



County of San Diego

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October 20, 2006

Ms. Billie Blanchard
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Ms. Blanchard,

The County of San Diego (County) has received and reviewed the Notice of Preparation/Intent for the Sunrise Powerlink dated September 11, 2006 and appreciates this opportunity to comment. In response to the document, the County has comments that identify the potentially significant environmental issues that may have an effect on the Unincorporated lands of San Diego County, reasonable alternatives, and mitigation measures that the County will need addressed in the environmental document.

The County is the land use authority in the Unincorporated area of San Diego County. The public looks to the County to establish regulations which guide reasonable and environmentally sensitive growth, especially in current rural communities, like Ocotillo Wells, San Felipe, Ranchita, Lake Henshaw, Mesa Grande, San Ysabel, Witch Creek, Ballena, San Diego Country Estates, Barona Mesa, Irving's Crest, Shady Dell, and Fernbrook. The County's interest is also in maintaining the quality of County road right-of-ways and public facilities, and the recreation value of the Los Peñasquitos, Sycamore Canyon, and Mount Gower Open Space Preserves as well as other parks and preserve areas.

Staff from the Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and the Department of Parks and Recreation (DPR) have reviewed and identified certain issues that should be analyzed in the EIR/ EIS. Most significantly, the County is concerned with the project infrastructure including the transmission lines as well as the proposed substations, project purpose and resulting growth inducement.

In the Unincorporated area, the proposed infrastructure will have the potential to degrade the quality of the environment, including the visual, biological, archaeological/paleontological, and geological environment; it will have adverse land use compatibility (agricultural and rural), air quality, water quality, noise, and traffic impacts; and it will likely result in cumulatively considerable and significant indirect impacts because of the project's large scope and its stated objectives (development of alternative energy sources and transmission of a major energy supply).

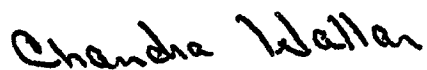
In the Unincorporated area of the County, the project may be growth inducing because the project will remove barriers to growth. These effects are magnified by the fact that it is the Unincorporated area that will have undeveloped land to feel the effects of growth in the future.

The EIR/ EIS must explicitly analyze environmental impacts caused by proposed infrastructure including, but not limited to, the poles and pole lines, substations, staging and laydown areas, construction and maintenance roads, methods, timing, and duration of construction and maintenance, fire fuel modification, and indirect impacts that the project could have with respect to increased wildfire, human access, and health and safety. The EIR/ EIS must also analyze environmental impacts to traffic, biological and cultural resources, air quality, and other impacts that will result from the significant growth induction that would result from this project.

The comments attached to this letter are meant to guide analysis on these issues and are identified by subject matter.

Please feel free to contact Dahvia Locke, Environmental Resource Manager with the Department of Planning and Land Use at (858) 694-3075 with additional questions.

Sincerely,

A handwritten signature in black ink that reads "Chandra Wallar". The signature is written in a cursive, slightly slanted style.

CHANDRA L. WALLAR
Deputy Chief Administrative Officer
Land Use and Environment Group

County of San Diego
Comments on the Sunrise Powerlink Notice of Preparation (NOP)
October, 2006

Project Description

The project description and impact analysis should include the proposed energy sources and projected impacts. In addition, the Lakeside Planning Area should be included as a community that the project will traverse.

General Comments

The County requests several changes to the existing project maps for the purposes of any future publications related to the project including the EIR/ EIS. The EIR/ EIS and other documents should include maps of the proposed alternatives including the following base information: 1) County parks, 2) locally & regionally significant preserve lands, and 3) existing lattice towers. This additional information is important to demonstrate the position of the proposed routes relative to important land uses.

In addition, the NOP notes the anticipated impacts of the project for each link, but does not provide total calculations or impacts to specific vegetation types or land use types. The EIR/ EIS should provide the following information up front in a tabular format: 1) the total acres impacted for the project as a whole including all impacts for roads, construction (temporary impacts), etc., 2) anticipated impacts by vegetation type, 3) quantifiable impacts to County Parks and Open Space Preserves.

Also, the EIR/ EIS should examine the *whole* of the project per the California Environmental Quality Act (CEQA) [Sec. 15378 (a)] including the potential impacts of the power generating facilities that the project (as currently defined) will be dependent upon.

Finally, a close examination of the viability of the proposed technology should be included in the EIR/ EIS. A range of power-generating alternatives to the project should also be considered, potentially including the Million Solar Roofs plan and other ground-breaking solutions for providing clean energy to the San Diego region in keeping with the Regional Energy Strategy.

