

Feb. 20, 2007

Billie Blanchard, CPUC/Lynda Kastoll, BLM
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Billie Blanchard and Lynda Kastoll,

We wish to express our opposition of the S.D.G.E. Sunrise Powerlink Transmission Lines and all of the Alternative Routes. Not only the ethical questions of why we believe it should not be approved, but also our concerns of possible environmental impacts in the location areas of each of the alternatives. We also are concerned about the response time for commenting on the Alternative Routes, with a deadline of Feb. 24, 2007 for the EIR/EIS.

In all fairness to the average citizen, who may have property, that could be "taken" on an existing 69 kv electrical line Right of Way, and is not aware of the Proposed Alternative Routes of the Sunrise Powerlink Project, more adequate time is needed for understanding, in order to respond. Presentations by S.D.G.E., in which some Community Planning Groups became aware of the Alternative Routes running through their Communities has barely been completed, when a new round of Alternative Routes has now come out as of Feb. CPUC and BLM Scopings. Some of the Communities got their first looks at maps, not showing specific details, too late to respond on

Alternative Routes B, C, and D to the CPUC on the first round, anyway. This time with new additional routes in the second round, the Planning Groups are still not up to date on everything presented in the scoping presentations in Feb. There are still Planning Groups in San Diego County that have not gotten the word out to their communities. In fact, there are Planning Groups that have not had S.D.G.E. presentations and groups that maybe in the location of the Alternative Routes that are not aware at all. Ironically, it is the individual Planning Groups responsibility to receive directives from the County of San Diego in the eventuality of eminent domain. They speak for their communities on land use issues as an integral component of our governmental process and represent every one living in their area who may be effected by this project. It takes time to research these Alternative Routes. Thus in all fairness, everyone affected, has a right to know. Could S.D.G.E. contact each property owner and tell them their property is under consideration for the Proposed Alternative Sunrise Powerlink?

We went to the County Records Dept. to search the maps, and get the names and addresses of all the land owners in the S.W. corner of the Cleveland National Forest boundary of Jamul on the Alternative D Route, in order to get the information about this to them. The map we were given by S.D.G.E. is difficult to understand. It was an overview of the Alternatives. Although we tried copying it and blowing it up to make sure our property was on D Route, it was not clear. When we contacted S.D.G.E. back later and asked for another map, we were told to follow the maps on S.D.G.E. Sunrise Powerlink website, that they had no more maps to give out. On the internet or at the Planning Group presentations, the maps were vague and did not give the detail, we needed, showing only dots representing our land. It is not simple to understand for the average citizen.

Please give the public more time to understand this complex issue in which to respond and better maps.

To extend response time, on the Alternative routes into new areas, would be beneficial to the EIR/EIS process by reviewing land owner's input on environmental data not included in U.S.F.W. studies for Critical Habitat listings, which are mostly on Public Lands. It just stands to reason, that most volunteers, trackers, and wildlife biologists who turn in that information, are not doing species inventories on private lands. Landowners don't want any difficulty in gaining grading, and building permits to develop their lands.

Please note, that Mary Herron, residing in the S.W. corner of Jamul, on D Route, spoke at the Jamul/Dulzura Planning Group about her concerns for safety and health. She has a relative, that had to sign a document, that they would not sue S.D.G.E., if they developed cancer as a result of living in close proximity to an electrical line on their property. In Europe, electrical force fields cause problems and are reconidite as radiation having a direct effect on people.

There were over 100 community members at the Pine Valley Planning Board meeting when S.D.G.E. made their presentation of the Sunrise Powerlink Alternate Routes. Some members voiced concerns about health also. Current and past lawsuits were mentioned. One person spoke about a Mission Valley Business in close proximity to electrical powerlines, in which everyone in the building working over the years, has fallen ill, many with cancer. What are the health risks and liabilities? Should CPUC choose to go forward with this project, are those living close to the lines, going to be asked to sign an agreement with S.D.G.E. that they will not sue the company, if someone gets deathly ill, as a result of it?

In focusing on the health, safety and comfort issues, in the determination for the need for this project, we question how the CPUC could grant a Certificate of Public Convenience and Necessity at all? It is not convenient for the public to have these transmission facilities on our public lands in correlative use as a choice of alternative. Be it BLM, CNF, State-designated wilderness, etc., because these are everyone's lands, to go to, without worry about safety and health concerns.

In 2003, the largest blackout in this country's history, happened when a tree hit a power line, hundreds of miles away in Ohio. Over 9,300 square miles in New York were in darkness. Stephen Flynn's book, Edge of Disaster, believes there is a real risk of terrorist targeting electrical connecting lines and causing blackout disasters far reaching across the nation. Stating such a disaster could take months to get back to normal.

