



IMPERIAL COUNTY FARM BUREAU

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October 20, 2006

Ms. Billie Blanchard, CPUC
Ms. Lynda Kastoll, BLM
C/O Aspen Environmental Group
234 Montgomery St. Suite, 935
San Francisco, CA 94101-3002

Re: SDG&E Sunrise Powerlink Project Scoping Comments

Dear Ms. Blanchard and Ms. Kastoll:

Imperial County Farm Bureau (Farm Bureau) hereby submits the following comments on the amended application for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project (Powerlink) submitted August 2, 2006 by San Diego Gas and Electric. ICFB is a voluntary, membership based organization comprised of over 800 members, most of which are farmers and ranchers of the Imperial Valley. These comments are directed at the potential impacts this project could have on agriculture land use.

Farm Bureau has not taken a position on the Sunrise Powerlink Transmission project; however, we are concerned about the location of the 500 kilovolt line. It is our understanding that SDG&E has filed for a preferred route, the so-called eastern route, which would run through and/or adjacent to agricultural land including Bullfrog Farms Dairy, planned sites of future potential dairies and crop production land. This is problematic and should be carefully considered for the following reasons.

The County of Imperial along with Farm Bureau and other organizations has worked diligently over the past decade to attract agricultural industry such as dairies to Imperial County in order to stimulate our agriculture economy. Bullfrog Farms was the first dairy to relocate to the Imperial Valley and has proven to be an incredible asset to our community. Furthermore, the area surrounding Bullfrog Farms has been designated as an area ideal for additional dairies to relocate to and is currently being considered by some. An electrical transmission line of this magnitude would be detrimental to this industry.

The impacts of stray voltage and therefore electricity in general have been well documented. Numerous studies have shown that it would be necessary for the line to be located a minimum of one mile (ideally five miles) away from livestock in order to prevent impacts to the health and productivity of the animals. The Farm Bureau would be willing to provide copies of some of those studies if so requested.

The Van Leeuwens, owners of Bullfrog Farms, have determined based on studies and real-life experience, that they would lose ten pounds of production per cow per day due to impacts from the electrical line. Based on 3200 cows and \$13 milk, that equates to a loss of \$4150 per day and \$1,514,750 per year. They anticipate approximately 200 cows to perish due to the electricity in addition to the normal death rate. Each cow has a value of \$2000 for a total loss of \$400,000 per year. If the cost of decreased productivity is added to the loss due to deaths it amounts to \$1,914,750 per year. A 3200 cow dairy cannot survive a loss of this magnitude. It will surely put them out of business and avert any other dairies considering relocation to the Imperial Valley.

In addition to dairies, farming operations with growing crops in Imperial County would be negatively impacted by the 500kV Powerlink traversing or running adjacent to their land. If the Powerlink divides the field it could impact access as well as water delivery which would be detrimental to the ability to farm the land. Aerial application of chemicals to crops is a common and necessary practice in Imperial County and the location of the line could be dangerous to pilots and hinder the ability to proceed with this practice.

Farm Bureau encourages you to thoroughly analyze all lands being considered for location of the Powerlink and the potential associated land use impacts. Impacts to agricultural land should be considered significant in the process and existing right-of-ways should be looked at for routing alternatives.

Farm Bureau appreciates the opportunity to comment on the scoping of the project and looks forward to working with you on assessing impacts to agriculture and finding a compromise suitable to all stakeholders involved. Please feel free to contact our office with any questions or concerns you might have.

Respectfully submitted;



Nicole M. Rothfleisch
Executive Director



**CALIFORNIA
WILDERNESS
COALITION**

The Voice for Wild California

October 20, 2006

Billie Blanchard, California Public Utilities Commission
Lynda Kastoll, Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94101-3002

Subject: Sunrise Powerlink Project EIR/EIS scoping comments

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for this opportunity to offer scoping comments on the Sunrise Powerlink Project EIR/EIS.

The California Wilderness Coalition (CWC) is a non-profit organization incorporated under the laws of the State of California with its central office in Oakland, California, and field offices in Riverside and Redding. CWC has more than 5,000 members and more than 200 member organizations and business sponsors. The CWC protects the natural landscapes that make California unique – providing clean air and water, a home to wildlife, and a place for recreation and spiritual renewal. In particular, the CWC focuses on the management of wilderness-quality lands on National Park Service, California State Park, U.S. Forest Service (USFS) and Bureau of Land Management (BLM) holdings.