Suggested Alternative Routes

The County has concerns about the preferred route as well as several of the alternatives that have been delineated through the central portion of San Diego County. While the preferred route cuts through Anza Borrego State Park, a number of the other alternatives traverse important biological areas under Forest Service and State Park ownership, particularly on the western slopes of the Cuyamaca Mountains and lands east of Ramona and Alpine in the central portion of the County. If the No Project Alternative is infeasible, the County suggests alternate routes for the proposed project be considered to the far north outside of the County or far southern portion of the County. Specifically, the County suggests that the co-location of the project with Interstate 8 in strategically selected locations to avoid visual impacts in key areas such as Buckman Springs Valley

and Cameron Station or near the existing Southwestern Powerlink along the U. S. - Mexico border.

If less impactful alternatives to the overall project are not available, and if the Powerlink is determined to be necessary, the County would recommend the consideration of an alignment alternative that follows the existing right of way alignment through Santa Ysabel. The County would also request that if the alignment traverses Mt. Gower Preserve, it be undergrounded for the entirety of that segment, along with all associated equipment. Under this scenario, the potential negative impacts of this alternative to natural and rural lands west of State Route 79 should be fully examined.

Aesthetics/ Visual Impacts

The project is likely to create significant visual impacts to community character and to unique and pristine viewsheds. This is a particular issue in natural areas and in remote places like the Santa Ysabel Valley as well as County, State and Federal park and preserve land that is not visible from main roads.

Additional impacts may include potential conflicts with the County of San Diego Dark Skies policy. This is especially important in the evaluation of the impacts of the proposed substation on the north end of Volcan Mountain. Impacts to dark skies should be examined in the EIR/ EIS, particularly as they affect the work performed at the world-renowned Palomar Observatory.

Furthermore, the size of the industrial style facility for the Central East Substation and the massive landform modification due to grading for the substation pad would represent a severe departure from the rural and wildland habitats that currently exist in the region. It would be the most intense development in the central portion of San Diego County. The facility, the associated grading and the continuous operation that would involve lighting and service uses would be extremely intense for its location.

Agriculture

San Diego County boasts the fourth highest number of farms of any county in the country and the third highest number of farms of any county in California. San Diego is the only major urban county with a farm gate value¹ consistently ranked among the top 10 agricultural counties (number 8 for several years) in California. Farming occupies over 250,000 acres of land within the unincorporated County and is the fifth largest component of San Diego region's economy with a total economic impact of more than \$5 billion. The County values agriculture's contribution to the local economy, the rural lifestyle, and to habitat conservation programs, and has adopted Board Policy I-133 to support and encourage farming in the unincorporated County.

¹ The farm gate value of a cultivated product in agriculture or aquaculture is the net value of the product when it leaves the farm, after marketing costs have been subtracted. Since many farms do not have significant marketing costs, it is often understood as the price of the product at which it is sold by the farm (the farm gate price). The farm gate value is typically lower than the retail price consumers pay in a store as it does not include costs for shipping, handling, storage, marketing and profit margins of the involved companies.

The proposed Sunrise Powerlink may present both direct and indirect impacts to agriculture. Under the proposed route scenarios agricultural lands will be reduced by the construction of substations and/ or other infrastructure on existing grazing lands such as those in Santa Ysabel and South of Warner Springs. Increased human activity at substations and other infrastructure is also likely to disturb grazing cattle and reduce the likelihood that they will utilize nearby areas, effectively reducing the amount of viable grazing land remaining in these locations.

Changes to the visual character of the area resulting from the construction of large lattice towers, substations and overhead powerlines may alter the community character of predominantly rural and agricultural areas. This may indirectly reduce the long-term viability of farming in several capacities; 1) by adversely impacting actual and/ or perceived land values such that engagement in agricultural activities is considered to be a greater economic risk to farmers and is thus less desirable as an occupation, 2) by downgrading the experience of the rural community character that is widely considered a valuable element of the agricultural lifestyle. All reasonably foreseeable impacts to community character and the economic impacts of the loss or relocation of agriculture should be considered.

Biology

The EIR/ EIS should adequately address any potential impacts to the large number of sensitive species and cultural resources occurring in the project footprint and surrounding areas where relevant. While the PEA indicates that the infrastructure has flexibility to avoid direct impacts during construction, the County disagrees with its determination of "Less than Significant" including pre-construction surveys. Modeled sensitive species and habitation locations include ridgelines and valleys. The topographic constraints of the project associated with draping power lines between tall towers would also indicate use of ridgelines. For areas within County jurisdiction, the EIR/ EIS should insure that all species found on the County's Sensitive Species Lists are evaluated. Due to the high concentration of sensitive species within San Diego County, the County does not agree that mitigation can reasonably occur after the fact by minor modifications of structure sites and have the result of "Less than Significant" after mitigation.

Possible impacts to bird species from contact or collision with or visual exposure to power lines should be considered. This should be examined particularly with regard to large raptors. In addition, the project impacts to migratory bird species due to nocturnal collisions should be examined in light of the Migratory Bird Treaty Act (1918).

