
Appendix C-2. Summary of Written Comments Received from Private Organizations and Companies

Date	From	Comments
April 20, 2006	Spangler Peak Ranch, Inc. Wally Besuden, President	<ul style="list-style-type: none"> • Concerned with proposed routing of the SRPL Project. • Have completed conceptual plans for a future master planned community at Spangler Peak Ranch. Plans include custom home sites, extensive trail system, golf facility, and an equestrian center, all in an agricultural setting. • If choose the proposed Creelman Lane alignment with above ground transmission both business and real property will be greatly damaged. Creelman is the proposed east access point for the new housing development. • If Creelman is chosen then we request that the line be placed underground from San Diego Estates through Creelman Lane.
September 2, 2006	Santa Ysabel Ranch Albert and Kathleen Cauzza	<ul style="list-style-type: none"> • The ranch has preserved and maintained the Santa Ysabel Valley as agricultural land and open space for three generations. • Income depends on the surrounding property and the Project has the potential to impact family income from cattle ranching. Lines would bring unsafe emissions (EMF) that can sterilize cattle and cause other safety issues such as fires. References the Cedar Fire. • Favors routing alternatives through land with limited use and no businesses. • Opposed to the Project. If proceed with Project will fight to have the line go underground through Santa Ysabel Valley. • SDG&E waited too long to contact affected property owners.
September 5, 2006	Pacific Crest Trail Association Suzanne Wilson	<ul style="list-style-type: none"> • Concerns and criteria of the Pacific Crest National Scenic Trail have not been considered in SDG&E's application. Significance or characteristics of a National Scenic Trail, or potential impacts from the SRPL are not mentioned. • National Scenic Trails create an experience of solitude and are wild and scenic places. Traveling next to or under a 500 kV line is an intrusion on the atmosphere strive to obtain. Noise and visual impacts ruin experience and disturb serenity. • Access roads serve as byways for Off-road Vehicles and near a Trail invite illegal uses and create significant damage to trails. • Central East Substation will be visible from the Trail. • The area where the SRPL Project is proposed is an area that is unscarred, which is becoming rare in San Diego County. • The importance of the Pacific Crest Trail has not been fully recognized in SDG&E's application to the CPUC.
September 16, 2006	San Diego Renewable Energy Society, American Solar Energy Society Rich Caputo, Chair	<ul style="list-style-type: none"> • Wants to ensure that the comparative economic data of all routes is available to public/political discussion. • Attachments: official statement and request for comparative costs data. • Statement references CASIO study of SRPL and 24 alternatives. This study identified the SDG&E preferred alternative as the one with the highest benefit/cost ratio. Comparative cost data was not published; however important to current review process.
September 28, 2006	Palomar Observatory Scott Kardel	<ul style="list-style-type: none"> • Research at the Palomar Observatory depends on dark skies. Neighboring city and county governments have enacted ordinances to minimize light pollution. • Wants to ensure that the Proposed Project will comply with San Diego County's lighting ordinances and that the lighting used will be low-pressure sodium lighting with full-cutoff fixtures. • Requests the EIR/EIS address outdoor lighting. Observatory and California Institute of Technology staff is available to assist if necessary with lighting issues.

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September 29, 2006	West Chase Homeowners Association Keith Ritchey Powerlink Issues Manager	<ul style="list-style-type: none"> • Wants to ensure that if a route is chosen, it will be the one that is least intrusive to Rancho Peñasquitos. • Attachments: West Chase Homeowners Association official protest to CPUC; analysis of alternate routes. • Protest presents three alternatives in the Rancho Peñasquitos area. • 1. Carmel Valley Road. Starts at end of Park Village, joins existing overhead lines and runs north approximately 2.2 miles until it reaches Carmel Valley Road at Via Albertura. It would run northeast for 2.7 miles under Carmel Valley Road. It would then transition back to existing overhead lines and run 2.3 miles southeast to Chicarita. Several advantages are identified for this alternative including the underground portion would be placed entirely within a street median, route within an existing corridor, and would impact fewer homes than the preferred route. • 2. SR-56. Travel north from the end of Park Village about 1.9 miles on existing overhead lines until reach SR-56, transition to underground for about 3.5 miles east. Cross bridges at Camino Del Sur and move under Peñasquitos Boulevard to Chicarita. Advantages for this alternative were similar to those mentioned above. The alternative would be placed within state and local public roadways and would impact fewer residences than the preferred route. • 3. Los Peñasquitos Preserve and Mercy Road. Travel south from end of Park Village and then turn east, following preferred route until it turns toward Park Village Road near Darkwood Drive. Continue through the Preserve to the end of Canyonside Park Drive for 2 miles in the preserve. Then continue east under Canyonside Park Drive to Black Mountain Road where it would turn south to Mercy Road. Transition to overhead at Sycamore Canyon Substation. This alternative would impact fewer homes than the preferred route. • The Association prefers Alternative 2, but if this is not possible then Alternative 1. Any of the proposed alternatives are better than the preferred route for the Rancho Peñasquitos community.
October 2, 2006	Natural Resources Defense Council Johanna H. Wald Senior Attorney	<ul style="list-style-type: none"> • Proposed Project routes conflict with mission and resources of Anza-Borrego Desert State Park (ABDSP). • Alternatives are key in EIR/EIS; imperative that routes that avoid ABDSP are fully evaluated. • Concurs with concerns addressed in attached State Parks letter regarding potential impacts to the ABDSP and incorporates State Parks comments by reference into the NRDC letter. • Attachment: Pre-hearing conference statement from the California Department of Parks and Recreation. • In summary, Proposed Project is not compatible with Park goals, objectives, and mandates. No benefit to Park and would “forever” change character of Park. Statement cites concerns with inadequate alternatives analysis and impacts to State Wilderness, visual resources, biological resources, recreational resources, and cultural resources.
October 3, 2006	Anza-Borrego Foundation and Institute Diana Lindsay President	<ul style="list-style-type: none"> • Alternatives identified by SDG&E do not follow the spirit of CEQA in identifying alternatives that lessen significant effects. • Use of Park lands would be a significant unavoidable impact. What would offset these significant unmitigable impacts to the State Park? • Preferred route would cross designated Wilderness that requires determination from the California State Parks Commission. There has been no similar past action and this would set a precedent. SDG&E has not identified any alternatives that do not intrude on the Park.