The great ecological transition zone between the deserts of eastern San Diego and western Imperial County and the coastal sage scrub of central San Diego County is one of the most biologically diverse and scenic areas in California. The steady growth of cities and suburbs in the region has resulted in significant habitat loss and has made the federal, state and local public lands in San Diego and Imperial Counties more important than ever before as refuges for sensitive plant and wildlife species and for maintaining the quality of life for the area's residents.

Given the ecological and social importance of the region's natural places, it is no surprise that it has an exceptional array of designated federal and state wilderness areas, BLM wilderness study areas (WSA), USFS inventoried roadless areas and citizen-proposed wilderness areas (hereafter referred to collectively as "wilderness-quality lands"). Other ecologically and socially important areas include state parks and areas managed for non-motorized recreation by the BLM and USFS.

We are truly shocked by San Diego Gas and Electric Company's (SDG&E) unprecedented proposal to violate the boundary of a designated state wilderness within Anza-Borrego Desert State Park (Notice of Preparation/Notice of Public

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Scoping Meetings for an EIR/EIS, page 5). The California Wilderness Act (Public Resources Code 5093.30-5093.40) states at 5093.31 that the purpose of wilderness is to:

...assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas on state-owned lands within California, leaving no areas designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the State of California to secure for present and future generations the benefits of an enduring resource of wilderness.

The California Public Utilities Commission (CPUC) and other state agencies should honor both the letter and spirit of the California Wilderness Act by treating designated state wilderness as a truly enduring resource, and not one to be defiled whenever a major corporation proposes a development project. Remember: infrastructure can be moved, wild places cannot.

The following wilderness-quality lands appear to be either penetrated by or are adjacent to the various powerline routes under consideration as illustrated on the Sunrise Powerlink Project, Figure 8, SDG&E Alternatives Considered and Eliminated map attached to the Notice of Preparation/Notice of Public Scoping Meetings for an EIR/EIS.

POTENTIAL POWERLINE ROUTE	WILDERNESS-QUALITY AREAS THAT APPEAR TO BE PENETRATED BY OR ARE ADJACENT TO THE POTENTIAL POWERLINE ROUTES ACCORDING TO FIGURE 8
Proposed Project 500 kV	Vallecito Mountains State Wilderness, Pinyon Ridge State Wilderness, Grapevine Mountain State Wilderness & San Felipe Hills WSA
Route 4	Sawtooth Mountains Wilderness, Sin Nombre State Wilderness, Carrizo Canyon State Wilderness, Sombrero Peak State Wilderness, Agua Caliente State Wilderness, Whale Peak State Wilderness, Granite Mountain State Wilderness, Grapevine Mountain State Wilderness, Vallecito Mountains State Wilderness & Sawtooth Mountains A WSA
Route A	Desert Oasis State Wilderness, Santa Rosa Mountains State Wilderness, Wil-yea State Wilderness, Sheep Canyon State Wilderness & Pinyon Ridge State Wilderness
Route B	None
Route C	None

Route C-D	Hauser South Inventoried Roadless Area
Route D	Eagle Peak Proposed Wilderness (a citizen-proposed wilderness included in Senator Barbara Boxer's S. 2432)
Route 3D	Fish Creek Wilderness & Coyote Mountains Wilderness

Note: The map erroneously places a portion of the BLM's Jacumba Wilderness on both sides of Interstate 8 and adjacent to the Jacumba Mountain State Wilderness. The BLM land in that location should have been labeled the Table Mountain WSA, and it is only on the north side of Interstate 8. The BLM's Jacumba Wilderness is entirely south of Interstate 8.

We request that the CPUC, BLM, California Resources Agency and USFS prohibit the construction of powerlines in the areas listed above. We also request that these agencies compel SDG&E to follow a route that limits ecological disruption and disturbance to the maximum extent possible. Instead of plowing the powerline corridor through wilderness-quality lands and other special places, we request that SDG&E be required to place the corridors along existing paved roads whenever possible and appropriate. In addition, existing utility corridors should be used to the maximum extent possible.

