

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of
San Diego Gas & Electric Company
(U-902-E) for a Certificate of Public
Convenience and Necessity for the
Sunrise Powerlink Transmission Project

A.06-08-010
(filed August 4, 2006)
A.05-12-014
(filed December 14, 2005)

**PREHEARING CONFERENCE STATEMENT OF
CALIFORNIA DEPARTMENT OF PARKS AND RECREATION**

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Pursuant to the August 25, 2006 Administrative Law Judge's Ruling Setting Date for Prehearing Conference Statements and Extended Time for Filing Protests and applicable rules of the California Public Utilities Commission, the California Department of Parks and Recreation ("State Parks") submits this prehearing conference statement on the application of San Diego Gas & Electric Company ("SDG&E") for a Certificate of Public Convenience and Necessity for its proposed Sunrise Powerlink Transmission Project ("application"). In particular, State Parks offers these comments on substantial deficiencies in the Proponent's Environmental Assessment filed with the application that must be addressed during consideration of the application. State Parks requests any ruling on the scope of the proceedings in this matter reflect these concerns.

I. STATE PARKS' INTEREST IN THE PROCEEDINGS

State Parks has completed its initial review of SDG&E's Proponent's Environmental Assessment ("PEA") for the Sunrise Powerlink. State Parks is

being asked by SDG&E to bear a substantial burden for the project by agreeing to allow a proposed 500 kV electrical transmission line to bisect the heart of Anza-Borrego Desert State Park (“ABDSP” or “Park”), the largest of California’s state parks. While the proposed Preferred Alternative route would approximate an existing 92/69 kV transmission line right-of-way, along an approximate 23-mile length of the Park, the scale of the proposed project dwarfs the existing transmission line in size and magnitude of environmental impact to ABDSP. State Parks staff in the Colorado Desert District¹ has been cooperating with SDG&E and its consultants for some time in SDG&E’s need for information as it developed a proposed project, including sharing of environmental data, project alternatives, and facilities siting. State Parks agreed to work with SDG&E to assist it in developing an accurate database of baseline conditions, and to attempt to minimize impacts from the project to ABDSP. After now having the opportunity to review the PEA for the proposed project, however, including the project alternatives and environmental impacts analyses, State Parks concludes that the proposed project is not compatible with its goals, objectives, and mandates. This project does not provide a net benefit to ABDSP, and would forever change the character of this pristine Park and wilderness areas. Moreover, the flaws in the PEA, if carried forward to the final environmental documentation, will result in a legally inadequate analysis.

State Parks is not in a position to argue the case for or against the need for an additional transmission line into the San Diego region. That is outside our area

¹ ABDSP is located in State Parks’ Colorado Desert District.

of expertise. However, State Parks is a Trustee Agency under the California Environmental Quality Act (CEQA) charged with preservation of park properties within its jurisdiction. We, along with the California State Park and Recreation Commission, are also Responsible Agencies pursuant to CEQA. Unlike many other land management agencies, State Parks is not an agency dedicated to multiple uses of the land. Our purpose is to conserve and manage the resources on the lands we oversee, not accommodate development projects that do not benefit State Parks and its mission. Therefore, we believe that park land should be viewed with State Parks' mission and purpose in mind when evaluating impacts. Impacting dedicated State Parks lands, in our view, is not the same as impacting undeveloped private lands, or lands of agencies that by design are able to accommodate the types of development projects that the Sunrise Powerlink represents.

State Parks' specific concerns with both the project in general and the conclusion outlined in the PEA fall into seven general areas: 1) inadequacy of the alternatives analysis; 2) land use impacts; 3) impacts to State Wilderness; 4) impacts to visual resources; 5) impacts to biologic resources; 6) impacts to recreational resources; and 7) impacts to cultural resources.

II. INADEQUACY OF ALTERNATIVES ANALYSIS

All Sunrise Powerlink routes, both the proposed and alternatives, pass through ABDSP. This is not acceptable. The alternatives analysis in the PEA lists

a number of alternative routes that were preliminarily reviewed but summarily rejected as infeasible or otherwise inadequate to meet project objectives. Many of the assertions of infeasibility are based on faulty analysis and incorrect conclusions. Additionally, SDG&E's project objectives, not surprisingly, lead to a focus on alternatives that are simplest, cheapest and quickest for SDG&E. These objectives, however, should not necessarily be the objectives approved by the California Public Utilities Commission ("CPUC"). Objectives most convenient for SDG&E are not necessarily the most appropriate for State Parks or the citizens of California. Moreover, an environmentally superior alternative may not be SDG&E's preferred choice, but it may be superior for the citizens of California.