The County of San Diego is also enrolled in the State of California Natural Community Conservation Planning Program (NCCP) and has adopted an NCCP known as the Multiple Species Conservation Plan (MSCP) affecting the southwestern portion of the County. The MSCP plan addresses the issue that San Diego County is nationally known for the high number of rare, endangered, threatened and otherwise sensitive species of plants and animals and is also developing rapidly with urban and agricultural uses. The MSCP planning process involves years of preparation and review by a set of stakeholders, input from property owners and ultimately approval of permits by Federal and State wildlife agencies. The MSCP plan is critical for allowing economically important land development to proceed while conserving important biological areas. These biological areas serve as mitigation for the development that has and will occur in

the region. The County has a draft MSCP plan for the northwestern portion of the County, and an additional plan in progress in the eastern portion of the County. The project EIR/ EIS should examine the impacts to areas identified as high value habitats or Pre-Approved Mitigation Areas (PAMA) in the existing and proposed MSCP plans. In addition, many County Preserves were acquired for preservation in the Multiple Species Conservation Program. These Preserves are considered extremely important to the MSCP. Impacts to these reserve and preserve lands from this project would be considered significant. The MSCP may need to be amended if there are impacts. A discussion of this requirement should be included in the EIR/ EIS.

Cultural Resources

The County would like to review all cultural resource documents that pertain to land we own and/or manage.

Based upon a review of the County's Geographic Information System (GIS) cultural and paleontological database, it appears that there are a number of archeological resources within the proposed transmission corridor development areas, and many of the sites have not been analyzed to date. The EIR/ EIS should analyze all cultural resources impacts and propose adequate mitigation for those impacts. It should also include a table showing the types of archaeology sites that will be affected. The EIR/ EIS should also address Indian History in the region since the proposed alignment passes within the vicinity of a number of Tribal lands.

In the Proponents Environmental Assessment (PEA), Page 1 of the Cultural Resources section refers to Appendix K. The California Environmental Quality Act was amended in November 2005 and sections 15064 and 15064.5 deal with cultural resources. Appendix K is now "Criteria for Shortened Clearing House Review". This should be clarified and corrected in the EIR/ EIS.

Land Use and Community Character

Development on Unincorporated lands is governed by the County of San Diego General Plan. The planned land use designations in the existing General Plan within the study area are mostly rural and agricultural including (18) Multiple Rural Use (1 dwelling unit per 4, 8, or 20 acres, depending on percentage of slope), (20) General Agriculture (1 dwelling unit per 40 acres), and the urban community of San Diego Country Estates in the Ramona Community Planning Area (land use and related maps are available through SANGIS or through the County of San Diego GIS).

Currently, the County is preparing a comprehensive update to the General Plan. Proposed land use alternatives endorsed by the County Board of Supervisors and County environmental impact analysis efforts designate the area of the alignment as primarily lower density residential and agricultural uses. The County of San Diego is planning for future growth, but the majority of areas directly affected by the project are proposed as rural and agricultural with the exception of the urban community of San Diego Country Estates in the Ramona Community Planning Area and a few other currently urbanized areas.

Policies of the General Plan that should be considered are: Scenic Highways, Recreation, Agriculture, and Public Facilities Element (fire). Community Plans for the affected communities should also be reviewed.

Overall, land use and community character are likely to be significantly impacted by the proposed project. The transmission lines themselves will create a swath of structures that intrude into the rural landscapes. Construction of the substations, particularly the Central East substation, will also generate major community character impacts. That substation alone would cause enormous cut and fill slopes that are likely to be visible from a long distance in an otherwise pristine, undeveloped landscape of rolling hills, ridges and canyons supporting chaparral, grasslands and oak woodlands. The impacts of this site alone would be unprecedented in the region.

Growth Inducement

This section should perform a generalized analysis of the energy needs of the region and the County's vision of the land uses as stated in the current General Plan and the draft General Plan 2020, and make a determination if that vision conforms (or does not conform) with the proposed increase in energy supply. Further, growth-inducing effects need to be evaluated, albeit in a general way, to discuss the concurrent availability of other services that accommodate growth, like the road network, fire protection, and water availability.

Parks & Recreation

Many County of San Diego Parks and Open Space Preserves would be impacted by the proposed project. When observing a map of County parks and preserves, one can see that the proposed alignment traverses eight of them. The importance of these lands was mentioned in the biological section described above. The County would like to continue to work with the project proponent, CPUC and BLM to determine alternatives that would avoid impacts to these lands. In addition, the County would like to be involved in the selection of appropriate mitigation measures.

Many of the Preserves were acquired to protect sensitive habitats, species, and cultural resources, serving as regional mitigation for the land development in the Unincorporated Area. Impacts to these resources would be considered significant and should be evaluated in the EIR/ EIS.