By placing the powerline along or immediately adjacent to existing infrastructure, the CEQA/NEPA analysis may be reduced in both scope and depth. Often, areas that have been previously disturbed require less analysis for expansion of existing disturbance than would be required for new disturbance of pristine and/or wild areas.

The approval of a powerline route affecting federal wilderness must be made in accordance with the Wilderness Act of 1964 and other applicable laws and policies. The approval of a route affecting state wilderness must be made in accordance with the California Wilderness Act and other applicable laws and policies. The approval of a route affecting BLM WSAs must be designated in accordance with the Federal Land Policy Management Act and other applicable laws and policies. If a route will affect USFS inventoried roadless areas please note that the 2001 Roadless Area Conservation Rule was reinstated by a federal judge in September in the case of *The Wilderness Society, California Wilderness Coalition, et al. v. United States Forest Service, et. al.* The 2001 Roadless Area Conservation Rule prohibits the construction of roads in inventoried roadless areas, including roads needed for utility construction.

In addition, if a powerline is proposed where State Park, BLM or USFS land use plans do not currently provide for approval of rights-of-way or construction of facilities, or require

compliance with protective measures (such as visual resource management classifications), a formal amendment process and appropriate environmental analysis must precede imposing a powerline corridor on the affected lands. Also, if a proposed route crosses through a newly-acquired federal or state parcel that has never had a wilderness suitability study, we request that the public land management agencies inventory the wilderness characteristics of these lands and, based on this information, exclude lands with wilderness characteristics from the proposed powerline route.

Some of the issues that should be studied, described and discussed for each alternative in the EIR/EIS include:

- The risk of reducing water quality.
- Impacts to air resources.
- Consequences of and for fire and fuels management, including the risk of plant community type-conversion from accelerated fire cycles.
- Impacts of development at various elevation distributions.
- The cumulative impacts of the proposed project in light of other federal, state, local and private projects in the region that will impact habitat, scenery and recreation.
- Impacts to terrestrial animal and plant habitat, including fragmentation and connectivity, edge effects, habitat suitability and effectiveness, early-successional habitat, game species and late-successional habitat.
- Impacts to aquatic animal habitat and species.
- Impacts to threatened, endangered, proposed and sensitive species.
- Impacts to research, monitoring and reference landscapes.
- Consequences for non-mechanized, mechanized and motorized recreation.
- The risk of opening previously trackless areas to unauthorized off-road vehicle use as a result of new road construction.
- Impacts to scenic quality.
- Consequences to heritage resources.
- Mitigation measures to off-set the visual impacts of development that may be visible from lands important for recreation and scenery, including wilderness, WSAs, inventoried roadless areas, proposed wilderness, state parks, the Pacific Crest National Scenic Trail corridor and the California Riding and Hiking Trail corridor (again, we request that powerlines not be proposed inside any of these areas because the impacts, visual and otherwise, are simply unmitigable).

Billie Blanchard, CPUC & Lynda Kastoll, BLM
CWC scoping comments on the Sunrise Powerlink Project EIR/EIS
October 20, 2006
Page 5 of 5

Thank you for considering our comments. Please notify us of any further opportunities to comment on the Sunrise Powerlink Project in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Henson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan Henson
Policy Director

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October 20, 2006

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Billie Blanchard, CPUC/Lynda Kastoll, BLM
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San Francisco, CA 94104-3003

Re: NOP/NOI for the Preparation of an EIR/EIS for the Sunrise Powerlink Project
(A.05-12-014 and A.06-08-010)

Dear Ms. Blanchard and Ms. Kastoll,

The California State Parks Foundation (the "Foundation") has reviewed the Notice of Preparation/Notice of Intent (NOP/NOI) for the preparation of an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Sunrise Powerlink project and offers the following comments, which are consistent with and elaborate upon the Protest filed by the Foundation with the CPUC on September 8, 2006.

Protected Wilderness Areas

The existing easement in Anza Borrego Desert State Park ("ABDSP") ranges from 24 to 100 feet in width. SDG&E requests an expansion of the easement to 150 feet. This proposed widening will encroach on Wilderness Areas designated by the State of California as protected from any development or disturbance. Wilderness Areas are particularly significant in value because they support protected habitat and species and therefore, by their very definition, are not meant for development, infrastructure or human habitation. Intruding into designated Wilderness Zones has never previously been allowed in California and would create significant negative impacts for the ABDSP that cannot be adequately mitigated.