We don't want to give terrorist ideas. However, we are robbing ourselves of the the greatest dangers, if we don't protect ourselves in this country. Terrorism is a threat that we need to safeguard and prepare how we will react in worse case scenarios. This way we become a stronger nation.

When Vern Dennen commented on the Southwest Powerline in close proximity to the Sunrise, in Boulevard at the Feb. Scoping on this subject of vulnerability, he had only 3 minutes to comment. He stated in a terrorist bombing, the towers and power lines would fall like dominoes far reaching.

Any where these lines are located on the Sunrise Powerlink and/or all the Alternative lines, and especially at the substations, they are vulnerable to the possibility of a terrorist disaster. There is even a risk in connecting across the border in Mexico. We ask that you consult National Homeland Security Experts on this matter. We have already lived with blackouts in San Diego County from natural disasters caused by fire. Please provide what worse case, of repair and time periods of history from the fires; in how long it took S.D.G.E. to get San Diego County back online? What are the analysis of recovery of power with undergrounding? The location positioning of the transmission structure supports are exposed and not protected. What guarantee have S.D.G.E. given the CPUC. that infrastructure will be protected? Protected from terrorist? Protected from natural disasters like earthquake and fires? The Boulevard/Campo, Route D, Interstate 8, BCD Route, the West of the Forest Route; are of concern in regards to how close they are to the border.

We have concerns about the Cleveland National Forest and that S.D.G.E. Sunrise Powerlink Transmission is not designed to co-operate or comply with the Cleveland National Forest Land and Resource Management Plan. A 5 year plan to improve, protect, and enlarge Wilderness. Part 3 contains appendices with operational guidelines for land and resource management for selected operations, some of which apply to the construction, operation and maintenance of existing powerlines and related facilities. The Cleveland's only currently - designated utility corridor is identified in Table 485, located on page 14 of Part 2. Any additional utility corridor would require a Plan Admendment, with a decision document following evaluation under the National Environmental Policy Act, as amended. We know in the second round of Alternatives that some routes, example Route D has skirted around private lands in the South West Corner of the Cleveland boundary, to avoid private properties, but D changes are still in the Cleveland Forest. We are concerned that you have a Plan Admendment secured that has passed N.E.P.A. as amended. Is this amended?

The Cleveland National Forest (CNF) has 420,878 acres. The CNF has eleven geographical areas called "Places." Our property is in Deerhorn Valley. A community of Pine Creek Place (PCP).

$420,878 \text{ acres} / 11 \text{ places} = 38,252 \text{ acres} = 9.1\%$ average. Of the 420,878 acres, to understand in perspective, Pine Creek Place is $33,561 \text{ acres} = 8.0\%$ average. The CNF has four places north of San Diego County (SDC). They are Elsinore, Silverado, San Mateo, and Aguanga. This northern area (outside of the county) has $182,424 \text{ acres} = 43.3\%$ average. The CNF in San Diego County (SDC) has seven Places. They are Palomar, San Dieguito/Black Mountain, Upper San Diego River, Mt. Laguna, Sweetwater, Morena, and Pine Creek Place. The SDC area has $238,454 \text{ acres} = 56.7\%$ average.

Pine Creek Place has two Congressionally Designated Wilderness as of Sept. 28, 1984 (Public Law 98-425). Additionally, PCP has recommended Wilderness Areas protected, awaiting pending legislation. That is

20,202 acres of PCP

2,751 acres of Recommended Wilderness PCP
22,953 total acres of Wilderness. That is 33,561 total acres PCP = 68.4% average Wilderness PCP.

The remaining six Places in the CNF in San Diego County, do not have Wilderness Areas. Pine Creek Place is also the southern gateway to the Pacific Crest Scenic Trail. The PCP Wildernesses are undisturbed. This is an area that is not developed. It is remote and isolated, A valued landscape with pristine canyon woodland communities. The S.D.G.E. Sunrise Powerlink needs to find another route other than "D", around the Wilderness heart of the Cleveland National Forest in San Diego County. In the CNF Land Resource Management Plan there are some goals that apply. CNF-S20, "Limits of acceptable change. Methodology will be used to ensure an acceptable state of solitude." In CNF-S21 "Reduce Wilderness Resource degradation."

The "National Strategic Plan" strives to reduce the risk from catastrophic Wilderness fires as well. This is a sacred wildlife sanctuary and refuge. Endangered species are undisturbed in the Pine Creek Wilderness. PCP is not a major utility corridor, it is non-motorised, critical biological, restricted wilderness. Please do not put enormous high power-line towers in the Pine Creek Place..