Many of the County Open Space Preserves were purchased with grant funding. Some of the grants may exclude building of roads or structures on County lands purchased with these grants. If the proposed project is approved, the project proponent would need to compensate the County if these lands are lost due to conflicts with grant restrictions. This should be analyzed in the EIR/ EIS.

Barnett Ranch and Santa Ysabel Open Space Preserves have approved Area Specific Management Directive (ASMD). San Vicente Highlands has a draft ASMD for the preserve. These ASMDs direct the management of the preserve. These documents should be reviewed and referenced in preparation of the EIR/ EIS. In addition, the County is currently preparing an ASMD for the Boulder Oaks Open Space Preserve. A final draft is expected in the Fall of 2008.

Visual impacts to parks may be partially mitigated by undergrounding the Powerlink in some locations. This is discussed with regard to the Mt. Gower Preserve in the "Suggested Alternative Routes" section of this letter. Any under-grounding of power transmission lines occurring on parkland or preserves owned or managed by County Parks and Recreation shall require the preparation of a restoration plan to return the property to the condition it was in prior to initiation of construction. Any restoration plan shall conform to the County of San Diego Revegetation Plan Format, Content and Guidelines that can be viewed at: <http://www.sdcounty.ca.gov/dplu/Resource/docs/3~pdf/Reveg-guidelines.pdf>

In brief the following shall be used as an outline for preparing the text of a Revegetation Plan:

1. Purpose and Goals of the Revegetation Plan
2. Project
 - a. Project Site Location
 - b. Existing Site Conditions
 - c. Project Impacts
3. Agency Concerns and Requirements
4. Revegetation Design Concept
5. Project Responsibility
6. Establishment of Reference Site
7. Revegetation Site Suitability Analysis
8. Project Implementation
9. Project Maintenance
10. Project Monitoring
11. Project Cost Estimate

The proposed project could also impact many existing and planned recreation trails. Impacts to these trails would be considered significant by the County and should be analyzed in the EIR/ EIS.

The following comments relate to specific segments of the proposed project as noted:

Imperial Valley Link, Land Ownership and Land Use. This section indicates the primary ownership of land in this segment is private. However, greater than 75% is open space and recreation. This is therefore misleading and should not be stated as such in the EIR/ EIS. In addition, the EIR/ EIS should provide a description of lands that are considered open space and recreation.

Central Link Land, Ownership and Land Use. This section indicates impacts to 0.2 miles of park land would occur. The EIR/ EIS should describe the owner/manager of the park land impacted.

Central Link. This segment of the proposed project would have potential visual impacts to recreational uses of Santa Ysabel Open Space Preserve and the Coast to Crest Trail. These potential impacts should be analyzed in the EIR/ EIS.

Inland Valley Link, Project Location. This section indicates lines in Mount Gower County Open Space Preserve would be installed underground. However, it appears from Figure 5A that a portion of the preserve on the northeastern corner of the preserve would be directly impacted by overhead lines. In addition, the proposed project appears to also

directly impact Boulder Oaks County Open Space Preserve, San Vicente Highlands Open Space Preserve, Barnett Ranch Open Space Preserve, Sycamore Canyon Open Space Preserve and Los Peñasquitos Preserve. These preserves should be clearly marked on the EIR/ EIS figures and should be labeled. This will provide the public with the knowledge of the potential impacts and the opportunity to comment on the impacts. Currently, Barnett Ranch is not shown on Figure 5A.

Public Health & Safety

The proposed project may present a significant potential fire hazard due to the location of active power lines in fire-prone areas. These power lines have demonstrated the capacity to initiate and to act as conductors of fire. Major fires resulting from power line issues include the Pines fire where a helicopter clipped a line near Banner, and the Laguna Fire from 1970. Furthermore, fires have been observed traveling along transmission lines spreading the fire as it travels. Fires are a natural condition in San Diego County. Potential fire hazards resulting from the project should be thoroughly examined, as well as significant impacts to the project in the likely event of wildfire in the project location(s). Any other health issues associated with the placement of high voltage power lines also need to be evaluated.

Public Facilities/ Transportation & Traffic

If the project proposes improvements within County right-of-way, the County of San Diego Department of Public Works (DPW) should be consulted. If property owned by the County of San Diego Department of Public Works including Airports or Road stations, is proposed for improvements or for use as staging areas, DPW should be consulted.

The project does not initially appear to present foreseeable impacts to County airports. The EIR/ EIS team should consult the Federal Aviation Administration (FAA) regarding the format for documentation of all tall towers, particularly as they may relate to FAA lighting requirements.

Socioeconomics

The potential for the project to cause adverse socioeconomic impacts should be considered especially from the perspective of the possible economic and/ or legal issues with the taking of or impacts to lands purchased with public monies and the public cost of wildfire resulting from faulty or damaged power lines.