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2006 October 19

Commissioner Dian Grueneich
Administrative Law Judge Steve Weissman
via Billie Blanchard/Lynda Kastoll
California Public Utilities Commission/United States Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104

e-mail: sunrise@aspeneg.com
fax: 866 711-3106

Subject: Scoping Comments on SDG&E's Proposed Sunrise Powerlink Project and
Application for Certificate of Public Convenience and Necessity, and
Associated Environmental Review per CEQA and NEPA Processes.

Dear Commissioner Grueneich and Hon. Steve Weissman,

I have a number of objections to the proposed Sunrise Powerlink transmission project, and some specific requests for investigations during your Commission's deliberations and study leading to the approval or denial of San Diego Gas & Electric's Proposal and Application. I also propose some specific, feasible alternatives for study and potential implementation that offer significant benefits to the environment, SDG&E customers, and California. Please consider the following:

1. The Proposed and "Alternative" routes for the power line appear to have been chosen to reduce or minimize the number of residences impacted, and perhaps thereby to reduce opposition to the Project. SDG&E, as the Applicant, should be asked to describe and quantify all metrics they used in evaluating and comparing different potential routes. Please observe that, while an imposition for some homeowners, residences can be bought by SDG&E or the State where there would be a direct adverse impact from the presence of a 1 GW power capacity, 550 kV power line. In such cases, residents can move to a new location with such funds as SDG&E should be required to provide. The loss of people's homes, to the extent this would be necessary, is not permanent and irreplaceable. However, unspoiled wild and State Park land cannot be created anew, and the loss of such land to interference and ruined viewshed will be permanent and irreplaceable. There will be less unspoiled land left after a new or much enlarged power line is run across Anza Borrego Desert State Park and other wild lands along the Proposed or Alternative routes. I would like to propose that the following metrics be compiled and provided by an independent contractor, be carefully checked by CPUC, and be published in the Draft and Final Environmental Impact Reports

and any other public assessment of the Proposed, Alternative, and considered-but-rejected routes that SDG&E has investigated:

a. Viewshed:

- i. square miles within 10 miles either side of the Powerlink from where the top of at least one tower can be seen;
- ii. Square miles of the above that are within State Park, County and Municipal Park, and other protected lands and Recreation Areas, and undeveloped private land;
- iii. Square miles of the above that are not already within a mile of a 4-or-more lane major highway or within a mile of an existing 230 kV or higher voltage power line.

b. Residential Impact:

- i. Number of residences within 10 tower-heights of either side of the Powerlink from where the top of at least one tower can be seen;

c. Construction Impact:

- i. Square miles of wild land from which construction activity can be heard at ≥ 10 dB above average background sound level;
- ii. Square miles of wild land (i.e., State Park, County and Municipal Park, and other protected lands and Recreation Areas, and undeveloped private land) within 0.5 miles of any construction activity from which construction activity can be seen.
- iii. Linear miles of blue line and intermittent (dashed) blue line stream bed, per USGS 7.5 minute quadrangle maps, downstream within 1 mile of where unpaved access roads used by construction equipment cross such stream beds.

2. That the CPUC require that a quantitative assessment be made of the vulnerability of the Powerlink to terrorist attack by an independent contractor, be carefully checked by CPUC, and be published in the Draft and Final Environmental Impact Reports and any other public assessment of the Proposed, Alternative, and considered-but-rejected routes that SDG&E has investigated. This assessment should specifically consider the probability of an attempted attack being successful as a function of the likelihood that citizens on the ground would observe preparations and execution of such an attack. Such likelihood is likely to be dramatically different for routes in high traffic areas, such as the Interstate 8 corridor, vs. backcountry desert routes. Rigorous standard engineering methods of Probabilistic Risk Assessment (PRA) should be employed in these analyses (there are applicable NASA standards for analyses of rare-occurrence space system failure risks). Quantitatively compare the vulnerability of these various potential Sunrise Powerlink routes to the vulnerability of the alternative local power conservation and generation approaches in 4 a, b, c & d below.

3. That the CPUC require that a quantitative assessment be made of the vulnerability of the Powerlink to helicopter and fixed-wing aircraft impact, and the risk of resulting range- and forest-fires, by an independent contractor, be carefully checked by CPUC, and be published in the Draft and Final Environmental Impact Reports and any other public assessment of the Proposed, Alternative, and considered-but-rejected routes that SDG&E has investigated.

This assessment should specifically consider the probability of any resulting fire being detected at different elapsed times from its start, and over what acreage and property value it would most likely burn before being contained and extinguished. Such “most probable acreage” is likely to be dramatically different for routes in populated areas and transportation corridors where an accident would be almost instantly detected and firefighters would arrive quickly from nearby locations, vs. backcountry routes in difficult terrain, where a crash might not be detected for hours, and more hours would elapse before the first firefighters would arrive at the now-much-larger fire scene. Rigorous standard engineering methods of Probabilistic Risk Assessment (PRA) should be employed in these analyses. The seemingly improbable scenario of an aircraft/powerline collision exactly happened in the fire started when a helicopter collided with a powerline, starting a fire that destroyed many homes in Ranchita, and nearby communities, and devastated thousands of acres of wildlife habitat. Across the country, military and civilian aircraft collisions with power lines occur every year, and resultant fires are not as rare as one might think. This analysis should also quantify the most likely levels of firefighting cost and property damage from any resulting fire, and specify who would pay for resulting damages from what funding source (e.g., taxpayer-supported disaster relief, insurance, homeowner funds, SDG&E, etc.)

4. That the CPUC require that additional Alternatives to the Sunrise Powerlink be considered whereby:
 - a. Time-of-use (TOU) metering would be employed with all new construction, and retrofitted to various fractions of existing customers. Based on data from different utility customers inside and outside SDG&E’s territory, assess the most likely impact on demand by customers employing different common TOU metering rate schedules, and for different levels of projected electric power cost growth. Extensive employment of TOU metering is likely to at least delay, if not eliminate the need for Sunrise Powerlink, because of the financial incentives it gives customers to limit power use during the peak demand periods that drive the alleged need for Sunrise Powerlink.
 - b. SDG&E would employ a capability for remote shut down of air conditioning and other high power equipment at locations they could select and for limited durations to reduce load during peak demand periods. Based on data from different utility customers inside and outside SDG&E’s territory, assess the most likely impact on demand by employing different common and potential remote A/C shutdown implementations. Many customers would happily trade lower peak rates for SDG&E’s ability to selectively turn off their A/C for 1 or at most 2 hours at a time. Indeed, many small and large businesses, and NASA’s Jet Propulsion Laboratory, employ this method to a limited degree to lower peak loads served by Southern California Edison. The penetration of this technique across a much larger fraction of the customer base is feasible at costs much lower than a new major transmission line, and customers get to pocket a portion of the savings.
 - c. A combination of the above Time-of-use Metering and Remote Shut Down techniques are employed to reduce peak loads.
 - d. Rooftop, ground mount, and carport solar electric energy production would be required on 50% - 90% of all new construction, and with various incentive schemes for retrofit installation at existing homes and business/government/school locations,

such that over 5 years, 100,000 homes and 10,000 commercial/government/school buildings and their associated parking areas be outfitted with 6 kW per home and 150 kW per building and associated parking area, respectively. Calculate and publish the payback times for homeowners and building/parking operators who employ this self-generation tied to the grid vs. what they will pay in total for power delivered to their homes and buildings via Sunrise Powerlink. Obtain and publish the comparison of the same calculations from the 1) CPUC, 2) SDG&E and 3) suppliers of grid-connected home/small business solar power systems and equipment (e.g., Sharp Electronics Corp. (5901 Bolsa Ave., Huntington Beach CA 92647) for photovoltaic panels, Real Goods (13771 South Highway 101, Hopland CA 95449) for home systems, and SMA America, Inc. (20830 Red Dog Rd, Grass Valley CA 95945) for grid-tied inverters).¹ Compare for this alternative and the various Sunrise Powerlink route options: 1) total San Diego County new jobs created by year, 2) total California new jobs created by year, 3) total new revenue by year for small businesses in California.

5. Prior to any approvals, that the CPUC require that an independent expert panel be convened to advise the CPUC and report to the public on the likely readiness by dates from 2010 to 2020 of the proposed Stirling-based commercial power plant for full-scale commercial operation at various reliability levels. Forecasts of development time of Stirling power for proposed space applications have habitually been optimistic by many years. While the challenges of creating reliable and economically viable commercial-scale power generators are different from the challenges of space flight, many similar obstacles exist to technological maturation. The charter and makeup of NASA science advisory panels may serve as a good model for providing objective evaluations.
6. Prior to any approvals, that the CPUC require that SDG&E and its parent company, Sempra Energy, disclose their internal assessment of Stirling power plant readiness, along with their backup plans in case this power source does not come on line when publicly forecast. Do they simply plan to build a Sunrise Powerlink to no power source, or would they utilize power from alternative plants, which ones, and what would that environmental impact be? Under what circumstances would power be provided by existing or to-be-built power plants in Mexico, and how would their environmental impact differ from use of plants built under U.S. regulations?
7. Prior to the CPUC approving the conclusion of the formal Scoping Process now underway, ascertain which property owners along the affected areas on either side of the Proposed and Alternative Routes were not formally contacted about the possible impact on their property. Require that these property owners be formally notified, with verification of receipt, via their addresses on County tax rolls, and given adequate time to comment as part of the

¹ These are the suppliers of my home solar power equipment installed in 2003-2004; clearly other suppliers could be selected, as well. SDG&E calculations should not be accepted without such a comparison, because differing business interests will lead to differing assumptions and different estimates.

public Scoping Process. (While I own property precisely along the Alternative Route nearest Borrego Springs, I have yet to be officially notified of the potential route and possible impact on my property. However, my property tax bill from the San Diego County Tax Collector arrived a short time ago at my correct home address in good order the same week it was mailed. I also have yet to be asked for permission to enter my property for examination of the Alternative Route, but I am told by neighbors that non-Surveyor personnel having likely association with Sunrise Powerlink were seen on my property during the last two months. Other property owners in similar situations have indicated that they also have received no notification, and several first found out about the plans from my wife and me.)

I would like the CPUC to consider that while the stated objectives of the proposed Sunrise Powerlink are to 1) Maintain Reliability, 2) Promote Renewable Energy, and 3) Reduce Energy Costs for SDG&E ratepayers, I believe a case can be made that the underlying motivation is 4) to increase SDG&E and Sempra Energy profits. The first three of these objectives are indeed reasonable objectives for the CPUC to support, though this is not necessarily best done by approving the proposed Sunrise Powerlink Project. The fourth objective is inappropriate for the CPUC to support.

In my judgment as an engineer, I believe it is highly probable that an objective analysis of Alternative 4.d above will 1) yield the highest reliability power delivery to present and future SDG&E customers, and 2) provide the greatest certainty of promoting increased use of renewable energy. I further believe that under reasonably likely economic conditions and power prices over the next ten years, that 3) total energy costs to SDG&E customers over the next ten years, and even more so over the following ten years, will be lower than any Sunrise Powerlink option. As a Southern California Edison customer, even with lower rates than SDG&E, my installation of a grid-connected 6 kW peak solar power system (actually two separate 3 kW systems) will pay back in ten years or less. Had I borrowed all the money (I borrowed about half), my monthly payments for the ten years following my purchase would be similar to my prior monthly electric bills. My electric bills have gone to essentially zero for the house served by one of the systems. For the second house, my bills are about one-fifth to one-third of what they were before installing the system.

My installation costs of about \$4,000 went directly into Southern California small businesses and their employees. Based on my experience, one can estimate that for 100,000 homes and 10,000 building/parking operators, close to \$1 billion would go into local small businesses and local jobs over a 10-year period. This would be a worthy boost to any local economy.

There would be even greater incentive for renewable energy if California regulations were changed to require major power providers to buy excess power, perhaps at reduced wholesale prices, back from small generators like me. Right now, power companies are only required to reduce bills down to near-zero for small generators. However, when they buy from large generators, of course they pay for that power, and then pass the cost on to their customers.