SDG&E may not assert the infeasibility of an alternative based on inconsistency with or need to amend a governing land use management plan because, as is explained further below in this section and in the sections on Land Use and State Wilderness impacts, the proposed project is not consistent with the ABDSP General Plan and will require amendment. SDG&E may also not assert the infeasibility of an alternative based on claimed lack of support from the body or agency with the authority to alter that plan, or the claimed lack of support for any responsible agency, for that matter. This implies support from responsible agencies that has not yet been demonstrated.

In the alternatives comparison tables in Chapter 3 (pgs, 3-11, 12, &13), it appears that the proposed project actually has greater impacts to a number of sensitive resources (e.g., floodplain, critical habitat, State Wilderness, etc.) than

the rejected alternatives. Impacts to military resources and operations also appear greater. All this is contrary to the conclusion that the preferred route impacts are less than the alternatives.

The area of alternatives analysis that focuses on visual impacts asserts project impacts are less, but gives a misleading comparison between federal and state lands. The Cleveland National forest has designated “viewshed acres” which are considered sensitive to visual impacts. The proposed project is shown to have no designated viewshed acres. State Parks, however, does not designate its lands in this fashion, unlike the U.S. Forest Service, because it does not anticipate having development projects within State Parks that might impact visual resources. We believe that most or all of the views within ABDSP should be considered sensitive based on the State Wilderness designation that covers much of the Park,² but the alternatives analysis fails to acknowledge this, thus giving a false comparison. This leads to a false conclusion that the visual impact is less if the project runs through the Park.

There is also an assumption that impacting the Cleveland National Forest is somehow equivalent or worse than impacting ABDSP. The U.S. Forest Service, which manages Cleveland National Forest, is a multi-use land management agency. As mentioned above, it is able to accommodate a new transmission line more readily than State Parks by the very nature of its mandate. The fact that the Cleveland National Forest’s Forest Plan would need to be amended is not a sufficient enough barrier to rule out this option. The ABDSP General Plan would

² See section IV., *infra*.

also have to be amended, and 73 acres of State Wilderness rescinded by the California State Park and Recreation Commission in order to accommodate the proposed transmission line.

Several alternative routes that travel south of ABDSP are discussed in PEA but rejected for various reasons, some of which are poorly and inadequately defended. It also appears that several potential alternatives have been summarily rejected based on the need to acquire rights-of-way or exercise eminent domain beyond that which might be required for the proposed project. This is primarily a claim of economic infeasibility. A more costly alternative is not, in and of itself, infeasible. The additional costs or lost profitability must be sufficiently severe so as to render it impractical to proceed with the project. *Citizens of Goleta Valley v. Bd. Supervisors* (1988) 197.Cal.App.3d 1167. Moreover, as case law is clear, claims of financial infeasibility must be borne out by substantial evidence. See, e.g. *County of San Diego v. Grossmont-Cuyamaca Community College District* (2006) 141 Cal.App.4th 86. Although our review of the PEA is continuing, we have yet to see such evidence.

Similarly, claimed lack of support from a potential responsible agency cannot be grounds for rejection of an alternative at this time. Claimed lack of support merely factors into whether eminent domain action would be necessary and whether such action is authorized. In some circumstances, however, public utilities in California can exercise the power of eminent domain and, as the United States Departments of Interior and Energy have recently noted in a report to

Congress, even tribal lands can be subject to eminent domain through appropriate legislative action.³

Given the rather superficial analyses of alternatives, one or more alternatives that avoid ABDSP must be studied in far greater depth to assess their feasibility. In our discussion with SDG&E regarding a project route through ABDSP, we were able to reduce impacts from the original proposal through specific adjustments of the route. While the impacts are still significant, detailed siting can result in reduced impacts. This same specific siting approach should be applied to one or more alternatives that avoid ABDSP to reduce the impacts from these rejected alternatives further, and thus make them viable alternatives for consideration.

III. LAND USE IMPACTS

The CEQA Significance Criteria for impacts to land use are listed in the PEA (page 5.1-1). Two of the criteria are: 1) conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project; and 2) create long-term disturbances that would disrupt an established land use. The PEA indicates that with the proposed mitigation measures, land use impacts to ABDSP will not be significant. The PEA also indicates that the proposed project is compatible and consistent with land uses within ABDSP, and that the project will not have a significant impact to land use. The ABDSP General Plan is cited as

³ *Draft Report to Congress: Energy Policy Act of 2005, Section 1813, Indian Land Rights-of-Way Study*, U.S. Dept. of Energy, U.S. Dept. of Interior, August 7, 2006.

accommodating the project because it includes the existing powerline right-of-way within the General Plan as an acceptable land use.

