

From: Jeannie Foreman [mailto:jmforeman@webtv.net]
Sent: Sunday, February 24, 2007
To: sunrise@aspenerg.com
Subject: Powerlink

We have valued our time camping and hiking in Anza Borrego for over 25 years. It has been a unique experience including vegetation, wildlife and most of all spectacular desert scenery as well as the peace and serenity we experience.

We do not believe this powerline should be allowed to destroy a beautiful State Park and most particularly designated Wilderness areas. This would be an inexcusable and completely unacceptable choice.

Sincerely,

Jeanne & Robert Foreman
1937 Swallow Lane
Carlsbad, CA 92009

February 24, 2007

Billie Blanchard, CPUC/ Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street , Suite 935
San Francisco, CA 94104-3002

Dear Ms. Blanchard and Ms. Kastoll,

My house is in the Crest and Harbison Canyon area.

I am writing to you to express **absolute opposition** to the entire proposed **Sunrise Powerlink Project**. Additionally, I am adamantly opposed to ***West of Forest Alternative*** which is listed as one of the Southwest Powerlink alternate routes. This alternative plows directly through my property in officially designated “*open space preserve*” while crossing over the extant 69 kV power lines. The simple fact that SDG&E has proposed this as an alternate route has already decimated my property value. If I were to list my house for sale right now I would be required by California law to disclose the material facts (**documents sent to us by SDG&E regarding the Sunrise Powerlink Project and the West of Forest Alternative**) to any prospective buyer. Such a disclosure would prevent the sale or severely decrease the sale price. SDG&E has, by taking this wreck-less action **already** cost my wife and me a considerable loss in property value.

The area on your map denoted between WF-15 and WF-20 is the area intersecting my property as well as the property of many of my neighbors in the Crest and Harbison Canyon.

The following issues **must** be considered in any assessment of potentially placing these power lines through our property. I trust they will be included in any Environmental Impact Study or Report (EIS/EIR).

- 1) Effectively demonstrate San Diego’s need for more power. SDG&E has not proven that we need it.
- 2) Demonstrate and commit to an honest sincere plan of action to produce clean electricity locally.
- 3) Study and report on the pollution, environmental destruction and wastefulness of producing power in Mexico where there are less or few regulations. That honest report must be made public here and to the citizens of Mexico.
- 4) Study and report on pollutants from the power plants in Mexico and the probability of pollutants drifting back into California, Arizona, and beyond.

- 5) Produce unbiased appraisals and compensate owner's loss of property value due to proposed route.
- 6) Produce unbiased appraisals and compensate owner's loss of property value if W-F route is chosen.
- 7) Produce unbiased appraisals and compensate owner's loss of property value if line(s) is (are) built.
- 8) Produce unbiased appraisals and compensate owner's loss of property value based on the destruction of their view (180 degree in our case).
- 9) Evaluate constructability of new line(s), terrain is very steep and rocky. Indemnify property owners for all damages caused by construction, **future** run-off and land slides.
- 10) Establish in writing all future maintenance assurances for these new power lines.
- 11) Evaluate and correct history of non-repair of access roads to extant 69kV power transmission line on our property. The roads have not been maintained for over two years. It is currently impassable.
- 12) Evaluate and mitigate impact on wildlife on our property
- 13) Evaluate and mitigate impact on designated open space on our property.
- 14) Evaluate and mitigate impact on Sycuan Peak Ecological Preserve.
- 15) Evaluate and mitigate impact on Crestridge Ecological Preserve.
- 16) Evaluate and mitigate risk of fire (2003 the Cedar fire destroyed this entire area and burned approximately 400 homes).
- 17) Evaluate and mitigate firefighting capabilities under and near power lines.
- 18) Evaluate and mitigate firefighting air tankers fire retardant drop capabilities in proximity to 165 foot high power poles. Tanker planes are the best and probably only effective way of fighting future fires in this area.
- 19) Evaluate and compensate all potential and future damages due to homeowner's insurance cost increases or cancellation.
- 20) Evaluate and indemnify potential and future damages due to health risk to people from electromagnetic fields. Note: Current laws say that power lines like these must be at least 230 feet from all schools and hospitals.

