

Appendix C-1. Summary of Written Comments Received from Government Agencies and Special Districts

Date	From	Comments
Federal Agencies		
February 21, 2007	USDA Forest Service Cleveland National Forest Tina J. Terrell Forest Supervisor	<ul style="list-style-type: none"> • Requests additional time to complete comments; will reply by March 16.
March 16, 2007	USDA Forest Service Cleveland National Forest Peggy Hernandez Acting Forest Supervisor	<ul style="list-style-type: none"> • Agrees with elimination of SWPL Alternatives B, C, and B-C. • Recommends elimination of the Route D Alternative east of Loveland Substation, the Interstate 8 Alternative, and the Serrano/Valley Central 500 kV Full Loop Alternative because they would be inconsistent with the CNF Land Management Plan. The Route D segment would change the character of undeveloped forest land and Interstate 8 would have unmitigable impacts on emergency response. • BCD and Route D, south of Loveland Substation, Alternatives could be carried forward with route and engineering modifications. • Potential impacts of West of Forest and CNF Existing 69 kV Route Alternative on Forest land are mitigable. • Finds it inappropriate to consider the LEAPS Alternative until FERC rules on the project. • Attachment: letter from Dale N. Bosworth instructing the Forest Service not to approve any further management activities in inventoried roadless areas according to the 2001 Roadless Rule in compliance with U.S. District Court ruling on State Petitions for Inventoried Roadless Area Management Rule.
State Agencies		
January 23, 2007	California State Lands Commission (CSLC) Jim Porter Public Land Management Specialist	<ul style="list-style-type: none"> • Identifies that there are several State-owned school land parcels that lie in the vicinity of the proposed routes. Advises that the applicant will be required to obtain authorization from the CSLC before any proposed activity or development will be permitted on State lands. • Requests legal definition of routes.

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January 30, 2007	Native American Heritage Commission (NAHC) Dave Singleton Program Analyst	<ul style="list-style-type: none">• Notes that during monthly meetings with tribes of San Diego and Imperial Counties, tribal members are frustrated over the lack of information and inadequate consultation regarding the federal energy corridors that the project represents.• Urges BLM to be proactive in providing tribes adequate opportunity for consultation on the Proposed Project and Alternative corridor routes.• Notes that the NAHC is assisting Project archaeological and environmental contractors in identifying cultural resources known in its Sacred Lands File Inventory.• Advises that under CEQA and NEPA, the lead agency is required to assess whether the Project will cause a substantial adverse change in the significance of a historical or archaeological resource, and if so, to mitigate that effect. Commission recommends contacting the appropriate CHRIS to determine: whether the area of potential effect (APE) has been previously surveyed for cultural resources; whether any known cultural resources have already been recorded in or adjacent to the APE; the probability that cultural resources are located in the APE; and whether a survey is required to determine if previously unrecorded cultural resources are present.• Advises that if an archaeological inventory survey is required, the final report should be submitted immediately to the planning department, and sensitive information regarding site locations should be in a separate confidential addendum. The final report should be submitted within three months after work has been completed to the appropriate regional archaeological Information Center.• Advises that the NAHC be contacted for a sacred lands file search, and advises the use of Native American Monitors. Requests that USGS 7.5 minute quadrangle citation with name, township, range and section be provided to the NAHC to assist with the sacred lands search.• Advises that lack of surface evidence of archaeological resources does not preclude their subsurface existence. Advises that lead agencies include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archaeological resources per CEQA § 15064.5 (f), and for the disposition of recovered resources and human remains.

