




A  Sempra Energy utility™

David L. Geier
Vice President
Electric Transmission & Distribution

San Diego Gas & Electric
8330 Century Park Court
San Diego, CA 92123-1530

Tel: 858.650.6131
Fax: 858.650.6106
dgeier@SempraUtilities.com

February 24, 2007

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

RE: Notice of Second Round of Scoping Meetings on Alternatives to the Proposed
Sunrise Powerlink Project

Dear Ms. Blanchard:

San Diego Gas & Electric Company (SDG&E) submits the following comments on the California Public Utilities Commission's (CPUC) and the Bureau of Land Management's (BLM) Second Scoping Notice for the proposed Sunrise Powerlink Project. SDG&E's comments focus on the alternatives the CPUC and BLM will analyze in the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS).

EIR/EIS Schedule

Section D on page 2 of the Second Scoping Notice identifies the current EIR/EIS schedule. SDG&E is concerned about the potential schedule delays associated with the CPUC's right-of-entry (ROE) issues on the alternatives that will be fully analyzed in the Draft EIR/EIS as well as the timing and completion of biological surveys and studies associated with such alternatives. If the CPUC/BLM anticipates a change in the schedule due to ROE issues and/or the ability to complete necessary surveys and studies, SDG&E should be advised of such changes in a timely manner. To meet the anticipated in-service date, SDG&E is aggressively pursuing its own ROE and survey schedule. Any delays in the EIR/EIS schedule will likely affect SDG&E's activities and the Project in-service date.

CPUC/BLM Identification Of Basic Project Objectives

In its Proponent's Environmental Assessment (PEA), SDG&E presented eight project objectives. In the Second Scoping Notice, the CPUC and BLM reduced SDG&E's proffered objectives to the following three basic project objectives:

Basic Project Objective 1: to maintain reliability in the delivery of power to the San Diego region

Basic Project Objective 2: to reduce the cost of energy in the region

Basic Project Objective 3: to accommodate the delivery of renewable energy from geothermal and solar resources in the Imperial Valley and wind and other sources in or outside of San Diego County

Rather than specific project objectives, the CPUC/BLM's basic project objectives only reflect the 3 general components of the Project's purpose and need. The Draft EIR/EIS should contain the fully realized eight objectives and not just the CPUC/BLM's summaries used to compare alternatives to the Project. This is because the eight objectives provide the numerical and qualitative means to determine the degree to which project alternatives could attain these objectives. The purpose of the alternatives analysis is to suggest ways in which most of the project objectives might be achieved at less environmental harm.

For example, using the CPUC/BLM's third basic project objective, an alternative that was only capable of economically transmitting a small portion of renewable energy would still meet the objective, even though SDG&E's objective is to economically access renewable energy supplies sufficient to meet a 20% goal by 2010. Perhaps an alternative that provided economical access to renewable energy supplies sufficient to meet a 15% goal could mostly meet this project objective, but not an alternative that only provided economical access sufficient to meet a 5% goal. Without benchmarks there is no way to demonstrate whether and how much an alternative meets any given objective. Project objectives properly written should not be unduly broadened by a lead agency, particularly when an application is deemed complete. SDG&E thoughtfully developed the eight objectives to facilitate a fully disclosed, meaningful analysis and comparison of the merits between the Project and any alternative. Refined project objectives are also important for the CPUC/BLM in the preparation of findings or a statement of overriding consideration, if any.

Alternatives

SDG&E requests that the CPUC/BLM include in the Draft EIR/EIS information on various alternatives in the 4 links as described below. In addition, SDG&E has continued to assess potential alternatives and engineering modifications that could reduce environmental impacts. As a result, SDG&E suggests route variations and other modifications that the CPUC and BLM should consider analyzing in the Draft EIR/EIS.

Imperial Valley and Anza-Borrego Link Alternatives Retained

Imperial Valley FTHL Alternative

SDG&E looked at similar options during the routing development but concluded that there was no overall reduction in impacts, merely a shift of impacts from flat-tailed

horned lizard habitat to agricultural lands. SDG&E has proposed a modified alignment to this alternative as described on pages 9 and 10 below.

Partial Underground 230 kV ABDSP SR78 to S2 Alternative

SDG&E has technical, engineering and environmental concerns about this alternative. SDG&E is also concerned about the ability of this alternative to expand over time and maintain transfer capability. The overall design goal for the Sunrise Powerlink is to bring a single 500 kV line as close to the SDG&E load center as is reasonably practicable, then to use 230 kV lines to distribute the power to major 230 kV load-serving substations within the San Diego load center.

Based on SDG&E's current construction standards, it takes four 230 kV lines to match the capacity of one 500 kV line. Thus, under an ultimate design for an all-lines-in-service condition there could be at least four 230 kV circuits coming out of the Central Substation. But, in order to maintain transfer capability on the 230 kV circuits equivalent to the transfer capability of the 500 kV portion of the Project for an N-1 or a credible N-2 outage of the 230 kV circuits, there should really be five or six 230 kV circuits coming out of the Central Substation. The design and layout of the Central Substation can accommodate up to six 230 kV lines.