21) Distribute accurate comprehensible maps next time which include roads, **all** existing power line corridors, designated open space, and are generally understandable to land owners.

22) Distribute accurate comprehensible information to all land/home owners who will see and be affected by the installation of unsightly power poles and lines in their views. Not just owners of property within 300 feet of the lines. Most people are not aware of what is being proposed.

23) **Make no recommendations to CPUC until** there has been an open, informative, accurate and understandable scope delivered to and comprehended by all who would be affected.

I SAY NO TO SDG&E, *the Sunrise Powerlink and the West of Forest Alternative.*

Respectfully,

Mitchell W. Gaul
15001 Ferrell Ln
El Cajon, CA 92021

Cc: Via e-mail

February 24, 2007

Billie Blanchard, CPUC/Lynda Kastoll, BLM
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, Ca. 94104-3002

Re: Public Comment on Alternatives to the Proposed Sunrise Powerlink (CPUC application A.06-08-010)

Ms. Blanchard and Ms. Kastoll,

My wife and I attended the CPUC/BLM Public Scoping Meeting in Alpine, Ca. on February 7, 2007 and wish to provide the following comments for the record:

We are residents of the community of Guatay which is located on Old Highway 80 just west of Pine Valley, Ca. Our community is a small rural mountain hamlet with older mostly low-income residents living in single family dwellings. There are approximately 400 residents with several small long-time established businesses including a hardware store, small convenience store, towing business, tractor museum, woodworks gallery, and two churches.

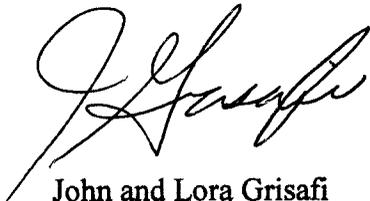
The proposed alternative Route C that SDG&E has shown on their previous maps was shown on the Aspen Environmental Group map labeled as Figure 8 at the public meeting and was labeled as an alternative route recommended for elimination.

My wife and I both support the recommendation of Aspen to eliminate this route through the community of Guatay for several reasons:

1. The proposed route would follow along the existing 69KV line easement. This would require a taking of at least 10 single-family homes and could include the taking of 5 of the local businesses mentioned. The fiscal impact to the community would be significant and disrupt the lives of many of the local residents. Property values of homes adjacent to the proposed line would be devalued and established businesses would be forced to close.
2. The proposed route would bisect the community as the existing easement runs through the middle of Guatay. The visual impact and potential health hazards related to the increased size of the powerline could be detrimental to the health and safety of the residents of our community.
3. Alternatives are available that would not disrupt our community.

In the event the CPUC approves SDG&E's request for a Certificate of Public Convenience and Necessity alternatives that do not impact as many dwelling units can be found. One of the alternatives shown on the Aspen map Figure 8, is the Interstate 8 alternative. This alternative would satisfy part of the intent of SB 2431 wherein the legislature declared that existing linear facilities or physical features should be considered when adding new transmission lines. The existing state highway route 8 is a freeway corridor and is an existing linear facility. Sharing this corridor or placing the new transmission line adjacent to it would be the least disruptive to residents and have a lower level of impact to the flora and fauna as the freeway corridor itself has already been well established. The primary drawback to this alternative is that Caltrans would require an encroachment permit to share any portion of the state highway right of way and trigger an exception requirement because it would be considered a longitudinal encroachment due to its designation of access controlled highway. It should be noted Caltrans has already approved longitudinal encroachments along portions of I-8 for other utility companies in recent years so adding another utility where no conflict with the other utilities arises may be possible. If Caltrans is unwilling to consider such an idea, then perhaps legislative approval of such an exception may be appropriate in light of the provisions of SB 2431. Another drawback to this concept is that SDG&E would prefer to obtain the needed additional right of way ownership as an easement which allows for prior rights in cases where future expansion is needed. An encroachment permit from Caltrans voids such prior rights and would not allow for expansion without additional approvals.