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February 23, 2007	John H. Robertus Executive Officer California Regional Water Quality Control Board, San Diego Region	<ul style="list-style-type: none"> • States that the Proposed Project has the potential to adversely impact water quality and beneficial uses during construction and over the life of the Project, and therefore it is paramount that impacts are a primary consideration in the ultimate selection of Project Alternatives. • Requires CEQA documentation and review to thoroughly address water quality and hydrologic impacts in order to recommend certifications for wetlands impacts associated with the Project and to avoid requiring a focused EIR at a later time. • The Regional Board has the following general questions and concerns regarding the Project: the CEQA review process and documentation must address all anticipated impacts to water quality and beneficial uses from all aspects of the project including post-construction operation and maintenance of access roads, etc. and the measures that will be taken to prevent wastewater discharges; the Board is concerned that certain alignments appear to selectively target public lands, which shifts the Project burden from the chief beneficiaries to public and preserved lands, and requests that the alignment selected reflect a better balance in the distribution of impacts; the documents and review process should provide additional detail to support the recommendation to remove the existing SWPL Alternative as it is unclear from the Notice why this route is more fire prone than the other Alternative routes; the Board requests further explanation of the elimination of the Valley-Rainbow Devers Miguel via Imperial County Alternative. • The Board makes the following recommendations: that the preferred alternative be the I-8 and West of Forest Alternative as it would seem to minimize additional impacts to otherwise pristine areas; that if the Central Link Alternative crossing Santa Ysabel Valley is selected, then the route should follow the 78/79 corridor to minimize impacts to open space; that SDG&E reject the Route D Alternative, SDG&E Route Segment C, and SDG&E Route Segment BC; that where impacts cannot be avoided, SDG&E consider establishing a mitigation bank for all cumulative and future impacts of the Project; that environmental review and documentation identify the appropriate mitigation measures rather than leaving that issue and its associated costs for later resolution during the permitting phase of the Project, and that a permanent mitigation and maintenance program be established.

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County Agencies		
February 6, 2007	San Diego County Supervisor Second District Dianne Jacob	<ul style="list-style-type: none"> • Represents second district that includes Ramona, Julian, Santa Ysabel, and other communities. • Appreciates that meetings were held in rural areas. • At pre-hearing conference questioned need for the project. Now after almost 100 alternatives, 30 recommended, still question whether Sunrise is the best use of taxpayer dollars. • The County will submit formal comments on the project's Draft EIR. • Strongly support No Action Alternative because SDG&E can satisfy renewable energy mandates with cheaper and safer measures. • With investment of \$1.3 billion ratepayer dollars must be certain renewable claim is true. • Why is SDG&E marketing the project as clean power when it won't specify the renewable power amount or source? Stirling solar has not been filed and energy experts continue to raise serious concerns about its viability. • Without information on the nature of power that will be used, it is premature to contemplate this massive project. • If project is focused on reliability why is the project an out-of-county project? Why not focus on in-basin power? • Must consider project in the context of other projects in San Diego County including South Bay power plant, changes to Encina Plant, proposed Otay Mesa Power Plant, Sempra Energy's Palomar plant, which is in operation, and planned peaker sites. With these projects, experts say that Sunrise is not economical compared to in-basin generation. • Sunrise puts all of San Diego County's "eggs" in one basket. Multiple set of strategies would be safer and more practical. • Sunrise will create significant visual impacts to the unique and pristine viewsheds of the Santa Ysabel Valley. The Santa Ysabel State Route 79 underground alternative must be studied.
March 7, 2007	County of San Diego Gary L. Pryor Director of the Department of Planning and Land Use	<ul style="list-style-type: none"> • According to CEQA, the whole of the project should include energy sources and projected impacts. • Include Lakeside Planning Area as an affected community. • Requests thorough analysis of future phases in this EIR/EIS. • Requests certain items in project maps including parks and existing towers. • Requests a table comparison of impacts by acre, vegetation type, residences, and county parks and open space preserves. • Requests consultation to design alternatives and mitigation measures to avoid impacts; discusses the following sensitive issues. <ul style="list-style-type: none"> — Parks and Open Space — Multiple Species Conservation Program Preserves — Roads, Infrastructure, and Facilities (encroachment permits would be required to protect public safety) — Agricultural and sport aircraft flying areas; Warner Springs Glider Port and private airports. • Supports analysis of all retained Non-Wires Alternatives, including energy efficiency measures and upgrades to existing power plants. • Recommends retaining HVDC Light Alternative because CEQA finds cost to be insufficient reason to find an alternative infeasible. Supports undergrounding along existing disturbed areas and to avoid impacts to cultural resources.

