



MERIT

Mountain Empire Resources Information Taskforce
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22 February 2007

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To Whom It May Concern:

RE: Sunrise PowerLink Alternatives and EIR/EIS

I live in Campo, which is 55 miles east of San Diego. My home is 4 miles from the Southwest PowerLink line, and I see six of the large steel towers from my home. Even at 4 miles away they are too close.

I am speaking for MERIT (Mountain Empire Resources Information Task Force), a land use advocacy group of Campo area residents. I am also speaking for San Diego Quail Unlimited, where I am Habitat Coordinator for San Diego County. In addition, I am an active member and supporter of a number of organizations, which I have listed in attachment A.

I spend hundreds of hours every year working to preserve, protect and enhance our natural environment. This includes developing water sources for wildlife, working on trails, removing invasive plants, picking up trash from the roadways, stewarding lands acquired by various organizations both private and governmental. I work in almost every area of San Diego County.

Decisions on the Sunrise PowerLink situation are very simple. The Anza Borrego State Park route must not only be denied, it must be eliminated from consideration as an alternative. There are a number of viable alternatives. The Anza Borrego route is not a viable alternative.

I attended the Aspen/SDG&E meetings held in Alpine and in Borrego Springs. The only reason there was a second round of scoping hearings and a raft of new alternatives is because the public complained so loud and so long about how terrible the Anza Borrego route would be. The public should be congratulated on their participation and should take pride in the fact that they were able to accomplish a reconsideration of the route. In a democracy, when such a large portion of the public says NO! you know there is something wrong. The public votes and has voted against this project. How else would there have been a second scoping. It is unfortunate that SDG&E did not drop the proposed Anza Borrego route even while they are looking at new approaches for a route for this line.

I have also attended a number of planning group meetings in San Diego County in the rural communities. Without exception community planning groups in all of the Back Country communities that would be affected by the PowerLink route do not want the Anza Borrego route. In fact, most people do not believe that there is any need for this project and do not support any route.

What do we do? We need to revisit the alternatives and look also at some new alternatives. We need to do a better job of examining the alternatives. Even Mr. Avery says we need input - more and better input. We can not approve the SDG&E proposal based on the inadequate analysis they have provided when there are better alternatives available.

The approval process and the relation of the Environmental Impact Statement and the General Proceeding for a Certificate of Public Convenience and Necessity

We do not believe almost simultaneous decisions on the environmental report and the general proceeding (the engineering project) are a reasonable expectation. Broad outlines for the design of the power line and the associated facilities are needed to do the EIR/EIS. We understand that, having participated in numerous land use proceedings under CEQA and NEPA.

However, in this proceeding the evidentiary process for the CPUC general proceeding is started prior to the release of the Draft EIR/EIS for public review. The Final EIR/EIS will be sent out within days of the ALJ's Proposed Decision. Preliminary evidentiary process is to identify environmental concerns. Only after the EIR/EIS is complete should serious work began on the design of the project because the land use issues often dictate substantive changes in the project design. The EIR needs to be circulated for public review and the concerns of the public addressed.. Then serious design work can start. SDG&E has distorted the process. California Public Utilities Commission states the environmental review is preceding concurrently with the general proceeding with both decisions to be

made early in 2008. *This is an indication that SDG&E's decision on the route was made regardless of what their research on environmental issues might ultimately show. How else could they reach a final decision on the engineering process simultaneous with the EIR.*

The Sunrise PowerLink decision must not be a decision from the heart: the facts are clear.

Reams of testimony that is from the heart have been presented to the State Parks Commission and to the CPUC/BLM/Aspen scoping meetings. There is no need to repeat the almost unanimous feelings of love and respect and reverence all feel for an unspoiled Anza Borrego that has not a square inch of de-designated land. To de-designate any land would be a template for future loss of protected lands throughout the United States.

You do not need to rely on emotions to deny the application for a route across Anza Borrego State Park. The facts dictate selection of one or more of the other alternatives which are all environmentally and operationally superior. Look at the alternatives carefully and it will be obvious a number of alternatives are less costly – both economically and environmentally.

However, on an emotional level, most people realize building the transmission line across Anza Borrego State Park is equivalent to building a line across Yosemite – an abhorrent idea. Do not let us repeat the error that destroyed Hetch Hetchy and now has people trying to reverse that mistake.

The Preferred Alternative.

The Preferred Alternative is the No Action alternative, the No Project alternative, the Do Nothing alternative. CPUC must require that the No Project alternative be honestly and fairly and completely and thoroughly investigated and evaluated. The applicant SDG&E does not want this alternative, although it is the best alternative. No Project analyses are traditionally given cursory attention and are almost always inadequate. Please do not let this happen. Do not accept an analysis without a thorough investigation of the No Project alternative. The Anza Borrego route is not the best route and needs to be denied.