The CPUC specifically, and California as a whole, have an opportunity make a major beneficial change in economics and environmental quality worthy of the outset of the 21st Century in which we live. Going beyond the above alternatives to Sunrise Powerlink, Southern California can become, in ten years, a net exporter of electrical energy to the rest of the nation. This export can take place over the same major powerlines already in place, just with the power running the

opposite direction during our peak sunlight periods, which correspond to peak demand periods in the rest of the Country (and here). There is no better part of the country to do this on such a scale. This is a goal in which everyone from individual home and business owners, to major corporations, to schools and government agencies, can participate. It can assert California's leadership in another initiative to reduce greenhouse gas emissions. The technology to do this is here today, in my front yard and on my patio roof and thousands of other homes like mine, and in every major utility transmission line. By installing on a fraction of new and existing homes, buildings, and parking lots, not one square foot of wild and scenic desert or forest land need be spoiled. Any plot to disrupt electric power generation will be foiled before it starts by an incredibly robust network of power generators right where people live. Economic risks will be dramatically reduced, because investments can yield new kilowatts and reliability improvements \$10,000 and one home at a time, instead of spending at least a billion dollars before a single new kilowatt is delivered to customers years after the start.

Such a bold step can set a new direction toward reducing dependence on foreign fossil fuels, and exporting billions of dollars to metastable political regimes. While the alternatives I suggest have many authors, and will by no means solve all California's energy problems, they can be refined and assembled as perhaps the boldest step the CPUC can take quickly. With California in the lead, there will be unexpected benefits, not to mention cooler cars parked under ubiquitous parking lot solar arrays, and maybe even a reduction in urban heat island woes. There is no better State to take the lead than California, and no better time than now. Perhaps the most beneficial impact of the Sunrise Powerlink proposal will be to stimulate a new dimension of environmental improvement, reduced foreign energy dependence, and total energy cost reduction. That's probably not what SDG&E stockholders had in mind, but you ultimately serve the people of California and the United States, not a large corporation with many foreign stockholders.

Thank you for your patience and consideration.

Sincerely,
[original signed by]

Robert L. Staehle

cc:

Gov. Arnold Schwarzenegger
Hon. Adam Schiff, U. S. House of Representatives
Hon. Carol Liu, California Assembly
Hon. Jack Scott, California Senate
Hon. Dianne Feinstein, U. S. Senate
Hon. Barbara Boxer, U. S. Senate
Ms. Judy Winter Meier, Editor, Borrego Sun

October 18, 2006

From: Shannon Davis
1185 East Lane
Imperial Beach, Ca 91932

To: Billie Blanchard, C.P.U.C.
Linda Kastoll, B.L.M.
C/O Aspen Environmental group
235 Montgomery Street, Suite 935

Re: Sunrise Powerlink Proposed Transmission Line

Dear Billie Blanchard and Linda Kastoll,

I am opposed to the development and construction of the Sunrise Powerlink, not only because I have property on the west side of Sunrise Highway on Mt. Laguna, and on the D route. I believe there is cause for concern for environmental impact on wildlife and habitat.

I, personally, made public comment at a U.S.F.W. HEARING To determine critical habitat for Peninsular Bighorn Sheep. I know that a State Fish and Game wildlife officer reported a Bighorn Ram on Sunrise Highway. That is essential for this Endangered Species to travel from one ewe group to another through out their range. One Ram was documented from the Anza Borrego Peninsular Bighorn group with a radio collar, ended up in a Ewe Group in the mountains of Mexico. A Bighorn Sheep can go for 4 days without water, like a camel.

Our property at 20731 Spice Way, parcel 602-020-08 is nine acres with a S.D.G.E. easement of thirty feet right of way for maintenance on power poles, with "D" Route increasing the easement to three hundred feet running dead center of the lot.

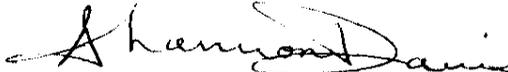
In the "D" Route is an inventory of forty homes will be condemned and "taken" for the new 300 foot easement.

Our question is, are we included, specifically, are we being forced to sell at what S.D.G.E. deems fair price or is it taken by eminent domain ? We surmise that we would be left with 12% on one side of the easement and 20% on the other. Which would end up even less with current San Diego Building and Land Use Codes.

Given the slope of the property, the buildable area left will make it very difficult to build. Let alone the question of how safe and healthy would my family be in close proxcmity to the increased electro magnetic lines ? We have a lot to lose on this property. How will the economic loss be compensated or mitigated ?

We have paid taxes for 21 years on this property and have complied with fire codes with the County of San Diego and the Cleaveland National Forest as well. There was a fire started at the electrica~~d~~ station for S.D.G.E., right over the next mountain at Barrett Sub-Station. How will you insure property owners that this will never happen again ?

I am oppose to Routes: A and B and C AND D .
I believe as George Washington asserted "Private property and freedom are inseparable " .


Shannon Davis

TO: BILLIE BLANCHARD, C.P.U.C.
LINDA KASTOLL, BLM

OCT 18, 2006

JUST NORTH OF THE BARRETT SUB-STATION
OUR 9 ACRE PARCEL, 602-020-08, ON THE "D" ROUTE
IN THE C.N.F. HAS A ROAD ON THE NORTH AND SOUTH ENDS.

THE CURRENT 30' ELECTRICAL EASEMENT DIVIDES
THE PROPERTY LENGTHWISE. A 300' EASEMENT
WOULD LEAVE 12% ON ONE SIDE AND 20% ON THE OTHER.
WOULD THE PROPERTY BE "TAKEN"?

BE RESPONSIBLE TO

IF NOT "TAKEN" WHO WOULD CLEAR BRUSH
ON THE 600' ROAD FRONTAGE AND THE
ELECTRICAL EASEMENT LAND FOR THE
CLEVELAND NATIONAL FOREST (CNF) FIRE PROTECTION?

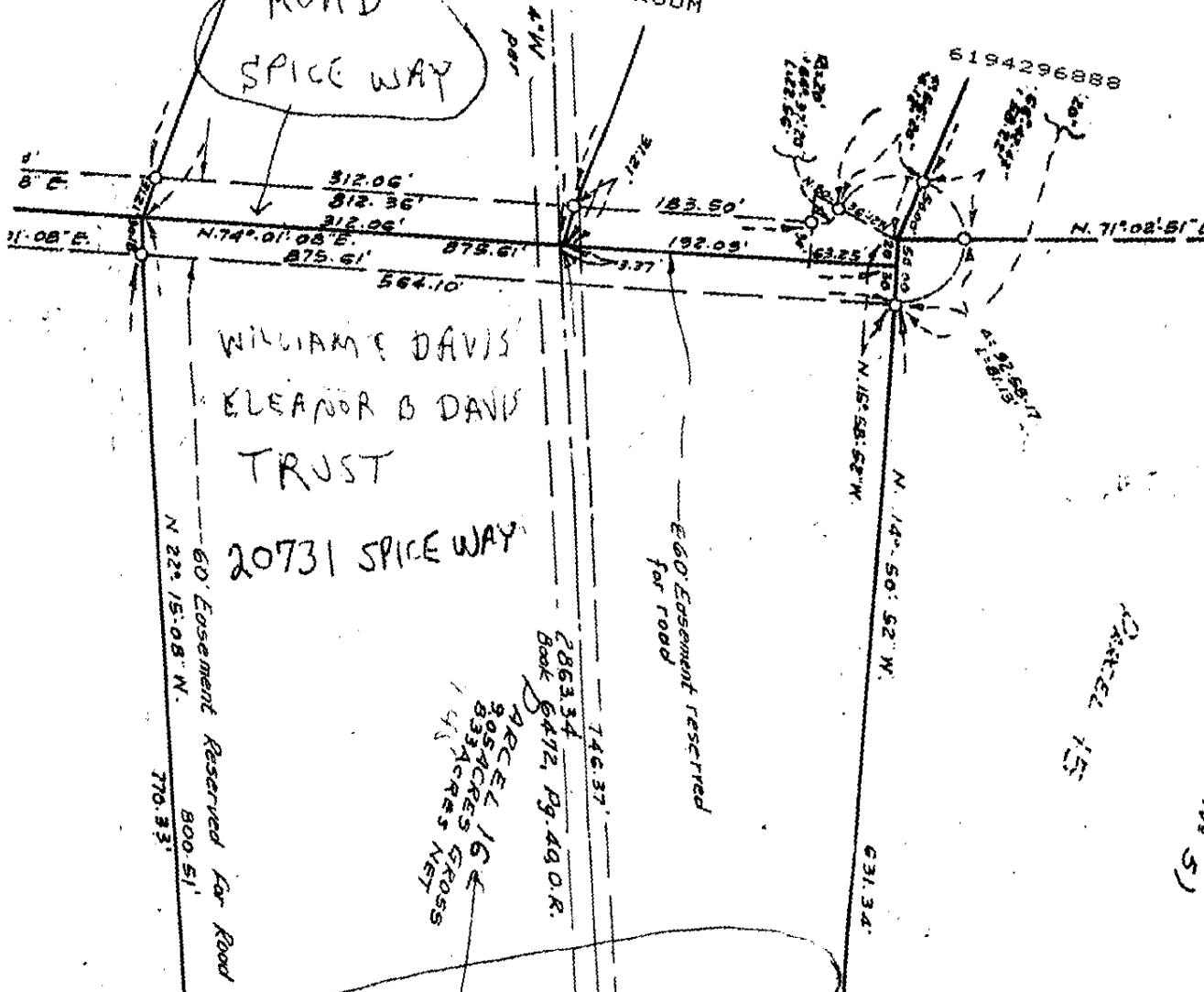
WHAT HAPPENS TO OUR 43 GPM WELL IN THE
NEW 300' EASEMENT?

PARCEL #
602-020-08

WILLIAM ELMER DAVIS JR. IMPERIAL BEACH
WILLIAM ELMER DAVIS JR. CA, 91932

PAGE

ROAD
SPICE WAY



WILLIAM E DAVIS
ELEANOR B DAVIS
TRUST
20731 SPICE WAY

PARCEL NO.
602-020-08

ROAD
THYME WAY



PARCEL #
130722222

SHELF
P

-----Original Message-----

From: Victor Levine [mailto:ravok@nethere.com]
Sent: Thursday, October 19, 2006 3:39 PM
To: sunrise@aspenerg.com
Cc: Victor Levine
Subject: Proposed Sunrise Powerlink project

There has been too little study of electromagnetic fields generated by 500kV lines. EM fields run at a minimum of 300 feet or 100 yards on all sides of the line.

We don't know much more than that. The truth is we don't even know what the effect is of smaller, 92kV lines on humans and human habitations.

Heat is another critical factor which has received minimal study. Heat generated by buried lines in one instance was apparently sufficient to require the lines be moved to an above-ground location.

Both electromagnetic effects and the generation of heat require an systematic examination, and it is about time they received them. Any question about the daily use of extremely high voltage lines, given the current state of knowledge, needs to be definitively answered as it relates to the safe distances for all life-forms, human and other, not to mention structures and local and proximate environments.

Victor A Levine
Mary Hill Levine
3463 Carillo Road
POB 444
Borrego Springs CA 92004

-----Original Message-----

From: booker@sdcoe.k12.ca.us [mailto:booker@sdcoe.k12.ca.us]

Sent: Friday, October 20, 2006 1:48 PM

To: sunrise@aspeneg.com

Subject: Sunrise Powerlink

I would like to voice my opposition to the building of the Sunrise Powerlink. Different options could be combined to produce all the energy

San Diego needs without unduly harming our neighborhoods, forests, or parks. How about programs for conservation, energy efficiency, local renewable energy, replacing existing transmission lines with new wires that

can conduct more electricity, more local power generation, and other potentially less destructive transmission upgrades. Thank you. Audrie and

Steven Clark 7012 San Bartolo, Carlsbad, CA 92011.

From: Charlie Kurth [mailto:charliekurth@yahoo.com]
Sent: Friday, October 20, 2006 11:18 AM
To: sunrise@aspenerg.com
Subject: Sunrise Power Link Comments

To whom it may concern:

I am writing to voice my deep opposition to SDG&E's proposed Sunrise Power Link Project. In what follows, I focus on two issues:

- The project compromises public lands. The current route through Anza-Borrego Desert State Park is unacceptable (and alternative routes through other public lands are also of dubious merit). Anza-Borrego Desert State Park is one of the finest in California--if not the nation. The Project will eviscerate the idea that park land is for public recreational use. It will surely also cause significant damage to the aesthetics of the park, the flora and fauna, and the cultural resources/artifacts. SDG&E does not appear to have given any consideration to these losses in evaluating its options.
- Conservation and renewable energy must be a priority. It is far from obvious that the money needed to construct the Power Link would not be better used to increase conservation and efficiency, and to promote the use of renewable resources. SDG&E's dismissal of this alternative is of questionable merits and does not appear to consider the value of taking this opportunity to establish itself (and California) as leader in responsible energy use.