In the Alternate Routes of the Sunrise Powerlink transmission project are three species of birds that are endangered or becoming extinct. The Southwestern willow flycatcher, the least Bell's vireo, and the coastal California gnatcatcher depend on riparian habitats with streams, like the watershed in the CNF at Pine Creek Place which drain into Barret Lake, ^{and} Morena Reservoir; like Wilson Creek. Also numerous Springs, like Pats Canyon; there is even a spring on stream flows with a current 69 kv line going through it near Eichenlaub Ranch to the north east, not far from Japutul/Lyons Valley Road. On page 18 of the Submission of S.D.G.E. Response to Assigned Commissioner's Directive at Sept. 13, 2006 submitted by E. Gregory Barnes, Attorney, is "The D Route would impact designated critical habitat for multiple species!" This is one of many similar areas, along each of the Alternative Routes. A nesting pair was noted, not long ago, in the Pine Creek Place. In 1995 less than 1000 breeding pairs were counted in five western states. Pine Creek Place has a successfully restored least Bell's vireo habitat, near Pine Creek Trailhead, west of Pine Valley on the Descanso Ranger District of CNF. Least

Bell's vireos are closely monitored by National Forest Biologists. The numbers have improved in the restored area to a survey of 1,500 breeding pairs in 2001. In the coastal shrub community, again near water drainage and sources, the coastal California gnatcatcher primary habitat is found. This includes most of the Alternative Routes for the Powerlink, even lands to the west and north of the CNF and Anza Borrego State Park (A Route). Various shrubbery, sage shrub, California Sagebrush, California Buckwheat are typical habitat. In 1991 it was estimated that there were 2,000 to 3,000 nesting pairs in the United States. Since then numerous fires, some caused by power poles, and one at Barret Substation, and some human-caused have reduced habitat. Areas that have burned twice have become non-native grass lands. The main threat to gnatcatcher is development.

Also Endangered Listed, are Laguna Mountain Skipper on B Alternative Route, and Quino Checkerspot, both butterflies with drastically reduced. The quino checkerspot habitat is upland sage and scrub habitat. But also their habitat can be in city areas, subdivisions and roads. Only

eight populations of the checkerspot butterfly are known. With a survey count of only one in Baja California. In April and May of 2006, quino checkerspot sightings were observed in the San Diego area resulting in negative surveys. The monitoring is primarily for phenological information to document continued presence. Monitoring sites Jacumba (campo) 1 was sighted Apr. 25, Jamul/Dulzura area 3 on Mar. 30, 2 on Apr. 8, 9 (specifically in Dulzura) on Apr. 19, 3 on Apr. 20, 1 on Apr. 30, 1 on May 4, 1 on May 6, 1 on May 13th. This from table 2 of the updated May 31, 2006 research. The Carlsbad Fish and Wildlife Office which currently monitors nine reference sites occupied by Quino Checkerspot butterfly. There are more studies from more areas that may indicate habitat along Sunrise Powerlink and/or Alternate Routes that are numerous to note. Please, can the Aspen Environmental Group follow up with this spring seasons count with U.S.F.W. to be included?

Added to the Endangered list that may be impacted by the Sunrise Powerlink, the Arroyo Toad. This small three inch amphibian can know to survive in only 22 major drainages. The Arroyo Toad spends its entire life in and around intermittent

streams and/or arroyos. They burrow in areas that are easily harmed by construction activities. The powerlink towers go down 40 feet changing waterflow drainage, runoff, erosion, with irrevocable sediment change to the ecotone. Toads don't need water all year long, unlike frogs, they like seasonal dry streambeds. The California Red Legged Frog is also of concern for waterways.

Also to the list of possible impacts and cause for concern are Flannel Bush (*Fremont Odendron Mexicanum*), the Murr's Onion, the Tecate Cypress (in Pine Creek Place, near Guatay and the B, C, D Route), "Rare" Hermes Copper Butterfly (*Lycaena Hermes*) and Dulzura Kangaroo Rat. Also note the American Bald Eagle, a pair have been sighted from Lake Moreno over recent years to Lake Henshaw area, now recently.

Week Please note articles from L.A. Times, Magazine and Sierra Magazine (Vol. 92.07), stating that large migratory groups of birds navigate by the stars at night and mistake lights on poles and become electrocuted. The Week Magazine said some 50 million birds die this way (an estimation). Sierra Magazine said at least 22,000 birds have collided, in a count, in Altamont, California with tall structures. Also 400 Golden Eagles were included in that count.

We know our property is raptur-sensitive, because we see them often; they land on our Middle Pole frequently. Large raptors are sensitive in Valle de San Jose Grant surrounding Lake Henshaw, The Santa Ysabel Valley, the Witch Creek area, and the San Vicente Valley of San Diego Country Estates and can be viewed there as well. For years we have observed the plight of Eagles (usually Golden), Hawks, Falcons and kestrels in the backcountry. Urbanization pushes them out of their territory. The Southland Alternative Routes are still their territory. Some stay in areas in various stages of development waiting for rabbits as the earth moving Caterpillars grade their habitat. We found a wounded Hawk by the large 500kv Line in East Otay Mountain Wilderness. We took it to a Wildlife Rescue Center, hoping it's wing would recover and it would be released back into the wild. It's a magnificent creature that is being pushed out by a population of over 2 million humans in San Diego County.