State Parks disagrees with SDG&E's assessment that the proposed project is consistent with and an allowable use under the current ABDSP General Plan. The excerpt from the ABDSP General Plan cited on pages 3-9 of the PEA in support of its assertion merely recognizes that SDG&E and the Imperial Irrigation District have existing rights-of-way within ABDSP, and that State Parks will work with SDG&E and the Imperial Irrigation District to try and resolve the inherent conflicts of future energy needs and conservation of Park resources, and the size and location of any future facilities within those rights-of-way. SDG&E, however, is seeking land outside of its existing rights-of-way, including encroachment into State Wilderness. As discussed further in the State Wilderness Impacts section below, the proposed project is not compatible with uses allowed in State Wilderness lands. The proposed project would require an amendment to the ABDSP General Plan and a redesignation of State Wilderness by the California State Park and Recreation Commission.

Additionally, as discussed in detail in the Visual Impacts section below, the visual impacts to the Park from the proposed project would seriously disrupt the existing land use as a scenic park, and this impact cannot be mitigated to a level less than significant. State Parks judges the impacts from the project on land use issues in ABDSP to be significant under CEQA standards, regardless of any potential mitigation.

IV. STATE WILDERNESS IMPACTS

ABDSP supports over 400,000 acres of designated State Wilderness for the purpose of public enjoyment of the wilderness experience, the conservation of important biological and cultural resources, scientific research, and public education. This represents over 80% of all lands so designated in California.

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

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

Wilderness is meant to be forever, and is not open to the developments of man. We cannot recall the California State Park and Recreation Commission having ever removed land from the State Wilderness system. To do so for this project would set a dangerous precedent that would mean that State Park lands and State wilderness are merely held in trust by the State of California until such time as they may be needed by private developers or utility companies.

The impacts to State Wilderness from the proposed project are not just the direct impacts of constructing a 500kV transmission line on lands so designated. The visual and recreational impacts of the line will substantially diminish

enjoyment of the wilderness experience from potentially tens of thousands of additional acres of State Wilderness lands.

The impacts to State Wilderness from a proposed 500kV transmission line through ABDSP, both direct and indirect, are significant and the proposed 2:1 mitigation ratio is completely inadequate compensation.

V. VISUAL IMPACTS

The PEA concludes, and State Parks concurs, that the visual impacts to ABDSP from the proposed project would be significant. It is our view that these impacts cannot be mitigated below a level of significance given their severity and the lack of practical measures available to off-set the impacts. There is a tone in the PEA, though, that because there is an existing transmission line passing through ABDSP, this new powerline will not create a major change in public perception of the land. This is far from accurate. The current 92/69 kV line is only 40-50 feet tall and mounted on wooden poles. The new lattice or “H” towers will average 130 feet in height and be much more obvious in the landscape. This project is not just a matter of increase in degree, but a major order of magnitude impact to visual resources.

In Section 5.9.1 of the PEA, CEQA criteria are listed to judge the significance of adverse impacts to visual resources, including: 1) has a substantial adverse effect on a scenic vista; 2) substantially damages scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within

a designated state scenic highway; and 3) substantially degrades the existing visual character or quality of the site and its surroundings. The proposed project, with approximately 140 towers averaging 130-feet in height, and transmission lines strung between them, would be a significant impact under all three of the above criteria.

This project would change one of the fundamental characteristics of ABDSP, its unspoiled scenic vistas. This is a key element of what makes ABDSP what it is, and what the public visits to enjoy, the unsurpassed desert vistas. This is also one of the reasons so much of ABDSP is designated as State Wilderness. Destroy the vistas and you destroy much of the basis for the designation, not just for the land directly taken for the transmission lines, but also for the land from which the vistas would be permanently altered.

VI. BIOLOGICAL RESOURCES IMPACTS

Although the biological consultants for the project proponent made a good faith effort to complete a biological study of the proposed preferred alternative route in the late spring and early summer of a drought year (2006) here in the Anza-Borrego Desert State Park region, the inventory and analyses of biological impacts of the proposed projects is inadequate.