State Wilderness is defined by statute in Public Resources Code section 5019.68 which, in part, states:

State wilderness, in contrast with those areas where man and his own works dominates the landscape, are hereby recognized as areas where the earth and its community of life are untrammelled by man and where man himself is a visitor who does not remain. A state wilderness is further defined to mean an area of relatively undeveloped state-owned or leased land which has retained its primeval character and influence or has been substantially restored to a near-natural appearance, without permanent improvements or human habitation, other than semi-improved campgrounds...

ABDSP supports over 400,000 acres of Wilderness Areas for the purpose of public enjoyment of the wilderness experience, the conservation of important biological and cultural resources, scientific research, and public education. This represents over 80% of all lands so designated in California. The Foundation is therefore extremely concerned that any proposed expansion into protected Wilderness Areas will set a terrible precedent that could have unanticipated impacts not only in ABDSP, but in other state parks throughout California.

Impacts are not limited to just the Wilderness Areas that are proposed to be taken by SDG&E. Impacts would extend well beyond the easement to the enjoyment of the entire park by thousands of annual visitors. These impacts are discussed more fully below.

Impacts to Habitat and Wildlife

SDG&E's application does not adequately analyze the full extent or impact of the Powerlink project on either habitat or wildlife. The application concedes that there is the potential for "significant impacts" to sensitive plant species, to raptors, reptile and amphibian species, avian species, small mammals, and Peninsular Bighorn Sheep. It dismisses a range of impacts to other species and plant communities as "less than significant," including impacts to wildlife corridors. The analysis does not adequately address migration patterns, wildlife corridor disruption, exotic, non-native species invasion impacts, permanent impact to sensitive and protected plant communities, the interdependence of habitat and wildlife, and a host of other issues.

For instance, the species evaluated for potential project impacts in the EIR/EIS should include not only those listed as federally or state-endangered or threatened, but also "covered" species that are included within the regional habitat conservation plans within San Diego County through which the project would cross. Potential impacts to the Peninsular bighorn sheep, a federally-endangered and state-threatened species, have not been adequately addressed and must be analyzed in the EIR/EIS, which should address both direct and indirect impacts to bighorn sheep.

The EIR must also take into account impacts of the proposed towers and transmission lines on nesting, foraging and roosting behavior of Golden Eagles, as well as other protected and endangered species. The potential for electrocutions and collisions with the introduction of new structures in the habitats of these species is high and should be addressed in the EIR/EIS.

Last, the increased threat of fire to the area has not been adequately analyzed and needs to be fully evaluated. Power lines inevitably increase such risks, but to impose that risk on protected Wilderness Areas, our state's highest land protection designation, is unacceptable unless it can be conclusively proven that the risk is minimal.

Impacts to the Viewshed

The poles along the current easement are made of wood, are 40-50 feet tall and contain a single line. SDG&E proposes metal lattice poles that are more than double in height, carrying multiple, tiered lines. The visual and noise impact of these poles would be extremely significant for park visitors who are traveling through the park, and even more so to visitors camping there at Tamarisk Campground or elsewhere in ABDSP. Even SDG&E admits that of the 17 Key Observation Points identified in the Application, visual change would be moderate to high in at least 12 cases, and that visual impacts would be adverse to significant in 14 cases. The Application concedes that the larger poles would "conflict with the natural background of many recreational resources."

SDG&E dismisses the extreme nature of the visual impact by arguing that because fewer poles would be needed, they would be further apart and therefore less impactful. Moreover, they assert that visitors would become accustomed to the larger size-poles and therefore "over time, the presence of the larger line would be expected to become common to the visitor as the (existing small wooden poles have) been." The EIR/EIS must include the impacts of visual disruptions to present-day users, whose standing is as important in this environmental assessment as future users.

The EIR/EIS needs to complete a thorough analysis of visual impacts from the proposed project. A preliminary visual impacts analysis conducted by the California State Department of Parks & Recreation, Colorado Desert District, utilizes a line-of-sight Geographical Information System (GIS) model to assess the distance from the transmission line that towers and wires are visible given the

surrounding topography. This preliminary analysis indicates that tens of thousands of acres would be visually affected, with many of those acres being designated State Wilderness lands.

