

October 20, 2006

SUNRISE POWERLINK PROJECT

Dear Ms. Blanchard,

The Descanso Planning Group respectfully requests a 45 day extension from the October 20, 2006 deadline and new scoping hearings in the rural East County communities of Boulevard, Jacumba, Campo, Pine Valley, Descanso and Alpine where previously eliminated routes are now back under consideration. We will then be able to further comment on this proposed project. We are not prepared to comment on the project in totality due to lack of information forthcoming from the Public Utilities Commission. It has only been one week since we learned through SDG&E that the Alternate Routes C and D are again being considered by the Public Utilities Commission.

Please be advised that the Descanso Planning Group voted on October 19, 2006 at our Regular Meeting to oppose the Sunrise Powerlink Alternate Routes C and D that run through Descanso

These proposed routes will promote industrialization of a rural area violating community character and community plans.

There will be negative impacts on the Cleveland National Forest and Cuyamaca State Park. Sensitive species habitat and panoramic view shed throughout the forest, park and the Descanso community will be negatively impacted

This one project will destroy our community. We stand to lose completely 50-60 homes, our Methodist church, and our historic elementary school. It will further affect hundreds of more homes and property due to the 200 ft. Right of Way required. This proposed major transmission corridor will plow right through the middle of our rural community. It is unacceptable for SDG&E and the PUC to threaten Descanso to this extent.

We survived the Cedar Fire only to be faced with annihilation of homes, a church and our school by SDG&E and the Public Utilities Commission!

Many of the residents of the backcountry communities feel this is a ploy and a manipulation of the residents to push us into agreement with the original proposal for a transmission corridor through Anza-Borrego. Perhaps if our request for a 45 day extension is granted we can get to the truth of this prevailing suspicion

Sincerely,

Jo Ellen Hucker, Chair
Descanso Planning Group
PO Box 38
Descanso, CA 91916

Transmitted via email to Sunrise@aspeneg.com

October 19, 2006

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

Subject: Sunrise Power Link-Scoping Comments for the Coastal Link from Black Mountain Road to N72A-Proposed Powerline within the Park Village Community and along Park Village Road, San Diego, CA

Dear Billie and Lynda,

The Park Village Maintenance Assessment District (PVMAD) Advisory Committee directs the ongoing maintenance and improvements for the open space and enhanced landscape within the boundary limits of the district. Our Advisory Committee provides monthly input to preserve the area's character and administers the funds of approximately 3,200 homeowners. Funded through our annual property taxes, our charter provides the authority to monitor the maintenance, development and growth of our open space areas to assure the prosperity of the District.

The placement of the Coastal Link Section, between Black Mountain Road and the Penasquitos Canyon Preserve, would have substantial adverse impacts on the Community and our open space areas. It is imperative that alternative alignments be studied to reroute the power line outside of the PVMAD. Locating the Powerlink through our community is not our desired option. If this route is selected, it could potentially destroy the enhanced landscape that the homeowners' taxes have paid for and have a negative effect on the existing natural canyon environment that we all have come to value. For the record, on behalf of the PVMAD we opposed the Sunrise Power Link being located within our Community at large, and specifically within the Park Village Maintenance Assessment District.

We recognize that **if** the power line is to be placed within the boundary of the PVMAD, the impacts would alter our existing open space environment forever and we would be subject to maintaining the areas disturbed by these facilities. Due to the potential placement of lines, vaults, junction boxes and access routes in the PVMAD, we request the Powerlink project provide mitigating measures to enhance the Park Village Community and the well being of the PVMAD. Some of the requested mitigation measures should be:

- § Complete replacement of disturbed areas with like kind or enhanced planting and irrigation.
- § Full landscaped median improvements along Park Village Road impacted by power line placement.
- § Accessible trails which would jointly service facilities and provide enhanced pedestrian/ biking connections.

In summary, the impacts incurred due to the Powerlink development will change our community and forever alter the existing state of the PVMAD. We appreciate you including our concerns in your Scoping Report for the Powerlink EIR/EIS.