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October 3, 2006	Community Alliance for Sensible Energy (CASE) Mary Aldern CASE, Co-Director	<ul style="list-style-type: none"> • Borrego Valley Alternative and SR-78 East Alternative would traverse downtown Ranchita, Sheep Canyon, and Pinyon Ridge Wilderness areas of ABDSP, and peninsular big horn sheep habitat; impact archeological sites; threaten safety of children on way to bus stops. • Proposed route including Mesa Grande Road goes through significant archeological site, and through daycare center and preschool and school bus routes. • Central East Substation – San Felipe would be devastated by miles of access roads and light pollution. • SRPL would hamper best view of new casino at Santa Ysabel Indian Reservation. • Severe and significant impact to private property owners and families from the proposed route. May compare in size to residences in Alternative 6/8, which was rejected because of its proximity to populated communities and schools. • Proposal appears to unduly impact and discriminate against CASE allied communities. <ul style="list-style-type: none"> — Underground 230 kV-alternative has been offered to other communities but not to ours. — “Full Loop” alternative or some variation is a future plan of SDG&E because the possibility has been kept open at all costs. • Hidden incentive to create future links to the North to carry energy (other than renewable) from Mexico; this is the reason why Imperial County is retained in all preferred and alternative routes. This would create significant impacts to our allied communities and entire region. • Maps do not indicate location of Preserve lands (Figures 1, 3 7 and 8). • Central East Substation and proposed 230 kV line are proposed in lethal fire corridors. Need to address community safety and endangerment laws and responsibility for any costs for disasters or other losses. • Placement of the Project on an active earthquake fault is a risk that must be examined. Proposal “aligns almost perfectly” with active San Diego County faults. • Attachments: (A) July 5, 2006 Communication from Jared Aldern, Environmental Historian on Fault Rupture; (B) Arizona Public Service 2005 Press Release; (C-1) Jim Avery, Presentation to the California Energy Commission (CEC) July 2005; (C-2) website location for CEC Strategic Transmission Investment Plan; (C-3) CEC Border Energy Workshop Transcript (one paragraph quote) May 18, 2005; (C-4) Statement from Bill Powers, President, Border Power Plant Working Group; (D) Further Evidence for Full Loop (Website locations for further information); and a copy of the service list that received CASE comments.
September 25, 2006	Community Alliance for Sensible Energy (CASE) Mary Aldern CASE, Co-Director	<ul style="list-style-type: none"> • Criticizes the choices scoping meetings locations and for omitting the Warner Springs area. Meetings regarding the project held there have drawn many locals.
October 4, 2006 2.6	California Overland Desert Excursions Joe Raffetto	<ul style="list-style-type: none"> • Letter addresses two questions: (1) who makes decision and it is open to appeal? and (2) reasons why SDG&E discounts I-8 corridor?

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October 4, 2006	California Native Plant Society Kay Stewart Landscape Architect Conservation Committee Representative	<ul style="list-style-type: none"> • Project objectives do not reference the Federal Endangered Species Act in relation to MSCP and other dedicated habitat that has been set aside for species conservation. Objectives should also include reference regional energy goals. • The Inland Valley map fails to identify dedicated conservation land west of San Vicente Road (near N40). • PEA listing of all plant species is flawed; notes five areas where there were errors or omissions. • Plant locations referenced in “node segments” do not correlate with plants listed in Table 4.2.1 in the PEA. In addition, analysis does not list all species of concern for particular “node segments.” • PEA references field surveys conducted in 2005/2006 (dry years) but no field data or citations are included in the appendices/report. Field data is necessary to ground truth the results of the surveys. • Concerned about applicant-proposed measures identified in the PEA that allow ten days response from resource agencies (CDFG and USFWS); would like to see mitigation measures that will result in better protection of species of concern. Suggestions include extending the response time; involving other organizations such as the CA Native Plant Society, San Diego Natural History Museum Botany Department and conservation land managers; and tracking all actions associated with the measure. • Roads are proposed in wilderness and desert areas in the ABDSP. Maintenance of these roads and areas would require repeated disturbance and degrading of plant communities. • Wants to ensure that vernal pools north of Rancho Peñasquitos Preserve are avoided, as alternatives are considered. • Disagrees with PEA finding of no significant impact to plant species. Need to adequately identify plants and propose mitigation measures to reduce risks to rare, threatened, and endangered native plants. Project as proposed conflicts with plant conservation and is considered a poor solution to meet San Diego’s energy and environmental needs.
October 5, 2006	Carmel Valley Community Planning Board Laura Copic	<ul style="list-style-type: none"> • “Transmission first” strategy proposed by SDG&E conflicts with Energy Action Plan and San Diego Regional Energy Strategy 2030 that emphasize energy efficiency, demand reduction, distributed generation, other in-county generation and renewables before transmission. • SDG&E’s request to construct additional overhead facilities in the Carmel Valley community is unacceptable. Letter provides eleven reasons why additional overhead facilities are not warranted (e.g., increased fire risks, damages property, damages quality of life, moves circuits closer to homes, unfair burden on community). • Aesthetics. Concerned with the adverse visual effects on the Los Peñasquitos Canyon Preserve. Adding more towers and wires would increase the “wiring-off” effect of the public from the preserve and further reduce enjoyment of the preserve. • Biological. Construction of towers will disturb wildlife corridor in the preserve and cause displacement of deer and other wildlife. • Hazardous Materials. Construction and operation of the Project could impact (from hazardous materials) Sage Canyon Elementary School and homes in the area. • Hydrology. Construction of Project could shift drainage patterns and impact existing habitat and trails. • Land Use Planning. More towers will increase the risk and exposure to the community.