One reason No Project is the best alternative is that the **need for this line has not been demonstrated**. All we have is SDG&E self serving statements. You need to have an independent outside analysis of the need and the impacts of the in basin alternatives before any decision can be made. The preliminary studies I have seen indicate there is no need for this project. The No Project study must include this unbiased study on the actual needs. We should all have learned a lesson about accepting SDG&E projections when in January, after being challenged on their estimates of cost savings, they had to revise their “savings” downward by \$400 million **per year**. Under some scenarios for in basin power generation Sunrise PowerLink would be more expensive. That fails the Basic Project Objective #2. This revision in the savings estimate was reported in the January 24, 2007 edition of the *San Diego Daily Transcript*

The Second Best Preferred Alternative

While the No Project alternative is preferable, the second option is the Non-wires alternative outlined by San Diego Gas and Electric. The Non-wire alternative has at its heart in basin generation of electricity, which is cheaper. This would include purchasing power from an upgraded/new South Bay Power Plant, a concept that has been rejected by SDG&E as was widely reported in the San Diego newspaper. Mr. Avery said, “...utility has no plans to purchase powerSDG&E is confident it can meet the region's power needs without it.” He even said that they need peaker plant power yet there is a peaker plant built after the energy crisis that sits in Otay unused. SDG&E is rejecting without

analysis better options. We can not help but observe that SDG&E does not want competition and they reject anything that is not 100% in their control - more competition would be good for the ratepayers.

It is clear Non-wires is less costly. The alternative also includes conservation which will be a substantial source of electricity. Our region's experience in conserving water shows that when people are aware and informed they can greatly reduce use of resources like water. The same should be true electricity. No where is there an analysis of how changes in appliances have reduced the need for electricity. What is the savings from education and conservation? The Union Tribune reported recently that California uses less energy per person than any state in the Union and that has been the case since 1978. Our per capita use of electrical energy is the same today as it was 30 years ago . That is clear indication that we can conserve. Has this type of consumer behavior been factored into the demands for energy SDG&E is using to justify the Sunrise project?

The San Diego Regional Energy Plan details how the non-wire alternative can meet the need for electricity without building Sunrise PowerLink. Yet SDG&E does not even mention this plan and the impact on the demand for energy. Evaluation of this regional plan should be a basic component of the study. You should ask why SDG&E does not mention anything that might cause even the slightest doubt about the need for a new transmission line.

We should consider improvements in the grid system to reduce wasted and inefficient use of electricity. It was reported widely in the press recently that addressing inefficiencies in the antiquated grid system within the San Diego basin would generate substantial savings. Yet this is not even mentioned as an alternative.

It appears that none of the Non-wire alternatives have been addressed in more than a cursory manner. Inferior alternatives such as the Sunrise PowerLink should not be considered until all of others are examined.

Numerous people have commented on other actions SDG&E could take to improve their existing system. Green Path was one alternative mentioned by many; I am not familiar with that plan but it appears there are other actions SDG&E could take that have not been evaluated. We also have not been told of what system improvements can be made to make the system more efficient.

One of the most significant of all the Non-wire alternatives is to increase solar power generated in the basin yet this alternative is not even mentioned by SDG&E. For example, I could generate more electricity from my roof top than I can use but SDG&E refuses to buy the excess generated. How much of the need could we satisfy if we could sell the excess to SDG&E. How many more people would convert to solar if they could sell the excess? How much faster would the conversion to solar happen if we could sell the excess? How much greater would the ethic of the home owner be to conserve if he has a solar roof?

The alternatives must consider the likely outcomes from the State of California's solar energy initiative as brought forward by Governor Schwarzenegger. Tens of thousands of roofs will have solar panels and it seems obvious that the cost of solar will continue to decline appreciably making even more homeowners eligible for solar. It is obvious to San Diego County residents that SDG&E has not been a leader in getting solar in place so the potential in this County is very large. Many think that SDG&E has actively discouraged development of solar power in part because that threatens their monopoly. We need to evaluate what will be the solar market in the next few years and is the

Sunrise project needed.

The Third Best Preferred Alternative

Transmission System alternatives are so obvious that those actions should be part of this years operating plan for SDG&E. They should be routine operational decisions. All of these alternatives would add reliability to the system, can be done in the short term, would require little or no regulatory actions and would be approved. The plans are no doubt in place and ready to execute so there would be no delay. The LEAPS project must be done as must the Mexico light 230 KV alternative. Why would any regulatory body not require SDG&E to upgrade their system when they are attempting to use their lack of action on the upgrades to force a decision on the Sunrise PowerLink.?