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		<ul style="list-style-type: none"> • Recommends undergrounding of the entire transmission line; requests cost analysis considering inaccessibility of some overhead tower locations. • Concerned about visual impact of proposed 230 kV steel structures. • Questions the need for the Proposed Project and any route alternatives. Requests No Project Alternative analysis to include projections of regional energy need and multiple options for their fulfillment. • Eliminate SDG&E Desert Western Alternative due to impacts to wilderness areas and future East County Multiple Species Conservation Plan. • Supports the Imperial Valley FTHL Alternative. • Partial UG 230 kV ABDSP SR 78 to S2 Alternative has potential impacts on biological resources, but supports with underground option to reduce visual impacts. • Eliminate 500 kV ABDSP within Existing 100' ROW Alternative due to same impacts as Partial UG 230 kV ABDSP SR 78 to S2 Alternative. • Concurs with elimination of the following Imperial Valley and Anza-Borrego Link alternatives: <ul style="list-style-type: none"> — SDG&E Alternative Segments 3, 3B, 3D — SDG&E Segment A/Northern Borrego Springs via S22 Alternative — SDG&E Segment 1/Imperial Valley via 92 kV Alternative — SDG&E Segment 4/ABDSP via S2 Alternative — SDG&E ABDSP North Side of SR78 Alternative — SDG&E Borrego Valley Alternative — SDG&E SR78 Julian Alternative — SDG&E Overhead ABDSP SR78 to S2 Central Alternative — Overhead 230 kV ABDSP Alternative (impacts to roads, infrastructure, and utilities) • Recommends elimination of Santat Ysabel Partial UG Alternative due to insignificant reduction of potential visual impacts. • Recommends elimination of Santa Ysabel Existing ROW Alternative for the same reason; in addition, there would be physical impacts to Santa Ysabel Open Space Preserve. • Urges retaining the Santa Ysabel SR79 All Underground Alternative because it would avoid visual impacts to the Santa Ysabel area. Analyze economics of technical measures to mitigate for geological impacts. • Requests an underground option for the segment crossing Mount Gower Preserve to avoid impacts to land west of SR 79. • Concurs with elimination of the following Central Link alternatives: <ul style="list-style-type: none"> — SDG&E Central East Substation to SR79 Alternative — SDG&E Warners S2 to SR79 Alternative — SDG&E San Dieguito Park Alternative — Volcan Mountain Alternative • Supports retaining the CNF Existing 69 kV Route Alternative because impacts to biological resources and the East County Multiple Species Conservation Plan would likely be insignificant. • Supports retaining the Oak Hollow Road Underground Alternative and further analysis of alternatives to protect the visual character of the Oak Hollow community. • Concurs with elimination of the following Central Link alternatives: <ul style="list-style-type: none"> — SDG&E Segment 10/Inland Valley SR78 Alternative — SDG&E Creelman Alternative

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		<ul style="list-style-type: none"> — West of San Vicente Road Underground Alternative • Supports analysis of the following Coastal Link alternatives: <ul style="list-style-type: none"> — Pomerado Road to Miramar Area North – Combined Underground Alternative and Underground/Overhead Alternative — Carmel Valley Road Alternative — Los Peñasquitos Canyon Preserve and Mercy Road Alternative — Black Mountain to Park Village Road Underground Alternative. • Suggests underground option along all of MCAS Miramar – All Underground and Underground /Overhead Alternative and Rancho Peñasquitos Boulevard Bike Path Alternative. • Show existing lines with capacity indicated on maps of Los Peñasquitos Canyon Preserve and Mercy Road Alternative. • Agrees with elimination of the following Coastal Link alternatives: <ul style="list-style-type: none"> — SDG&E Northwest Corner Alternative — SDG&E Mannix-Dormouse Road Alternative — SDG&E Segment 12 Poway Substation to Peñasquitos Substation Alternative — SDG&E Segment 13 Scripps Ranch Alternative — SDG&E Segment 14 Poway Alternative — SDG&E Segment 15 Warren Canyon Alternative — SDG&E Segment 16 North of Peñasquitos Alternative — MCAS Miramar–Combination Underground/Overhead Alternative — MP 146.5 to Peñasquitos Substation Underground and Consolidation Alternative — Scripps-Poway Parkway to State Route 56 Alternative — Scripps Poway Parkway – Pomerado Road Underground Alternative — State Route 56 Alternative • Recommends elimination of West of Forest Alternative due to visual impacts to unincorporated communities, impacts to Sycamore Canyon Preserve, and Alternative 17 impacts to biological and recreational resources including Multiple Species Conservation Program Pre-approved mitigation area, El Capitan Preserve, and Sycuan Peak open space. • Agrees with elimination of the following SWPL alternatives: <ul style="list-style-type: none"> — SDG&E Route B Alternative — SDG&E Route Segment C: — SDG&E Route Segment BC — West of Forest/Route D Western Origination Segments • Requests more information about Coastal Link System Upgrade Alternative, Pomerado Road to Miramar Area North – Combination Underground/Overhead Alternative (eliminated), SDG&E Central South Substation Alternative, and Mataguay Substation Alternative. • Agrees with elimination of SDG&E Warner West Substation Alternative and Warners Substation Alternative. • Recommends focus on non-wire alternatives and avoidance of impacts to County residents and resources.

