

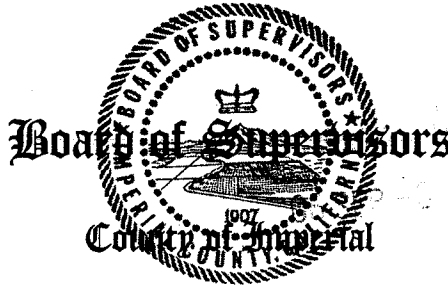
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September 5, 2006

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Ave.
San Francisco CA. 94102

RE: A.06-08-010 Sunrise Protest to Application

Dear Mr. Director:

I would like to take this opportunity to formally voice the Imperial County Air Pollution Control Board of Director's (ICAPCD Board) concerns and opposition to the proposed new construction of electrical transmission lines and other system upgrades to be constructed between Imperial Valley Substation and San Diego.

In the Notice of an Application for a Certificate of Public Convenience and Necessity, it explicitly states that the existing Imperial Valley Substation would be modified to accommodate one new 500 kV transmission line. The ICAPCD Board is very concerned that if these proposed modifications to the existing I.V. substation are completed, and available transmission capacity is increased, that this project will become a platform for building additional fossil fuel burning facilities just south of the border in the Mexicali Valley area that do not have to meet the same stringent air quality standards as they do in California. The end result could be further degradation of air quality in Imperial County, which does not meet several state and federal air quality standards, and exacerbate the negative impact on the health of the residents in Imperial County.

The Imperial County Air Pollution Control District (ICAPCD) has previously submitted opposition comments on transmission line project's that were proposed and subsequently approved by the applicant, San Diego Gas & Electric Company (SDG&E) [Environmental Assessment (EA) reference

Nos. CA-42892 and CA-42893, letter dated September 26, 2001, to DOE and also a letter dated October 8, 2001 re: application 01-09-007] as it pertained to accommodating two merchant transmission lines to connect the power generating facilities being built in Mexico by Sempra Energy Resources and Baja California Power, Inc. (InterGen) to the electrical power grid operated by SDG&E in southern California.

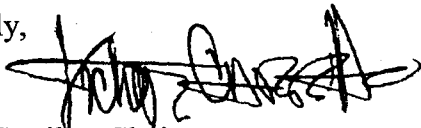
The ICAPCD Board's main focus continues to be protecting the health of the border region residents. Once again, it is our feelings that increased transmission capacity availability at the I.V. Substation will promote additional power plant construction the Mexicali Valley area that do not have to meet the same stringent air quality standards in California that includes offsetting their associated emissions. A fortified example of this is evident by Sempra Energy's continued reluctance to offset their air emissions associated with their Termoelectrica de Mexicali (TMD) facility located just south of the border that currently utilizes the I.V. Substation to transmit power from their facility into the Southern California electrical grid. The ICAPCD Board will continue to oppose any electrical energy generation project or portion of a project that does not implement Best Available Control Technology (BACT) and does not offset their emissions or pay in-lieu of fee to be used to offset those emissions that may impact Imperial County and its residents.

The ICAPCD Board feels that any facility that utilizes existing or any proposed transmission lines that run through Imperial County, and may impact Imperial County air quality, should install and maintain Best Available Control Technology (BACT) on all sources to mitigate emissions to the best available levels and also offset their emissions to California standards.

It should be noted that the ICAPCD Board does support renewable, green energy projects provided that they too meet all the applicable standards as expressed above.

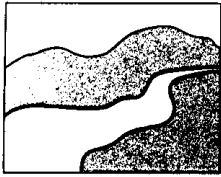
In Closing, the ICAPCD Board urges the California Public Utilities Commission to carefully consider all submitted comments in regards to the proposed Sunrise Powerlink Transmission Project and make it a priority to take into account the health and well being of the residents of Imperial County and the border region.

Sincerely,



Victor Carrillo, Chairman
Imperial County Air Pollution Control Board

cc: Imperial County Board of Supervisors
Jurg Heuberger, Planning Director, Imperial County
Robertta Burns, CEO, Imperial County
Ralph Cordova, County Counsel, Imperial County



San Dieguito River Valley
Regional Open Space Park
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October 18, 2006

Billie Blanchard, CPUC
Lynda Kastoll, BLM
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

**Subject: NOP Comments for SDG&E Sunrise Powerlink Project
EIR/EIS**

Dear Ms. Blanchard and Kastoll:

Thank you for the opportunity to comment on the NOP for this important project. I have included a copy of the San Dieguito River Park Concept Plan for your reference and use in preparing the EIR/EIS. We appreciate SDG&E's recognition of the San Dieguito River Park's Focused Planning Area (FPA) shown in Figure 4A of the NOP. However, we are concerned that these large steel powerline structures are proposed with the San Dieguito River Park. Specifically, the Sunrise Powerlink Central Link travels through the River Park's FPA. As shown in Figure 4A, the powerline is proposed in a north/south direction through Landscape Unit M-Santa Ysabel Valley of the FPA just west of Highway 79 and south of Mesa Grande Road (see Concept Plan, Figure 4E and pages 61 and 63). The proposed powerline route also crosses the planned Coast to Crest Trail alignment (Concept Plan, Figure 2). Approximately 26 miles of the Coast to Crest Trail is complete and another 3 miles are due to be completed within the next two years. The Coast to Crest Trail is also included in the County of San Diego General Plan and Regional Trails Plan, as well as the State's trails plan. The most recent addition to the Coast to Crest Trail is an 8-mile long segment through the County's Santa Ysabel Preserve from Highway 79 to Farmer Road. The County intends to extend the Coast to Crest Trail through the western Santa Ysabel Preserve just west of the proposed powerline route.

The JPA recognizes the need for public facilities that may be constructed within the FPA. Page 19 of the Concept Plan discusses the issue of new public facilities that may be constructed in the FPA in the future. The Concept Plan states that these facilities should be constructed in a manner "that minimizes environmental impacts, complies with CEQA, avoids impacts to existing and/or proposed park amenities, and to the extent feasible, is compatible with the goals and objectives outlined in the Concept Plan".

We request that the EIR/EIS for this project address the following environmental issues:

- Consistency of the powerline project with the San Dieguito River Park Concept Plan including the Park Objectives and the Coast to Crest Trail.
- The proposed powerlines will significantly disturb the pastoral setting and visual quality of this scenic area. Public views from Highways 79 and 78 will be impacted as well as views from future trail users along this route. The EIR/EIS should address project compatibility with the scenic drive and future trail users including visual quality and safety.
- The EIR/EIS should quantify the exact placement of the powerlines and associated maintenance roads in order to determine impacts to the scenic views.
- Besides quantifying impacts to habitat from construction of the powerlines and roads, the EIR/EIS should also evaluate how the lines may impact wildlife corridors, avian flight patterns, and animal behavior in the vicinity of the project both permanently and temporarily during construction.
- Since it would be impossible for the Powerlink project as proposed to avoid crossing the FPA since the route apparently must travel in a north/south direction at some point to access central San Diego County, SDG&E should mitigate for this impact in ways that would further the goals and objectives of the San Dieguito River Park as suggested below under Potential Mitigation Measures.
- The JPA strongly opposes the Powerlink alternative alignment through the Central Link that proposes a route along the western edge of the Santa Ysabel Open Space Preserve and along land recently purchased by the JPA for the San Dieguito River Park with public funds.

As requested in the NOP, we suggest the following as potential Mitigation Measures:

- Mitigation land should be purchased by SDG&E not just to mitigate for lost habitat, but to preserve additional land in the FPA to mitigate

for significant damage to the scenic nature of this area. The magnitude of the visual impacts to public views from large steel towers intruding in this pastoral setting warrants mitigation that is commensurate with the impacts such as a substantial contribution to further the creation of the San Dieguito River Park in this area.

- Consider undergrounding the poles west of Highway 79 as a project alternative or mitigation measure.
- Site the poles west of Highway 79 along the toe of slope so that they are less visible against the backdrop of the hillsides in the area.
- Consolidate existing powerlines within the new route and remove old poles to improve the visual quality along Highway 79.
- All mitigation land for impacts within or adjacent to the FPA should be located within the San Dieguito River Park east of Lake Sutherland.
- Project approvals should include a legal right-of-way or easement allocation for the future alignment of the Coast to Crest Trail within the SDG&E Powerlink right-of-way.

We hope that appropriate measures will be incorporated into the project design to reduce impacts to the greatest extent possible and that the EIR/EIS will include aggressive mitigation measures to minimize the significant impacts this project is guaranteed to create. We also hope that the CPUC recognizes the public benefit of the San Dieguito River Park and this scenic area when assessing project impacts and suggesting mitigation.

Thank you again for considering our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawna C. Anderson". The signature is fluid and cursive, with a large loop at the end.

Shawna C. Anderson, AICP
Environmental Planner



San Dieguito River Park Concept Plan

**SAN DIEGUITO RIVER PARK
JOINT POWERS AUTHORITY**



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ADOPTED FEBRUARY 18, 1994
UPDATED FEBRUARY 15, 2002