The Fourth Best Preferred Alternative.

The use of the Southwest PowerLink route would be a superior alternative to using the Anza Borrego State Park route. San Diego Gas and Electric had summarily rejected this route giving a variety of reasons. However, a dispassionate and rational analysis of this alternative would clearly demonstrate its superiority to the Anza Borrego route. I say this despite the fact that I live close to the Southwest Route and look at the towers every day.

It is hard to take SDG&E seriously when they eliminate this route despite the fact it was considered a totally viable route when earlier they proposed their Valley Rainbow Route. The V-R Route is clearly shown on the different route maps that were released for the second round of scoping meetings.

Much of the land along the Border is already owned by Bureau of Land Management. Most of the private parcels along the border are not developed and are available for sale. The County of San Diego has a Board of Supervisors policy which prohibits any development within 300 feet of the border so there are no houses along this route. The existing Southwest PowerLink goes along the Border and SDG&E has a substantial right-of-way. The area along the Border is already heavily crossed by an extensive network of maintained roads used by Homeland Security as part of their work to control illegal immigration. Virtually no disturbance of the area's biological resources would be necessary to put this line along the border. In addition, there is plenty of room to run a new line parallel to the existing PowerLink.

Even if was felt necessary to underground the lines with 2 parallel 230 kilovolt lines, there is more than enough room to do so. These lines could be run along the border using the existing roads that parallel the Border for miles. The SDG&E complaint that these areas are prone to fire, which short-circuits the line due to the carbon and smoke in the air, is their reason for not even seriously considering this route. They summarily rejected it based on what they think CAISO would say but SDG&E never asked how the line could be put along the Southwest Route and minimize CASIO concerns. The County already has in place environmentally sound fuel management practices and measures. Applied in this area the threat of fire problems would almost be eliminated. This would be a great benefit to all the area residents north of the Border as we have had numerous fires that came from the Mexican side of the Border and which burned deeply into the US because of the extensive brush on the BLM lands. Fire clearing would protect the power lines, protect the people, would preserve the wildlife corridors and would improve the reliability of the existing Southwest PowerLink. Improved reliability is Basic Project Objective #1 and this alternative would improve reliability of the Southwest and the new line. In addition, these fire measures would provide additional benefits to the public by opening up the landscape for greatly improved Homeland Security/Border Patrol observation and apprehension and detention of illegal immigrants.

Use of the Southwest PowerLink route would also support another objective in the PEA . Objective #8 is to minimize the need for new or expanded transmission ROW in urban or suburban areas..... and assist in implementing local land use goals.

The Border Route, the Southwest PowerLink is obviously superior, because of the ability to use the BLM and vacant private land in an area already environmentally disturbed with numerous roads. This route is easily accessible for maintenance. This route is substantially shorter than the route proposed through Anza Borrego. Even if it were necessary to bury two 230 KV lines, this route would appear to be much less costly, economically as well as in greatly reduced environmental costs.

The Fifth Best Preferred Alternative

Even if there were not four better alternatives why has SDG&E hardly mentioned a far better alternative than the noisy unsightly obtrusive overhead lines. It would be far superior if the line were to go through part of the Park to have the entire line through the Park underground and buried. While it this alternative is far less desirable than any of the alternatives listed above, nonetheless it would be better than what SDG&E has proposed. We find it on rather strange that SDG&E did not discuss this alternative in a hand out they made at the various presentations to communities around County. There were a number of meetings prior to the State Parks Commission meeting and that alternative was not discussed. The proliferation of routes in the second scoping session - new routes, old routes, eliminated routes, multiple routes - made the maps so confusing, it was difficult to pick out this alternative .

We were especially disappointed at the SDG&E booklet handed out at the State Parks meeting. That hand out by SDG&E with only two routes and a summary dismissal of one of the routes (Southwest PowerLink) was self-serving and was in no way meant to discuss the alternatives. The hand out was dated February 2007 so there is no excuse it was an "old out of date" report.

Even though there are a myriad of fact based reasons to select a number of alternatives other than Borrego, the natural beauty of Anza Borrego is always in this discussion. Before the CPUC meeting in Borrego, I took a walk in the morning in Palm Canyon. As always, I was taken by the natural beauty and serenity and reveled in the wonders of nature. As I walked along, I saw some small tamarisk sprouting up. These invasive plants are an enormous threat to our environment killing and displacing natives. My reaction was to reach down and tear them out. That is what we should do with these towers and power lines that would be so invasive, foreign and not native in the Park. Tear these invasive towers out of the plan and eradicate them just like an invasive weed. They do not belong.