If the San Felipe Substation becomes the transition point between 500 kV and 230 kV with 230 kV underground lines brought through the ABDSP then ultimately as many as four additional underground 230 kV circuits would be required through the ABDSP, for a total of six underground 230 kV circuits. Environmentally and economically, it is better to have one overhead 500 kV transmission line through the ABDSP than to have six underground 230 kV transmission lines through the Anza Borrego Desert State Park (Park or ABDSP). Although this ultimate build out may not be needed for decades, at least one or two additional underground 230 kV circuits are possible within the first decade following completion of the Sunrise Powerlink.

Based on the description and mapping provided, the underground segment of this alternative begins at the San Felipe Substation and travels westerly in Old Kane Springs Road until intersecting State Route (SR) 78 approximately 1 mile east of Narrows Substation. Beginning west of the intersection of Old Kane Springs Road and Split Mountain Road, Old Kane Springs Road is an unpaved road with a disturbed width varying from approximately 10 ft. to 15 ft. As described in SDG&E's PEA, two (2) 230kV circuits would require two (2) separate ductbanks with six (6) cables each. This configuration will require a much greater area than what is currently available in and along the existing roadway. If expansion of the disturbed area along the roadway is limited or impossible, derating of the 230kV circuits is anticipated due to mutual heating effects, which will reduce the transfer capacity of the Sunrise Powerlink.

The unpaved sections of Old Kane Springs Road are also problematic due to terrain, geology and environmental impacts. One concern during both construction and operation is several large washes that cross Old Kane Springs Road. Stormwater flows

through these washes could damage the unpaved road resulting in delays during construction and maintenance. Depending on the frequency and severity of flows within these washes, the underground facilities could be damaged. Minimizing the impact of stormwater flows by placing the transmission line in a deeper trench could cause increased construction impact area and derating of the circuits.

For the segment of this alternative in SR-78 between Old Kane Springs and S2, the width required for construction of two (2) 230kV underground circuits will require expanding the disturbed areas in and along the highway. Portions of the highway narrow to as little as 23 feet in width, which is much less than the space needed for the installation of two (2) 230kv circuits. This will require additional excavation along the roadway, which is anticipated to include blasting in many areas. If expansion of the disturbed area along the roadway is limited or not possible, derating of the 230kV circuits is expected due to mutual heating effects, which will reduce the transfer capacity of the Sunrise Powerlink.

In assessing this alternative, the Draft EIR/EIS should also consider traffic impacts on SR-78 during construction due to the limited width of the roadway. Road and lane closures are anticipated. The resulting traffic delays and detours may be unacceptable to Caltrans. Recently, there has been public outcry about the closing of SR78 for several weeks on another project. Also, the alignment within SR-78 will require a bridge attachment crossing approximately 2.7 miles east of the intersection of SR-78 and S-2. Bridge attachments will require Caltrans approval.

This alternative includes two transitions from underground to overhead, each requiring two (2) 230kV steel cable poles. The cable poles will require a clear area of approximately 200 ft. x 200 ft. near the roadway. Along the length of this alternative, several equipment and material storage areas (approximately 5 acres each) will be required during construction. It is anticipated that 2-3 of these temporary areas will be within ABDSP. Additional space would be needed during construction to stockpile excavated material.

Due to the length of the underground construction for this alternative (approximately 25 miles) and difficulties associated with traffic control, access, blasting, and environmental mitigation, construction will likely take significantly longer, thereby delaying the in-service date. Other factors that may affect the construction schedule include limited construction resources, materials availability, and Caltrans and County of San Diego permitting.

As indicated in the Second Scoping Notice, expansion of this alternative to accommodate future 230kV circuits from San Felipe Substation would not be possible without significant expansion of existing roadways and disturbed areas. If existing roadways and disturbed areas cannot be expanded, alternate routes for future circuits across portions of ABDSP would be required.

Additional right of way will be required for transmission facilities placed underground along Old Kane Springs Road. The transmission facilities located within the public right of way for State Route 78 and S-2 (a county road) would be installed under encroachment permits issued by Caltrans and the County of San Diego. From a land rights perspective, these facilities would be unprotected and may be subject to future ratepayer expense. If the location of the facilities conflicted with road improvement plans, the agencies would order the relocation of these facilities at ratepayer expense.

Borrego Valley Underground Alternative (Similar to the SR78/S2 Underground Alternative)

If the CPUC and BLM insist upon an underground alternative through the Park, SDG&E requests that the Draft EIR/EIS evaluate the following alternative. With regards to the proposed CPUC/BLM alternative of a 500/230kV substation at San Felipe east of the Park and then proceeding from the substation with 230kV underground within SR 78 through the Park, this alternative substantially limits SDG&E's ability to meet the project objectives. If this alternative is carried forward for full analysis, however, then SDG&E strongly suggests that a modified Borrego Springs route also be carried forward, placing the 230kV underground within SR 78 then Borrego Valley Road/S3 underground to a 230/12kV substation replacing the proposed 500/12kV substation. The 230kV facilities could then be placed underground within Tubb Canyon Road where it can proceed until it reaches the base of the escarpment to a riser pole, where it can go overhead following the 500 kV Borrego Valley Route as described above but at 230kV. The SR 78 or Borrego Valley alternative would traverse existing wilderness either for geologic or topographical reasons, however, the Borrego Springs route seems superior because it allows for the removal of all substation and transmission facilities within the Park, results in a net increase in designated wilderness and increases reliability for Borrego Springs. Nevertheless, this alternative presents environmental and constructability concerns similar to the Partial Underground 230 kV ABDSP SR78 to S2 Alternative but reduces impacts to the Park.