I again reiterate my strong opposition to SDG&E's proposal: The costs of the project are significant, and there are better alternatives.

Regards,
Charlie Kurth
3761 Florida St, Unit B
San Diego, CA 92104
619.298.0475

10-20-06

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

Dear Ms. Blanchard and Ms. Kastoll,

I write this letter with a mixture of sadness and exasperation, sadness because of the lack of mindful consideration for the beauty of our backcountry community and exasperation at what seems to be a lack of common sense on the part of the planners of the proposed Sunrise Powerlink Project. I feel I must add my voice to those of my friends and neighbors to strongly oppose the proposed project.

I first became aware of the proposed Sunrise Powerlink when a friend informed me that one of the proposed routes would run right through State Park Lands. I was horrified by the thought. State Park Lands are important to me in my private life, not only because I'm an avid outdoorswoman, but also because I work as an Outdoor Educator in the area. In an effort to teach appreciation of nature to inner city children I am utilizing State Park lands on a weekly basis. I can not even begin to imagine how giant towers and transmission lines running through the State Park would not affect the thousands of students who visit the park through the program I teach for.

After looking into the Sunrise Powerlink Proposal more deeply, I became truly perplexed. Why spend 1.26 billion dollars to construct a power line when one already exists along the I-8 Corridor? Why spend that kind of money on new transmission lines and new routes if old routes already exist, routes that don't compromise our beloved State Park lands?

Since that initial moment of exasperation, and after learning more about the Powerlink Project, I have to say that I now question the necessity of the project at all. My initial hesitation has turned into full-blown opposition to the Project in its entirety. It seems to me that the project being proposed by SDG&E/Sempra Energy is outdated, dangerous and wasteful, and it would result in an environmental and social injustice.

I won't restate the points already made by my neighbors, but I have some additional information compiled by Edward D. Gorham, Ph.D., from the University Of California, San Diego. I find myself in agreement with his points and list them here for your perusal:

- Best available technology (BAT) for transmission cables are not considered in the application. Steel cables could be replaced with aluminum composite cable with ceramic cores that resist heat and sagging and can transmit three to four times the power of current of steel cable. Consideration of "reconductoring" of existing transmission capacity directly falls within the scope of the project.
- Several routes on the existing Southwest Power Link could be refitted with aluminum composite cables to meet transmission needs without the construction of any new transmission towers through Anza Borrego Desert State Park, or elsewhere. This fact needs to be included in scope.
- The sources of electricity to be transmitted must be fully evaluated in the context of evaluation of the environmental impacts of the proposed transmission towers. Identification and consideration of these power sources fully falls within the scope of the project.

- The proposed transmission towers are inextricably linked to the environmental burdens created by new power generation stations at their sources. These are two large power plants in Mexico. Sempra's new 600 Megawatt power station in Mexicali and the 750 Megawatt InterGen power station at the La Rosita power complex. Environmental effects from these plants fall fully within scope.
- Emissions of oxides of nitrogen from these plants are an integral part of the environmental impacts of the proposed transmission towers and must be considered to be in scope.
- The fact that air pollution emissions from these plants will not be regulated under United States federal, state or local clean air standards is a critical aspect of the environmental impact of the construction of these transmission towers and must be considered in to be in scope.
- The fact that the 750 Megawatt InterGen power station is not equipped with a catalytic converter to control emissions of oxides of nitrogen is within scope.
- The fact that nitric acid rain from these plants will affect Mexico, the Imperial Valley, the Anza Borrego Desert State Park and San Diego County must be considered among the critical environmental impacts of the proposed transmission towers and must be considered in the scoping process.
- Meteorological wind rose studies of pollution patterns from these plants are critical to understanding the environmental impacts of the proposed transmission towers and must be considered in the scoping process.
- The fact that these new transmission towers will create environmental injustice by contaminating air basins distant from the locations where the electricity will be used must be fully evaluated and included as a result of the scoping process.
- Power for the SDG&E transmission towers will burden the people of Mexicali, Calexico, and El Centro with air pollution that is unregulated under U.S. laws for the benefit of the energy traders in the profitable markets of Riverside and Orange Counties. This environmental injustice must be considered within the scope of the evaluation of the proposal for the transmission towers.
- Environmental injustice issues arising from pollution from these power plants is inextricably linked to the proposal for these new transmission towers and fully falls within the scope of evaluation of the current proposal.
- Visual pollution and visual impacts of the 150 miles of 160 foot-tall and 65 foot-wide transmission towers covering some of San Diego county's formerly most scenic parks and neighborhoods must be fully evaluated and falls within scope.
- Underground alternatives fall within scope and the fact that San Francisco residents insisted that Pacific Gas and Electric put its 230 Kilovolt lines across the peninsula underground and PG&E complied falls within scope.
- The impact of air pollution emissions from power plants in Mexico on visibility in the Imperial and San Diego County air basins are critical to understanding the environmental impacts of the proposed transmission towers. Visibility studies must be conducted and requirements for these considered in the scoping process.
- The impact of air pollution emissions from the power plants in Mexico on the U.S. and foreign countries must be included in the scoping process.
- The fact that acid rain pollution will occur when moist air from Mexico carries oxides of nitrogen and sulfur dioxide from the power plants that are not subject to Federal or State clean air standards needs to be considered in scope.
- Projections of the impact on Imperial County residents of the release of more than 400 tons per year of oxides of nitrogen from the combined-cycle power plants in Mexico assuming they are equipped with catalytic converters needs to be considered in scope.

- The facts that catalytic converters to remove oxides of nitrogen and reduce the potential for acid rain are not required for the two power plants in Mexico, and requirements for catalytic converters are not easily enforceable needs to be considered in scope.
- Emission of substantial quantities of other harmful air pollutants from these power plants in Mexico into a troubled air basin that currently is in violation of Federal and State clean air standards for healthy air several days a year needs to be considered in scope.
- The fact that the transmission towers will damage a National Historic Trail and State and County parks needs to be considered in scope.
- The fact that the transmission towers will be visible for hundreds of square miles throughout San Diego County, only to carry power to Riverside and Orange Counties needs to be considered in scope and is an aspect of environmental injustice.
- The fact that the transmission towers will facilitate manipulation of electric power supplies and a utility company has yet to settle lawsuits regarding energy trading practices which have been called "Enron-like" by California Attorney General Bill Lockyear needs to be considered in scope.
- The fact that Southern California won't gain energy security from these power lines and that these lines won't help prevent power reduction (brownout) or interruption (blackout) needs to be considered in scope.
- The fact that it is long distance power transmission that is to blame for most blackouts and brownouts that occur when these systems fail needs to be considered in scope.
- The fact that long-distance power grid systems are subject to market manipulation that can result in power interruptions needs to be considered in scope. Since these transmission towers will add to that grid and enhance opportunities for market manipulation they have a potential to increase the frequency of brownouts and blackouts.
- The fact that costs for electrical power will not be reduced if these lines are constructed needs to be considered in scope. Although the rate charged per kilowatt hour of power is regulated by the State Public Utilities Commission (PUC), the costs of power transmission are passed directly to the customer and are difficult to verify.
- The facts that transmission costs are difficult for PUC to verify and long distance transmission practices facilitate energy trading need to be considered in scope.
- A utility company is now lobbying the PUC for rate increases for each kilowatt sold. This fact is relevant to the current proposal and in scope.
- The fact that the California Independent Systems Operator (ISO) recommends these transmission towers, but that power transmission costs support the ISO Corporation needs to be considered in scope as a clear conflict of interest.
- The fact that ISO runs the power grid is relevant to their approval of the currently proposed transmission towers and needs to be considered in scope.
- The fact that the California ISO is not a disinterested party and their analysis endorsing construction of these transmission towers should be questioned needs to be considered in scope.
- The fact that the people of San Diego County will be burdened with the sight pollution from the 160 foot tall and 65 foot-wide transmission towers, and acid precipitation from oxides of nitrogen air pollution, yet have little expected benefit in rate reductions or prevention of brownouts and loss of power needs to be considered in scope.
- Interruptions in power supply are most effectively prevented by construction of small local power plants known as peaker plants. The use of peaker plants as an alternative to long distance power transmission needs to be considered in scope.

- Although less efficient at start-up, peaker plants emit vastly less carbon dioxide (greenhouse) pollution because they don't have to run continuously. This fact needs to be considered in scope.
- The fact that three to five small peaker plants could be built for the cost of the proposed transmission towers with equivalent energy generating potential needs to be considered in scope.
- The fact that transmission losses from peaker plants are very low because they are located close to the demand needs to be considered in scope.
- The fact that long distance transmission losses across a 150 mile powerline could reach 10%, and may be higher at higher temperatures needs to be considered in scope.
- The fact that long distance powerlines ignite hundreds of wildfires when they fail and by attracting lightning strikes needs to be considered in scope.
- The fact that these transmission towers will block aerial fire control efforts because aircraft must avoid them needs to be considered in scope.
- The fact that long these transmission towers along rural roads block access to these roads by emergency medical helicopter services needs to be considered in scope.
- The fact that small local plants (peaker plants) can meet peak demand without the need for long distance power transmission and that powerlines from peaker plants can be placed underground needs to be considered in scope.
- The fact that long distance these transmission towers will irretrievably damage our State and County parks, a national historic trail, our clean air, and increase corporate profiteering, cross-border pollution and environmental injustice need to be considered in scope.
- The claim that these transmission towers would provide access to transmit “renewable” energy must be demonstrated and the factual basis for the need for these transmission towers for transmission of “renewable” energy should be considered in scope.
- The transmission tower project defeats the intent of the Western States Energy Corridor to group power transmission thorough designated Federal corridors. Its routing specifically avoids Federal lands. This fact falls directly within scope.
- Alternatives routes along existing corridors including the South West Power Link in conjunction with use of composite aluminum cable with three to four times greater transmission capacity needs to be considered in scope.
- Use of the federally-designated new Western States Energy Corridor near the Mexican border for westbound transmission of electricity from the Imperial substation to the coast must be considered in scope.
- Relevant laws that need to be considered in scope include: San Diego Air Quality Management Regulations and standards for fixed Sources; Imperial County Air Quality Regulations and standards for fixed sources; California Air Resources Board standards, regulations and practices; California Historical Preservation Act — Includes sites of anthropological importance such as Native American Sites; National Historical Preservation Act; US Clean Air Act; US Clear Skies Initiative.

These points made by Dr. Gorham seem valid to me and should be taken into account. The fact that long distance power lines can and have ignited hundreds of wildfires when they fail is more than a concern for me. It is a reality. I have already suffered personally with losses from the Pines fire that was started from a downed power line. Moreover, the fact that these transmission towers will block aerial fire control efforts because aircraft must avoid them worries me as well. I also worry that transmission towers along rural roads might block access to these roads by emergency medical helicopter services, something we in the back country depend on in times of need.

I agree also that these long distance transmission towers will irretrievably damage our State and County parks, our national historic trail, and our clean air—in other words, the very substance of our community.

Sincerely,

Constance A. Hughes
37469 Highway 78
Julian, CA 92036
760-765-1282

9558 Pipilo Street
San Diego, CA 92129
October19, 2006

CPUC/BLM
C/O Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: Sunrise Powerlink

Dear Ms. Blanchard and Ms. Kastoll,

I am writing this letter to voice my concerns about the Sunrise Powerline Project. I would like to be included as part of the EIR/EIS Scoping Comments proceedings. I am very concerned about the impacts this proposed project will have on our community of Rancho Penasquitos and the Anza Borrego Desert State Park.

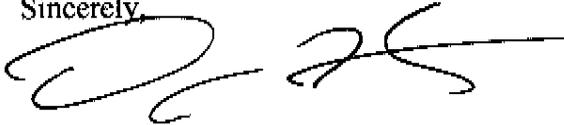
My home is shown on Map Figure 6B, we are one of many homes located on the existing vacant SDG&E Row. This row runs Parallel to SR56 and is part of the 50-year-old dedicated utility right of way. Which was not disclosed on my title when we purchased the property over six years ago. I am worried about the impact of under grounding power lines on this vacant row. At this time, walkers and children use this row for recreation. This row also supports the migrant community as a place to live. One concern that I have is the impact on air quality due to the close proximity of our homes to the row during construction. My son has asthma, and during times of home construction we have had to relocate to a hotel due to the dust raised, which flared up his asthma. As noted on page 17, we could possible be exposed to potential air quality impacts resulting from heavy equipment, support vehicles and other internal combustion engines. We would also potentially be exposed to fugitive dust generated from ground clearing, grading, and vehicle traffic. I am also concerned about the possibility of risking people living in this row to Coccidioidomycosis (Valley Fever). San Diego is listed as (Endemic) an area with established cases of Valley fever. Transmission of this disease is cause by inhalation of airborne arthroconidia after disturbance of contaminated soil by humans or natural disasters. People who are considered risk groups are Asians, pregnant woman during the third trimester, and immunocompromised persons with asthma like my son. This construction would occur less than 100 feet from our homes in a community that has been settled for over 18 years.