Impacts to Recreation

SDG&E has consistently emphasized off-road vehicle usage as the primary recreational use that would be impacted by the proposed power lines. In fact, recreation encompasses a much broader range of activities within ABDSP, including but not limited to hiking, camping, birding, cycling, even geotech games.

In that context, recreation resources are as severely impacted as the viewshed, and this impact must be much more fully analyzed in the EIR/EIS. Aside from the visual impacts discussed above, the proposed project would be built adjacent to the Tamarisk Grove Campground and the Yaqui Wells Primitive Camp. The PEA does not adequately address the economic and use impacts of this huge project on this quiet and protected campground, and the EIS/EIR must do so. While there currently is a 69 kV in the vicinity of the campground, it is extremely unobtrusive. Concerns over power-line electromagnetic fields has not been addressed, nor have noise impacts from multiple high power lines running directly through and over the campground been adequately analyzed and/or mitigated.

And finally, the EIR/EIS needs to address the impacts of construction itself on the recreational experiences of park visitors. While temporary, the presence of equipment, the disruption of visitor access to areas of the park, noise, and visual impacts all need to be addressed specifically during the construction phase of the project.

Protected Archeological and American Indian Sites

According to its General Plan, ABDSP contains 4,322 archeologically and culturally sensitive sites; SDG&E has identified only 39 of these thousands of sites in its preferred alignment. SDG&E concedes that construction could significantly impact both known and previously unknown cultural resources, but asserts, without any evidentiary support, that those impacts can be limited through project design. The EIR/EIS must accurately count the number of sites identified and, more importantly, objectively assess the ability of SDG&E to adequately control and limit irreparable impacts to these historic, sacred archeologically and culturally sensitive sites.

Alternatives to the Sunrise Powerlink Route Through Anza Borrego Desert State Park.

In its Application, SDG&E failed to put forth any alternative route that did not run through Anza Borrego Desert State Park. Alternatives that avoided the ABDSP were eliminated prior to even being carried forward for public consideration. When directed to present alternatives that did not run through ABDSP, SDG&E did not present or analyze any new routes; they simply restated the inadequate analysis in the PEA.

It is the Foundation's position that there are feasible alternatives to the severe impacts on ABDSP that the current alternative routes will inflict. The Foundation is specifically concerned that SDG&E'S emphasis on existing right-of-way easements not preclude a set of alternatives that may prove environmentally superior and still achieve an appropriate balance between transmission corridor development and neighborhood protection.

The Foundation also is concerned with the consistency of SDG&E's position that alternative routes that do not go through ABDSP are not viable on the grounds that there might be a need to amend land use and management plans. Indeed, expanding the existing easement through ABDSP would require amendment of the General Plan and redesignation of protected Wilderness Areas, and thus under SDG&E's analysis in its PEA should therefore be equally impracticable.

SDG&E asserts that alternatives outside of ABDSP are infeasible because of adverse economic impacts to other areas, but does not offer any evidence to support that assertion. The EIR/EIS should detail the criteria used for economic impact analyses and display the conclusions for chosen alignments as well as rejected alternatives.

Finally, it is the Foundation's position that SDG&E has failed to adequately analyze southern alternative routes along Interstate 8. As noted above, these are among the alternatives rejected without detailed or in-depth analysis. The Foundation believes that SDG&E's cursory analysis was defective and did not take all factors into consideration. The EIS/EIR should take all factors into consideration and objectively evaluate every route, up to and including a "no wire" alternative solution.

In summary, then, the Foundation's position on all of the above categories of concern is that SDG&E has not adequately analyzed alternatives or impacts, and moreover has not presented sufficient evidence to support either its assertions or its conclusions. SDG&E's PEA is biased and incomplete. The Foundation sincerely hopes that the full range of deficiencies in the PEA are cured in its EIR/EIS. Thank you for the opportunity to make these comments, and we look forward to providing you with further detail and analysis in the future as this process moves forward.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara Feldman".