Sincerely yours,



Michael C. Thometz
President

Exhibit A

California State Parks Foundation
San Diego Quail Unlimited
Desert Wildlife Unlimited
California Wilderness Coalition
Endangered Habitats League
California Invasive Plant Society
California Native Plant Society
National Audubon Society
Volcan Mountain Preserve
Yosemite Association
San Dieguito River Valley Conservancy
San Diego Natural History Museum
Pacific Crest Trail Association
Environmental Working Group - San Diego Foundation
Back Country Land Trust
Conservation Biology Institute
Trust for Public Land
Student Conservation Association
Friends of the River
Rails to Trails
Save the Bay
Save the Redwoods
Hawkwatch International
California Oak Foundation
National Wildlife Federation
National Arbor Day Foundation
Mono Lake Committee
Sempervirens Fund
Tree People
San Diego Audubon

From: Stuart Peace [mailto:speace@stuartengineering.com]
Sent: Thursday, February 22, 2007 05:10 AM
To: sunrise@aspeng.com

How can I get a more detailed map of the alignment of the West Forest Alternate Route specifically from Harbison Canyon to I-8?

If I can not obtain a more detailed map by the 2-24-06 deadline I hereby register my opposition to the West Forest Alternate Route

since the public has not been adequately informed of its intended route.

Stu Peace

President

STUART ENGINEERING
Peace Engineering, Inc.,
A California Corporation
7525 Metropolitan Drive Suite 308
San Diego, CA 92108
(619) 296-1010 (619) 296-9276 FAX
speace@stuartengineering.com

From: Denis Trafecanty [mailto:denis@vitalityweb.com]
Sent: Thursday, February 22, 2007 03:36 AM
To: 'Billie Blanchard'
Cc: tmurphy@aspenerg.com
Subject: FW: Enron clip

Billie,

It would only take you 10 minutes to listen and view this tape. It applies to the California portion only.

Denis T.

Subject: Enron clip

Landowners,

If you never saw the movie Enron: The Smartest Guys in the Room, you should view the attached 10-minute clip attached by Laura Copic, who is an active member of our group. See the attachment below. Remember that SDGE was a big part of this whole scam.

Denis T.

For a ten minute insight into why we should think twice about the de-regulation of energy markets and cannot depend on energy companies to make the right decisions for us, see this clip from the movie Enron: The Smartest Guys in the Room regarding Enron's role in the California energy crisis...Keep in mind that Enron was not the only player in these market manipulations...and ask yourself how this could happen with the Cal ISO and FERC in place?

<http://www.youtube.com/watch?v=ANvV0j1xy5Y>

Laura Copic
Carmel Valley Concerned Citizens
www.cvconcernedcitizens.com <<http://www.cvconcernedcitizens.com/>>

TULLOCH FAMILY PARTNERS
CUMMING TRUST D
GLENN & MARGARET DROWN

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

Re: COMMENTS ON PROPOSED AND ALTERNATIVE ROUTES

Tulloch Family Partners is affected by the proposed route and various alternative routes. The line will cross approximately 5.2 miles of family owned land. Additionally we are targeted as the alternative substation site. There will be significant impacts to our property that can not be measured financially. This land has been with our family for 5 generations and we resent the encroachment from within our own property. Often agriculture is forced out from encroachment from neighboring developments but seldom from imposition within its own boundaries. We are opposed to the construction of this line and firmly believe that there are reasonable ways to produce the required power within the San Diego area. These methods may not be of significant benefit to SDG&E and thus they are proposing their own method. We implore the CPUC to fully and completely research the “in-basin” alternatives.

Please accept our comments and concerns about the proposed and alternative routes. Remember that we are opposed to the line but also realize there is an impact to us that we must address if the line is approved. I will try to address specific areas that present problems for our families land and agricultural operations. We are mostly affected by the Inland and Central Link route but have property along the I-8 alternative as well.

I will address the Central Link section first. We have lands owned by Cumming Trust D that are impacted from MP 108.3 (at Highway 78 crossing) to MP 110 and Tulloch Family Partners land from MP 110 to beyond MP 113.

- Why does the proposed alignment have to cross 3 separate legal parcels south of Highway 78 to MP 109.5? This creates an unnecessary financial burden on the land owners. The alignment crosses directly over a cattle watering source which would be lost to the easement. Additionally we have concerns over the impact to cattle that would be under the lines for significant amounts of time while watering, if they would even continue to use the water source. The proposed alignment should be amended to follow parcel property lines at a minimum.
- The Santa Ysabel SR79 Underground Alternative should be amended to continue south underground to approximately the 109.5 MP. This area is just as much in the view shed and just as environmentally sensitive as the lands to the north. At the 109.5 MP the terrain changes to hillsides, trees, rock and heavier vegetation where undergrounding would be more difficult and costly. However the section from Highway 78 south is flat grassland and would be just as easy to underground as the section along Highway 79. **Why is this section not being looked at for undergrounding?** We would request that we be consulted regarding the alignment from the Santa Ysabel town site south to the

existing 69KV ROW in order to minimize impacts to our agricultural operations. (The maps provided at the scoping meetings were different than those in the mailed notice. The underground alternative on the meeting map seemed to address this area.)