I also question the need for the Sunrise Powerlink. My husband and I invested in putting solar panels on our roof. Our total bill for 2005was \$66.00 and our bill for 2004 was under \$47.00. We need to make solar more affordable to encourage more people to install solar and rely more on renewable energies to help power our grid. I also support

the report from UCAN on the need for San Diego to be completely re-wired and to rethink the way it uses and distributes utility services. I feel that supporting the "smart grid" will be the most cost-effective and the most practical way to support our growing demands for energy without having such a horrific impact to our Parks, and Communities in San Diego.

In summary, I do not support the need for the Sunrise Powerlink. I feel that we need to consider the impacts this would have on our environment, parks, and communities. Please look into other alternatives such as the "Smart Grid", or affordable rooftop solar. Please don't allow SDG&E to justify their lies to the people of San Diego.

Sincerely,



Dayon Higgins
(858) 538-9743
higgin_dayon@earthlink.net

Disease Listing, Coccidioidomycosis, Technical Info | CDC Bacterial... http://www.cdc.gov/ncidod/dbmd/diseaseinfo/coccidioidomycosis_t.htm

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Get Smart on the Farm
11 Aug 2005
[CDC Foundation interview with Tom Chiller, epidemiologist and medical director of CDC's Get Smart on the Farm program.](#)

Contact Info

1600 Clifton Road NE, MS-D63
Atlanta, GA 30033
Phone: + 1-800-311-3435

[Email Us](#)

Clinical Features	Symptomatic infection (40% of cases) usually presents as flu-like illness with fever, cough, headaches, rash, and myalgias. Some patients fail to recover and develop chronic pulmonary infection or widespread disseminated infection (affecting meninges, soft tissues, joints, and bone). Severe pulmonary disease may develop in HIV-infected persons.
Etiologic Agent	<i>Coccidioides immitis</i> .
Reservoir	Soil in semiarid areas (primarily in the Lower Sonoran life zone). Endemic in the south-western United States, parts of Mexico and South America.
Incidence	Incidence was 15 cases per 100,000 population in Arizona in 1995. Of persons living in areas with endemic disease, 10-50% are skin-test positive.
Sequelae	Meningitis may lead to permanent neurologic damage. Mortality is high in HIV-infected persons with diffuse lung disease.
Transmission	Inhalation of airborne arthroconidia after disturbance of contaminated soil by humans or natural disasters (e.g., dust storms and earthquakes).
Risk Groups	Persons in areas with endemic disease who have occupations exposing them to dust (e.g., construction or agricultural workers, and archeologists). High risk groups are African-Americans and Asians, pregnant women during the third trimester, and immunocompromised persons.
Surveillance	National surveillance through NETSS started in 1995. Reportable in states with endemic disease: California, New Mexico, Arizona.
Challenges	Developing an effective vaccine (vaccination offers the best prevention measure because infection provides life-long immunity). Identifying factors associated with increased risk for dissemination in select racial groups to target prevention efforts.

Date: October 6, 2005
Content source: Coordinating Center for Infectious Diseases / Division of Bacterial and Mycotic Diseases

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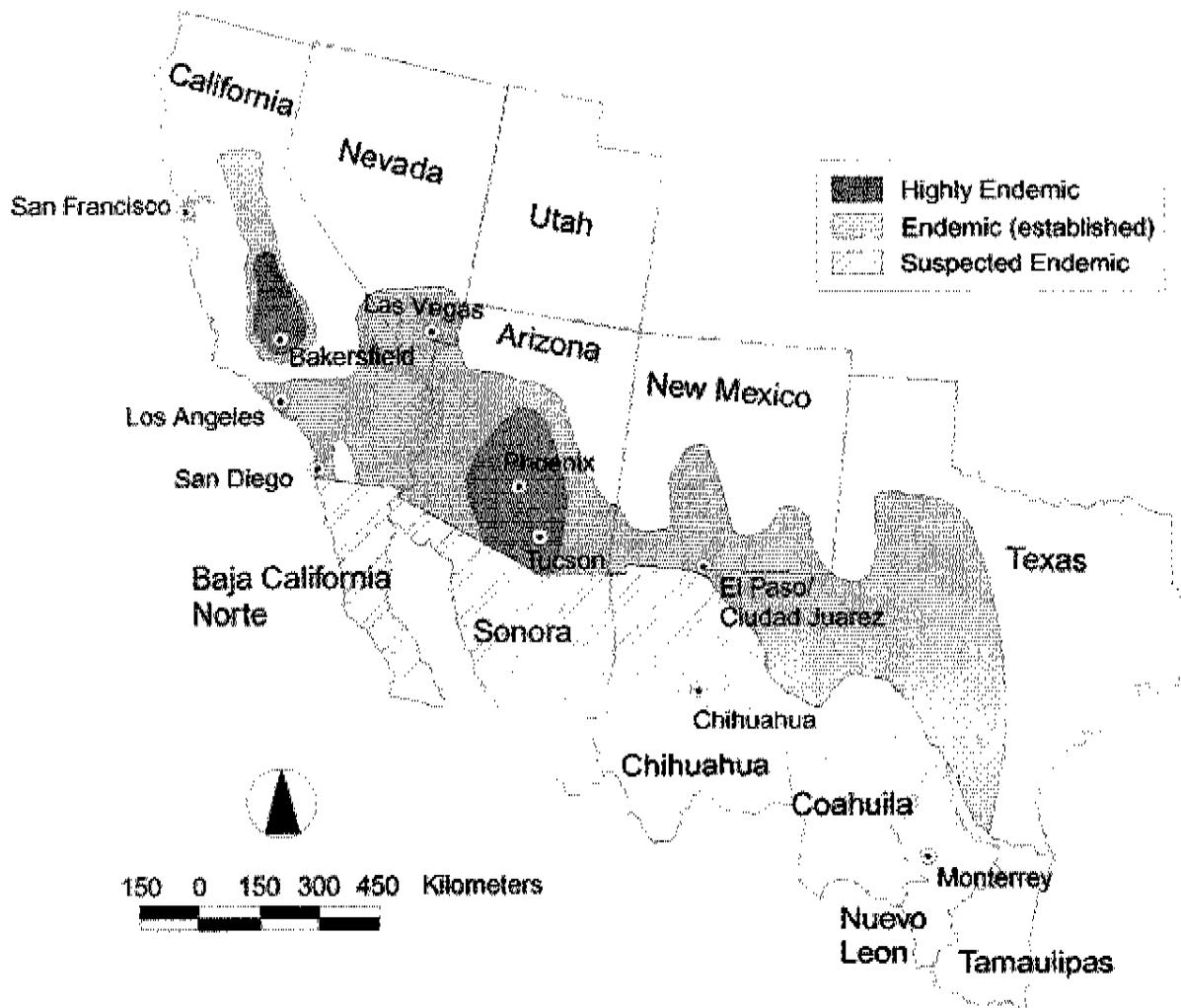
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Tel: (404) 639-3311 / Public Inquiries: (404) 639-3534 / (800) 311-3435



Department of Health
and Human Services

Figure 1. Areas of the Southwestern U.S. and northern Mexico in which valley fever is endemic. This map shows the regions of the United States and Mexico where valley fever (coccidioidomycosis) is most common. Highly endemic regions include areas surrounding Tucson and Phoenix in Arizona and near Bakersfield, California. The fungus is also found in other parts of southern Arizona and California (including areas near Los Angeles and San Diego), as well as in parts of Nevada (near Las Vegas), southern New Mexico, and eastern Texas. Northern Mexico is suspected to be endemic including Baja California, Sonora, and Chihuahua.



[Back to Predicting Valley Fever Incidence](#)

From: Eric Martin [mailto:ecmartin@ucsd.edu]
Sent: Friday, October 20, 2006 2:33 PM
To: sunrise@aspenerg.com
Subject: Sunrise Power Link Comments

To whom it may concern,

I am writing to express my concern over the proposed Power Link Project in the Anza-Borrego Desert State Park. This route through the park is unacceptable. Anza-Borrego desert is one of the best state parks in the nation, and it is a PUBLIC park - that is, it is supposed to be for public recreational use.

I am primarily concerned with the damage to the flora, fauna, and cultural resources of the park, but the Power Link Project will also invariably be an eyesore, so there are aesthetic concerns as well. I worry about SDG&E's dismissal of the idea of spending more money to promote conservation and renewable resources. I think the money for the Power Link Project would best be spent elsewhere.

Sincerely,
Eric C. Martin

3911-A Miramar St.
La Jolla, CA 92037
ecmartin@ucsd.edu

From: Glenda Kimmerly [mailto:kimmerlys@yahoo.com]
Sent: Friday, October 20, 2006 5:37 PM
To: sunrise@aspenerg.com
Cc: bcb@cpuc.ca.gov
Subject: Scoping Comments Regarding Proposed Sunrise Powerlink Transmission Project

To: Ms. Billie Blanchard, CPUC
Ms. Lynda Kastoll, BLM
Aspen Environmental Group

My husband and I are residents of and own property in Santa Ysabel. I would like to call your attention to a few of the dangers and environmental impacts of the proposed project, and strongly urge you to take these into consideration.

1. For the past three years a pair of endangered Bald Eagles have been nesting just south of Lake Henshaw. Experts believe Bald Eagles had not nested in the county since 1934. The Bald Eagle became an endangered species in 1963. It is a federal violation to harass bald eagles, with a fine of up to \$10,000. The proposed project runs just east of the nesting area and would have a greatly destructive impact on the bald eagles. See *The San Diego Union-Tribune*, North Inland Section, April 5, 2006.

2. The only wind data provided in the PEA submitted by SDG&E, (Part 2 of 2, Table 4.11-2) stated "El Centro - Avg. Wind Speed 6.9 mph from the West, and San Diego - Avg. Wind Speed 6.7 mph from the West Northwest". Data from the website www.ncdc.noaa.gov, "Severe Winds: Santa Anas", shows an entirely different scenario. The potential for downed transmission lines and towers in the areas of the proposed project is great, and the potential for wildfires and damage from the downed lines and towers is also great since a large portion of the proposed line runs through highly vegetated areas in the backcountry. Listed below is some of the recorded data from this website:

Feb. 22, 1946 - Icy cold winds in mountains of San Diego County, gust 72mph.

Jan. 10, 1949 - Cold winter storm. Gust to 75mph in SD County mountains.

Sept 26, 1963 - Santa Ana winds, gusts over 50mph in SD mountains.

Nov 19-20, 1963 - Strong storm winds, trees downed, power lines downed.

Dec 2-3, 1966 - Strong storm winds, power outages.

Jan 18-28, 1969 - Strong storm winds, power outages.

Sept 26-29, 1970 - Gusts to 60mph Cuyamaca St Park, The Laguna Fire, 8 killed, 400 homes & 185,000 acres burned.

Jan 21, 1999 - Gust 80mph in Salton Sea area.

Feb 10-12, 1999 - Gusts to 80mph reported from Interstate 8.

May 13, 1999 - Strong winds, sustained 61mph at Borrego Springs.

April 1, 2000 - Winter storm, gust 68mph in SD County mountains.

Feb 8-10, 2002 - Santa Ana Winds, gust 80mph at Descanso to 105mph at Santa Ysabel, widespread property damage.

Jan 6-7, 2003 - Widespread Santa Ana Winds, wildfires, property damage,

road closures.

Oct 25-27, 2003 - Santa Ana Winds, gust 56mph at Descanso. Unprecedented wildfires consuming hundreds of thousands of acres, over 20 people killed, over one billion dollars in damage.

3. In the PEA, Part 2 of 2, Chapter 6.9.3, Summary of Impacts and APMs for the Central Link, the stated impact "Level of Significance" as "Less than Significant" for all parts and locations of the proposed project is totally absurd and contrary to common sense. The entire route of the proposed project would be greatly and adversely impacted visually.

