutants which are responsible for a high incidence of lung cancers downwind from high power lines, and most significantly no review has been provided for a nondamaging underground power line which is still required under the California Environmental Quality Act (CEQA).

The proposed 100 foot tall structures, which would be the height of a 10 storey building designed to carry the 69kv power cables, which were the proven source of major fires last year costing thousands of homes and over \$3 billion in losses, is now depicted on the newest CPUC maps which follow. These new 69kv high power lines are designated for a variety of routes to deliver power from the Jacumba substation through Bankhead Springs to the Boulevard substation, in addition to the 230kv power lines from the Jacumba substation to the wind farm in Mexico, all of which would impact over 45 square miles (> 28,800 acres) of ranches, homes, property, business, viewshed and wilderness habitat, with a restoration and equivalent replacement value that would exceed \$3 billion for *just compensation* as required by law, and significantly more if medical costs and losses of life were to be included.

Further the routes shown on the following two maps, illustrate the 69kv, 230kv and 500kv power line routes, as well as the property that would be crossed which is dedicated to or held by the Anza Borrego Desert State Park and the Native American People or reservations.

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45 square mile substation and new power line impact area for Jacumba, Bankhead Springs, Boulevard and the southern Anza Borrego Desert State park, based on new 69 kv, 230 kv and 500 kv power lines.

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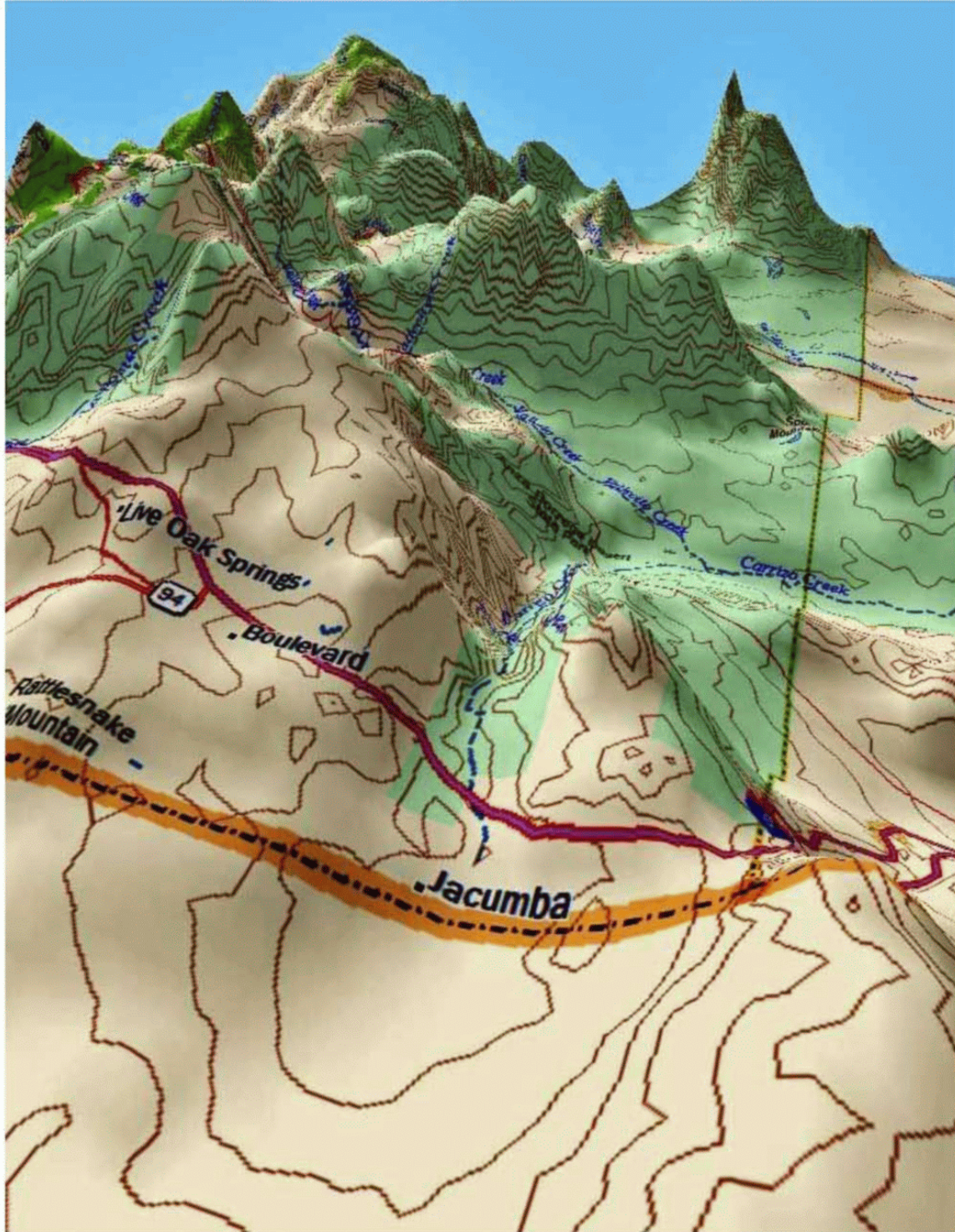
The following 3-D relief map with exaggerated elevations shows Interstate 8 from Imperial County at the east (right), past Jacumba, Bankhead Springs, Boulevard and Live Oak Springs, to the west (left). The elevations illustrate the extremely clear visibility of high power lines through the valley and along ridge lines.

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The 3-D map also shows the clear views of the area designated for the huge wind farm with 500 turbines up to 500 feet in height, incidentally as tall as some of the tallest buildings in San Diego, or San Francisco for that matter, that will all be visible throughout the region from Imperial County, throughout Jacumba, Bankhead Springs, Boulevard, and beyond Live Oak Springs to the west. The ridge for the wind turbines is in the lower right corner of the picture, again elevated on top of a ridge, which would also insure immediate visibility at great distances throughout the region. Placing the wind farm 10 miles further south, which is a remote and unpopulated region, as a condition to bringing power into the U.S. would benefit San Diego County, and cause no disadvantage to Mexico. On the next map we can see that this ridge extends southeast into Mexico well over 45 miles, so there's no shortage of space for wind farms in this area.

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