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		<ul style="list-style-type: none"> • Public Services and Utilities. Project increases risk of wildfires. Area has poor emergency response time (more than 5 minutes) because there is no nearby fire station. Additional risk can only be mitigated by construction of an additional fire station. • Cumulative Effects. Community impacted by highway/road improvements, new home construction, and potentially a commercial airport at MCAS Miramar. Residents and homeowners cannot tolerate additional disruptions. Construction needs to be minimized or avoided. • EIR/EIS needs to consider and evaluate placing the new and existing transmission lines underground at the Preserve. If undergrounding is not possible, consider newer low sag cables and further consolidation of the line. • Attachments: Carmel Country Highlands Owners official protest to CPUC; presentation by Carmel Valley Concerned Citizens; letter to CPUC dated March 13, 2006; letter to SDG&E dated April 17, 2006.
October 5, 2006	California State Parks Foundation Sara Feldman Southern California Director	<ul style="list-style-type: none"> • See summary for letter dated October 20, 2006. This letter has been replaced by the letter submitted on October 20.
October 6, 2006	West Chase Homeowners Association Michele Ritchey Director	<ul style="list-style-type: none"> • Concerned about health effects caused by EMF • Concerned about property values declining if Project is constructed. Knowledge of Project has affected the sale of homes in the area. • Best route for the Project would be underneath roadways, not on community streets. • Suggest avoiding impact to homes and running the line underground by entering Highway 56 or Carmel Valley in Rancho Peñasquitos. • Attachment: February 8, 2006 Letter to Kim Malcolm, Administrative Law Judge, CPUC; community photos.
October 9, 2006	The Boulevard Sponsor Group Donna Tisdale Chair	<ul style="list-style-type: none"> • Requests 45-day extension to the October 20th deadline and new scoping hearings in rural East County communities (Boulevard, Jacumba, Campo, Pine Valley, Descanso, Alpine) where previously eliminated controversial alternatives are again under consideration. • Rural, low-income area bears the burden of the existing 500 kV line. Concerned about increased risks of bone marrow cancer caused by exposure to power lines. • Other concerns include: <ul style="list-style-type: none"> — Need for Project is misrepresented; in-basin projects left out of the SDG&E application, renewable projects are not approved, and Project may provide power from Mexico to Los Angeles. — Impacts sensitive habitat, wilderness areas, view sheds, parks, rural areas, agriculture, and private property. — Violates community character and enables growth — BLM has inadequate staff available to address the numerous issues. — Concerned about impacts to groundwater flow and rock aquifers, specifically Campo/Cottonwood Sole Source Aquifer. — Eastern San Diego County has complex geologic/hydrogeologic areas — Some impacted communities are low-income and minority – environmental justice — Apply other measures (e.g. solar roofs, conservation) before destroying parks and rural communities. — Money spent on promoting SRPL should have been spent on home and business improvements in the community.

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October 11, 2006	Atma Jyoti Ashram Swami Satyananda	<ul style="list-style-type: none"> • Protest possible routing through the ABDSP. Towers would be most visible landmark in the valley. • Construction will have significant impact on bighorn sheep and other wildlife and sensitive species. • There are other viable alternatives available including one along Highway 8. On behalf of Monastery and residents and visitors of the park, ask that you preserve beauty and integrity of State park.
October 13, 2006	Carmel Valley Neighborhood 10 North Homeowners Association Joanne Fogel President, Board of Directors	<ul style="list-style-type: none"> • SDG&E has made no attempt to mitigate impacts to the Carmel Valley Neighborhood. Rationale for not mitigating impacts is that a line currently exists in the neighborhood. Overhead lines existed before expansion of the community; however, the transmission lines are no longer appropriate for the area. • Concerned about EMF exposure and wildfire risks. There is inadequate fire and emergency response in the area because there is no fire station nearby. • Project also brings collision risks for birds and low-flying military aircraft as well as visual impacts from the taller more intrusive metal and concrete pylons. • Undergrounding options exist at a reasonable cost and would be less intrusive to the neighborhood and to the Del Mar Mesa and Los Peñasquitos Canyon Preserves. Suggests website for more information on new technology for undergrounding lines. • Undergrounding all lines would improve the Preserve view corridor and improve property values. • Cannot support a project that does not explore mitigation options unless forced by regulatory agencies.
October 16, 2006	Carmel Valley Neighborhood 10 North Homeowners Association Board of Directors	<ul style="list-style-type: none"> • Large utility infrastructure projects are inappropriate to place immediately adjacent to residential neighborhood and along Los Peñasquitos Canyon Preserve. • No proof has been provided on the need for the SRPL project or evidence that other environmentally-friendly alternatives have been fully evaluated. • Neighborhood concerned with potential health and safety effects associated with transmission lines. Neighborhood is already impacted by existing lines; the neighborhood will not accept even a slight potential risk. • Neighborhood is outside acceptable emergency response time for fire and emergency response. Project will add to risk for fire in the area.
October 16, 2006	Poway Democratic Club Pete Babich. President	<ul style="list-style-type: none"> • Project will have very substantial and significant impacts on lands and communities. • Supports and advocates Democratic Party's 6-Point Plan for 2006 – Energy Independence. Suggests using broader, less expensive alternatives to the proposed line. • No Project Alternative must consider all laws and regulations. <ul style="list-style-type: none"> — AB 32 Global Warming Solutions – sets in place the nation's economy-wide global warming emissions reduction program that requires California to reduce global warming emissions to 1990 levels by 2020. — SB 107 Accelerated Renewable Energy Standard – moves timeline for reaching State's renewable energy standard requirement up by seven years to 2010. — From CPUC website – CPUC is committed to solar energy resources. • EIR/EIS must evaluate the feasibility of the Project to meet Project Objectives particularly those that provide environmental benefits. Report must assess the feasibility of the renewable energy projects and fully evaluate impacts that result if fossil-fueled plant energy is used instead.

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		<ul style="list-style-type: none"> • EIR/EIS must evaluate the cumulative and growth-inducing impacts of the substantial surplus transmission capacity that the Project will produce. Extensive information is available on what these impacts could be, based on other projects including the Rainbow Transmission Line denied by the CPUC. Report should also fully evaluate impacts of generating this additional electricity. • Rare opportunity to put vision of recently enacted legislation and that of CPUC into concrete action.
October 18, 2006	Pine Valley Community Planning Group Vern Denham	<ul style="list-style-type: none"> • Concerned that 38 homes will be removed if project is pursued, some with historical significance. In neighboring community, homes, church, and a historic school will be taken. • Requests a 45-day extension for commenting.
October 20, 2006	Border Power Plant Working Group Ratepayers for Affordable Clean Energy Bill Powers, P.E.	<ul style="list-style-type: none"> • Need to identify what low-cost generation will access the SRPL. Most generation will on long-term contracts in Arizona by the time Project is operational in 2010. EIR should address potential of Project to “debottle-neck” transmission access from plants in Mexicali. • Take a fresh look at transmission options even those that have been rejected by SDG&E. • Address expansion of transmission options such that SRPL is used for bulk power transport only. • Address impediments to location in same corridor as SWPL. • Address reconductoring 230 kV lines with high temperature low sag lines. • Address likelihood that 500 kV lines will be commercially available by 2015 and that Stirling will be completed in 2010. • Address why LADWP-IID Green Path alone is not adequate. • Determine if reasonable to assume lower natural gas prices in Arizona as justification for SRPL after 2008. • Attachments: Comments on Draft 2005 IEPR Transmission Chapter; Order to CPUC dated Sept 10, 2004; Imperial Valley Study Group meeting minutes dated April 12, 2005; Ratepayers for Affordable Clean Energy official protest to CPUC.
October 20, 2006	LS Power Brian Cragg Goodin, MacBride, Squeri, Ritchie & Day	<ul style="list-style-type: none"> • Would like the EIR/EIS to include an in-basin generation alternative in the environmental review. Reasons stated to reject the in-area generation alternative were flawed. • The in-area generation alternative studied by SDG&E was not linked to any transmission upgrades that could deliver renewable power. Alternative should have considered more modest transmission upgrades focused on delivering renewable generation from the Imperial Valley to the load center without also serving as a transmission superhighway. • Recognize that a system of Renewable Energy Certificates (RECs) will allow SDG&E to meet its obligations. • An in-area generation alternative can be combined with either modest transmission upgrades or an assessment of RECs to create a complete alternative. • The discussion of economic aspects of the in-area alternative was also defective in the PEA. No explanation is given for why there is a statement for the need for supplemental payments to ensure economic viability of new plants. PEA also states that in-area alternative may have limits on economically feasible air emission offsets, but fails to identify projects that already have air permits (e.g. LS Power’s South Bay Replacement Project). • Suggestion that in-area generation would have greater environmental impacts is a “short-sighted” approach. In-area generation needs to be considered in the environmental analysis because it will have nowhere near the total environmental effects of the SRPL project.