Alternatives that would avoid impacts of the proposed projects:

According to CPUC and CEC "Energy efficiency is California's highest-priority resource for meeting its energy needs in a clean, reliable, and low-cost manner.

For more than three decades, California has adopted energy conservation and efficiency policies and made investments that are among the most aggressive in the nation. These efforts have saved more than 40,000 GWh of electricity and 12,000 MW of peak demand - avoiding the need to build 24 large power plants, and equal to the energy required to power 3.8 million homes. The broader benefits of California's energy efficiency programs and investments include: Reducing energy supply costs and lowering bills for customers. Strengthening California's economy. Maintaining reliable energy services and reducing price volatility. Protecting the environment by reducing air pollution, greenhouse gases and other environmental impacts of electricity generation....California has only begun to tap its potential energy efficiency resources and can continue to achieve significant energy savings through investments in energy efficiency. The California Energy Commission estimates that, between 2003 and 2013, California can achieve 30,000 GWh of additional cost-effective efficiency savings." This information is quoted from a brochure titled "Energy Efficiency California's Highest-Priority Resource", published by CPUC and CEC. If we are to believe the information in this brochure, then energy conservation and efficiency, along with promoting roof-top solar and efficient generation within San Diego would eliminate the need for the proposed costly and destructive Sunrise Powerlink project.

Respectfully submitted,

Glenda Kimmerly
(760) 765-1149
P.O. Box 305
Santa Ysabel, CA 92070

October 20, 2006

Dear Planning Team,

Please consider my comments below in your project scoping. Best of luck with this complex planning project!

Sincerely,
Gloria Silva

Address: 4498 Exbury Ct., San Diego CA 92130

Comment: Please explain why the Tijuana-Miguel 230kV and Tijuana-Otay Mesa 230kV lines are not quantified and included in the reliability analysis. At least quantify the energy coming from Mexican source(s) and if excluded from the analysis, explain why. You state that the SDG&E electric transmission system is interconnected with Comision Federal de Electricidad (“CFE”) in Mexico through two 230 kV transmission lines (Path 45), one at the Imperial Valley substation and the other at the Miguel substation. You presume realistic levels of net import from all other sources in the reliability analysis, so why is this source not quantified and counted? Are you assuming that the Mexican infrastructure will be phased out in the future?

Comment: Please describe the economic model’s assumptions and methodology.

Comment: I hear that SDGE says that adding to the Southwest powerlink (SWPL) would not address the need for reliability as both lines could be brought down simultaneously by the same fire event. However, SDGE needs to explain why they did not consider an alternative from Imperial Valley substation to the border and parallel to the forthcoming international border fence and then traverse north along 805—which is a planned designated corridor in the West Wide Energy EIS. Especially if the fence is a given, this alternative would consolidate urban infrastructure and move but also minimize the overall adverse effects. A fence/Sunrise alternative would avoid negative impacts to precious natural, visual and heritage resources in the public’s Cleveland National Forest and inventoried roadless areas, and Anza Borrego State Park and wilderness.

Comment: SDGE states in several objectives that the energy is for the “San Diego area”. The powerlink project primary reason #3 states reduce energy costs in the “San Diego region”. However, the analysis supporting the need for the project appears to be the analysis by CAISO which considered the needs of all southern California and objective 5 would seem to say that supplying other areas of the State is also an objective. In addition, the “Development Plan for the Phased Expansion of Transmission to Access Renewable Resources in the Imperial Valley Report” by the Imperial Valley Study Group (September 2005) appears to say or imply that the San Diego north route through San Felipe and Warner Springs substations is needed to assist in transmission of the Imperial Valley’s technical potential of 2,200 MW from renewal sources to the west and north, to areas beyond the San Diego region. If this is the case, the Sunrise powerlink project analysis should add to the purpose and need that the project is to provide power for San Diego as well as assist in providing reliable and sufficient power to southern

California (e.g. via sale of use of transmission infrastructure to other southern California utility companies).

Comment: Your study states that recently the IARC and DHS have classified EMF as a possible carcinogen. I read that the EPA proposed categorizing EMF as a carcinogen in the 1990s but withdrew this after what some described as political pressure brought to bear. Given the volume of legitimate scientific studies and these recent classifications, EMF should be considered a significant issue and addressed in the NEPA analysis. The context is a large region and population and long-term effects. The intensity of the impacts may be severe. The degree of effect on human health appears to be more pronounced in children and possibly people with already compromised systems. Possible effects on the human environment are uncertain. There is no doubt that these effects have been highly controversial amongst credible national and international health organizations and other entities. Please reconsider EMF from powerlines as an issue and include in the effects analysis.

I believe that the analysis should quantify the total EMF exposure from powerlines to the closest residences by link. EMF measurements could be estimated from planned voltage and distance from homes based on existing reports or from historical data from SDGE's program for measuring EMF in residences. Also, it should be clearly stated that moving lines underground mitigates the visual effects but not the EMF effects on the residents.

Comment: Each alternative should consider the cumulative effects to health via additional electrical transmission through existing lines—for example, the line that runs north of the Penasquitos station through coastal north San Diego County. Will there be foreseeable projects for upgrading voltage in these lines because of the increased loads being transmitted in the Sunrise project? Re-conductor? If upgrades will occur because of Sunrise, then these other actions and effects are connected actions and should be described in the DEIS/DEIR.

Comment: A quote from the report says of the Sunrise Powerlink project: “this cost-effective project will provide \$552 million per year in *net* energy savings for California electricity customers under normal operating conditions. These savings will come in the form of reduced energy costs and congestion savings resulting from increased access to lower cost sources of power in the desert southwest and reduced reliance on older, less efficient in-area generation. All customers in the CAISO control area will share in these benefits.” Does this mean customers throughout southern California? Please define the “CAISO control area.”

Comment: The Sunrise Powerlink project is connected to the future renewal energy projects in the Salton Sea area. Please inform us about the reliability of the geothermal and solar plant capacity in Imperial Valley. Please also quantify the amount of renewal energy that SDGE is legally entitled to distribute. (It appears that LADWP and others are also planning to transmit renewal energy from the Salton Sea—how much will San Diego get?) A man at a meeting asked what happens if the geothermal and/or solar energy don't live up to the estimated production? What is the contingency? Please answer his question.

The existing and proposed renewal energy projects (both geothermal and solar) and total potential slated to be transmitted to San Diego should be clarified, perhaps in a table. The

Sunrise Powerlink report notes that a Stirling solar plant should provide 300 MW—is that the total for solar power? How much geothermal? The IVSG report describes a 2,200 geothermal potential with plans for building this capacity between 2010 and 2020. Since SDGE is talking about investing over a billion dollars, the reliability and status of the geothermal and solar energy plants that SDGE has or intends to have agreements with is pertinent. Also, since plans and permits for the renewal energy projects is occurring simultaneously with plans for the transmission thereof, is it known at this time if the Salton Sea area can develop this potential and still retain a sustainable ecosystem itself?

Comment: It would appear that LADWP plans to build a transmission route north from Imperial Valley Substation to Los Angeles County. The Sunrise executive summary says that CAISO contacted LADWP Transmission Planning Department for the latest change to this project but wasn't able to obtain the requested data. CPUC should continue to pursue identifying LADWP's "Green Path" proposal and other alternatives, and consider its relevance and use in the Sunrise powerlink NEPA/CEQA analyses (e.g. cumulative actions and effects).

Comment: I support renewal energy but question if the potential will be successfully developed and operational in the amount and timeline that is needed by southern California. It would appear that a number of California counties hope to meet their 20% renewal energy goal largely or solely with the Imperial Valley sources. Please explain how the explosive population growth projected across southern California is considered in the reliability analysis. What are the population projection figures you used to determine the future energy loads in 2010 and 2015? Did the projected energy load figures presume any energy efficiency or customer use increasing commensurate with population growth? It would appear that the decisionmakers reject energy efficiency as a sole solution but I believe it would be wise to quantify and include aggressive energy efficiency as a part of the powerlink proposal given population projections and finite energy source.

(E.g. The San Diego population is currently almost three million with a population projection estimate for San Diego area of 30-50% between 2000-2020 and over 50% is projected for Imperial area (source: Interim County Population Projections; State of CA; Department of Finance; Demographic Research Unit). Add to this that the Imperial Valley renewal energy sources are also proposed for transmission further north and west than San Diego area (e.g. to Devers station and westward from there to Riverside and/or other counties)—and these counties have similar projections.)

Comment: See Project Objective #3. In the comparison of alternatives in the DEIS/DEIR please quantify for each alternative the percent of renewable energy source provided for San Diego to see how well it addresses the mandate and Governor's goal.

From: Jennifer [mailto:wanderlustarts@yahoo.com]
Sent: Friday, October 20, 2006 3:55 PM
To: sunrise@aspenerg.com
Subject: Sunrise Powerlink

October 20, 2006

Jennifer Voss
PO Box 268
Borrego Springs, CA 92004
(760) 767-5794

Billie Blanchard/Lynda Kastoll
CPUC/BLM

Thank you for the opportunity to comment about SDG&E's proposed plan to route the "Sunrise Powerlink" through the protected wilderness of the Anza-Borrego Desert State Park.

Sunrise Powerlink's environmental impact on the Anza-Borrego Desert State Park, the largest state park in the continental United States, would be severe and irreversible and would set a dangerous precedent threatening the continued protection of other park lands.

Among the impacts to the park, its inhabitants and visitors would be:

- Destruction of significant cultural sites.

- Significant impacts to travel corridors for the Federally-endangered Peninsular bighorn sheep, other animals and a number of sensitive plants.

- A major increase in the width of its easement and the addition of service roads to reach each tower pad, impacting State Wilderness Areas.

- Significant impacts to designated and open camping areas including Tamarisk Grove Campground and Yaqui Well Primitive Camp.

- Loss of view shed and sense of "timelessness" and tranquility so associated with desert open spaces.

- Direct impacts in up to 3 State Wilderness Areas.

About 90 percent of the California State Wilderness System is located in two-thirds of the Anza-Borrego Desert State Park. The 1974 California State Wilderness Act states that a wilderness should retain "its primeval character and influence, without permanent improvement or human habitation." The Sunrise Powerlink would directly impact three State Wilderness Areas and five state wilderness view sheds -- more than 90,000 acres of view shed will be stained with the Sunrise Powerlink. Further, the easement requested by SDG&E would require reversing the designation of "wilderness" by the California State Park and Recreation Commission -- something that has never happened in the history of our state park system or within nationally designated wilderness areas! Additionally, noise levels emanating from the lines would also destroy the surrounding silence and the electromagnetic field from the lines may adversely affect humans and animals in close proximity -- including the endangered peninsular bighorn sheep. The lines themselves may kill golden eagles and Swainson hawks.

I have visited and explored this park for more than 35 years. I am a nature and wildlife photographer and much of my work has been focused on the breadth and beauty of this special place; particularly on the still remaining numbers of the magnificent Peninsular bighorn sheep. My husband and I have recently taken up permanent residence here. I am extremely concerned about the devastating and irreversible environmental impacts to Anza-Borrego that would be brought about by the Sunrise Powerlink and I vehemently oppose it. I thank you again for the opportunity to express my view.

Sincerely,
Jennifer Voss

-----Original Message-----

From: joldson@esli.com [mailto:joldson@esli.com]
Sent: Friday, October 20, 2006 10:41 AM
To: sunrise@aspenerg.com
Subject: Comments on proposed Sunrise Powelink

The following comments are submitted, concerning the proposed Sunrise Powerlink

Thank you

John Oldson
3663 1/2 Jackdaw St.
San Diego CA 92103

1. Proper consideration of the legal issues in crossing Anza-Borrego State Park has not been shown.

2. The document submitted by SDG&E fails to present an accurate assessment of the technical need for the project, compared to alternatives. These include:

New and upgraded existing local power generators
Upgraded power lines in Mexico
Total potential load reduction from energy conservation and distributed generation
Load shifting, such as thermal energy storage for air conditioning.
Impact of the LEAPS project.
Quantitative information on the likely ranges for the cost and amount of power from the proposed Stirling Energy System project

3. The CPUC has failed to provide adequate information on alternatives. It appears to rely too heavily on the clearly biased SDG&E information.

In summary, I believe this project should be delayed, pending resolution of these and other issues. I also believe this specific project shows a need to ask broader questions about proper regulation and control of utilities in California, and what bodies should perform these tasks.