Respectfully,

Jon Becker, Board Member
Hector DeLeon, Board Member
Tom Masten, Board Member
Jeanette Waltz, Board Member
Bernie Wenzig, Board Member
Sharon S. Wong, Board Member



CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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October 20, 2006

Ms. Billie Blanchard, CPUC
Ms. Lynda Kastoll, BLM
c/o Aspen Environmental Group
234 Montgomery Street, Suite 935
San Francisco, CA 94101-3002

Re: SDG&E Sunrise Powerlink Project/Scoping Comments

Dear Ms. Blanchard and Ms. Kastoll:

The California Farm Bureau Federation ("Farm Bureau")¹ submits the following Scoping Comments on the SDG&E Sunrise Powerlink Project ("Powerlink"). The Powerlink may potentially impact Farm Bureau members in San Diego and Imperial counties. These comments follow and expand on the oral comments made at the EIR/EIS Public Scoping meetings and are directed at the potential for agricultural and land use impacts.

Agricultural Impacts

Potential impacts of the project on agricultural operations affects operations in both Imperial and San Diego counties. Although the types of operations in the two counties vary, all operations would be significantly impacted by the traverse of 500kV through their businesses as follows:

1. In Imperial County SDG&E's proposed route could possibly cross or run adjacent to existing dairy farms. The PEA does not adequately address the affects of the high voltage lines on the dairy cattle themselves and the overall operations. Further assessment of those impacts and the alternatives to avoid them is needed in order to fully analyze the project.

¹ Farm Bureau is a voluntary, non-profit corporation representing more than 88,000 members throughout California. California's farmers and ranchers sell \$24.8 billion in agricultural products annually, accounting for 9 percent of the gross state product, and support hundreds of thousands of jobs in California.

NANCY N. McDONOUGH, GENERAL COUNSEL

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CARL G. BORDEN • KAREN NORENE MILLS • RONALD LIEBERT • JOHN R. WEECH

2. In addition to dairies, farming operations with field crops in Imperial County may be traversed by the line. If the line divides a field it may separate the field into distinct segments. That separation could render the ability to farm nearly unmanageable in that the access is changed and water delivery may be impacted. In the case where aerial crop dusting is utilized for crop management, location of the lines can make crop dusting a virtual impossibility. Those types of impacts need to be more closely scrutinized, rather than being dismissed as insignificant as the PEA is prone to do.
3. In San Diego County the proposed route, as well as alternatives, cross significant acreage of grazing land. Depending where the line specifically crosses, the ability to graze the units is dramatically diminished. Further review is required to assess those impacts and better balance the impacts against possible alternatives.
4. Finally, across all the agricultural lands better consideration must be given to the permanent effect of construction activities on agricultural lands. The PEA suggests it can restore the ground, but the restoration process may take years to return the ground to pre-construction condition. Again such impacts must be more thoroughly reviewed to fairly analyze both temporary and permanent disturbances to land uses.

Clarity Needed on Land Impacts

Fundamental questions remain about whether the PEA can be fairly analyzed for the impacts on agricultural lands. The metric and definitions used for weighing impacts is in many cases questionable, perhaps inaccurate. Better analysis of the lands is required before the matter moves forward. For example, the attempt to compare the disturbance and impact to land use of the proposed route within the Central Link with the alternative alignment within the Central Link (PEA 6.1.2) raises several questions. A large category of land for comparison of impacts is listed as "vacant land." In discussions with landowners in the area, it appears that the land is used as grazing land and should be described as agricultural land with the impacts appropriately noted.

The charts used to demonstrate the impact in these sections by acreage are confusing and conflicting in some cases. Combined with the probable inaccurate categorization of agricultural land, the real impacts on agricultural land is likely masked.

Use of Existing Right of Ways

In a number of settings SDG&E has championed its utilization of existing transmission right-of-ways in the proposed route. It is quite true that state policy prefers use of existing transmission rights-of-way. Recently enacted SB 1059 (Escutia) signed by Governor Schwarzenegger on September 29, 2006, provides at Section 1(c):

To promote the efficient use of the existing transmission system, the state should do both of the following:

1. Encourage the use of existing rights-of-way, the expansion of existing rights-of-way, and the creation of new rights-of-way in that order.
2. Promote the efficient use of new rights-of-way, where needed, to improve system efficiency and the environmental performance of the transmission system.

There are existing lines in areas such as the Central Link which should be more fully explored. As better information is collected and weighed during assessment of the PEA, the impacts of new rights-of-way against utilization of existing rights-of-way can be better weighed.