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		<ul style="list-style-type: none"> • Biggest weakness in the PEA evaluation is its exclusive focus on local air quality with no consideration of emissions associated with gas- and coal-fired plants that will produce electricity for SRPL. • In-area generation teamed with modest transmission upgrades is a viable and preferable alternative to SRPL.
October 20, 2006	Golightly Farms Carolyn Morrow	<ul style="list-style-type: none"> • Questions the need for more power. • Suggests that in-county power generation would be more effective. • Concerned that the line will only import energy from Mexico to Los Angeles.
October 20, 2006	Center for Biological Diversity and San Diego Chapter Sierra Club David Hogan Urban Wildlands Program Director Center for Biological Diversity Paul Blackburn Energy Committee Chair San Diego Chapter Sierra Club	<ul style="list-style-type: none"> • Conservation groups do not endorse any route or mitigation for the Powerlink and will continue to vigorously oppose this “unnecessary and harmful Project.” • Intend to prove that compliance with State’s loading order, California’s Renewable Portfolio Standard, global climate change laws, and requirements related to minimizing costs will require adoption of a “no wires” alternative. • Since scoping provides opportunity for input - provide possible alternatives and mitigation measures but do not endorse or accept routing alternatives or mitigation. • Conservation groups consider a failure to provide an opportunity for scoping comments on routes that do not transect ABDSP to be a violation of NEPA and CEQA, and be grossly unfair. • No wires alternatives and alternatives outside ABDSP are feasible. • Objectives. Project objectives not appropriately stated. Objectives should be in term of outcomes, not technical approaches. For example, first objective limits its objective to transmission but other means include in-basin generation and load reduction efforts. • Project objectives are excessively narrow. CPUC and BLM must define objectives in terms of benefit to society instead by the specific infrastructure proposed by utility. • Alternatives. Project alternative must comply with CA’s loading order (State Energy Action Plan II, page 2). CPUC is required to consider energy supply alternatives in a particular order and transmission infrastructure must advance this order. Alternatives must meet energy demand through energy efficiency and demand response measures, then renewable sources and distributed generation, and finally through clean and efficient fossil-fired generation transmission facilitates order, not an energy source. • CPUC must provide its independent assessment of the efficacy of conservation, energy efficiency, demand management and smart grid efforts. • Assertion that the Project promotes renewable energy from Imperial Valley is based on flawed analyses. Need to re-evaluate Stirling Energy Systems contract to determine commercial viability of technology and evaluate financial feasibility of geothermal energy from Salton Sea in Imperial County. Failure to fully evaluate renewable energy development claims would undermine objectives of loading order, failure to increase renewable energy use, and sacrifice precious public lands to increase use of fossil-fired energy and its green house gas emissions, which contribute to global climate change. • Loading order significantly modifies the types of alternatives that the CPUC may consider. For example, alternative must be combination of methods of meeting energy demands. Comparing energy conservation to the Project and dismissing it as infeasible violates this requirement.

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		<ul style="list-style-type: none"> • CPUC should evaluate a range of alternatives that include energy conservation measures, possible renewable energy sources, and possible fossil fuel-fired sources; evaluate these energy options in one or more alternative options, and identify combination of energy sources that best meet project objectives; then can evaluate transmission alternatives. • CPUC/BLM must fully evaluate “no wire” alternatives as well as alternatives that require substantial transmission upgrades. • If significant amount of new out-of-basin capacity is identified (not supported by Conservation Groups) then CPUC/BLM must consider a range of reasonable <i>transmission</i> alternatives [emphasis added]. • Additional feasible transmission alternatives include: <ul style="list-style-type: none"> — New 230 kV lines located in Mexico between the Imperial Valley and Miguel Substations — Joint Imperial Irrigation District and Los Angeles Department of Water and Power line proposed as part of IID’s full Green Path Project (Green Path North) — Four new 230 kV circuits overhead or underground from Imperial Valley substation into San Diego County — Upgrades to existing transmission lines through the use of high capacity, low-sag wires — Better integration of SDG&E, CFE and SCE grids to improve reliability — Reinforce SDG&E’s internal transmission grid to increase internal flow capacity and reliability • Conservation groups support use of UCAN alternatives and encourage CPUC to require additional workshops on to identify other alternatives. • ABDSP and other Protected Areas. Project would significantly harm scenic, biological, recreational, and other values of ABDSP. Project would also significantly harm many other protected areas (letter identifies 12 other locations). • Other alternatives should be considered to avoid or reduce this harm to ABDSP and other protected areas. Consider route alternatives alongside existing major transmission lines and/or transportation corridors out of ABDSP and other protected areas. Although do not endorse co-location with SWPL, existing lines in Mexico and/or I-8 would greatly reduce impacts identified in letter. • Construction and maintenance would significantly harm special status species, including state and federally listed species, and natural communities. Complete thorough, seasonally appropriate protocol surveys for 28 identified animal and plant species. • Include “no wire” alternatives and alternative routes along SWPL, lines in Mexico, lines in Imperial Valley, and/or I8. Any impacts to the 37 identified species and natural communities would be significant. Mitigation should include compensatory protections, management and monitoring plan addressing each impacted species and natural community. • Wildfires. Project would greatly increase likelihood of wildfires and interfere with effective fire response; wildfires harm biological resources. Alternatives should be identified to reduce impacts from wildfires. Mitigation could include funding to expand and improve emergency fire facilities, equipment and personnel for immediate emergency response; require locked gates on Project access roads and other measures to prevent public access; and monitoring plan should detail how measures will be accomplished. • Invasive Exotic Plants. Project would significantly harm biological resources and increase risk of wildfire by facilitating spread of harmful, invasive, exotic plants. Include alternatives away from relatively