Overhead 500 kV ABDSP Within Existing 100 Foot ROW

SDG&E met with representatives of the ABDSP throughout the route development process. SDG&E identified two viable "Macro Corridors" traversing the ABDSP in which the Project could be sited. Based on discussions with the ABDSP, the corridor containing the existing SDG&E/IID 69/92 kV transmission line ROW was preferred. This corridor was preferred for several reasons. First, this was an existing transmission line in a disturbed setting that had been in place through the ABDSP since the 1920's. Second, the existing ABDSP General Plan expressly recognizes its existence and allows for future expansion of facilities. An excerpt from the Park's General Plan (2004) states:

*Utility companies (such as San Diego Gas & Electric and the Imperial Irrigation District) have existing transmission lines through the Park. These companies have the **responsibility to address California's future***

need for additional electrical power, which is critical to the continued economic viability of the State. Anticipated electrical needs in Southern California will require the utility companies to evaluate proposals to expand the existing level of service... Reconciling the inherent conflicts between the future electrical needs of the State and the protection of Park resources, will require the utility companies and State Parks to work closely together in planning for the size and location of these future facilities. (Emphasis added).

In accordance with the General Plan, SDG&E and ABDSP representatives considered several structure and routing options to site the line and maximize the use of existing linear features while minimizing potential impacts. The primary objective of routing options through the ABDSP was to reduce the number of structures by approximately 50%, minimizing ground disturbance and locating structures in the least environmentally sensitive areas. Specifically, SDG&E developed a preferred route with fewer and shorter, less visible structures than the existing ROW alignment. This preferred route also avoids culturally sensitive areas, avoids recreational areas and requires fewer road crossings over SR 78. The preferred route substantially traces the existing ROW alignment, but deviates from the ROW in certain locations to further minimize environmental and visual impacts.

This preferred route deviation from the existing ROW crosses State Designated Wilderness Areas to meet the requirements identified above. Therefore, SDG&E has proposed to relocate some sections of the ROW. SDG&E would abandon those sections of the existing ROW, which have similar wilderness characteristics and higher-quality cultural characteristics. California Department of Parks and Recreation (State Parks) officials could then adjust the designated wilderness boundary to conform to the proposed minor route deviation. SDG&E's proposal would result in no net loss of designated wilderness areas, while sensitive cultural areas would be placed in the protected wilderness zone.

The Sunrise Powerlink could be built in the existing ROW without any impacts to designated wilderness areas. However, SDG&E has proposed a preferred route that slightly deviates from the existing ROW and would reduce impacts to the surrounding environment. SDG&E supports carrying forward the existing ROW, with minor deviations, for full analysis in the Draft EIR/EIS.

Due to the narrower right-of-way width in this alternative, significantly taller transmission structures are required to attain a narrower structure width that stays within the right-of-way. Maintenance practices may have to be modified to stay within the 100 ft. right-of-way. This could include additional helicopter maintenance.

Portions of the alignment are very close to SR-78 which includes several highway crossing. This will require additional traffic control measures during construction and possibly for maintenance. Portions of the alignment that encroach SR-78 right-of-way will require Caltrans approval. Additional tree trimming may be required along the

southwest corner of Tamarisk Grove Campground to maintain clearance to the 500kV transmission line.

Although the proposed transmission line could be constructed within the existing 100 foot ROW, SDG&E encourages the CPUC and BLM to consider an alternative using the preferred alignment with 150 foot ROW east of Tamarisk Grove Campground. In this segment, the preferred project does not impact designated wilderness. West of the Campground, this option would utilize the existing ROW thus avoiding impact to wilderness.

Imperial Valley and Anza-Borrego Link Alternatives Eliminated

SDG&E ABDSP Borrego Valley Alternative

SDG&E strongly encourages the CPUC and BLM to carry forward the Borrego Springs alternative for several reasons. This option substantially minimizes State Park potential direct impacts and provides compensatory measures for remaining Park impacts. Those measures include the removal of all transmission line and substation facilities in the Park. This route follows existing disturbed dirt roadways, which are non wilderness by Park definition, except for approximately two miles. Just east of the Park in a large lot residential development area, the route follows an existing dirt road on private property, which provides access to infrastructure to serve the development in the Tubb Canyon area. As the route enters the Park, it deviates away from the springs used by bighorn sheep as quickly as possible and enters topography that intervenes between the proposed line, S22 and the scenic overlook, to minimize visual effects. From there, several structures could be constructed and maintained with helicopter access only, much like the existing SWPL line going through portions of Jacumba, which is also in designated critical habitat for the bighorn sheep. From the road gap area, the line would follow the existing dirt road connecting to S22 in Culp Valley, again being visible for only a short period until it goes behind intervening topography. The line would exit the Park along the southern edge of Ranchita and structures can be located to minimize sky lining and visibility from a majority of the area.