- The Santa Ysabel Existing ROW Alternative certainly reduces the visual impacts through the SY valley over the proposed route. The map does not show what would happen to the alignment after coming into Santa Ysabel at the existing SY substation. We would request that it continue south and follow the existing 69 KV route for the same reasons states in the notice. It will reduce visual impacts being at the base of the hill and below Highway 78 from Julian. If the alignment is moved to parallel Highway 78 to the MP 108.3 then cross the valley in the same location as the proposed alignment the visual impact will be the same as the proposed route. **It does not make sense to put the line across the middle of the valley when there is already an easement, roads and access along the existing route.** We do not buy into the argument by the County of San Diego that the land north of Santa Ysabel is more sensitive than the private lands. In fact this land was owned and grazed by the same people that own the remaining private land. (The maps provided at the scoping meetings were different than those in the mailed notice. The underground alternative on the meeting map seemed to address this area.)
- The argument from the County of San Diego that the Santa Ysabel Existing ROW Alternative would impact their sensitive lands does not hold water. They currently have no regard for the management of their land as evidenced by the fact that they allow free, uncontrolled grazing of Santa Ysabel Reservation cattle. We have requested numerous times that the County work with neighboring ranchers and their management plan with no response. Therefore we must believe that they do not have much regard for the biology of the land and the proposed power line will not be much of an impact.
- The map SY-09 provided to us by Aspen shows the SY underground alternative coming to MP SY-9.2 where it would transition above ground. From there the proposed route runs right through the middle of parcel 2481300600 south to the existing 69KV line. This alignment should be adjusted to follow a parcel boundary line until reaching the existing 69KV alignment.
- The map SY-09 shows the underground alternative following the south property line of parcels 2480300800 and 2480300700 but then follows an existing ranch road crossing parcels 2480300600, 2480300500, 2480201200 and 2480201200. We would ask that the alignment be adjusted to follow the south boundary of these four parcels as well and then locate the transition location at the point the line reaches parcel 2481300600 as referenced in the previous point.

-
- The SDG&E Central South Alternative Substation is upon our land and will have a tremendous impact upon our ranching operation. We could loose up to 100 acres of prime grazing land that is currently enrolled in Williamson Act contracts. This location is a significant distance from any public road and will cause severe impact to several residents located on private property there. We have not received any indication of how the site would be accessed from Highway 78. Using current ranch roads is completely unacceptable as this would pass within feet of a new residence on the ranch. Creating a new access road suitable for use by SDG&E will place a tremendous scar on terrain. There is very rough and rocky terrain between the site and Highway 78. This location for a substation should be removed from any proposed or alternative routes. The existing substation at Santa Ysabel provides much easier access and less impact to the environment.
 - The CNF alternative is the most reasonable and direct route to take along the proposed route. This area of the route is extremely rocky and rough and routing the line along the proposed route, avoiding the current 69KV alignment, is just not reasonable. The existing 69KV route across Cleveland Forest land is not visible from Highway 78. The new proposed alignment would be quite visible. Additionally it would require new roads and access through very rough terrain which would be quite costly.

Again we ask that you give great consideration to the burdens this line places upon many landowners that are enrolled in Williamson Act contracts in order to keep our lands from development pressures. Allowing construction of this line across those lands will have an impact upon the agricultural operations by adding increased traffic for maintenance and repair operations. Cattle grazing is generally a passive operation and disturbances to them will result in them not utilizing the land. Once we loose the benefit of being able to graze the land because of human intrusion and interruption, we have to look to other methods of generating income. That typically leads to development of the land. So, please look to the "in-basin" alternatives to resolve this issue.

Respectfully submitted

Glenn E. Drown



February 23, 2007

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

Re: Proposed Sunrise Powerlink Project
Opposition to the Mataguay Substation Alternative

Dear Ms. Blanchard and Ms. Kastoll:

The San Diego – Imperial Council, BSA joins with the Vista Irrigation District and the Santa Ysabel Band of Dieguneo Indians in the strong opposition to the reintroduction of the Mataguay Substation Alternative (page 18 of the notice.)