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		<p>intact natural areas. Mitigation: limit and delineate construction and maintenance footprint, fund control and removal of exotic invasive plant species, and detail how exotic species measures will be accomplished.</p> <ul style="list-style-type: none"> • Visual Resources. Project would significantly harm visual resources throughout the project area including ABDSP (enormous impacts), parks and preserves, undeveloped BLM lands, the Imperial Valley, and scenic highway corridors. Need to assess impact of additional utility corridors Imperial Valley given CA Desert Conservation Area Plan goals. Include alternatives that avoid this harm; consider underground lines through areas of high scenic and aesthetic value. • Off-road Vehicles. Project would facilitate access by off-road vehicles, which would harm biological, archeological, historic, and cultural resources. Consider alternatives that discourage off-road vehicle use in remote natural areas. Mitigation: fund park and preserve managers, install locked gates on access roads, monitor any ORV trespass problems - respond with vehicle barriers or other measures. Monitoring plan should detail how ORV mitigation will be accomplished. • San Diego Multiple- Species Conservation Plan (MSCP). Project conflicts with MSCP and harms MSCP preserves. Alternative route north of Los Peñasquitos Canyon would threaten ecological integrity of the preserve. Consider alternatives that avoid or reduce harm. EIR/EIS should articulate relationship between state and federal endangered species and other city and county plans. Maps should show County's Pre-approved Mitigation Areas, City's Multiple Habitat Planning areas, and MSCP preserved lands. Mitigation: double mitigation for MSCP preserve lands to cover existing and proposed Powerlink projects. Cannot rely on County Regional HCP because does not cover all applicable species and is out of date. • Cultural Resources. Project would harm sensitive archeological, historic, and cultural sites (identifies five key sites). Alternatives should be considered to avoid harm to cultural resources. Mitigation: fully survey route to avoid direct impacts, where avoidance not feasible document and preserve all resources; acquire funding for important unprotected cultural and archeological resource sites for dedication as new park land. Monitoring plan should detail how sites placed at risk by Project will be protected. • Cumulative Impacts. Project would significantly harm environment by promoting large-scale renewable energy facilities. Identifies four areas proposed for renewable energy development that need to be evaluated in the EIR/EIS. Conservation Groups support renewable energy facilities but should locate on disturbed land and away from sensitive resources. Alternatives should be considered that encourage development of renewable energy facilities. • Project results in cumulatively significant harm by permitting completion of "full loop" transmission alternative. SRPL and "full loop" are closely related. EIR/EIS must consider cumulative harm of the "full loop" alternative on people and nature. • Recreational/Educational Experiences. Huge towers and substations will substantially reduce recreation value of any area within sight of facilities. Cites impacts to six trail/preserve areas and five campgrounds. Consider alternatives to reduce this harm. Mitigation: acquire ABDSP in holdings, adjacent natural lands, and other at-risk educational areas for park dedication. • Noise Pollution. Project would increase noise levels along route. Consider alternatives that avoid or reduce this harm. It is not possible to mitigation for noise impacts; only option to adjust route. Include

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		<p>noise measurements inside ABDSP, away from Highway 78, and far western Imperial County.</p> <ul style="list-style-type: none"> • Water Resources. Project would harm waterways. Consider alternatives that avoid or reduce harm. Mitigation: design infrastructure to minimize erosion and limit need for regular maintenance that disturbs land. Detail in monitoring plan how watershed protection will be accomplished. • Global Warming. Letter provides detail on global warming, CA goals for this issue, and summarizes global warming research. Emissions from fossil-fuel fired plants outside CA contribute to global climate change. Must assess likelihood of the use of the Project by both fossil fuel-fired plants and renewable energy plants. Review potential sources of electricity to be transmitted and assess propensity of Project to promote development of renewable energy. Model greenhouse gas emission impacts of power plants and compare to the Project's greenhouse gas emissions relative to non-transmission alternatives. • ABDSP General Plan. Project conflicts with ABDSP General Plan; Identifies General Plan language that does not support construction of utilities. Nothing in General Plan authorizes activities within specific corridors identified by SDG&E. General Plan directs DPR to protect park resources. General Plan and state law prohibit construction of transmission lines in wilderness areas; Project would require change in designation of land through a plan amendment. EIR/EIS must provide full assessment of extent and nature of ROW through ABDSP, including detailed maps. Changing wilderness designation is a harmful precedent that must be assessed on California's wilderness system.
October 20, 2006	Mussey Grade Road Alliance Diane Conklin	<p>Biological Impacts</p> <ul style="list-style-type: none"> • Requests an additional year of sensitive species surveys and protocol-level surveys for all threatened and endangered species. • Species population, population sizes, and suitable habitat should be mapped for each sensitive species. Temporary and permanent impacts should be overlain on maps and construction footprint altered to avoid sensitive species. • A number of open space preserves are of special concern because they are home to sensitive plant and animal species. • Mitigation: install towers using helicopters to limit ground disturbance; detailed construction monitoring plan to address sensitive species; a before and after study should be done to determine long-term impacts; long-term resource management plan to mitigate edge effects and direct loss of habitat. <p>Fire Hazards</p> <ul style="list-style-type: none"> • SRPL would traverse many miles of extremely flammable vegetation. Many communities along the route have suffered through past fires in 2002 and 2003 and a loss of 2,200 homes and 15 lives. • Ten percent of all major fires are started with power lines. Letter provides additional statistics on power line fires. • Presence of power lines complicate fire fighting. NIOSH reports 10 firefighter deaths from 1980 to 1999. Firefighters will avoid activities near power lines. • Power lines are responsible for 6% of all helicopter accidents such as the 2002 Cedar Pine fire. Ramona area, where all SRPL routes converge, has five sources of low-altitude aircraft, which would pose a greater hazard for power line collisions.