This alternative is the only route option that can trade the wilderness and transmission facility areas in the Park, resulting in a net increase in designated wilderness area. The wilderness area to be traded is under the jurisdiction of the State Parks Commission who has the authority to make such trades especially if they increase wilderness and restore the Park to a more natural condition. The existing transmission line to be removed traverses campgrounds and sensitive cultural sites, and this alternative would avoid such areas. SDG&E is the only private entity with existing facilities traversing the Park thus providing a unique opportunity to trade locations to minimize potential wilderness impacts and provide direct benefits to the Park. No other private entity has this ability. and public entities currently traversing the Park are limited to Caltrans and the County, both of which have existing, relatively wide, rights of way with well established roads and unlikely facilities expansion. Even if these facilities

expanded, there are no engineering or environmental advantages to placing the road facilities outside of the right of way.

Electric reliability to Borrego Springs would also be substantially increased, as reliability has been a problem for the area and would be another benefit of this alternative due to the provision of a strong, high reliability 500kV transmission source for the Borrego Springs distribution load.

A closer look at current wilderness designation documentation shows a high level description of general areas. As such, there is an opportunity to adjust wilderness boundaries to include sensitive cultural sites and other similar high value habitat while maintaining the general wilderness boundaries. This alternative provides a chance to increase designated wilderness area by removing more of the proposed and existing transmission lines outside of the Park.

In addition, the Draft EIR/EIS should analyze an alternative that avoids or substantially minimizes waters/wetlands or coastal zone impacts. Such an alternative should be analyzed to avoid the potential for subsequent environmental review requirements and associated delays in SDG&E's post-CPCN permitting. For example, the Borrego Springs Route was designed to address waters of the US impacts as well as park impacts by avoiding major wash areas within the Park (another benefit of retaining this alternative). It is important to note that the State and Regional Water Boards found the LEAPS' EIS inadequate for subsequent permitting purposes, and SDG&E would like to ensure full environmental analysis to satisfy the requirements of the California Coastal Commission, Army Corps of Engineers, CDFG and State Water Resources Control Board.

From an engineering perspective, the alternative as proposed by SDG&E is approximately 2.4 miles shorter and has 18 fewer structures between the eastern boundary of ABDSP and the Central East Substation than the preferred route. Within the boundaries of ABDSP, this alternative is approximately 10.4 miles shorter and has 75 fewer structures than the preferred route.

This alternative includes the removal of the existing Narrows Substation and 69/92kV transmission lines within ABDSP and the addition of a new 500/12kV substation within Borrego Springs. These modifications will improve electrical reliability, voltage levels and power quality for Borrego Springs.

The elimination of the underground 69/92kV transmission line within SR-78 and 500kV transmission lines adjacent to the SR-78 between Old Kane Springs Road and Yaqui Pass Road will greatly reduce short and long term traffic impacts. Because there will be less facilities within ABDSP, temporary and permanent impacts resulting from construction and maintenance activities will be reduced. Additional ROW will be required though.

Other Imperial Valley and Anza-Borrego Link Alternatives

Imperial Valley FTHL Modification to the Alignment

SDG&E encourages the CPUC/BLM to consider an alternative to its Imperial Valley FTHL Alternative (D-1) that utilizes existing linear features (section/property lines and canal rights-of-way) and avoids a master plan development called Imperial Reserve, being proposed by the Castle Euroasia and Zen Media Corporations. SDG&E's preferred route, if unchanged at this location, could significantly impact this planned development consisting of up to 3,800 single family homes, a golf course, one or more lakes and commercial development. Land rights would not be affected by this alternative alignment, as SDG&E would have to obtain easements of similar scope on private lands.

The alternative is as follows: Beginning at an angle point adjacent northeasterly to IID's Westside Main Canal in Section 29, T16S-R12E, SBM near the southeast corner of the NE1/4-SE1/4; proceed northwesterly adjoining the easterly side of the Westside Main Canal through Sections 29, 20, 19 and 18 to a crossing of Interstate Highway 8 near the northwest corner of the SW1/4-SE1/4 of Section 18; proceed northwesterly to an angle point easterly of the Westside Main Canal adjoining the northerly side of the East-West One-Quarter line of Section 18; proceed westerly along the One-Quarter line to intersect the preferred alternative northwesterly of the East One-Quarter corner of Section 13, T16S-R11E, SBM.

West of Dunaway Road Alternative

SDG&E encourages the CPUC and BLM to consider a "Dunaway Road" alternative that follows existing linear features (section/property lines and transportation rights-of-way) and avoids a master plan development called Imperial Reserve, being proposed by the Castle Euroasia and Zen Media Corporations. SDG&E's preferred route, if unchanged at this location, could significantly impact this planned development consisting of up to 3,800 single family homes, a golf course, one or more lakes and commercial development. Land rights would not be affected by this alternative alignment, as SDG&E would have to obtain easements of similar scope on private lands.

This option is as follows: Beginning at the angle point adjacent to SDG&E's SWPL transmission line in Section 30, T16S-R12E, SBM the alternative would continue northwesterly adjoining the SWPL transmission line to a new angle point in the NE1/4-NE1/4 of Section 26, S16S-R11E, SBM, approximately 500 feet west of the east line of Section 26; proceed northerly approximately 500 feet westerly of the east section lines of Section 26, 23, 14 and 11 to the southerly right-of-way line of the San Diego and Arizona Railroad in the Southeast One-Quarter of Section 11; proceed easterly adjoining the railroad right-of-way to the easterly property line of the BLM parcel in Section 12 (APN 034-380-40); proceed northerly adjoining the easterly line of the BLM parcels (APN 034-380-40 and APN 034-390-25), crossing the railroad right-of-way and the Evan Hewes Highway, to an angle point in the Northeast One-Quarter of Section 12; proceed northeasterly to an angle point near the southwest corner of the N1/2-NE1/4-NW1/4 of Section 7, T16S-R12E, SBM A(PN 051-020-28) to intersect the preferred alternative.