Throughout the 135 pages of biological impact analysis included in the PEA, assumptions are repeatedly made that the impacts of the preferred alternative project would be less than significant. An assumption is made that since there is

already a 69kV line (with 40-50' tall poles) through this area of ABDSP, that building a 500kV transmission line (with 130-150' tall towers) "would not present a new obstacle for birds that frequent the area; therefore no significant increase in collision risk is expected." (Sunrise Powerlink Project PEA at 5.2-72.) According to the project proponent, impacts to wildlife corridors through ABDSP from the proposed 500kv transmission line and 130' tall towers would be "considered less than significant and no mitigation is required." (*Id.*). We respectfully and strongly disagree with these assumptions. State Parks staff believes that the mitigation measures and compensation ratios proposed to date for impacts to sensitive species and natural communities are woefully inadequate, particularly given that the lands on which they are occurring are State Park lands and State Wilderness lands set aside in perpetuity for the preservation of native habitats and species.

VII. IMPACTS TO RECREATION

Recreational impacts from the project involve two issues. The first is the visual impacts of the project upon the recreational enjoyment of ABDSP. Quite simply, much of the recreational value of ABDSP rests in its scenic vistas and relatively unspoiled beauty. This has already been discussed and is judged to be a significant but unmitigated impact. The second concern is the impacts of the project on the Tamarisk Grove campground. The proposed project would be directly adjacent to the campground. An existing 69kV transmission line currently is

adjacent to the campground, but is somewhat screened by tamarisk trees on the edge of the campground. The PEA makes the following statement (page 5.5-4-5.5-5):

The permanent addition of new industrial structures, such as transmission structures and substations, conflict with the natural background of many of these recreational resources, and can also disrupt the individual's enjoyment and recreational activities. While the location of the Proposed Project in developed recreation areas such as the Tamarisk Grove Campground within this segment will not add a new feature to the landscape (because there already is a 69kV transmission line in this alignment), the 500 kV transmission line will be larger and more noticeable to the user. This could affect the experience of the user or possible decrease use in the short term. However, over time, the presence of the larger line would be expected to become common to the visitor as the existing 69 kV transmission line has been.

Based upon this assumption, the PEA states that recreational impacts are less than significant. State Parks disagrees with this assessment. There is no evidence cited in the PEA that people will acclimate to camping adjacent to a 500 kV transmission line that will be significantly more dominant in the campground area than the existing, much smaller line. Correct or not, the general public perception that there are health risks in close proximity to larger powerlines will make the public reluctant to use the campground. Tamarisk Grove campground is a source of income for State Parks, and State Parks takes any loss of income very seriously. The burden of proof is on SDG&E to clearly demonstrate their contention that recreational activities will not be significantly impacted at this campground. Otherwise, the impact of the proposed project on recreation and recreational facilities should be considered significant.

VIII. CULTURAL RESOURCE IMPACTS

It is our understanding that cultural resource surveys for the powerline alignment alternatives through ABDSP have not been completed. Therefore, it is premature to assume that the impacts have been adequately avoided or mitigated. New cultural sites are discovered regularly, as much of ABDSP has not been surveyed in detail for these resources. State Parks will reserve judgment on this issue until a full survey and analysis of the project has been completed

IX. CONCLUSION

State Parks has serious concerns regarding the Sunrise Powerlink project, as currently proposed. The impacts that this project would have on Anza-Borrego Desert State Park, the jewel of California's State Park System, and California State Wilderness are large and, in our estimation, unmitigable. We ask that the California Public Utilities Commission request that the project proponent design and examine feasible alternatives that would bring the proposed transmission lines to San Diego by a route that goes around Anza-Borrego Desert State Park.

State Parks appreciates this opportunity to present its concerns to the Commission and hopes the Commission will keep these concerns in mind as it proceeds on the application.

Respectfully submitted, September 5, 2006.

CALIFORNIA DEPARTMENT OF
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By:

A handwritten signature in cursive script that reads "Ruth Coleman". The signature is written in black ink and is positioned above a horizontal line.

Ruth Coleman

CERTIFICATE OF SERVICE

I, Bradly S. Torgan, hereby certify under penalty of perjury that I have on this 5th day of September, 2006 served a copy of **PREHEARING CONFERENCE STATEMENT OF CALIFORNIA DEPARTMENT OF PARKS AND RECREATION** on all known parties to proceeding A.06-08-010 and A.05-12-014 by mailing a properly addressed copy by first-class mail to:

Steven A. Weissman
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and to all parties on the attached service list via electronic and/or mail.

Executed on September 5, 2006 at Sacramento, California.


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