Sara Feldman
Southern California Director
California State Parks Foundation

cc: Elizabeth Goldstein, President, California State Parks Foundation
Traci Verardo, Policy & Legislation Director, California State Parks Foundation

From: Kashani, Allen \(\Pardee Homes\) [mailto:Allen.Kashani@pardeehomes.com]
Sent: Saturday, October 21, 2006 04:00 AM
To: sunrise@aspeneg.com
Subject: Sunrise Powerlink NOP

Pardee has reviewed the Notice of Preparation for an Environmental Impact Report/Environmental Impact Statement of the Sunrise Powerlink Project. Our land intended for single-family homes in the approved Carmel Valley Neighborhood 10 Precise Plan and Del Mar Mesa Specific Plan appears to be impacted by the Sunrise Powerlink Project. Namely, we are impacted by the Coastal Link portion of the project. We ask the following considerations be incorporated in the analysis to protect the interests of our community and future homeowners:

Aesthetics:

Will our existing community and future homeowners be impacted by the aesthetics of the new power poles and 230 kV power line? How can aesthetic impacts be minimized or mitigated? Should undergrounding of the power line be a consideration?

Construction:

Would construction of the power line impact the existing community and future homeowners? Can these impacts be mitigated? In addition to disruption of their home enjoyment, the existing community and future homeowners will be concerned about a decrease in the value of their property due to construction in the area, and consideration to minimizing these impacts should be made.

Post-construction Noise:

Will our existing community and future homeowners be impacted by noise caused during fog or heavy moisture? Are there mitigation measures that can be implemented to minimize post-construction noise? Should undergrounding of the power line a consideration?

Environmental:

The existing SDG&E right-of-way is adjacent to Los Penasquitos Canyon Preserve. Special consideration should be given minimizing and mitigating aesthetic impacts from the preserve.

Access and trails:

The community currently uses trails in the vicinity of the proposed

coastal link. The trails serve pedestrian, bicyclist and equestrian use. Consideration should be given to preserve existing and proposed trails for the community and reasonably coordinate SDG&E access.

Allen Kashani, P.E.
Land Development Manager
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From: Richard [mailto:rwj9@yahoo.com]
Sent: Saturday, October 21, 2006 05:42 AM
To: sunrise@aspenerg.com
Subject: comments on the proposed sunrise powelink

To: Ms Blanchard
Ms. Kastoll
Whom It May Concern

I am writing to express my concerns regarding the proposed, so called "Sunrise Powerlink" and to say that as a member of the Ocotillo Wells Citizens Alliance for Responsible Energy I represent the views of many other residents of Ocotillo Wells.

Not only does this proposed power line pass through miles of the heart of the , pristine Anza Borrego State Park, it also passes directly through the community of Ocotillo Wells. First and foremost I must say that I am appalled that anyone would even conceive of putting this destructive, mega super energy highway through the largest and arguably one of the most pristine, beautiful, serene, and ecologically sensitive state parks in the country. It is inconceivable to me that SDGE would even for a moment consider permanently and forever scaring this irreplaceable landscape when other very viable alternatives are available. Do they not understand why this area has been designated as a State Park, from the many species of plants and animals to the unsurpassed black, starry night sky, and the surreal sunrise and sunsets? What are they thinking? I think they are thinking about their pocketbooks.

I am concerned about the production of dirty energy from unregulated power plants in Mexico to markets in Los Angeles at the expense of a national treasure. I am wondering why alternative routes such as the existing I-8 corridor cannot be used. In fact, I wonder why this line is needed at all. With the state of the ozone layer depletion which this would exacerbate and the state call for more creative energy solutions why hasn't SDGE put more thought into spending this money on roof top solar on private and public buildings? The call is to reduce carbon dioxide production, not increase it. I believe the case could be made that this line is an outdated, archaic solution to a modern problem that could be mitigated in much more progressive ways, not the least of which would include conservation or reconducting existing lines to 2 or 3x their current capacity. There are concerns that SDGE is creating congestion by routing electricity from plants in Arizona and Mexico through San Diego to bolster their "case" for the SPL.

I am concerned about the viability of the solar, geothermal, and wind renewables that SDGE says the line needs to tie into. Studies have shown problems with the reliability,

technology and environmental impact of the solar (thousands of acres for the panels/relatively untested)and geothermal(ground water depletion) alternatives and the siting of the wind turbines in areas where there is not much wind.