West Main Canal – Huff Road Modification Alternative

SDG&E encourages the CPUC and BLM to consider an alternative that avoids a planned unit development and uses existing linear features (section/property lines and transportation and canal rights-of-way). This alternative avoids impacts to the race track development called Raceland, proposed by Raceland USA. SDG&E's preferred route, if unchanged, would cross the northwest portion of this development. The alternative routes the line southwest along the west side of the IID Westside Main Canal on the east side of (and thus avoiding) the Raceland development area. Land rights would not be affected by the alternative alignment as SDG&E would have to obtain easements of similar scope on private lands.

This alternative is as follows: Beginning at new angle point on the preferred alternative in the NW1/4-SW1/4 of Section 29, T15S-R12E, SBM proceed northeasterly to an angle point adjoining the northerly side of the East-West One-Quarter line of Section 29; proceed easterly adjoining the East-West One-Quarter line to an angle point adjoining the westerly side of the Westside Main Canal in the SE1/4-NW1/4 of Section 29; proceed northeasterly adjoining the westerly side of the Westside Main Canal through Sections 29, 20, 21, 22 and 15 to an angle point on the easterly side of Huff Road in the NW1/4-SE1/4 of Section 15; proceed northerly along the easterly side of Huff Road to intersect the preferred alternative in the SW1/4-NE1/4 of Section 10, T15S-R12E, SBM.

San Felipe/Old Kane Springs Road Alternative

SDG&E encourages the CPUC and BLM to consider an alternative that avoids a number of smaller rural residential tracts along Old Kane Springs Road. Land rights would not be affected by this alternative alignment, as SDG&E would have to obtain easements of similar scope on private lands.

It is described as follows: Beginning at a new angle point on the preferred alternative in the SW1/4-0NW1/4 of Section 26, T12S-R8E, SBM, approximately 0.25 mile southeasterly of IID's San Felipe Substation; proceeds continue northwesterly to a point in the NW1/4-NW1/4 of Section 26 approximately 0.25 mile northerly of the San Felipe Substation; proceeds northwesterly to a point adjoining the northwesterly side of a road along the south line of Section 22; proceeds westerly along the northerly side of the road and the south line of Section 22 to intersect the preferred alternative in the SW1/4 of Section 22.

Central Link Alternatives Retained

Santa Ysabel Existing ROW Alternative

SDG&E looked at this alternative in the development of its Project and determined that potentially significant visual and cultural impacts could occur to the

Nationally Registered Santa Ysabel Chapel (Mission San Diego Assistencia). This route also has a highly visible location immediately adjacent to SR 79 and would require additional right of way.

Santa Ysabel Partial Underground Modified by SDG&E Alternative

If the CPUC and BLM insist upon an underground option in the Santa Ysabel, SDG&E encourages the CPUC and BLM to consider a modification to it. Rather than follow the existing 69 kV transmission line right-of-way from MP 100 to the SR79 crossing, this option would transition to underground at the angle point in the preferred alternative near the Center One-Quarter corner of Section 8, T12S-R3E, SBM, adjoining Mesa Grande Road in APN 2470-400-600; proceed underground within Mesa Grande Road to SR79; turn south within SR79 (joining the Santa Ysabel Partial Underground Alternative) and then turn west within SR78, transitioning to overhead to rejoin proposed route at MP 108.3 (the point where the proposed route crosses SR78).

Compared to the Santa Ysabel Partial Underground Alternative, this alternative eliminates the need to clear oak trees to the west of SR79; reduce the number of oak trees to be cleared; greatly reduce and/or eliminate visibility of new 230 kV lines from SR79; and, would greatly reduce and/or eliminate visibility of new 230 kV lines through Santa Ysabel Valley.

Construction of two (2) 230kV underground circuits along the alignment proposed for this alternative will require lane closures and additional traffic control on SR79 and SR78. Traffic control would also be an issue during maintenance. The most significant impact of this option will be construction at the intersection SR-78/SR-79 in the town of Santa Ysabel. There will also be significant impacts to residents in nearby communities. Vehicle access to properties along SR79 may be restricted at times during construction which would require residents to use alternate routes. Due to potential significant impacts to both SR78 and SR79, this alternative will require Caltrans approval.

There is one bridge crossing located to the north of Santa Ysabel approximately 1.3 miles. Crossing this bridge would require either bridge attachment, horizontal directional drill, or jack and bore techniques. The additional length of underground construction required for this alternative could delay the Project in-service date. Transmission facilities would be located within the public right of way for SR78 and SR79, under an encroachment permit issued by Caltrans. From a land rights perspective, Caltrans could order the relocation of these facilities at ratepayer expense.

Central Link Alternatives Proposed by SDG&E

Mesa Grande Alternative

SDG&E strongly encourages the CPUC and BLM to consider a modified segment that SDG&E refers to as the Mesa Grande Alternative. This alternative provides for better screening of the transmission line from the Santa Ysabel Valley viewshed; utilize an existing access through the Cauzza property; avoid use of access roads to non-impacted Batchelder parcels; and require less access road construction. Land rights would not be affected by this re-route of the preferred alignment, as easements of similar scope would be obtained in either case.