-----Original Message-----

From: Kathleen Rubenson [mailto:bakdapple@san.rr.com]

Sent: Friday, October 20, 2006 9:55 AM

To: sunrise@aspenerg.com

Subject: Powerlink

October 20, 2006

Billie Blanchard, CPUC

Lynda Kastoll, BLM

We find it hard to believe that SDG&E is proposing routes for the Sunrise Powerlink through a National Park and some of the most beautiful and pristine areas of San Diego County! We own property both in San Diego and in Julian and realize what a treasure this county has in its undeveloped areas! To corrupt these areas with huge power links is unimaginable! With that same east/west direction already changed by a large freeway (Hwy 8), why would the eyesore be in another area?

The areas around Julian, Ramona, Cuyamaca, Pine Valley, just to mention a few, are not populated with heavy density: therefore there are not a lot of people to protest about their own situation: yet, that does not seem to justify destroying this area of beauty, unless the goal is to make San Diego County as built up and defiled by man-made things as possible!

We strongly protest the arrogance or complete lack of the big picture on the part of SDG&E!

Kathleen and David Rubenson

From: Wang, Martin [mailto:mgwang@qualcomm.com]

Sent: Friday, October 20, 2006 1:44 PM

To: sunrise@aspenerg.com

Subject: SRPL Scoping Comment

Hi,

I have comment regarding the Sunrise Powerlink route that goes thru Rancho Penasquitos. Currently proposed route is going thru Park Village Rd. Although it will be underground, this still will be big and permanent impact to the neighborhood and family.

This is a busy street for many families here who our children go to Park Village Elementary school (Just next to Park Village Rd, next the to proposed power line). Sometime there are students and family walking to the school.

Many families are just next to the proposed power line. Although from the map, this seems a perfect route. But there are (and we are) the family and school just next to this.

What is the initial environment assessment that has been done to decide the route here? And, I feel this is still a tight space to put in a transmission line. What are the criteria to "measure" impact to the land, neighborhood, utilities/water system etc? What if during or after construction what happened is not as in reports?

Thanks,
Martin

Martin/Maggie Wang
12585 Picrus Street
San Diego, CA92129

From: Mike Voss [mailto:hikingmikev@yahoo.com]
Sent: Friday, October 20, 2006 11:31 AM
To: sunrise@aspeng.com
Subject: Sunrise Powerlink

October 20, 2006

Michael J. Voss
PO Box 268
Borrego Springs, CA 92004
(760) 767-5794
hikingmikev@yahoo.com

Billie Blanchard/Lynda Kastoll
CPUC/BLM

Thank you for the opportunity to comment on San Diego Gas and Electric's proposed Sunrise Powerlink.

My wife, Jennifer, and I have been exploring the San Diego back country and specifically the Anza-Borrego Desert for more than a decade. We are both photographers and avid hikers. Our photography has been sold at the Anza-Borrego Desert State Park's Visitor Center and my wife has donated her work to the park for use on interpretive panels. Our specialty is the endangered *Peninsular Bighorn Sheep*, which we are blessed to observe on a regular basis in the nearby canyons that are their home.

We are devastated by SDG&E's proposed 120-mile network of 130-foot tall polls through the heart of the Anza-Borrego Desert. The vistas from places that are sacred to us stretch for hundreds of miles in the dry, clear air we enjoy. The permanent visual destruction of scenic corridors through the park and the threat to wildlife in preserve areas are two of the main reasons I am urging you to implement alternatives to SDG&E's current proposal. The Anza-Borrego Desert is nationally recognized for its dark skies which blinking lights atop massive power poles would permanently destroy. The *Peninsular Bighorn Sheep* number in just the 100's!

I am also concerned about the bifurcation of SDG&E's application. Splitting the application process in the way SDG&E suggests is an unprecedented break with PUC procedure and may preclude fully considering the line's environmental impact.

The necessity of the line has been called into question as well. The *Powers of the Border Power Plant Working Group* disputed SDG&E public affairs manager Scott Crider's statement that the current transmission system in San Diego is reaching capacity and argues that five existing lines have enough capacity to meet San Diego's needs well into the future. By 2015 SDG&E officials estimate the region will need at most about 5,900 megawatts of generating capacity. SDG&E now has 4,750 megawatts of generating capacity and expects 550 megawatts to be added by the Palomar generating plant, bringing the total to 5,300. A speculative section of SDG&E's projection for the next 10 years involves what can be expected from the Encina Generating Station in Carlsbad and the South Bay Power Plant in Chula Vista. The owners/operators of those facilities -- NRG Energy and Duke Energy -- say they want to renovate their plants to

produce at least as much energy as they do now. The two plants now have the capability to produce about 1,800 megawatts. In it's planning for Sunrise, however, SDG&E projects that these facilities will produce just 1,000 megawatts. If Encina and South Bay were renovated and if a new partly built plant under construction by Calpine Corp. on Otay Mesa is completed, the region will have sufficient power for the next decade.

There are economic concerns also. As Duke Energy observed, "Simply put, it seems counter intuitive to conclude that power from a gas-fired generation plant in Arizona and transported over a \$1 billion transmission line to San Diego will be more economical" than power generated at a new plant within the region. Michael Shames of San Diego's Utility Consumers' Action Network is convinced it would not save money for local utility customers. "You could build two power plants that would produce more than this link would bring in."

Finally, James Ward of Friends of Anza-Borrego and former Colorado Desert District Superintendent David Van Cleve say that Powerlink threatens to permanently mar the visual grandeur of the largest state park in the continental United States and one of the most pristine resources in the world.

Please, don't set this dangerous precedent by allowing this tragedy to occur.

Sincerely,
Michael J. Voss

Letter to the Editor

There IS a way for SDG&E to provide 20% renewable energy by 2010 in a much less damaging and much more satisfying way than the Sunrise Powerlink. I know that SDG&E is not interested in exploring the option of privately owned rooftop solar, since they would be losing customers and money by doing so. BUT, if the solar panels belonged to SDG&E (or their contractor), AND if SDG&E were leasing rooftop space, THEN the generated electricity would be owned by SDG&E. Government owned buildings could be mandated for solar conversion. Private individuals could be compensated for rooftop space (I, for one, would gladly donate my roof for this project). Instead of flooding the media with sugary advertisements trying to justify this travesty, they could be flooding the media asking the public to sign up for the solar conversions. Current transmission lines could be used, eliminating the need for new power lines. Wow, a creative, simple answer to the problem!

So, why won't this work?

Well, rumor has it that the Sunrise Powerlink is a done deal and SDG&E is merely going through the motions to comply with legal requirements and to placate the public. This transmission line terminates very close to SDG&E's dirty power plants in Mexico. Hmmm. It makes me wonder why they haven't been able to come up with any creative, environmental-friendly options. Could it be that they don't want to?

Peggy Hurley
POB 548
Borrego Springs, CA 92004
(760) 767-4606



For the EIR, I would like to add:

It is a win-win-win situation.

20% solar by 2010
SDG&E owns the solar-generated electricity
No new power line needed

SDG&E could develop a solar division to oversee the project. This is a simple, feasible alternative and I would like to see this, not only explored, but also, required by SDG&E to implement.

EIR folks,
Thank you for your time in exploring alternatives to this issue.

From: Pippin Schupbach [mailto:pschupbach@ucsd.edu]
Sent: Friday, October 20, 2006 2:21 PM
To: sunrise@aspeneg.com
Subject: Sunrise Power Link Comments

To whom it may concern:

I am writing to voice my deep opposition to SDG&E's proposed Sunrise Power Link Project. In what follows, I focus on two issues:

- The project compromises public lands. The current route through Anza-Borrego Desert State Park is unacceptable (and alternative routes through other public lands are also of dubious merit). Anza-Borrego Desert State Park is one of the finest in California--if not the nation. The Project will eviscerate the idea that park land is for public recreational use. It will surely also cause significant damage to the aesthetics of the park, the flora and fauna, and the cultural resources/artifacts. SDG&E does not appear to have given any consideration to these losses in evaluating its options.
- Conservation and renewable energy must be a priority. It is far from obvious that the money needed to construct the Power Link would not be better used to increase conservation and efficiency, and to promote the use of renewable resources. SDG&E's dismissal of this alternative is of questionable merits and does not appear to consider the value of taking this opportunity to establish itself (and California) as leader in responsible energy use.

I again reiterate my strong opposition to SDG&E's proposal: The costs of the project are significant, and there are better alternatives.

Regards,

Pippin Schupbach
1928 3rd Avenue #3
San Diego, CA 92101
619.252.2421

DEAR BILLIE & LINDA-

This letter is about the
SUNRISE POWER LINK - SRPL - AND THE
NOTICE OF PREPARATION, ATTACHMENT
"1: SUMMARY OF POTENTIAL IMPACTS.

I will comment on the
ENVIRONMENTAL ISSUE AREAS IN
ORDER, AS THEY AFFECT ME, MINE,
FAUNA, FLORA, WATER AND OTHERS
THAT CARE.

Aesthetics/Visual: NO ONE HERE
HAS A VIEW EASEMENT, BUT THE
ANZA-BORREGO DESERT STATE PARK -
A.B.D.S.P. - WAS CREATED TO PRESERVE
THE VIEW FOR ME, YOU, THE
POPULANCE & OUR OFFSPRING FOR
ALL TIME -

My question: What is SRPL's
FAIR SHARE?

AIR QUALITY: AS OF THIS DAY
THERE IS NO DUST THAT BLOWS
THROUGH OCOTILLO WELLS DUE TO
CONSTRUCTION. DURING AND
MOSTLY AFTER CONSTRUCTION IS
DONE A 150' + WIDE ROAD WILL
RUN THE LENGTH OF THE SRPL

through ABDSP. - People ^{will} drive
the route in 4wd cars, pickups,
ORV's (quads, motorcycles, 3 wheelers,
dune buggies) - I've asked Imperial
Irrigation District - IID and
SEMPRA for dust monitoring
equipment on my property's now
so I'll have a record of a year
or more before SRPL starts
construction - IID & SEMPR
will not answer me or tell me
where to get the equipment.

My question: If SRPL is
built how can I prove SRPL is
spoiling the air? Or how can
they prove they aren't?

BIOLOGICAL RESOURCES - SRPL
will result in permanent loss of
flora, fauna and habitat. It
also could cause changes in
wildlife behavior.

My question: How can SRPL
be approved if, as they say,
they are changing the
evolutionary behavior of
wildlife?

Cultural & Paleontological Resources - There is absolutely no mention about the Desert Link of the SRPL -

My question: Why?

Geology & Soils - Ground failures from seismic activity could occur. The desert is new soil, the mountains old soil - the ground in ABIDSP has never been disturbed nor has it settled through acts of man. Soil volume changes will occur due to change in moisture content.

My question: How are the changes to come about? Is it by digging, filling & re-paction? Will ground failures due to seismic activity occur underground? As seismic activity is settling, shaking & moving the earth, driving pile & or dynamic compaction will cause seismic activity underground.

My question: IF SRPL, through manmade seismic activity, collapses a man's well, who does he see? Who is responsible? What proof is needed? What's his recourse?

No mention of underground impacts is mentioned.

HAZARDS AND HAZEROUS MATERIALS - WILDFIRES AND CONTAMINATION OF SOILS AND WATERS IS UNACCEPTABLE.

My question: Who pays if the aforementioned occur? I see no mention of responsibility for SRPL - why?

Hydrology & Water Quality - Again no mention about underground impacts.

My question: Again it is why? Will water be diverted through the use of DYNAMIC COMPACTION OR DRIVING PILE? If rock is fractured & water diverted, how can a man prove SRPL did it? Is a log,

RECORD OR LONG TIME USE
 PROOF A WELL WAS IN GOOD
 WORKING ORDER BEFORE SRPL
 WENT BY AND THE WELL
 FAILED?

LAND USE. PERMANENT
 PRECLUSION OF LAND USE WILL
 OCCUR.

My question: How ARE
 they going to keep people
 of their property in the
 desert? Will they RE-SEED?
 Will all the roads they build be
 fenced or left bare, denuded
 and open for use?

NOISE. CORONA NOISE WON'T
 QUIT & WILL HUM UNTIL THE LINES
 ARE TAKEN OUT. IN THE DESERT
 SOUND CARRIES FURTHER THAN IF
 AT SEA - DURING THE DAY CAR
 SOUNDS CARRY 1/2 MILE OR MORE -
 AT NITE A NORMAL CONVERSATION
 WILL CARRY A MILE, LAUGHTER
 MUCH FURTHER.