I am concerned about the serious fire, air transportation , and health hazards presented to the land, vegetation, animals and people living near the line. The proposed line runs over or between major earthquake faults that many predict could be the source of major activity in the future.

I am concerned about the loss of the incredible view shed in the park from the 130 to 160 foot tall towers with blinking red lights on the top that will be visible for miles in any direction in this vast, beautiful wilderness. I am concerned about severely compromised natural, cultural, and recreational resources and the potential impact on cultural and historic sites in the park. Designated scenic highway 78 would accommodate a long portion of the line.

I am asking to consider, very carefully, the concerns raised in this letter. Alternatives to this massive, intrusive project must be held to a higher standard. From in basin alternatives to incorporating conservation not as some private virtue but as public good, it is incumbent to upon us all to explore the most sensible, not the most profitable way to meet our energy needs. Many unmitigable environmental impacts will occur is this line is allowed to proceed to the drastic degradation of our environment, habitat, and communities.

Thank you for your consideration of my concerns.

On behalf of myself and the citizens of Ocotillo Wells,

Richard Jensen
Chairman
Ocotillo Wells Citizens Alliance for Responsible Energy
Ocotillo Wells, CA



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October 31, 2006

Susan Lee
Vice President, SF Office
Aspen Environmental Group
235 Montgomery Street #935
San Francisco, CA 94104

Subject: A.06-08-010; Utility Consumers' Action Network (UCAN) Comments on Sunrise Powerlink CPCN Application EIR Scope

DELIVERED VIA E-MAIL

Dear Susan,

The following is a discussion of issues that UCAN would like to see addressed in the EIR prepared for the proposed Sunrise Powerlink. They were largely raised in the SDG&E workshop, but I offer this discussion so as to be as clear as possible about the route alternatives which would allow delivery of generation from Imperial County to the CAISO (meeting SDG&E's goals of CAISO access to economic energy and deliverability of renewable resources) and would meet SDG&E reliability needs (meeting SDG&E's goal of solving reliability shortfalls projected in 2010-2015).

a. Relocate Central substation to the San Felipe substation site

i. This alternative reduces the number of new 500/230 KV substations along the line from two to one.

ii. This alternative creates the option of undergrounding Sunrise through Anza-Borrego, since the Sunrise project would now be 2 x 230 KV through Anza-Borrego.

b. Build a 500 KV line roughly parallel to SWPL from IV substation to the Boulevard/Campo area, then build 2 x 230 KV transmission from there to the existing SDG&E grid (possibly at Sycamore Canyon, possibly at a location in the El Cajon area along the existing Miguel-Mission and Miguel/Sycamore 230 KV lines.

i. This option would eliminate the need for two 500/230 KV substations in Eastern San Diego County, one at Central and one along SWPL to serve future wind development (as proposed in the interconnection requests already in the CAISO Interconnection Queue). One new 500/230 KV substation would serve as both an interconnection point for new wind generation and a transition point from 500 KV to 230 KV along the new Imperial Valley-San Diego transmission lines.

ii. This option would have a much shorter length at risk of a common mode outage with SWPL than building a SWPL II 500 KV line all the way from IV to Miguel. To the extent load the expected frequency of N-2 outages was still unacceptably high, this option would still require 413 Mw of reliability improvements within San Diego County to allow SDG&E reliability needs to be met through 2015 even under N-2 conditions of both 500 KV lines originating from IV.

c. Build a 500 KV line from Imperial County to the Los Angeles area as currently proposed by LADWP, and take other measures as necessary to meet SDG&E reliability needs.

i. This option would allow delivery of renewable energy from the Imperial Valley to California load centers, and would allow imports of economy energy into California. The 500 KV line would not solve SDG&E reliability problems.

ii. The “other measures” needed to meet SDG&E’s reliability problems would include some combination of the project alternatives described below, sufficient to provide 192 Mw of incremental capacity to SDG&E by 2010 and 413 Mw by 2015.