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		<p>Earthquake Impacts</p> <ul style="list-style-type: none"> • SRPL would traverse several active faults along the preferred route, through a region determined to be at risk for a "great earthquake." • Article in Nature magazine (June 2006) analyzed GPS data and identified two fault systems: San Andreas and San Jacinto. • Although San Diego thought to be earthquake safe, new results emphasize more a matter of timing than geological stability. <p>System Alternatives</p> <ul style="list-style-type: none"> • System alternatives should be fully evaluated and carried forward in the EIR/EIS. Energy savings and MW contributions should be provided in detail for each alternative. • Recommends a new Energy Efficiency/Renewables/Distributed Generation/Demand Response alternative. This alternative would also include Cool-Roof Program and Passive Solar Building Design Program. • Suggests aggressive energy-efficiency measures (e.g. public education, advertising, and increased rates for high energy users). • Suggests looking into solar, cool-roof, and more energy-efficient programs, and provides justification for the feasibility of a Cool-Roof Program. <p>Additional Miscellaneous Matters</p> <ul style="list-style-type: none"> • Alternatives –Need to consider a full range of alternatives from in-basin generation to most recent technology to conservation measures to a full evaluation of the No Project Alternative. Other suggestions: <ul style="list-style-type: none"> — Use local existing and planned power plants instead of building new transmission. — Expand capacity of existing transmission lines. — Replace SWPL or its cables with DC transmission. — Transmit energy from Mexicali plants and new sources to Tijuana; connect to California through existing Tijuana-San Diego 230 kV intertie. — Encourage enhanced energy conservation measures (e.g. real-time metering, daylighting technology, solar photovoltaic sources). • Reliability. Carefully examine reliability of new transmission line and the El Centro Substation. • Solar Energy Premise. Access to centralized energy in Imperial Valley is not a reasonable premise for constructing the SRPL project. Proposed technology is not in commercial production. • Wind Premise. Access to wind energy is not a reasonable premise for constructing the SRPL project because Imperial Valley has the lowest wind generation in the State. • Geothermal Premise. Access to geothermal energy is not a reasonable premise for constructing the SRPL project because access to geothermal resources in the Imperial Valley have been stalled due to limited water supply, induced seismicity, and limited interest in an uncertain investment. • Cumulative impacts need to be fully evaluated and should cover all aspects of the Project. • Other issues to be considered are land use planning and the Project's impact on extending sprawl. Also, the cost of solar installations and the cost of land acquisitions and other costs associated with the Project (ratepayers financing the line). • Attachments: Pre-hearing conference statement from Mussey Grade Road Alliance, September 7, 2006; Mussey Grade Road Alliance official protest to CPUC, September 22, 2006.

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October 20, 2006	Rancho Peñasquitos Concerned Citizens Harvey Payne, Chair	<ul style="list-style-type: none"> • The Rancho Peñasquitos Concerned Citizens (RPCC) have provided detailed alternatives to the Coastal Link portion of the Proposed Project and request that the alternatives be carried forward for full analysis in the EIR/EIS. <p><i>Transmission upgrades to SDG&E's system that would avoid the need for a 230 kV line to be built between Sycamore Canyon substation and Peñasquitos substation.</i></p> <ul style="list-style-type: none"> • New transmission line to Peñasquitos Substation is not needed to serve the San Diego load center. Sycamore Canyon Substation is connected to SDG&E's transmission system; alternative upgrades to transmission system meet project objectives without building a new transmission line. • Three upgrades, which are feasible and meet project objectives: <ul style="list-style-type: none"> — Place reactors in series with three overloaded transformers at Sycamore Canyon Substation and add a 230 kV transformer at Miguel Substation. — Add a 230/138 kV transformer and a 230/69 kV transformer at Sycamore Canyon Substation and add a 230/69 kV transformer at Miguel Substation; and — Loop in one of both of the Mission-Miguel 230 kV lines into the Sycamore Canyon Substation and add a 230/69 kV transformer at Miguel Substation. • SDG&E has chosen the most expensive environmentally damaging alternative to mitigate effects of the influx of electricity in Sycamore Canyon substation. • The proposed upgrades, in comparison to a new transmission line, would be expected to reduce or eliminate the following impacts: aesthetics, air quality, biological, cultural and paleontological, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, noise, recreational resources, and transportation and traffic. <p><i>Alternative routes and minor routing adjustments that reduce impacts as compared to the Proposed Project.</i></p> <ul style="list-style-type: none"> • RPCC offers seven alternative routes or route adjustments and provides maps in the attachments that describe the proposed alternatives. Each of the routing alternatives meet most of the project objectives except for objective 8. Alternatives include: <ul style="list-style-type: none"> — 1a. Pomerado Road to Miramar Area North – all Underground Option — 1b. Pomerado Road to Miramar Area North – Combination Underground/Overhead Option — 2a. MCAS Miramar – All underground Option — 2b. MCAS Miramar – Combination Underground/Overhead Option — 3. Mercy Road to Peñasquitos Canyon Preserve – Combination Underground/Overhead Option — 4. Rancho Peñasquitos Blvd. Bike Path Adjustment — 5. Preferred Route Adjustment • Alternatives 1a and 1b significantly lessen the impacts to visual, biological, noise and recreation resources. These alternatives avoid far more neighborhoods and place the transmission line underground on secondary streets that are abutted by commercial buildings and light industry. • For Alternatives 2a and 2b, impacts are hard to assess because do not have access to the base but expect fewer impacts based on aerial maps of the area.