This option is as follows: Beginning at the angle point on the preferred alternative near the Southwest corner of the SW1/4-SW1/4 of Section 30, T11S-R3E, SBM proceed southeasterly to an angle point on the southerly side of a ridge saddle along the easterly line of APN 195-1-00-0-3 in the NE1/4-SW1/4 of Section 31; proceed southwesterly along the lower portion of the northwesterly facing slope of small valley running from the northeast to the southwest to the existing angle point in the preferred alternative in the NW1/4-SW1/4 of Section 6, T12S-R3E, SBM adjacent to the southerly side of Mesa Grande Road.

Oak Hollow Underground Alternative

This alternative would require approximately 0.5 miles of additional undergrounding of two (2) 230kV circuits and would relocate the two (2) 230kV cable poles from near the boundary of Mount Gower Open Space Preserve. A new segment of two (2) 230kV overhead transmission line will be required from the cable poles to the SDG&E preferred alignment.

The existing roadways do not have adequate width to accommodate all facilities for two (2) 230kV underground transmission lines. This will require expanding the disturbed areas and some portions of the existing roadways. Expansion of existing SDG&E access roads or construction of new access roads may be necessary to avoid conflicts with existing SDG&E overhead transmission lines and other overhead utilities. Construction in and along existing roadways will impact residential traffic and could restrict access to properties during construction.

Coastal Link Alternatives Retained

Pomerado Road to Miramar Area North

For the underground segment east of I-15, construction is within Pomerado Road, which is a major roadway with heavy traffic volume. Construction within the roadway would require lane closures, which would impede access to residential areas, military facilities, schools and Alliant International University. SDG&E recommends that construction impacts related to traffic and noise along this route be thoroughly assessed, not only to homes but to businesses as well. Currently, there are major underground improvements for a new Middle School at Willow Creek Road and Pomerado Road that have caused significant traffic impacts in the area. Road closure and nighttime

construction as traffic mitigation was not considered as an option due to the proximity of homes in this area and the short-term noise impacts.

This alternative crosses I-15, which would require Caltrans approval. Crossing the interstate would require either bridge attachment, horizontal directional drill (HDD), or jack and bore techniques. If bridge attachment is not allowed by Caltrans, there is limited space for jack and bore or HDD construction activities, which may require modifications to the proposed alignment or taking of commercial property.

For this alternative, transmission facilities would be located within the public right of way of city streets, in a franchise position. Similar facilities relocation issues arise with this option as described above with the Santa Ysabel partial underground alternative.

MCAS Miramar

The feasibility of this alternative is questionable primarily due to concerns with obtaining land rights across MCAS Miramar, limited space within existing access roads, unfavorable terrain and environmental issues. SDG&E avoids siting its facilities on military lands such as Miramar because the easements granted by the Department of Defense (DoD) are for 50-year terms and they contain very restrictive language, making it more difficult for SDG&E to construct and maintain its facilities. Additionally, easement renewals could be at substantial ratepayer expense.

Like the Pomerado Road alternative discussed above, this alternative crosses I-15, which requires Caltrans approval. The additional length of underground construction required for this alternative will likely delay the in-service date. Environmental review/permitting requirements, restricted work hours, availability of materials, limited construction resources and mitigation could also delay the schedule.

Rancho Peñasquitos Boulevard Bike Path Alternative

This alternative would require Caltrans approval, which will affect both construction and maintenance practices. Issues related to this option that could affect Caltrans operations include construction ingress/egress, traffic control, impacts to the Salmon River Road bridge and impacts to the Rancho Peñasquitos Blvd. off ramp. Construction of this alternative would require closure of the bike path for approximately 1-2 months.

For this alternative, transmission facilities would be located within the public right of way for State Route 56, under an encroachment permit issued by Caltrans. From a land rights perspective, the facilities would be somewhat unprotected and may be subject to future ratepayer expenses. If the location of the facilities were in conflict with road improvement plans, Caltrans would order the relocation of these facilities at ratepayer expense. Additionally, the right of way for SR 56 in this area is partially owned by Caltrans and the City of San Diego. Because the right of way transfer from the

City to Caltrans has not been finalized, it is uncertain at this time who would manage the bike path.

Carmel Valley Road Alternative

While avoiding the Preserve itself, this alternative was found to traverse other county and state owned lands purchased for the preservation of biological resources including coastal sage scrub habitat and vernal pools. These lands are, for all intents and purposes, part of the preserve and are included in the City's Multiple Habitat Planning Area preserve.

In addition, construction of the underground portion within Carmel Valley Road will cause significant traffic impacts during construction due to lane closures. Traffic control will also continue to be an issue during maintenance. Also, Carmel Valley Road contains numerous underground utilities which would conflict with the proposed alternative. At a minimum, these utility conflicts would increase the duration of construction activities within the roadway.

A bridge crossing is required approximately 0.5 miles west of Camino Del Sur. This would require bridge attachment, horizontal directional drill, jack and bore or open trench techniques. At the point where Carmel Valley Road intersects the existing SDG&E transmission corridor, the transmission line would transition from underground to overhead. To accommodate the new 230kV circuit within the existing 100 ft. right-of-way, that right-of-way would need to be widened. Depending on the additional right-of-way width acquired, the existing 138kV transmission line may be modified.