2. Project alternatives which would not involve any new transmission lines in Imperial County. These alternatives would permit new renewable generation to be delivered to markets over existing transmission lines, as demonstrated by SDG&E’s 8/4/06 Cases 100 and 104, each of which delivers at least 99.7% as much IV generation to load as SDG&E’s Sunrise case in 2010, and at least 99.8% as much as Sunrise in 2015. These alternatives would have arguably lower economic benefits than Sunrise, which would be offset by their much lower capital costs. These alternatives would each meet SDG&E reliability needs for 192 Mw in 2010 and 413 Mw in 2015, in whole or in part, as discussed below. Individual project alternatives producing less than 192 Mw in 2010 and 413 Mw in 2015 would need to be combined to produce the needed reliability in aggregate.

d. “Mexico Light” (140-300 Mw)

Provides 140 Mw (existing system) to 300 Mw (with upgrade of gentie from IV generator to IV substation) of reliability by allowing some Mexican generation normally delivered to the CAISO at Imperial Valley to flow to SDG&E via Tijuana during outages of IV-Miguel line.

e. “SONGS Light” (< 1000 Mw)

Provides up to 1000 Mw of incremental reliability by uprating Path 44, the SCE-to-SDG&E path. SDG&E powerflow diagrams provided in discovery show up to 3500 Mw can currently be delivered from SCE to SDG&E during an N-1/G-1 outage of both SWPL and Otay Mesa without overloading any facilities above their emergency ratings. The CAISO says deliveries above 2500 Mw are not allowed because of the risk

of overloading Barre-Ellis if there was an (N-2, since SWPL assumed already out) outage of Del Amo-Ellis. However, the CAISO relied on a 2001 study which almost certainly didn't model the 450 Mw of Huntington Beach generation brought on line since 2001, and may have mismodeled Barre-Ellis as well.

If necessary, this option could involve reconductoring Barre-Ellis or other SCE 230 KV lines north of SONGS with 3M Corporation ACCR conductor.

Rerating Path 44 would also have economic benefits to go along with its reliability benefits, if the N-0 path rating were also increased.

f. "G-1" rerate (232 Mw)

The CAISO currently assumes that new combined cycles at Otay Mesa and Palomar are subject to simultaneous loss of both CTs and their steam turbine. If they were assumed to have a "G-1" contingency equal to loss of one CT and ½ of the steam turbine capacity, they would no longer be the largest G-1 contingencies on the SDG&E system (instead, Encina 5 would be the largest G-1). Redefining the "G-1" contingency would decrease SDG&E reliability requirements in 2010-2015 by 232 Mw.

g. AMI (230-262 mw)

SDG&E has applied for CPUC approval of a metering and rate design project referred to as its "Advanced Metering Initiative" ("AMI"). SDG&E claims AMI will reduce SDG&E peak loads in 2010 by 219 Mw, and in 2015 by 249 Mw. SDG&E also claims that AMI-caused load reductions would be accompanied by another 5-6% load reduction due to reduced distribution losses (before accounting for transmission losses, which are more dependent on the location of generation). AMI is not currently counted as an SDG&E resource in SDG&E's Sunrise analyses. 24% of the AMI demand reduction benefits come from large customers who already have interval meters.

h. Demand response programs (29-143 Mw)

SDG&E's existing demand response contract with Comverge can reduce peak load by 29 Mw, according to SDG&E. SDG&E has told the CPUC that it is pursuing near term (by 2008) demand response programs which could further reduce loads by another 17-114 Mw). None of these programs are included in SDG&E's Sunrise analyses.

i. New combustion turbines (414 Mw)

SDG&E's 8/4/06 Case 100 adds 414 mw of new combustion turbines in 2010-2014 to meet reliability needs through 2015 on a phased basis. Some of these turbines may be installed by 2009 in response to SDG&E's current RFO for 2007-09 capacity, and thus would exist whether or not Sunrise is built.

g. South Bay project (561 Mw – 620 Mw)

The South Bay combined cycle project currently in licensing at the CEC would add 620 Mw of capacity inside the SDG&E service area. Under the current N-1/G-1 methodology, the useful contribution to SDG&E reliability would be 561 Mw. If the "G-1" rerate option described above were successful, South Bay would contribute 620 Mw towards SDG&E's reliability needs.

I trust that this list will be useful for your CPCN review process. Please contact myself or David Marcus if you have any questions about the above.

Very truly yours,

Michael Shames

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