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Special Districts/Agencies		
January 29, 2007	San Dieguito River Valley Regional Open Space Park Dick Bobertz Executive Director	<ul style="list-style-type: none"> • Advises that on January 19, 2007 the San Dieguito River Park Joint Powers Authority approved Resolution No. R07-01 regarding the Proposed Project. • Resolution R07-01 (attached to letter) identifies the benefits of the Santa Ysabel Valley, including scenic viewshed and treasured landmark. • Proposed towers would cause potential fire danger in the area. • Acknowledges undergrounding lines in Ramona and Rancho Peñasquitos. • 55-mile Coast to Crest Trail planned through Santa Ysabel will attract many recreational users. • The Board of Directors of San Dieguito River Park Joint Powers Authority do not believe adequate information to justify project has been provided to date. • Board opposes transmission lines in the River Park's planning area. • Board urges SDG&E to underground lines in the Highway 79 utility corridor through Santa Ysabel.
February 16, 2007	Vista Irrigation District Don A. Smith Directory of Water Resources	<ul style="list-style-type: none"> • District strongly opposes the reintroduction of the Mataguay Substation Alternative. District opposes this alternative because it would have a tremendous visual impact on the entire Warner Valley. • This alternative would be prominently visible from the District's recreational facilities at Lake Henshaw, from the new casino (Santa Ysabel Band of Diegueno Indians), from highways 76 and 79 (for many miles), and from most of the valley. • Significantly impair the opportunity for a primitive wilderness experience for thousands of Boy Scouts on their way to Mataguay Scout Reservation. • This alternative would permanently and significantly degrade rural character of Warner Valley. It would also eliminate valuable grazing land and reduce habitat available to the endangered Stephen's kangaroo rat. • Given availability of far less disruptive alternatives, District strongly <i>endorses elimination</i> of the Mataguay Substation Alternative.
February 26, 2007	San Dieguito River Valley Regional Open Space Park Shawna Anderson Environmental Planner	<ul style="list-style-type: none"> • Strongly support detailed review of the Santa Ysabel Partial Underground Alternative. This alternative would eliminate many significant environmental impacts identified for the Santa Ysabel Valley. • Strongly agree that San Dieguito River Park and Volcan Mountain alternatives be eliminated from further consideration. • Non-wires alternatives should be thoroughly evaluated and seriously considered. • Hope CPUC takes the progressive approach and sets example for energy conservation rather than relying on traditional approaches to energy consumption. • Letter also included Resolution R07-01, which is described above (Dick Bobertz, January 29, 2007).

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Tribal Governments (Government to Government Consultation)		
February 9, 2007	Santa Ysabel Band of Diegueno Indians Office of the Tribal Attorney Devon Reed Lomayesva, Esq	<ul style="list-style-type: none">• Requests expedient government-to-government consultation regarding the Sunrise Project.• Serious concerns with Tribal and ancestral lands and surrounding community. Impacts include:<ul style="list-style-type: none">— Significant impacts to sacred lands and cultural resources, and biological resources— Aesthetic impacts to Tribe's economic development projects Santa Ysabel Reservation residents— Impact on wireless telecommunications through EMF emitted by power lines— Environmental water shifts— Increased fire danger and harmful EMF effects on Tribal members and surrounding community• Tribe opposes the proposed project. Contact Tribe to schedule a consultation to discuss concerns and proposed alternatives.