At the foot of Volcan Mountain northeast of San Diego, rests Mataguay Scout Ranch. Owned by the San Diego – Imperial Council, Boy Scouts of America, for 50 years, this beautiful and serene environment of more than 800 acres has provided the heart of the Scouting program. Scouting promotes the achievement of skills and the development of qualities that will last a lifetime: responsibility, self reliance, courage and leadership which Scouts acquire through activities such as camping and first aid training, leadership development programs, service projects, and wilderness backpacking.

Key leadership from Vista Irrigation District and the Boy Scouts thoroughly discussed this project “on site” at Mataguay Scout Camp and Warner Ranch. We agreed that the substation should not be at the mouth of Mataguay Valley or at the “Top of the World” site. Also that the power lines should run between the S2 road and top of the ridge line until they nearly reach Highway 79. They would closely follow S2 until they come close to the historic ranch house so that the towers would not be visible from that historic spot. The San Diego-Imperial Council would also prefer, that the lines go underground from there, if possible, to visually maintain the wilderness experience the Scouts now enjoy.

The Grapevine Canyon route is far less disruptive, allowing for the placement of towers that cannot be seen from either Vista historical sites or from our camp. We, therefore, strongly urge the elimination of the Mataguay Substation Alternative from further consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Trout".

Terry Trout
Scout Executive



**CALIFORNIA
STATE PARKS
FOUNDATION**

*The Voice for
California's
State Parks*

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February 23, 2007

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

Dear Ms. Blanchard and Ms. Kastoll:

The California State Parks Foundation (the "Foundation") thanks you for the opportunity to comment on the Second Scoping Notice on Alternatives (the "Notice"). We have reviewed the Notice and our comments are as follows:

1. The Foundation joins the Center for Biological Diversity and the Sierra Club in applauding the Notice's inclusion of a "no wires" alternatives. We agree that bundled no-wires alternatives along and/or in combination with system alternatives are an excellent means to encourage energy efficiency and conservation, encourage local development and renewables and cleaner and more efficient fossil-fired generation, improve energy grid security, and reduce energy costs while simultaneously protecting people and nature. The Foundation strongly urges that the Draft EIR/EIS include a full, independent and objective evaluation of these alternatives that includes full analysis of the public good and environmental factors.
2. The Foundation does not advocate for one alternative over another at the present time. However, as with the no-wires alternatives, we believe that the Draft EIR/EIS must fully and objectively evaluate the recommended alternatives. A complete discussion must include a full, independent and objective assessment of (a) the public interest, (b) environmental (including biological and habitat) impacts, (c) as relates to Anza Borrego Desert State Park (the "Park"), recreational impacts. This discussion must include a thorough analysis of impacts to the viewshed, impacts on recreational uses of the park, adverse economic effects on the park and surrounding areas, and archeological, cultural and historical impacts.
3. The Foundation notes that one of the recommended alternative (overheading 500 kV within existing 100-foot ROW alternative) can only be evaluated if it is definitively established that SDG&E's easement is 100 feet at all points throughout the Park. Evidence exists that this easement may be as narrow as 24 feet at certain points within the Park. The Draft EIR/EIS must provide a thorough independent analysis of this issue and include any documents establishing SDG&E's assertions concerning the boundaries of their easement.

HEADQUARTERS 800 College Ave., P.O. Box 548, Kentfield, CA 94914 TEL 415-258-9975 FAX 415-258-9930

SACRAMENTO OFFICE 1510 J Street, Suite 120, Sacramento, CA 95814 TEL 916-442-2119 FAX 916-442-2809

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EMAIL calpark@calparks.org **WEBSITE** www.calparks.org



THIRTIETH ANNUAL MEETING
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4. The Foundation urges that the analysis of the undergrounding alternative be addressed in a way that goes well beyond a purely financial analysis. While it may very well be that undergrounding is more expensive than above-ground transmission, the environmental, recreational and public good factors discussed above must be included as part of the equation.
5. Last, the draft EIR/EIS should contain an analysis of the impacts of construction and ongoing maintenance needs should the Sunrise Powerlink be built, including utility roads, staging areas, repairs, etc.

Thank you for the opportunity to submit these final comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Feldman", with a long horizontal flourish extending to the right.

Sara Feldman
Southern California Director

MORETTI FAMILY
CARRISTO RANCH
25580 HWY 79
SANTA YSABEL, CA 92070

February 23, 2007

Billie Blanchard/Lynda Kastall
CPUC/BLM
c/o Aspin Environmental
235 Montgomery Street #935
San Francisco, CA 94104

Re: Sunrise Powerlink

Ms. Blanchard and Ms. Kastall,

I am writing on behalf of my family, the Morettis who own a Ranch being impacted by the Sunrise Powerlink in the Central Link. Our Ranch is part of the original Santa Ysabel Spanish Land Grant. Part of the same Land Grant is now the Santa Ysabel County Preserve, our Ranch has the same sensitive environmental issues as the Preserve.