I PERSONALLY BELIEVE THIS

IS AN ATTEMPT BY SEMPRA TO
SET A PRECEDENT, BY GOING THRU
THE A.B.D.S.P., FOR THE UTILITY
CORRIDORS BEING DEVELOPED BY
THE FEDERAL GOVERNMENT & UTILITY
COMPANIES-

YOU ARE THE PEOPLES

REPRESENTATION-

YOU ARE THE UTILITY COMPANIES

OVERSEER- THEY ARE TO DO WHAT

YOU SAY-

PLEASE VISIT THE PARK BEFORE
YOU RULE-

Thank you very much
With respect-

Mike Hussey
4675 Hiway 78
Ocotillo Wells CA

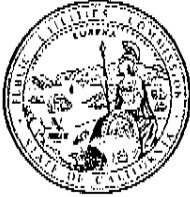
92004



Highway 78 - Looking east from
milepost 78-865 -

NO poles -
SILENCE -
SCENIC HI-WAY -

Picture taken 3/8/5



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



Comment Form

Proposed Sunrise Powerlink Project

Date: 10/20/06

Name*: Patrick Shaw, M

Affiliation (if any):* _____

Address*: 2622 Bristlewood Dr.

City, State, Zip Code*: Ramona CA 92065

Telephone Number*: 760 787 1135

Email*: ryanshaw092065@yahoo.com

Comment: Please consider moving the route to the Proposed Sunrise Powerlink Project to the south of Holly Oaks Ranch. Located on Southern Oak Dr, Holly Oaks Ranch is a home to roughly 50 families. Routing the proposed Sunrise Powerlink Project south of the neighborhood would prevent any long term, unforeseen health problems from affecting people in the community. The area south of Holly Oaks Ranch does not contain any residences nor other facilities. Additionally, the area's terrain is less rugged and more easily accessible than the current proposed route.

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

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be received by October 20, 2006. Comments may also be faxed to the project hotline at (866) 711-3106 or emailed to sunrise@aspeneg.com.

From: gaboony@sbcglobal.net
Subject: Sunrise Powerlink Comments
Date: October 20, 2006 10:30:10 PM PDT
To: dcb@cpuc.ca.gov
Cc: sunrise@aspenerg.com
5 Attachments, 302 KB

[Back up copy to the e-mail sent on 20 October 2006, see above time and date stamp.
Minor grammatical errors have been corrected in this copy and highlighted in dark blue]

20 October 2006

Billie C. Blanchard
Regulatory Analyst, California Public Utilities Commission
and
Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: San Diego Gas & Electric Company's Sunrise Powerlink Project
(Applications A.05-12-014 and A.06-08-010)

Dear Ms. Blanchard and Ms. Kastoll,

I own 54.67 acres on Tubb Canyon bajada adjacent to Anza-Borrego Desert State Park. San Diego Gas & Electric Company's Sunrise Powerlink alternate desert route near Borrego Springs for transmission towers will cross over my land and that of my neighbors. Near as we can determine, the desert alternate route near Borrego Springs and through Anza-Borrego Desert State Park was covertly added to the project by SDG&E a few months ago.

My husband and I purchased our land after careful analysis regarding its protected location (surrounded by the state park) and rich biodiversity (in proximity to rare Peninsular bighorn sheep habitat and water sources, with burrowing owls, horned lizards, and other rare flora and fauna typical of the Sonoran desert at its western terminus). SDG&E's Sunrise Powerlink project is a destructive, expensive boondoggle. The siting of their 500 kV 130-155 foot towers would effectively destroy our land along with immediately adjacent state park land, mar spectacular desert viewshed, and damage critical wildlife habitat along the tower route up sensitive Tubb Canyon.

Others better qualified than myself have questioned SDG&E's technical justifications for this project as well as submitted valid criticisms of the project's design, including better alternatives for meeting San Diego County's future energy needs. That said, I wish to point out several procedural issues that affect the public's right to have adequate notification about the project. I will also reiterate some of the serious concerns I raised at the 4 October 2006 scoping meeting in Borrego Springs, California.

Landowners in the Tubb Canyon and Ocotillo Wells areas have not been contacted by SDG&E about proposed plans to install towers on our property along the recently added desert alternate route near Borrego Springs. My husband and I own a segment of

undedicated Tubb Canyon Road immediately under the proposed towers, according to SDG&E's topographical project maps. We are still scrambling to inform other neighbors who own land and isolated desert homes in our area about this "new" alternative desert route. Many landowners, like us, live far away from our parcels and/or are part time residents in Borrego Springs. Though we have been doing our best to contact everyone, it is a burden that includes long distance phone calls and a lot of personal time and effort. Notifying those whose land would be adversely impacted by Sunrise Powerlink should not be our responsibility; however, our neighbors need to know about this threat to their property and the desert we love. We are their only source of information at this time. That needs to be remedied and SDG&E should be held responsible for contacting and holding discussions of intent directly with highly impacted property owners.

When asked whether or not property owners had been told about the alternate desert route, SDG&E's Senior Vice President for Energy, Jim Avery, stated in a recent San Diego Channel 10 TV news video (interviewed by reporter Erica Simpson) that, "We have notified all of the landowners." That is not true. Mr. Avery and SDG&E should be held accountable for promoting that misperception to the public and the CPUC. View the video at:

<http://www.10news.com/video/index.html>

(Click "play" on the "Borrego Springs Man Concerned about SDG&E Project" under the thumbnail photo.)

We would not have known about the transmission line ourselves (or Sunrise Powerlink going through other areas of the state park, which we staunchly oppose) except for the fact our neighbor, Bill Collins, contacted us. His family owns ~700 acres of Tubb Canyon on the tower route where he maintains water guzzlers for ~40 endangered Peninsular Bighorn Sheep that live in the canyon. (These sheep are the "Borrego" after which the desert was named.) Bill Collin's family also owns a small house adjacent to our land and the state park. Bill was the only Tubb Canyon landowner to receive limited notice about the project because he is a member of San Diego County's *Community Sponsor Group* that addresses land use planning in Borrego Springs. Bill gave us a shocking wake up call about the project a few weeks ago. We've since learned that the Sunrise Powerlink project has been in the works for over two years; therefore, this lack of official notice from SDG&E would appear to be deliberately deceptive or, at the least, evidence of incompetence. If SDG&E lets due diligence and numerous landowners slip through the cracks, should the same company be trusted with the budget, planning, contracting and construction oversight for a complex, ambitious, multi-billion dollar energy project?

With due respect, SDG&E knows who owns the land all along their proposed transmission line routes and they how to contact landowners by accessing tax assessor data and public deed records. Since we receive our property tax bills from San Diego County, it is obvious SDG&E can obtain our current mailing addresses from that source; however, we have received nothing from them to date. I received no response to a recent e-mail of concern and none to a voice message on their so-called project hotline (where a live person never answers the phone when we call).

SDG&E surveyors and other personnel, in two white SDG&E trucks, were recently caught by Bill Collins trespassing on several parcels, including my own, at Tubb Canyon. They were also intercepted by a caretaker in nearby Ocotillo Wells (east of our property on the tower route). If SDG&E plans are at the point where they are sending out

surveyors and examining our land, then property owners must be informed of intentions to "take" our land for the project.

How can any public scoping process be complete, and the closing date today be valid, when landowners who might lose their land to SDG&E's towers remain unaware of the project and [the risk to their land](#) and homes?

It is also noteworthy that scoping meetings in our desert region (Borrego Springs) have been occurring "off season" when the local population is at its lowest and the desert is hot and unappealing for the news media. This misrepresents the Anza-Borrego Desert as a "hot dry wasteland" where few local residents are concerned about the project. Official public notices and subsequent public meetings should have been scheduled earlier in the year when affluent seasonal residents are present, when tourists and other visitors who use the desert and state park are present, when local seasonal businesses are open, when rare flora and fauna are abundant, and when the region is at its most physically attractive. It is in cooler winter and spring months that the irreplaceable beauty of the local desert is most evident with fields of wildflowers and cacti in bloom across spectacular desert vistas. The population of Borrego Springs swells several times its summer season size during the prolonged "tourist season" from late-October through approximately mid-April or early May. Scoping meetings should be held during March, for example, not in late September or the first few days in October, before the majority of seasonal residents return.

SDG&E's power-line towers would damage Anza-Borrego State Park and ruin the desert viewshed near Borrego Springs, causing serious adverse economic impact to this small, isolated community where tourism generates significant income. Due to this, I respectfully suggest that future project information and notices of relevant public meetings in Borrego Springs should be more broadly distributed. Everyone should receive a notice about the proposed project and routes through the state park in their SDG&E electric bills and through numerous, [prominently posted](#) local advertisements. Many desert residents still do not know about Sunrise Powerlink or that the "new" alternate desert route and its substation will be prominently visible not only from town but from many vantage points in the state park. Word is spreading about the project now, but still too slowly and details are scarce in town.

SDG&E is a bully attempting to slam dunk its project before any of us in the backcountry know what hit us and before the larger population of this state can be informed of all the facts and abuses in the project. SDG&E's strategy seems to include overwhelming and sidestepping the sparsely settled backcountry, rather than angering densely populated city residential neighborhoods by proposing tower routes through their homes and yards. In attempting to avoid condemning houses, SDG&E is willing to condemn irreplaceable public parkland and wilderness that belongs to everyone. SDG&E is less concerned with reliable, renewable power sources than it is interested in maximizing shareholder profits. There are many holes in their assumptions regarding routing and reliability that I hope will be investigated and debunked by experts at the CPUC.

In fact, many of us are perplexed by the proposed routes that all travel northward only to drop southward again to the desert near the Mexican border. The reliability argument for separate transmission line routes does not hold water in the light of potential aircraft collisions (civilian and military) with the towers that could cause outages and start wildfires. As you know, the Ranchita fire was started by a helicopter colliding with a

power line. Also, locating the towers across some of the most seismically active regions in the state and in remote, rugged terrain where fire and criminal activity might go unnoticed for hours or even days, certainly does not contribute to increased reliability of the system. Additionally, the existing line and the proposed new 500kV line will share the Imperial Valley Substation, which means that a failure at that station would cause a catastrophic outage on both lines regardless of their physical distance from one another between the eastern substation and San Diego.

Assuming that another, lengthy 500kV line is needed (which is debatable!), the towers [would be](#) far safer and easier to maintain if located parallel to the existing 500kV tower route along the Mexican border where increased border patrols would provide excellent security and where there is less likelihood of aircraft collision because the lines would be farther away from the Borrego Springs airport, military airspace proficiency flight paths, and USFS and state park helicopter patrols and rescue flights. The new towers could be constructed an appropriate distance from the existing "old" towers to prevent arcing and falling towers from damaging or severing one another. This has been done in other locations where, near as I can tell, there has never been a power failure resulting from two transmission tower lines running parallel routes in the same region.

The California Department of Fish and Game (DFG), U. S. Fish and Wildlife Service (USFWS), state park resource staff, and California native plant botanists have expressed concern that there has not been enough time to adequately address the impacts of the Sunrise Powerlink project on sensitive wildlife species, native plant species, and natural resources across the proposed routes, especially through Anza-Borrego Desert State Park. As a California licensed veterinary technician specialized in wildlife management, a former zoo keeper at the Los Angeles Zoo, and as a biologist, I concur with their requests for 3 to 4 months additional time to determine impacts [to](#) local wildlife and formulate reports and recommendations. The chaparral, oak woodland, riparian habitat, and Sonoran desert along the project route support a grand diversity of life. Sunrise Powerlink would harm endangered species and species of special concern, including, but not limited to:

Peninsular bighorn sheep (*Ovis canadensis cremnobates*)

Southern Desert Horned Lizard (a.k.a. desert horny toad)
(*Phrynosoma platyrhinos calidiarum*)



(Photo by L. Paul)

Burrowing Owls (*Athene cunicularia*)



(Photo courtesy Palm Canyon Resort, Borrego Springs website)

... and several rare birds, raptors, and native plants. The large towers might pose significant threat of electrocution and collision to raptors, vultures, and even bats.