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		<ul style="list-style-type: none"> • Alternative 3 takes the line away from a large number of residences and out of a neighborhood park. These alternatives reduce some impacts (visual, recreation) and increase other impacts (geology and soils). • Alternative 4 would lessen the environmental impacts as compared to the project (visual, biological, geology and soils, hazards/hazardous materials, hydrology and water quality, and transportation and traffic). • There would be no additional environmental impacts associated with Alternative 5. • RPCC requests that CPUC carry forward each and every alternative set forth for full analysis in the EIR/EIS. • Attachment: Maps, photos, suggested mitigation, and documentation for alternative routing; copy of final EIR for State Route 56.
October 20, 2006	Descanso Planning Group Jo Ellen Hucker Chair	<ul style="list-style-type: none"> • Requests 45-day extension to October 20 deadline and new scoping hearings in East County Communities. • Group voted to oppose Alternatives C and D that run through Descanso. Construction of SRPL along these routes would violate community character and community plans. This project would destroy the community; 50-60 homes, a church, and a historic school would be (lost) gone. • Many residents believe that the Project is a ploy to manipulate the residents into agreeing with the original proposal to go through ABDSP. • Concerned about negative impacts on Cleveland National Forest and Cuyamaca State Park.
October 20, 2006	Park Village Maintenance Assessment Board Members: Jon Becker Hector De Leon Tom Masten Jeanette Waltz Bernie Wenzig Sharon S. Wong	<ul style="list-style-type: none"> • Opposed to the SRPL project. • Coastal Link between Black Mountain Road and Peñasquitos Canyon Preserve would have substantial adverse impacts on the community and open space. Imperative to reroute the Project outside of the district. • Project would destroy enhanced landscape and negatively impact the natural canyon environment. • If implemented then request the following measures: <ul style="list-style-type: none"> — Complete replacement of disturbed areas with like plantings. — Full landscaped median improvements on Park Village Road. — Accessible trails for service facilities and enhanced pedestrian/biking connections.
October 20, 2006	California Farm Bureau Federation Karen Mills Office of the General Counsel	<ul style="list-style-type: none"> • Agricultural operations in Imperial and San Diego counties would be significantly impacted by the traverse of a 500 kV line. • In Imperial County, the Project has the potential to impact existing dairy farms. Further assessment is needed on the affects of high voltage lines on dairy cattle and overall operations. Farming operations could be divided by the transmission line and impact access, water delivery, and could impact crop dusting. The Project's impact on these areas should also be evaluated. • In San Diego County, the Project would cross significant grazing land, which could diminish the ability to graze the land. The impact on grazing land must be assessed. • For all agricultural lands, the EIR/EIS should consider the impacts of construction on agricultural lands. Although the PEA states that agricultural land would be restored after construction, restoration takes years. This impact must be thoroughly reviewed. • The land use assessment must have an accurate identification of agricultural land. Some land has been identified as vacant land but it is actually grazing land. • Farm Bureau suggests using existing ROWs for the Project. State policy encourages use of existing ROWs (SB 1059). There are existing lines in areas such as the Central Link that should be more fully explored.

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October 20, 2006	Del Mar Mesa Community Planning Group Lisa Ross, Member	<ul style="list-style-type: none"> • SRPL will have serious negative impacts on the rural character of the Del Mar Mesa community. Community retains its agricultural zoning. • Del Mar Mesa has 10 miles of trails and at build out will have 540 homes on half-acre to 10-acre lots. Additional towers and lines will be visible from many homes in the community, from the trails, and from the golf resort. • Community is home to 1,500 acres of coastal maritime habitat, preserving 17 species of listed and endangered species. The Project will degrade viewsheds and compromise natural and recreational resources. More power lines create a “wall of towers” between the preserve and surrounding communities and the additional towers increase the risk of wildfires. • Welcome consideration of reasonable alternatives including undergrounding, using the SR-56 corridor or building a second line along SDG&E’s existing route along the southern San Diego border.
October 20, 2006	Community Alliance for Sensible Energy Mary Aldern Co-Director (Second Letter)	<ul style="list-style-type: none"> • Wants the EIR/EIS to provide more accurate and specific information on fire outage frequency along proposed and alternate pathways. • Green Path Phase 1 needs further exploration and more information. • Concerned that childcare establishments and cultural and historical landmarks will be impacted. • Suggests that recent purchase option of a Nevada power plant may offset the need for the SRPL Project.
October 20, 2006	Imperial County Dairy Attraction Committee Meghan Blevins DAC Chari	<ul style="list-style-type: none"> • Imperial County Dairy Attraction Committee (DAC) is an ad hoc committee whose mission is to attract dairies to Imperial Counties that are being pushed out by other counties due to urbanization. • Concerned about impacts to economy, specifically dairy and agricultural industries. Stray voltage would have an adverse impact on milk production, reproduction rates, and overall animal health. • DAC urges consideration of impacts to dairies.
October 20, 2006	Starlight Mountain Estates Owners (SMEO) Michael Page	<ul style="list-style-type: none"> • SMEO community located in Inland Valley Link portion of the Project and is located a half mile north of San Diego Estates in Ramona. Properties directly affected by Project are bordered on three sides by the Mount Gower Open Space Preserve. Average property size ranges from 20 to 60 acres. Portion of SMEO community affected by Project is Designated Critical Habitat. • Transitioning from underground to overhead facilities across the SMEO community impacts public scenic vistas and would be clearly visible from public trails within Mount Gower Open Space Preserve. • Overhead facilities in the SMEO community discriminate against the community, as facilities are proposed to be placed underground through adjacent areas. • Overhead facilities will damage property and restrict future highest and best use of SMEO land. • Consider extending underground facilities ending at N77 0.6 miles to the northeast, moving the transition to overhead to the end of the valley to proposed structure 193. • Suggests consolidating and relocating the existing 69 kV overhead facility underground in SMEO to minimize new and additional underground rights-of-way. • Impacts to SMEO community and surrounding preserve include: <ul style="list-style-type: none"> — Aesthetics – proposed underground to overhead transition would be clearly in public scenic vistas and viewsheds. Change from current to proposed towers will be significant and visible from roads and trails in the park. Adding a second parallel set of taller steel poles would have a significant negative visual impact. Extending underground facilities almost entirely reduces this negative impact.

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		<ul style="list-style-type: none"> — Agricultural Resources – Project would eliminate or partially eliminate vineyards and acreage near lines would be useless for planting grapes because of increased bird damage to the crop. Underground facilities in SMEO valley would eliminate this impact. — Biological Resources – Project negatively impacts golden eagles, kestrel, black shouldered kite, barn owls, great horned owls, mountain lions, bobcats, mule deer, and wild turkeys, all of which hunt and graze near proposed right-of-way. Consolidated underground facility removes this impact. — Hazards/Hazardous Materials - Concerned that fallen electrical lines caused by fire or winds will impair emergency access and exit routes. Transmission lines known to be an ignition source for wildfires. Underground alternative will dramatically reduce SMEO's risk of loss, injury or death involving wildfires. — Land Use and Planning – Proposed overhead facility will create physical division by forcing altered use, limited use, or non use of land within 200 feet of ROW. Underground facility would preserve land uses integrity of SMEO community. — General Issues – Prevalent public fear of EMF regardless of whether the basis is justified or not. Property values and related financial concern will be negatively impacted by Project. SMEO's underground alternative would mitigate public fear of the new transmission lines. • Asking for mutual consideration in meeting Project objectives as well as preserving quality of life that many have worked lifetimes to preserve. • SMEO not opposing project but is interested in minimizing and reducing negative impacts to community. Extending the underground facilities through SMEO community accomplishes this objective and allows project to be relatively unhindered. • SMEO's alternate proposal to extend underground facilities is feasible and reasonable. Avoids condemnation of several buildings and other improvements. • Extend invitation to visit community and get a feel for quality of life, view underground alternative location, and meet property owners affected by Project. • Attachment: photos and maps of affected area; SMEO official protest to CPUC; letter from Intermountain Volunteer Fire and Rescue Department dated September 1, 2006.
October 20, 2006	Imperial County Farm Bureau Nicole Rothfleisch Executive Director	<ul style="list-style-type: none"> • Imperial County Farm Bureau is a voluntary membership-based organization comprised of over 800 members. • Proposed route runs through and adjacent to Bullfrog Farms Dairy, planned site for future potential dairies and crop production land. An electrical transmission line would be detrimental to this industry. • Concerned about impacts to health and productivity of dairy cattle. Studies have indicated that it is necessary for a line to be located a minimum of one mile (ideally five miles) away from livestock to prevent health and productivity of the animals. • Project may impact dairy productivity and lead to economic losses of over \$1 million per year. • In addition to dairies, farming operations would be impacted. The Project could impact access, water delivery, and could be dangerous to pilots. • Farm Bureau encourages thorough analysis of all lands considered and the potential impacts. Impacts to agriculture should be considered significant. Existing routes should be considered for routing alternatives.