In regards to Route A, and the Alternate Route BCD that runs through the desert below Table Mountain and the Carrizo Gorge Wilderness, we believe perilous impact concerns for the flat-tailed horned lizard, the desert tortoise, the unarmored three spine stickleback, the desert pup fish, again the least Bell's vireo and southwestern willow flycatcher, and especially the Peninsular Bighorn Sheep, should be given full attention by the CPUC and BLM in the detail of the EIR/EIS.

We can't say enough in praising Anza Borrego State Park, our first camping trip together was there. It is truly a gem of "sanctity, fragility, and biodiversity" that needs to be saved for many generations to experience. It is a travesty to de-designate Wilderness and approve S.D.G.E.'s Proposed Sunrise Powerlink Project in Anza Borrego State Park.

Feb. 8th, 2007, you listened to the greater majority from 2:30 p.m. to 4:00 commenting that they were opposed to this project. Later that evening 400 people showed up with the majority vehemently opposed at the hearing for the State Parks Commission's and

joint hearing with you in Borrego Springs. A wildlife biologist spoke, in her two minute comment, that very day, had studied and witness the Pennisular Bighorn Sheep group right on the very same spot that the Sunrise Powerlink Transmission is proposed to go. Also that evening the Vice President for S.D.G.E. spoke for ten minutes after the presentation and introduction. Did the Vice President at one point say he was not going to pay for undergrounding, that it would cost too much? We see changes and improvements to alter the Powerlink being presented as possibilities, but in the end, is this effort "bait and switch" set ups just to get this approved? The Vice President made remarks that would make one suspect fair consideration by the CPUC.

We are aware that the CPUC web-site does not give locations of meetings and when it does, the CPUC changes locations without correcting it on the web site. It is confusing ^{for the} average citizen to keep up with the Sunrise Powerlink proceedings.

On pg. 28 you list the Environmental Issues and in each issue you focus on potential impacts. We notice that on aesthetics/visuals you do not mention particular Alternate Routes. Did you include Santa Ysabel Valley, a remote and gorgeous valley? Another Aesthetic and ^{pristine} view area along Route D is, as one drives along Japatul Lyons Valley Road. This road looks into beautiful Pine Creek Place, with a glimpse of Barret Lake and a herd of mule deer in the meadows near Wilson Creek. Could this area be analyzed also? Also include, we are opposed to view blockage and skylining up over the ridgeline of Barber Mountain. The BCD Route between BCD 37.9 and BCD-30, also C Route and D Route connecting to Descanso Substation that whole area is picturesque with natural beauty visible from Old Highway 80, some parts from Highway 79 and Interstate 8 and favored by San Diegans for recreation ventures. We regret we did not have time ^{to} say anything about the Alternative West of the Forest Route because all we have is the Figure 8 map to go by which is vague to determine the Aesthetic values. We know

cutting through Jamul to Alpine that there are natural beauty areas like Loveland. We would need more time to do fair justice to all of the Alternative Routes. Perhaps the category of, New 500kV and 230kV transmissions lines through inland and coastal San Diego County, will analyze the areas we have not included in visual impact assessment?

We appreciate the CPUC and BLM for holding scoping meetings in the communities affected by the Powerlink line like Boulevard and Alpine. That was special to those residents. We found out much more this way and got finally, a better map after one meeting showing our property.

As we stated in the beginning of this comment, We are opposed to the Sunrise Powerlink Transmission Line and all of the Alternative Routes.

Sincerely,
Bill and
Shannon Davis
Bill and Shannon Davis
1185 Eastlane
Imperial Beach, CA 91932



CALIFORNIA PUBLIC UTILITIES COMMISSION
U.S. BUREAU OF LAND MANAGEMENT



Comment Form

Proposed Sunrise Powerlink Project

Date: 2/20/07

Name*: Dan Desmond

Affiliation (if any)*: Property Owner

Address*: 14940 Montana Serena

City, State, Zip Code*: El Cajon CA 92021

Telephone Number*: (619) 441-7585

Email*: dandesmond@sbcglobal.net

Comment: Please do not use the West of Forest plan - we would all be heavily impacted.

Please use the original plan through the desert

**Please print. Your name, address, and comments become public information and may be released to interested parties if requested.*

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be received by February 24, 2007. Comments may also be faxed to the project hotline at (866) 711-3106 or emailed to sunrise@aspeng.com.