We appreciate the opportunity to provide our comments and look forward to review of the forthcoming Draft EIR/EIS.



John and Lora Grisafi
PO Box 310125
Guatay, Ca. 91931

From: Susan [mailto:susan@gbis.com]
Sent: Saturday, February 24, 2007 12:59 AM
To: sunrise@aspenerg.com
Subject: no power lines in Anza Borrego

Dear Sir or Madam - I strongly oppose the proposed towers and power lines through Anza Borrego Desert State Park. Anza Borrego is California's largest state park, and is an amazing wilderness habitat for countless plant and animal species. Anza Borrego attracts visitors from around the globe. State Parks are intended to be protected forever against development. Don't degrade this amazing park with unsightly power towers and lines.

I am a member of the California State Park Rangers Association. We are 700 strong, and we are very much against this proposed development.

Sincerely,
Susan C. Grove
P.O. Box 784
Tahoma, CA 96142
530-525-9323

From: Cheryl Kelly [mailto:giddyup@giddyup.cts.com]
Sent: Sunday, February 24, 2007
To: sunrise@aspeng.com
Subject: Sunrise power line system alternatives

To whom it may concern,

I agree with wireless alternatives. I also agree with the improvement of the Chula Vista Station. If the power line becomes an inevitable project, I agree with the rerouting along highway 8. Thirdly, If the link goes through Santa Ysabel, I do not agree with a substation in the town of Santa Ysabel, however I believe that underground alternatives are crucial where ever possible. I also agree that if your project does pass through the Tullock land, the line should follow the existing 69kv line through the corner of the Cleveland National Forest as in Figure 5.

Thank you,

Cheryl Kelly



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



Comment Form

Proposed Sunrise Powerlink Project

Date: 2/24/07

Name*: Barbara Levin

Affiliation (if any):* _____

Address*: 18140 Littlepage Rd

City, State, Zip Code*: RAMONA, CA 92065

Telephone Number*: 760-789-0702

Email*: bparra11@aol.com

Comment: We lost our home and all our possessions in the 2003 Cedar fire. We have rebuilt and now find out our home is located directly in the path of the proposed powerlink and according to the maps provided, our home is under one of the structures. Our home is located in the "Levin Family Trust" parcel.

We would be devastated if we were to lose our home again.

**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 February 24, 2007. Comments may also be faxed to the project hotline at (866) 711-3106 or emailed to sunrise@aspeng.com.

From: Drew Lewis [mailto:aysahrhedah@gmail.com]
Sent: Saturday, February 24, 2007 08:48 PM
To: sunrise@aspeneg.com
Subject: Borrego Comment

Please do not put powerlines through our beautiful desert. Let's respect the earth and citizens of Borrego who care so much for it.

Thank you for this avenue of expressing my opinion.

Sincerely,
Drew Lewis

From: Patti May [mailto:joyzplm@sbcglobal.net]
Sent: Sunday, February 24, 2007
To: sunrise@aspenerg.com
Subject: sunrise powerlink

Why not run the powerline along the 56 freeway that has access to a service road and will run into the existing power grid? Why are you considering ruining existing neighborhoods with families and children and animals? PLEASE inform us as to why their choice is a better choice.

We are totally opposed to the SDG&E plan.

Patti May & Family in Park Village

From: pamela05n [mailto:pamela05n@peoplepc.com]
Sent: Saturday, February 24, 2007 12:25 AM
To: sunrise@aspenerg.com
Subject: powerlink

Please move forward with the NON-WIRE alternatives only. Local and user point-source should be greatly expanded and promoted before anymore dangerous, expensive, environmentally damaging, inefficient and just-plain ugly transmission lines are considered from the desert. Generating at the user-site should be the only method we are considering right now. Solar in every neighborhood and commercial sites should be common. Wind can be used creatively even on a small scale.

SDG&E has not done their part in helping consumers transition into this type of responsible direction. Leasing packages to businesses and homeowners could be a first step.

Please move forward instead of background, by dropping this project.