The "Proposed Project Double Circuit 230 kV line to Parallel and relocated 69 kV line" would be constructed on a very remote area of the ranch. Parts of which have only been accessed by foot and by horseback.

The "Santa Ysabel Existing ROW and Santa Ysabel Overhead Portion" virtually cut the Ranch in half. This route is extremely close to the house and barn, within approximately 150 feet of the structures.

We have the following concerns:

HEALTH:

Even though research claims that cancer and other health issues caused by exposure to these lines is "inconclusive". That is not good enough to have our family and animals exposed to something that may or may not cause health issues. It needs to be appreciated that our animals are part of our ranching livelihood and to have these animals exposed to something that possibly may cause them to have health issues and not be able to produce offspring, is unacceptable.

ARCING:

National Ag Safety Data Base - Summary Case 193-488-01 as reported by Cal-Osha Cotton Harvester Operator was on top of the machine to clean a basket, parked under a high voltage power line when it began to rain. 14,000 volts of electricity from the power line arced to the machine and killed the operator. This is a particular concern with the lines being so close to the house and barns.

LINE MAINTENANCE

We understand that maintenance will include clear cutting for the concrete pads, tower sites and under the live wires. The clear cutting and brush removal will cause a great amount of erosion and property damage. If SDG&E will not be able to clear the area around the towers for fire protection we understand as allowed pursuant to Section 18 of the San Diego County Fire Code, the maintenance of these lines will be done by low flying helicopters including the washing of the insulators.

Low flying helicopters have many risks, including crashing and snagging lines, as was the case of the Pines Fire. A particular concern also, is the spooking of the livestock. Should this happen and cause the cattle to run through fences, we are faced with the job of gathering and sorting livestock and fixing fences.

Should the route be located where vehicle travel is possible to maintain, we have had numerous problems at our ranch. Including SDG&E employees and their subcontractors leaving gates open, which allowed cattle to go out. Driving their vehicles off the ranch roads, causing damage to the fields. Leaving trash on our property and taking items off our property.

We have strived to disturb the sensitive environmental aspects of our ranch as little as possible. We have a minimal amount of ranch roads and rarely travel off them by vehicle. The construction of the maintenance roads by SDG&E for these towers will adversely impact the grass lands we have maintained for the past 100 years. The construction of new roads on the ranch would also cause erosion issues.

FIRE AND WIND

Some of the major fires in recent history are

La Jolla Fire 1999 - 8,000 acres

Pines Fire 2002 - 60,000 acres - started by helicopter struck power line in Julian

Cedar Fire - 2003 - 273,000 acres - 32.5 million dollars to FIGHT the fire, average fire

speed 3,600 acres per hour, fastest 40,000 acres per hour 2,232 homes lost - 14 fatalities

Paradise Fire - 56,700 acres , 2 fatalities 176 residences destroyed \$11.3 million to fight

Mataguay Fire, 2004 - 8,867 acres

Volcan Fire - 2005 685 acres

Laguna Fire 1970 started by power line 170,000 acres - clocked at 3,000 acres per hour

CDF acknowledges that they can work around the high voltage towers and lines to fight fires, but they would prefer them to not be there. They will not send a crew where lines are active and arcing the will not dump retardant directly on a line or in an area where it can be carried to the line.

In Santa Ysabel with the type of terrain and access the most effective way to fight fires is with air support. There should not be anything hampering the pilots ability to get low enough in altitude to make an effective drop.

It is our understanding that these transmission lines cannot be easily de-energized, that this is a process and the electricity has to be "rerouted" and can take many hours. This particular scenario was one of the contributing factors that caused delay in controlling the Pinnacle Peak Fire in Flagstaff Arizona. The fire started June 21, 2005 and the high voltage lines were not de-energized until June 26, 2005. The fire was not contained until July 3rd - 13 days later, the biggest factor - High Voltage Lines. Putting these lines overhead will put not only our Ranch at risk, but also the entire County

NIOSH (National Institute for Occupational Safety and Health) minimum requirement for distance away from downed lines for firefighters equal to the span between two poles. Should a line be down near our home or barns, firefighters would not be able to save our property.

In the canyons the line is proposed to be constructed during a brush fire they would carry a risk of a "flashover". Inaja was the fire in which a "flashover" occurred killing 11 men. The disastrous flare-up of the Inaja fire was caused by a critical combination of highly flammable fuels, steep topography and adverse weather. These same conditions remain today in much of the area of the proposed lines. We are concerned with the consequences of a flashover would have on the lines especially if they have not been de-energized.

