

Appendix C-6. Summary of Written Comments Received from the Applicant

Date	From	Comments
February 24, 2007	San Diego Gas & Electric David L. Geier, Vice President, Electric Transmission & Distribution	<ul style="list-style-type: none"> • Is concerned about potential schedule delays associated with ROE issues on Alternatives as well as the timing and completion of biological surveys associated with Alternatives. Requests timely notification of schedule changes due to ROE issues or completion of surveys. Notes that any delays will affect SDG&E's activities and the in-service date. • Disapproves of the broadening of eight specific project objectives that were outlined in the PEA into three overly general Basic Project Objectives in the Second Scoping Notice. Maintain that the original objectives were properly written and that refined project objectives are important to facilitate a fully disclosed, meaningful comparison between the merits of the Project and Alternatives. • Requests retention of the four links format of describing alternatives. Comments on specific retained alternatives below. • Partial Underground 230 kV ABDSP SR78 to S2 Alternative: Has technical, engineering, and environmental concerns about this alternative. If San Felipe Substation becomes the transition point between line voltages, this presents a potential future need to build out these underground lines further to reach the same capacity as an above-ground line that transitions at the Central Substation as proposed. If expansion of Old Kane Springs Road, which is currently too narrow for two 230 kV circuits, is limited or impossible, derating of the 230 kV circuits is anticipated due to mutual heating effects, which will reduce the transfer capacity of the line. Concerns about traffic and Caltrans approval are detailed. • Requests consideration of a Borrego Valley Underground Alternative (similar to the SR78/S2 Underground Alt) if the lead agencies insist upon an underground route through the Park. This route would place the 230 kV underground within SR78 then Borrego Valley Road/S3 underground to a 230/12 kV substation replacing the proposed 500/12 kV substation. This route seems superior because it allows for the removal of all substation facilities within the Park, results in a need increase in designated wilderness, and increases reliability for Borrego Springs. • Overhead 500 kV ABDSP Within Existing 100-Foot ROW: The preferred route has fewer and shorter, less visible structures than the existing ROW alignment. The preferred route substantially traces the existing ROW alignment, but deviates from the ROW in certain locations to further minimize environmental and visual impacts. Has proposed to relocate sections of the ROW to maximize wilderness and preservation of cultural resources. • SDG&E ABDSP Borrego Valley Alternative: This option substantially minimizes potential direct impacts and provides compensatory measures for remaining impacts in the Park. Strongly encourages the lead agencies to carry forward this alternative. Further benefits of this alternative are detailed. • Encourages consideration of an alternative to the Imperial Valley FTHL Alternative (D-1) that uses existing linear features and avoids a planned development being proposed by Castle Euroasia and Zen Media Corporations. The alternative route is detailed. • Encourages consideration of a Dunway Road alternative that follows existing linear features and avoids the above-mentioned development. The alternative route is detailed. • Encourages consideration of a West Main Canal – Huff Road Modification Alternative that follows existing linear features and avoids a race track development proposed by Raceland USA. The alternative route is detailed.

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		<ul style="list-style-type: none"> • Encourages consideration of a San Felipe/Old Kane Springs Road Alternative that avoids a number of smaller rural residential tracts along Old Kane Springs Road. The alternative route is detailed. • Santa Ysabel Existing ROW Alternative: This alternative would have potentially significant visual and cultural impacts to the Nationally Registered Santa Ysabel Chapel. • Santa Ysabel Partial Underground Modified by SDG&E Alternative: If the lead agencies insist upon an underground alternative in Santa Ysabel, encourages consideration of a modification. The route is detailed. This modification would reduce the need to clear oak trees, and greatly reduce visibility of new 230 kV lines. • Mesa Grande Alternative: Strongly encourages consideration of a modification called the Mesa Grande Alternative. The route is detailed. This alternative provides for better screening of the line from the Santa Ysabel Valley viewshed, utilizes an existing access through the Cauzza property, avoids use of access roads to non-impacted Batchelder parcels, and requires less access road construction. • Oak Hollow Underground Alternative: Notes that the existing roadways do not have adequate width to accommodate the underground lines, which will require expansion of disturbed area. Would require ½ miles of additional undergrounding, relocation of two cable poles, and a new segment of overhead line. • Pomerado Road to Miramar Area North: Requests thorough assessment of traffic and noise impacts of construction. Potential issues are detailed. • MCAS Miramar: Notes that feasibility of this alternative is questionable due to obtaining land rights, narrow roads, unfavorable terrain, and environmental issues. Military easements are restrictive and could have unforeseen future burdens on ratepayers. • Rancho Peñasquitos Boulevard Bike Path Alternative: This option could affect Caltrans operations. Issues are detailed. • Carmel Valley Road Alternative: Although it avoids the Park, this alternative traverses other county and state owned lands purchased for the preservation of biological resources including coastal sage scrub habitat and vernal pools. Would have significant traffic impacts to Carmel Valley Road. • Los Peñasquitos Canyon Preserve and Mercy Road Alternatives: for the east of I-15 segment, there are concerns over construction impacts to traffic on Scripps Poway Parkway. • Black Mountain to Park Village Road Underground Alternative: This alternative would have major traffic impacts to Black Mountain Road. • Coastal Link System Upgrade Alternative: This alternative would increase total costs by a couple of hundred million dollars and reduce the economic benefits of the Project. • Mataguay Substation Alternative: There could be significant impacts to Stephen's kangaroo rat habitat. Additional concerns over the necessity to obtain a lease, license, or easement from VID. • Substation Alternatives Not Identified as Part of SWPL Alternatives: Assumes that the majority of the SWPL Alternatives retained would use existing substation sites, however two routes would require an additional substation site along the I-8 and West of Forest Alternative. • SWPL Alternatives Retained: There are reliability concerns with all of the SWPL Alternatives. The area is subject to wildfires, exacerbated by the Santa Ana winds, which generate intense heat and smoke that can trip a transmission line. A new line could be constructed adjacent to the existing SWPL only for a short distance without

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		<p>violating NERC, WECC, and CAISO reliability criteria or requiring a controlled load drop contingency plan.</p> <ul style="list-style-type: none">• Route D Alternative: The rugged terrain will make construction and maintenance difficult. SWPL Alternatives require acquisition of single family homes and some cross Indian tribal lands, which would require a Tribal Resolution be approved. Would require multiple closures of I-8.• BCD Alternative: Issues identified for Route D apply.• Non-Wires Alternatives Retained: There is an error on p.21 of the Second Scoping Notice for the rooftop solar photovoltaic estimate for the year 2010. The wind numbers provided in the table are inconsistent with the 308 MW of wind generation presented in the No Project Alternative section.• If any land use plans, such as the ABDSP General Plan, require amendment or modification, the lead agencies should include the analysis of a potential amendment and mandate the Department of Parks and Recreation simultaneously process the same.