Farm Bureau looks forward to the more thorough analysis of the project and its alternatives at this stage of review. As anticipated, the PEA is crafted in a manner which leads to a specific and desired result by SDG&E. In the zeal to reach the result, many factors which should be weighed may not have received the appropriate consideration. Much more information will be required to determine the actual impacts of the proposed project, let alone necessary mitigation measures. It is required that this stage of the proceeding create a better understanding of the impacts and solutions.

Respectfully submitted,



Karen Norene Mills

From: Lisa [mailto:freudsid@san.rr.com]
Sent: Friday, October 20, 2006 5:05 PM
To: sunrise@aspeneq.com
Cc: 'Gary Levitt'
Subject: Sunrise Powerlink EIS comments: Del Mar Mesa Planning Group

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

Attached you will find comments on the Sunrise Powerlink project Environmental Impact study. The proposed route will have serious impacts on the Del Mar Mesa community and the public open space preserves created by the Del Mar Mesa Community Plan.

Thank you for the opportunity to comment.

Lisa Ross
Member, Del Mar Mesa Community Planning Group

Del Mar Mesa Community Planning Board

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October 20, 2006

ENVIRONMENTAL IMPACT STUDY COMMENTS: SUNRISE POWERLINK

The Del Mar Mesa Planning Board submits the following comments on the Environmental Impact Study for the proposed San Diego Gas and Electric Sunrise Powerlink project. The Board is elected by the residents of the Del Mar Mesa community of San Diego and serves in an advisory capacity to the San Diego Planning Department and the San Diego City Council.

Community character

The proposed route for the Sunrise Powerlink will have serious negative impacts on the rural community character of Del Mar Mesa. The project will introduce a jarring industrial element surrounding the community, contradicting the aims of the Del Mar Mesa Community Plan.

Del Mar Mesa is a unique community in the City of San Diego, created over a twenty year planning process that began in 1985. Because of its historic rural history that goes back hundreds of years, and by virtue of several ballot measures and extensive complex negotiations between environmentalists, community planners, city and county public officials, public utilities, small and large property owners and developers, Del Mar Mesa retained its agricultural zoning when 12,000 acres of open space in northern San Diego were up-zoned for various degrees of density development.

As a result, Del Mar Mesa has retained its rural character. Its environmentally sensitive Community Plan is a model for balancing habitat and open space preservation with housing.

Del Mar Mesa is also proud of the 10 miles of recreational trails that link to the County trail system enjoyed by hikers, bikers and horse riders throughout San Diego, and the five-star Del Mar Grand National golf resort that is a major tourist destination. At build-out, the community will have approximately 540 homes on half-acre to 10-acre lots, many with horse facilities.

The additional towers and lines will be clearly visible from many homes within the community, those on the perimeter of the planning area, many of the hiking and riding trails and from the five-star Del Mar Grand National golf resort.

The neighborhoods adjacent to Del Mar Mesa, Carmel Valley and Torrey Hills, already are overburdened with power lines close to parks, schools and homes. Higher towers and more lines will transform the character of those family communities into industrial parks.

Habitat and open space

The community of Del Mar Mesa is home to approximately 1500 acres of coastal maritime habitat, preserving over 17 species of listed and endangered plants and animals on land that links Los Penasquitos Canyon Preserve with the County's open space system. This wildlife connection

is essential for habitat preservation in San Diego and is protected under the city's Multiple Species Habitat Plan.

The proposed Powerlink route will degrade view sheds and compromise the natural and recreational resources in this important open space preserve. In essence, adding more towers and lines increases what has been called locally a "wall of towers" between the preserve areas and the surrounding communities.

More overhead power lines and circuits increase the risk of wildfires in the preserve, which contains highly flammable native habitat. Because the homes in Del Mar Mesa abut the natural open space, this increased risk from fire also places the community in more jeopardy.

Public access to protected open space

San Diego's protected open space was by design meant to accommodate San Diego's unique habitat and the many hikers, bikers and horse riders who use the improved and natural trails. Higher towers and more lines create an unacceptable industrialization of a beloved and serene sanctuary creating visual blight and unacceptable noise levels.

Public Services

The project contemplates addition circuits increasing the risk of wildfires in the preserve which could rapidly spread into the community. This could only be mitigated by a very expensive addition of new fire stations and personnel servicing Del Mar Mesa, Carmel Valley and Torrey Hills which the financially strapped City of San Diego is unable to provide.