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October 20, 2006	California Wilderness Coalition Ryan Henson Policy Director	<ul style="list-style-type: none"> • Non-profit organization with over 5,000 members. Protect natural landscapes that make California unique. • Shocked by SDG&E's unprecedented proposal to violate the boundary of a designated state wilderness within ABDSP. • CPUC and other state agencies should honor the letter and spirit of the California Wilderness Act by treating designated state wilderness as an enduring resource. • Letter identifies 15 wilderness-quality lands that are traversed by or adjacent to the Project route. The Coalition asks that the CPUC and other agencies prohibit construction of power lines within the 15 wilderness-quality lands. The lines should be placed on paved roads whenever possible and existing corridors should be used to the maximum extent possible. • Concerned about impacts to water quality, air resources, recreational opportunities, and wildlife. • Disturbance of natural habitat will impact research, monitoring, and landscape referencing in the area.
October 20, 2006	California State Parks Foundation Sara Feldman Southern California Director	<ul style="list-style-type: none"> • Letter supersedes October 5, 2006 letter. • Comments consistent with Protest filed on September 8, 2006. • Wilderness areas of significant value. Intruding on wilderness would cause significant negative impacts. ABDSP supports over 400,000 acres of Wilderness Areas (WAs). • Foundation extremely concerned that any expansion into WAs will set a terrible precedent. • Impacts to habitat and wildlife not adequately or fully addressed: provides examples of areas not covered adequately. Must address migration patterns, wildlife corridor disruptions and other issues such as electrocutions and collisions with introduction of new structures. • Fire impacts not adequately addressed. • Impacts to viewsheds also impact park visitors. • Thorough visual analysis needed. Preliminary park study by Colorado Desert District of CA Parks and Recreation estimates that 10s of 1000s of acres would be visually impacted. • PEA does not adequately address economic and use impacts on campgrounds. • Need to accurately address impacts to protected archaeological and American Indian sites. • Inadequate review of alternatives. Need to consider alternatives outside ABDSP. Did not adequately consider alternative routes along I-8. Should consider and objectively evaluate all routes up to "no wire."
October 21, 2006	Pardee Homes Allen Kashani Land Development Manager	<ul style="list-style-type: none"> • Land intended for single family homes in the approved Carmel Valley Neighborhood 10 Precise Plan and Del Mar Specific Plan appear to be impacted by the project. The Coastal Link portion of the project would impact our land. • Cites aesthetic, construction, post-construction noise, environmental (impacts to Los Peñasquitos Canyon Preserve), and access/trail impacts.

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October 21, 2006	Ocotillo Wells Citizens Alliance for Responsible Energy Richard Jenson Chairman	<ul style="list-style-type: none"> • Appalled that anyone would conceive a mega super energy highway on largest and arguably one of the most pristine, beautiful, serene, and ecologically sensitive state parks. • Why permanently and forever scar this irreplaceable landscape when other alternatives exist. • Concerned about dirty energy from unregulated power plants in Mexico to markets in Los Angeles at the expense of a National treasure. • Why not use existing I-8 corridor? Why is the line needed at all? • State called for more creative energy solutions why hasn't SDG&E put more thought into spending money on rooftop solar on buildings. • Concerned about solar, geothermal and wind renewables that SDG&E says the line needs to tie into. • Concerned with serious fire, air transportation, and health hazards to plants, animals and people. • Concerned with loss of incredible viewshed in park and impacts to cultural and historic sites. • Alternatives must be held to higher standard, from in-basin alternatives to incorporating conservation.
October 31, 2006	Utility Consumer's Action Network Michael Shames	<ul style="list-style-type: none"> • Issues UCAN would like to see addressed in the EIR/EIS: <ul style="list-style-type: none"> — Relocate Central substation to the San Felipe Substation site – reduce number of substations and creates option for undergrounding through ABDSP. — Build 500 kV line roughly parallel to SWPL from IV Substation to the Boulevard/Campos area, then build 2 x 230 kV transmission from there to the existing SDG&E grid (possibly Sycamore Canyon), possibly at location in the El Cajon area along the existing Miguel-Mission and Miguel/Sycamore 230 kV lines. – eliminates need for two 500 kV lines and would have much shorter length. — Build a 500 kV line from Imperial County to the Los Angeles area as currently proposed by LADWP, and take other measures as necessary to meet SDG&E reliability needs. – allows delivery of renewable energy from Imperial Valley to California load centers and economy energy to California. Other combination of measures would be needed. — Mexico Light (140-300 Mw) – provides 140 to 300 Mw of reliability from Mexican generation. — "SONGS" Light (1000 Mw) – provides up to 1000 Mw of incremental reliability by upgrading Path 44. — G-1 rerate (232 Mw) – redefining the "G-1" contingency would decrease SDG&E reliability requirements in 2010-2015 by 232 Mw. — AMI [Advanced Metering Initiative] (230-262 Mw) – SDG&E claims peak loads reduced in 2010 by 219 Mw and 2015 by 249 Mw. AMI not currently counted in SDG&E SRPL analysis. — Demand Response Programs (29-143 Mw) – these programs could further reduce loads; none of these programs are included in Sunrise analysis. — New Combustion Turbines (414 Mw) – SDG&E adds 414 Mw of new combustion turbines in 2010-2014; some may be installed by 2009, thus would exist whether or not SRPL is built. — South Bay Project (561-620 Mw) – South Bay project would add 620 Mw capacity in SDG&E service area.