Rare Ocotillo (*Fouqueria splendens*) specimens with unusual yellow blooms (an extremely rare color variant of the normal red flowers) exist along the proposed route, as evidenced by this photo taken earlier this year in an undisclosed location:



(Photo by L. Paul)

Lastly, after receiving comment from a neighbor about the difficulty of downloading and viewing the Sunrise Powerlink map of the alternate route across our land in Tubb Canyon, I tried to see if the version of that map on the CPUC CEQA / NEPA site for the

project (Applications A.05-12-014 and A.06-08-010) would load faster:

<http://www.cpuc.ca.gov/environment/info/aspensunrise/sunrise.htm>

To my shock and surprise, the CPUC's list of project maps (NOP Figures 1 - 8), posted for public comment reference purposes, does NOT include a map of the desert alternative down Tubb Canyon across our property (with a substation near Borrego Springs). That map is missing.

The map of that recently added alternative is only available on the SDG&E Sunrise Powerlink website:

<http://www.sdge.com/sunrisepowerlink/map.shtml>

Click on the last map in the list:

"Desert Link (Anza-Borrego Desert State Park) Map" (a 23.1MB size file).

The SDG&E .pdf version is difficult for many computer systems to open. It takes over 5 minutes to load on my robust iMac, and I have a fast DSL connection. It also tends to bomb when you try to open the .pdf file. The SDG&E map files are unacceptably ponderous and there are those who suspect that this represents a deliberate tactic to discourage folks in the backcountry with slow dial up Internet access from seeing the detailed topo maps.

I read the following statement about Sunrise Powerlink maps on the CPUC site:

➤ *Note: Some of the [SDG&E map] files displaying the figures for the NOP [Notice of Preparation] are large and may display slowly. For faster results in displaying these files, right-click the file's link, click "Save Target As" to download the file to a folder on your computer, then browse to that folder and double-click the downloaded file. Or, if you wish, **send an email to sunrise@aspenege.com and request a CD containing these figures**, which will be promptly mailed to you. The second option is recommended for anyone with a dialup connection to the Internet.*

That option is appreciated; however, obtaining a CD does us little good if it duplicates the CPUC website's map list [that is missing the desert alternative map for our area](#).

I assume that the CPUC obtains the maps it posts for the Sunrise Powerlink project application from SDG&E. It is significant that your own Notice of Preparation website for the project fails to provide an important map for the "new" alternative desert route through environmentally sensitive Tubb Canyon and Anza-Borrego Desert State Park. This map, in a reasonable and easily downloaded format, should have been available for the public comment period that is closing today (20 October).

The difficulty of finding and viewing all the project's maps, combined with the widespread failure on the part of SDG&E to contact landowners along a new alternate route that has not been widely advertised, may be symptoms of ulterior motives. Those of us who own land at Tubb Canyon and in Ocotillo Wells think SDG&E's omissions and bombastic attitude merit the CPUC's close scrutiny.

In conclusion, adversely impacted landowners and seasonal residents of Borrego Springs have not been given sufficient notice and enough project information to assure that the scoping process for the Sunrise Powerlink project will be both comprehensive and fair. The project would cause extensive damage to Anza-Borrego Desert State Park and other wild lands, such as Cleveland National Forest. Wildlife, native plant

communities, and scenic vistas would also be harmed. The need for this expensive, lengthy, and unsightly power line is in question. The construction and implementation schedule for the project is over ambitious. Expectations for the first commercial deployment of Stirling engine-based solar concentrators may not be realistic. For so many reasons, I urge the CPUC not to approve the Sunrise Powerlink project, but rather send SDG&E back to the drawing board...

The CPUC has an opportunity to jump-start distributed solar energy, local power generation, and broad conservation incentives that will not only preserve Anza-Borrego Desert State Park and other wild lands in California, but also convert San Diego County from an energy guzzling region to a net energy producer. Keep renewable energy generation near power users, not 150 miles away through rugged terrain and parkland in the desert near Mexico. The coming years will see the end of cheap oil and the advent of global warming-related natural disasters. It is essential that energy generation diversify and gradually become the responsibility of every citizen and business, every city, and every county, not just the realm of SDG&E. There are wiser ways to spend San Diego County residents' money than on the Sunrise Powerlink project with all its risks and consequences.

Thank you for this opportunity to comment. I look forward to your report.

Respectfully,



Lori L. Paul, RVT
Owner of 54.67 acres of land on Tubb Canyon bajada adjacent to Anza-Borrego Desert State Park
153 Jaxine Drive
Altadena, California 91001
gaboon@sbcglobal.net
626.798.3235

CC:

Gov. Arnold Schwarzenegger
Hon. Adam Schiff, U. S. House of Representatives
Hon. Carol Liu, California Assembly
Hon. Jack Scott, California Senate
Hon. Dianne Feinstein, U. S. Senate
Hon. Barbara Boxer, U. S. Senate
Ms. Judy Winter Meier, Editor, Borrego Sun
+ various desert neighbors in Tubb Canyon, Ocotillo Wells, and in Borrego Springs, California

Dawn on Tubb Canyon Bajada... Ocotillos in the direct path of proposed Sunrise Powerlink 500kV 155 foot towers on Tubb Canyon Road. (Photo by L. Paul)



From: K. P. [mailto:kprince27@yahoo.com]
Sent: Saturday, October 21, 2006 06:55 AM
To: 'CPUC'
Subject: Proposed Sunrise Powerlink Project

The attached CPUC Response form is from Katalina Prince of Borrego Springs, CA.

Thank You!

Here is a printed version of the form:

Hello...

Please be aware of the irrevocable ramifications of this proposed link.

Generally, we are and act as an intelligent race... therefore, we should, at this time acknowledge alternatives to this link and the social, psychological, ENVIRONMENTAL, mental and ECONOMICAL damages that would incur in the multitudes of arenas and to a spectrum of communities for now and time to come. A link of this magnitude, location and unveiled intention(s) will continue to erode our home,... this land we live on and will affect every generation (regardless of social/political status) for all Earthly existence to come.

Let's encourage SEMPRRA, SDG&E and the entire Southwest region of the United States, especially such a shipping and industrial Center as San Diego, to pursue NATIONAL leadership in SOLAR Designs and ALTERNATIVE ENERGY Systems.

Thank You!

Stay in the know. Pulse on the new Yahoo.com. Check it out.

From: saschup [mailto:saschup@yahoo.com]
Sent: Saturday, October 21, 2006 10:59 PM
To: sunrise@aspeneg.com
Subject: Power link public comments

To whom it may concern:

Please consider alternatives to running the power lines through the Anza-Borrego State Park. Half of its beauty comes from the solitude and remoteness one feels when going there. This is a true rarity considering its proximity to the huge city centers of California. So much would be destroyed with a power line running through the park.

Moreover, construction of the power line would damage the delicate desert flora and fauna. Much consideration ought to be given to alternative power sources such as solar and wind energy, both of which are quite plentiful in Anza-Borrego.

Please make an effort at researching other alternatives and notifying the public of these efforts.

Stephani Schupbach
1656 Holly Way
Fort Collins, CO 80526
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CALIFORNIA PUBLIC UTILITIES COMMISSION
U.S. BUREAU OF LAND MANAGEMENT



Comment Form

Proposed Sunrise Powerlink Project

Date: 10/21/06

Name*: John R. Fsaider

Affiliation (if any)*: Peoples Powerlink

Address*: P.O. Box 121 (2591 Woodland Rd)

City, State, Zip Code*: Julien, CA, 92036-0121

Telephone Number*: 760-765-2722

Email*: skyword@sbcglobe.net

Comment: I stand STRONGLY with those who oppose
the Sunrise Powerlink plan. This transmission
line proposal represents an act of violence on two
fronts: (1) IT is an act of violence on nature.
Destruction of precious aesthetic, biological and
environmentally precious landscapes is an unnecessary
crime. (2) IT is an act of violence on
the community, on the goodwill of the people, on
humanity itself. The outcry of the public is
evidence for this. The technology and will
to develop alternatives is here now. The
timing is right to pursue solar, wind and
geothermal and even ocean wave technology. Lets
go for wireless alternatives to Sunrise Powerlink.

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

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be received by October 20, 2006. Comments may also be faxed to the project hotline at (866) 711-3106 or emailed to sunrise@aspenerg.com.

From: Robert or Margaret Barelmann [mailto:ecp@ixpres.com]
Sent: Monday, October 23, 2006 7:47 PM
To: QLi@aspeneg.com
Subject: Re: Your email re: the Sunrise Powerlink EIR/EIS

Qian Li,

Thank you for the email and attachment. It is my understanding that your attachment is for the preferred route through grapevine canyon; however, there is an alternative presented by SDG&E to the CPUC that runs northerly of that route and actually is proposed to take land from us. I received a letter coincidentally just last Friday from SDG&E for permission for right of entry for the purpose explained below. SDG&E did not send a map showing the easement location on our land or easterly of it.

SDG&E wants right of entry permission for 1). subsurface borings three to eight inches in diameter up to 50 feet deep; 2) seismic refraction surveys - 150 foot long linear array of sensors six inches in ground; 3) field resistivity surveys a linear array of sensors up to 150 feet long as well as environmental work for botanical, biological and cultural aspects. items 1 thru 3 must have huge vehicular equipment traveling on virgin countryside along the preferred route and two proposed alternatives. This will cause outrageous scars on the backcountry and on my property. We have owned the land for over 20 years and are not prepared to approve vehicular traffic along virgin land. The native plants do not recover and grow even 20 years after vehicles compact the soil with their tires. We know, we learned from experience. Please forward these comments to the correct location. Regards, Bob & Margaret Barelmann

----- Original Message -----

From: Qian Li
To: 'Robert or Margaret Barelmann'
Sent: Friday, October 20, 2006 5:37 PM
Subject: RE: Your email re: the Sunrise Powerlink EIR/EIS

Mr. and Ms. Barelmann,

Thanks for the clarification. Our GIS team is working with SDG&E to update the database. For now, please see from the attached map that the proposed project would not cross any part of 197-160-04 and is over 0.5 miles away at its closest approach. The numbers along the blue line (proposed project) are mileposts and correspond to those on Figure 1 of the NOP. Detail maps of the closest segment to your property are in the mail to you.

I apologize for the delay.

Sincerely,
Qian Li
Aspen Environmental Group
415-955-4775x204
235 Montgomery St. Ste. 935
San Francisco, CA 94104

From: estitt [<mailto:estitt@sbcglobal.net>]
Sent: Thursday, October 26, 2006 10:07 PM
To: sunrise@aspenerg.com
Subject: PROPOSED SUNRISE POWERLINK PROJECT

Date: 10/26/06

Name: Eduardo and Carmen Estitt (Husband and Wife)
Address: 9036 Buckwheat Street, San Diego, CA 92129
Telephone: (858) 484-2783
Email: estitt@sbcglobal.net

Comments: We are very concerned with the proposed Powerlink Project running through or near Park Village Road in Rancho Penasquitos. Our house is located directly behind the location of the proposed project and we fear the unhealthy effect of any leaking radiation. We are the grandparents of two young children who spend a great deal of time in our house and we don't want them to be exposed to any kind of radiation. We are also concern with our own health.

BILLIE BLANCHARD, CPUC / LYNDA KASTOLL, BLM
C/O ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935
SAN FRANCISCO, CALIFORNIA 94104 - 3002

10 NOVEMBER 2006

DEAR Aspen Environmental Group

It is appalling that anyone is seriously considering allowing SDG & E (or anyone else) to send a 500 KV powerline through our State Park. I grew up here believing that state parks were, by definition, protected. This monster would march through the heart of Anza-Borrego's Sonoran desert, through one of the last remnants of untamed desert left in California. Why is this being contemplated when in February of this year the CPUC president said the Sunrise Powerlink would not be needed?

Many people feel deserts are wastelands, not worth protecting, a place to throw trash, or a place to tame so it looks like any other manufactured place. However, for those of us who live here the desert is full of life. It is a place to understand that the unique plants, adapted to the climate, are both shelter and food for the wildlife from the smallest insects to the Bighorn sheep as well as a place to study previous civilizations. There are many other reasons not to allow the powerline such as raising light pollution in one of the very few places left where astronomers can go to study the night sky. There are also questions regarding the magnetic fields which affect humans as well as wildlife.

The desert is the most fragile of all plant communities. It does not heal quickly and often, even with little damage, does not recover at all - EVER. With the destruction of the desert will go a landscape of such overwhelming beauty we should stand in awe of it.

Please help us preserve this treasure.

Sincerely,

Barnaby Davidson

PO Box 1525

BORREGO SPRINGS, CALIFORNIA 92004