Alternatives

The Del Mar Mesa Planning Board welcomes consideration of reasonable alternatives. The board advises on land use and therefore will confine its comments to that area. There have been several reasonable suggestions for alternative routes, including under-grounding, using the SR56 corridor or building a second line along SDGE's the existing route along the southern San Diego border. We strongly urge consideration of these and any other alternative that would bypass the Del Mar Mesa, Torrey Hills, Carmel Valley and Rancho Penasquitos communities, as well as the protected open space habitat.

Ms. Blanchard, Ms. Kastoll,

Here are some quick additional concerns that I would like included as scoping comments:

1. The CAISO has made comments in regard to the lack of information on IID/SCE/LADWP's Greenpath Phase 1 (not phase 2 or 3) which needs to be more fully explored. The CAISO granted approval for SPL based on the assumption that this project is not being pursued, which we are still not sure of.
2. The SDGE map representing fire frequencies along the existing 500kV line (SWPL) does not show the actual fire outage frequency along the proposed or alternate pathways; it only shows fires larger than a certain size, though this does not reflect the actual outage frequency, the actual data point required to make an accurate comparison.
3. The PEA says some impacts are considered "less than significant" when we believe they are; things other than the viewshed, such as traditional childcare establishments, and cultural and historical landmarks, are important to the community and its future.
4. The First alternative suggested by UCAN, involving the reconductoring of a short segment across the Mexican Border which can double the current electric capacity, in conjunction with energy efficiency, new ocean wave technology, and municipal solarization of public buildings, should alleviate need.
5. Recent Purchase option of Nevada Powerplant could offset need of Sunrise Powerlink for several years.

Alternative transmission routes: along already ruined places, if at all.

Thank you for all of your work,

Sincerely,

Mary Aldern

Co-director, Community Alliance for Sensible Energy (CASE)

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IMPERIAL COUNTY DAIRY ATTRACTION COMMITTEE

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October 20, 2006

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Ms. Lynda Kastoll, BLM
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Re: SDG&E Sunrise Powerlink Project Scoping Comments

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for the opportunity to submit scoping comments on the proposed SDG&E Sunrise Powerlink Transmission Line project (Powerlink). The Imperial County Dairy Attraction Committee (DAC) is an ad-hoc committee comprised of representatives of numerous organizations including the County of Imperial, the Imperial County Farm Bureau, the Imperial Irrigation District, the Coalition of Labor, Agriculture and Business, various financial institutions and more. It has been in existence for about a decade and its mission is to attract dairies to Imperial County that are being pushed out of other counties in the state due to urbanization. Dairies provide economic stimulus to our rural, agricultural community whose number one crop in terms of acres is alfalfa.

The DAC recently met and discussed the Powerlink and its potential impacts to existing and prospective future dairies in Imperial County. Below is the resolution that was voted on and approved by the committee.

WHEAREAS, the Imperial Irrigation District and San Diego Gas & Electric are considering the most feasible route for their Green Path and Sunrise Powerlink projects, respectively, and,

WHEREAS, one such identified route would traverse the western edge of Imperial County and encroach on farmland zoned as "A-3," or heavy agriculture, and,

WHEREAS, This affected area comprises an emerging dairy corridor, mainly due to distance from the urbanized area, proximately to water and climatic features that make it an ideal location for 15-20 new dairies in the future, and,

WHEREAS, stray voltage from the western route identified above would have an adverse impact on milk production, reproduction rates and overall animal health, and,

WHEREAS, agriculture remains the county's dominate economic driver, and dairies represent an important growth industry within the agricultural economy, and,

WHEREAS, the positive economic growth that would come from the development of renewable energy in Imperial County shouldn't be secured at the expense of existing businesses, nor should it preclude the expansion of the local dairy industry.

NOW THEREFORE BE IT RESOLVED that the Imperial County Dairy Attraction Committee would consider favorably any preferred route for the Green Path and Sunrise Powerlink projects that does not negatively impact the region's No. 1 economic engine of agriculture.

The DAC urges you to consider impacts to dairies in the scoping process of this project. If you have any questions or would like more information on dairies in Imperial County, please feel free to contact us at (760) 352-3831.

Respectfully submitted;



Meghan Blevins

Meghan Blevins
DAC Chair