The "Open Fire" on the Farkash property in Santa Ysabel on November 30, 2006 was caused by a downed power line. Winds that day were clocked at 35 to 40 miles per hour. The Santa Ana winds occur here on a regular basis, and they can be extremely strong. In one particular instance the metal roof of our 80 foot by 140 foot pole barn was blown off in one piece. It is estimated that the winds on that particular day were

clocking 85 miles per hour with gusts in excess of 100 mph.

The possibility of a tower going down is a big concern. We have confirmed the following incidents.

- 1) 31 Steel Power Towers crumpled in South Dakota July 1, 2005 - winds 80-100 miles per hour
- 2) Heavy winds and thunderstorms toppled 500kv giant transmission tower in Elk River MN, August 9, 2001
- 3) Lincoln IL = March 14, 2006 - 100 mile per hour winds 4 Large Power Towers toppled
- 4) 500 KV Powerline downed in Riverside County July 1, 2006 by severe weather and wind
- 6) December 1, 2006 winds knocked over a Utility Tower in Charleston Virginia
- 7) June 1999 wind storms knock down 41 structures on a 345 KV line north of Steele North Dakota
- 8) July 1, 1999 high winds heavily damage four towers in Fargo, North Dakota
- 9) December 22, 1982 winds in excess of 100 miles per hour toppled six 500KV lines in PG&E's territory east of San Francisco
- 10) Redwood City California - December 28, 2006 winds knocked down three 160 foot High Voltage Transmission towers

With winds in excess of 100 miles per hour, this is a possibility that towers may be downed. It is our understanding that on our Ranch, the construction of these lines will be done by helicopter. In the event one is knocked down, it would be a major environmental impact to get equipment and men to them in order to demolish and rebuild.

PROPERTY VALUES:

This lines will cause our property values to decrease. According to Arthur Gimmey, MAI, as presented a seminar before the EMF Regulations and Litigation Institute, in a matched sale analysis in indicated properties abutting power line easements diminished in value from 18% to 53.8%.

HUD (Housing and Urban Development) handbook states has the following guide line for HUD loans:

“No Dwelling or related property improvement may be located within the engineering

(designed) fall distance of any pole, tower or support structure of a high-voltage transmission line, radio/TV transmission tower, microwave relay dish or tower or satellite dish (radio, TV, cable etc.) For field analysis, the appraiser may use tower height as the fall distance.

For the purpose of this Handbook, a High Voltage Electric Transmission Line is a power line that carries high voltage between a generating plant and a substation. These lines are usually 60 kilovolts and greater and considered hazardous. Lines with a capacity of 12-60 kv and above are considered high voltage for the purpose of this handbook. High Voltage lines do not include local distribution and service lines.”

The placement of this line on the 69 kV existing right of way would make it with fall distance of the house and barns.

The overhead lines would significantly diminish the value of our real estate. The diminished value of our property would be a substantial adverse economic impact.

LOSS OF USE

Every inch of ground used to construct these towers and maintenance roads takes away from the ranching operation. Every inch is a loss of use for the grazing of our cattle. The loss of use will be forever. The adverse economical impact to our Ranching operation would be devastating.

VISUAL

We have chosen to leave our property in the Ag Preserve, also known as the Williamson Act. The placement of this line would compromise what this family as been striving for. As stated in the Williamson Act.

“THE USE OR MAINTENANCE OF THE LAND WITHIN SAID AGRICULTURAL PRESERVE IN SUCH A MANNER AS TO PRESERVE ITS NATURAL CHARACTERISTICS, BEAUTY AND OPENNESS FOR THE BENEFIT AND ENJOYMENT OF THE PUBLIC, TO PROVIDE ESSENTIAL HABITAT FOR WILDLIFE”.

We would urge that the this line be avoided where it would compromise the purpose of the Agricultural Preserve.

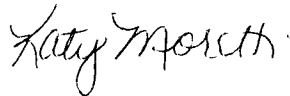
In conclusion, we have conveyed to SDG&E that the best placement of the line on our property to avoid adverse impacts is to go underground along Highway 79.

The newest scoping indicates that there is an earthquake fault line along State Highway 70 contiguous to our property and that it would not be possible to place the line underground. We find it very suspicious that this is not the case where the line would be visible to the San Diego County Preserve and is proposed to be placed underground.

Should this line not be able to be placed underground on our Ranch, there is really no place that the adverse impact would not be significant to our livelihood, property values and personal safety. We would urge that other alternatives be used.

After hearing so much regarding this line, our family is not convinced that the Sunrise Powerlink is necessary. We encourage the CPUC to carefully consider alternatives, that would allow SDG&E to meet there goals which would not include the construction of these towers which would be devastating to San Diego County for generations to come.

Respectfully Yours,

A handwritten signature in cursive script that reads "Katy Moretti".

Katy Moretti