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March 1, 2007	Ewiiapaayp Band of Kumeyaay Indians William Micklin Executive Director & COO	<ul style="list-style-type: none"> • Tribe wants to emphatically express its concern with SDG&E's evaluation of project alternative routes that were considered and eliminated (see PEA and Figure 8 of PEA). • Tribe supports alternative B (preferred) or C. Reasons for SDG&E's elimination of these alternatives include reliability concerns, impacts to residents and sensitive species, and approval process for amending the Forest Plan. • Tribe believes that the facts support its position that alternate routes B or C satisfy all three criteria: (1) satisfies minimum siting criteria; (2) prudent system expandability and regional expansion of electrical grid; and (3) provide transmission capability for Imperial Valley renewable resources to assist in meeting 20% mandate for renewable energy. • Imperial County is a source for solar power only — the most expensive source of renewable energy. Solar power produces energy during certain hours during daylight, no energy after the sun has set, and may produce less energy than expected during inclement weather. • SDG&E fails to include in its analysis the high value wind power available in alternative routes B and C on BLM land, Campo Indian Reservation, Manzanita Indian Reservation, and the Ewiiapaayp Indian Reservation. • Wind power is of the highest quality with capacities between 25% and 39%. Operating Kumeyaay Wind Power Facility on the Campo Indian Reservation produces 40 MW and has excess capacity. • The Ewiiapaayp Indian Reservation is developing a similar wind energy project that will produce between 75 and 100 MW. • BLM is studying wind energy production on 17,000 acres east of Ewiiapaayp Indian Reservation and north of Campo Indian Reservation. • Wind power is less expensive than solar power. Renewable energy most effective, efficient, reliable, and economical by the combination of solar and wind resource power. If SDG&E is to meet its target it needs to tap into wind energy along alternate routes B and C. • Completion date for increasing renewable energy went to 20% by 2010 and 33% by 2020. If SDG&E is to meet these goals they must use alternate routes B and/or C. • Tribe believes SDG&E cannot satisfy renewable energy demands or its minimum criteria with solar power alone. Tribe also suggests that criterion 3 be changed to reference Laguna Mountain renewable resources. • Tribe believes that SDG&E must amend its PEA to analyze wind resource power available along alternate routes B and C. Tribe is confident re-analysis will show routes B and C as preferred routes.
March 9, 2007	Ewiiapaayp Band of Kumeyaay Indians Harlan Pinto, Sr.	<ul style="list-style-type: none"> • Supports Route B or C SWPL alternatives because they satisfy project objectives, reduce potential impacts, and are feasible. • Criticizes SDG&E's failure to include wind power development in routing studies of Routes B and C. • References existing Kumeyaay Wind Power facility on Campo Indian Reservation; lists current studies of wind energy development in the area. • Solar and wind generation have complementary peak production periods. • SDG&E cannot satisfy renewable energy requirement through Imperial Valley imports alone.

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March 13, 2007	Viejas Band of Kumeyaay Indians Bobby L. Barrett, Chairman Viejas Tribal Council	<ul style="list-style-type: none">• Requests that the BLM initiate formal Government-to-Government Consultation.• Requests maps with greater detail than those in the Second Notice, aerial photographs of Alternative routes and their relationships to the Viejas and Capitan Grande Indian Reservations, maps indicating the one-mile cultural resources record search area for any Alternative routes adjacent to the Viejas and Capitan Grande Indian Reservations.• Notes that the Viejas Band has not received the private property owner notification for property owners within 300 feet of the Alternative routes.
March 23, 2007	Campo Band of Kumeyaay Indians Samuel D. Gollis, Attorney	<ul style="list-style-type: none">• Opposes the Proposed Project route through ABDSP due to its impact cultural and environmental resources.• Endorses the Interstate 8 Alternative but proposes the following changes. Requests that the route should cross the Campo Reservation entirely north of I-8 to mitigate impacts to commercial and residential development south of the Interstate. Due to the proximity of the Kumeyaay Wind Energy Project to the north side of I-8, this request may not be possible, but the Campo Band offers assistance in exploring the issue.• Believes that if the I-8 Alternative ought to provide for the construction of a new substation on the Campo Reservation for the purpose of interconnecting future wind generators in the area into the SDG&E grid.• Requests that the team pay close attention to impacts of this Alternative to cultural and environmental resources of the Campo Reservation, socioeconomic impacts, and potential fire risks.