Transmission facilities for this option would be located within the public right of way of city streets, in a franchise position. From a land rights perspective, the facilities would be somewhat unprotected and may be subject to future ratepayer expenses. If the location of the facilities were in conflict with road improvement plans, the City of San Diego would order the relocation of these facilities at ratepayer expense.

Los Peñasquitos Canyon Preserve and Mercy Road Alternatives

For the segment of the alternative east of I-15, there are concerns associated with construction within Scripps Poway Parkway (roadway name east of I-15). This is a major roadway through Scripps Ranch and Poway that has heavy traffic volume east of I-15. Construction within the roadway would require lane closures, which would impede access to residential areas and businesses. Maintenance activities will also result in additional traffic impacts. Since this segment crosses under I-15, Caltrans approval is anticipated. For the underground segments west of I-15, traffic control on Mercy Road, Black Mountain Road and Park Village Drive would impact several residential areas.

As described above, this alternative involves roadways with numerous underground utilities, which would increase the duration of construction activities within the roadway. Also, transmission facilities would be located within the public right of way of city streets, in a franchise position. Similar to the Carmel Valley Road alternative, land rights concerns exist with this alternative.

Black Mountain to Park Village Road Underground Alternative

The primary concern with this alternative is traffic impacts to Black Mountain Road between SR-56 and Park Village Drive. This road segment has heavy traffic volumes due to its close proximity to the Black Mountain Road exit off of SR-56. Construction within the roadway would require lane closures, which would impede residential access and impact traffic on SR-56. Maintenance activities will also cause traffic impacts. As a result, Caltrans approval is anticipated. For the underground segment in Park Village Drive, traffic control would adversely affect several residential areas.

Similar to the alternatives described above, the roadways contain numerous underground utilities, which would increase the duration of construction activities.

Coastal Link System Upgrade Alternative

SDG&E has preliminarily reviewed an option that eliminates the Sycamore Canyon – Penasquitos 230 kV line (SX-PQ 230) while retaining all other elements of the proposed Project. Absent the SX-PQ 230 kV line, approximately a dozen associated additional upgrade projects might be required. This increases total Project costs a couple hundred million dollars (even after subtracting the cost of the SX-PQ 230 kV line). Further, this option could nevertheless reduce the import capability and thus reduce the economic benefits of the Project.

Substation Alternatives Retained

Mataguay Substation Alternative

SDG&E reviewed a similar location in its Project development and determined there could be significant impacts to Stephen's kangaroo rat habitat in this area. Also, there were potential visual impacts along SR79 in this area.

Vista Irrigation District (VID), the owner of the property, has indicated that the land must remain in its control for protection of its watershed surrounding Lake Henshaw. Thus, the substation site could not be acquired from VID in fee, but only as a license, lease or easement. Obtaining a license, lease or easement from VID is unacceptable because SDG&E seeks fee ownership of its substation sites. Fee ownership provides maximum operational control. Also, SDG&E has already purchased property for the 500 kV substation site from a willing seller and at a reasonable price.

Substation Alternatives Not Identified as Part of SWPL Alternatives

The SWPL alternatives retained by the CPUC/BLM do not include associated potential substation sites. Therefore, it is assumed the majority of the SWPL alternatives would utilize the proposed SDG&E Central South Substation (the “Alternative substation site” in the PEA). This substation would be utilized for the Route D alternative and the Route BCD alternative.

Two of the route alternatives retained by the CPUC/BLM, however, do not terminate at the Central South Substation and, therefore, would require an additional substation site along the Interstate 8 and the West of the Forest Alternative. Thus, the CPUC and BLM should include in the Draft EIR/EIS substation alternatives associated with the southern alternatives to ensure compliance with CEQA and NEPA. Although the potential substation locations were not part of the Second Scoping Notice, SDG&E has developed and incorporated substation siting requirements as part of its PEA, specifically in the Routing and Siting Study and Chapter 2 and 3 of the PEA.

Southwest Powerlink Alternatives

SWPL Alternatives Retained

Reliability is major object of the Sunrise Powerlink. The reliability concerns discussed here pertain to all of the SWPL Alternatives. SDG&E is required to plan its transmission system to the reliability criteria of NERC/WECC and the CAISO. The NERC, WECC and CAISO planning standards generally provide that if a planned transmission circuit is to be adjacent to another transmission circuit, regardless of operating voltage, a case-specific analysis is required to determine whether the proximity of the circuits, and the geography that the adjacent circuits traverse, dictates specific mitigation measures for common mode contingencies (up to and including a determination that such proximity would constitute a violation of the planning standards). An exception exists where multiple circuit towers are used over short distances (e.g., station entrance, river crossings).

The case-specific analysis accounts for the probability of an outage of two adjacent circuits on separate towers, line design, the distance over which the two circuits are adjacent to each other, location, environmental factors, outage history of existing circuits, operating guidelines and separation between the circuits. In general, if two circuits on separate towers are adjacent for only a short distance; or if the geography over which the two circuits are adjacent is not subject to wildfires, lightning strikes or other common mode contingencies; then the likelihood of the common mode contingency is considered improbable (sometimes called “non-credible”) and no mitigation is required.

On the other hand, if two circuits on separate towers are adjacent for a longer distance; or if the geography over which the two circuits are adjacent is subject to wildfires, lightning strikes or other common mode contingencies; then the common mode

contingency is considered “credible” and mitigation, including the possibility of “Planned/Controlled” load drop, is required.

Applying the above reliability criteria to the San Diego-Imperial Valley corridor suggests that a new line could be constructed on separate towers adjacent to the existing 500 kV Southwest Powerlink only for a short distance without violating applicable reliability criteria or requiring a “Planned/Controlled” load drop in the event of a common mode contingency event. If the two circuits were adjacent for longer distances, then it may be necessary to implement “Planned/Controlled” load drop in order to mitigate any unacceptable thermal line loadings or voltages that result because the distances that are practically available if the governing geography would make the facilities subject to common mode contingency events.

The native vegetation in rural San Diego County is prone to periodic wildfires, abetted by hot, dry “Santa Ana” winds blowing west from the desert – the same winds that often bring the weather triggering the system peak. These fires generate intense heat and smoke due to the natural creosote laid down by generations of decaying brush. The smoke can trip a transmission line, even if the fires are not directly under the lines. There have been 46 outages of the Southwest Powerlink in the last 15 years, with 22 being fire-related on the San Diego County portion of the Southwest Powerlink. Since 1990, there have been two lightning strikes that tripped the Southwest Powerlink. These strikes also occurred on the San Diego County portion of the Southwest Powerlink.

Route D Alternative

Although this alternative is shorter than the proposed route, the terrain is generally more rugged and vegetated than the 500kV portion of the preferred alignment. The terrain and vegetation will increase construction difficulty and will require additional clearing, access road construction, structure pad grading, and helicopter construction. Blasting may be required in some areas for access road, structure pad and foundation construction. The terrain and vegetation will also make maintenance more difficult and likely require more frequent maintenance of access roads and increased vegetation management.

Each of the Southwest Powerlink Alternatives will require the acquisition of single family homes, which involves a much more complex acquisition process involving relocation assistance. Also, several of these alternatives either cross Indian tribal lands or would be close enough to cause significant visual impacts to tribal lands. These routes would only be viable if the Indian tribes supported the proposed routes and approved a Tribal Resolution (TR). Without the TR and an agreement among all parties, the Bureau of Indian Affairs would not grant an easement for the transmission facilities. Lastly, from a land rights perspective, it is not desirable to site transmission facilities within the Cleveland National Forest on U.S. Forest Service lands (USFS) because the USFS does not grant easements. Instead, USFS issues restrictive special use permits typically with 10-year terms.

Interstate 8 Alternative

The numerous I-8 crossing on the overhead portion of this alternative may be subject to Caltrans approval depending on encroachments to Caltrans right-of-way. The construction of these crossings will require multiple closures of I-8. Also, construction of new access roads for the entire length of this alternative is anticipated as access directly from I-8 is not feasible due to Caltrans' strict limitations on ingress/egress from controlled access freeways.

This option includes the transition from 500kV to 230kV near Alpine, however, a viable substation site has not yet been identified. This alternative includes approximately 9 miles of undergrounding two (2) 230kV circuits in Alpine Blvd., which is the main roadway through downtown Alpine. Construction of this underground segment within the roadway would require lane closures, which would impede access to residential areas, businesses and schools. Maintenance activities will also require traffic control, resulting in additional traffic impacts.

Alpine Blvd. contains numerous underground utilities that would conflict with the proposed alternative. Existing utilities include water, storm sewer, sanitary sewer, communications, gas and electric. At a minimum, these utility conflicts would increase the duration of construction activities.

BCD Alternative

Although this alternative is shorter than the proposed route, the issues identified for the D Alternative also apply here.

West of Forest Alternative

The issues identified for the D Alternative also apply to the West of Forest alternative.

Non-Wires Alternatives Retained

On page 21 of the Second Scoping Notice, there seems to be an error for the rooftop solar photovoltaic estimate for year 2010 (it exceeds the year 2016 estimate). It should reflect 98 MW for 2010. Also, the wind numbers provided in the table are inconsistent with the "308 MW" of wind generation presented in the "No Project" alternative section.

Other Considerations

In its scoping notices, the CPUC and BLM stated that the proposed Sunrise Powerlink presents potential conflicts with applicable land use plans (i.e., the ABSDP General Plan). State Parks is a statutory Trustee Agency that has certain responsibilities

under CEQA to actively engage in the environmental review process.¹ As the Project is proposed, State Parks is also a responsible agency under CEQA. Although the CPUC has not yet approved a particular route to determine the exact scope of the State Park's responsibility, it is imperative that State Parks actively engage in the CPUC/BLM's process and initiate the process of any related actions it may need to undertake. The intent of the Permit Streamlining Act is to have agencies timely process certain actions. (See, Govt. Code § 65941.) Accordingly, if any land use plans require amendment or modification, then the CPUC and BLM should include the analysis of a potential amendment and mandate that the State Department of Parks and Recreation simultaneously process the same.

SDG&E appreciates the opportunity to provide further input on the scope of the Draft EIR/EIS. Thank you in advance for your consideration of these issues.

Sincerely,



David L. Geier

¹ Cal. Code of Regs. §15386(e).