Pam Nelson
(951) 767-2324

From: Nichols Family [mailto:nichols.family1@cox.net]
Sent: Saturday, February 24, 2007 09:14 PM
To: sunrise@aspeneg.com
Subject: Sunrise Powerlink

Billie Blanchard, CPUC / Lynda Kastoll BLM:

We are writing you in OPPOSITION of SDG&E's Sunrise Powerlink. Some of The Anza-Borrego Desert State Park Areas ARE Protected from Public Access by The Bureau of Land Management.

Allowing SDG&E to bulid Towers across this most sensitive area would be unfair and would Spoil the Natural Beauty of This Vast and Wondrous Area.

As Property Owners on Old Kane Springs Road in Ocotillo Wells Our land will be Useless IF the Proposed "Preffered Route" through Anza-Borrego Desert State Park is approved.

Various Health Risks Are of Concern, such as, Electro-Magnetic Fields, Acid Rain from Exposed Cable, Noise Pollution (Hum), Reception of Television Signals, Loss of Use of Telephone and Communication Devices, Soil Contamination, Possible Lightning Strikes Due to 160 foot Tall Steel Towers. Loss of Necessary Wildlife.

We Believe SDG&E CAN BETTER Serve This Community through Energy Conservation Education, Upgrading Existing Generation Plants and Or Building New More Effeciant Ones HERE. Creating More Jobs Here thereby strengthing Our own infrastructure.

THANK YOU FOR YOUR SUPPORT IN OPPOSITION OF Southwest Powerlink!!!

David & Jackie Nichols

460 Ramona Avenue

Spring Valley, Ca 91977

From: John Ruddley [mailto:jruddley@znet.com]
Sent: Sunday, February 24, 2007
To: sunrise@aspeneg.com
Subject: CPUC/BLM/Sunrise Powerlink Comment

2/24/07
John Ruddley
30+ Years, Borrego Springs Resident
P.O. Box 24 [541 Circle J Drive]
Borrego Springs, CA 92004
760-767-4225
jruddley@znet.com

Please. I tell you. The proposed Powerlink corridor is a continuation of the Californication of California. Please. Make it go away. We, for all our intelligence forever continue to foul our nest.

Hello. Beauty is in the eyes of the beholder. One might view a city as beautiful while another scorns it. A visually unimpeded desert vista, essentially a wild and threatening environment to many people, is as absolutely beautiful and welcoming as an unimpeded mountain vista, flowing with water and abundant in wildlife and vegetation. It is just a matter of perspective.

How is it that a beautiful place can be destroyed when intellect is at the helm? Money? Greed? Ignorance? Perceived need? The process of destruction of our most beautiful places is pernicious, kind of like pernicious leukemia. It is slow but steady and ultimately it destroys. Look at the Los Angeles Basin. The San Joaquin Valley. A prominent example for me, having lived in San Diego county for over 35 years is the development of Mission Valley. Such a blasphemous waste of the San Diego River Valley. And here in Borrego Springs, the air pollution that wasn't apparent when I first moved here that spills over the Coyote Canyon "divide". Light pollution. Noise pollution.

Will it ever stop? Thank you.

John Ruddley
2/24/07 11:59 PM

February 24, 2007

Gordon Shackelford
9716 Red Pony Lane
El Cajon, California 92021
619-561-6323

Billie Blanchard, CPUC
Lynda Kastoll, BLM
C/O Aspen Environmental Group
235 Montgomery, St. Suite 935
San Francisco, California 94104
FAX 866-711-3106

Re: Second Round of Scoping Meetings on Alternative to the proposed
Sunrise Power Link

I support the EIR's review of various "non-wire" and system alternatives. My basic concerns with proposed Sunrise Power Link are in the following areas:

1. COST The proposed power line has a projected cost of approximately \$1.4 Billion, a very large amount of money that, in itself, produces no electricity. It is, in essence, an expensive extension cord to what?

2. SOLAR? There are several serious issues that should raise questions about the viability of the Sterling Energy Project.
 - A. Sterling Energy always seems to be "3 months" away from submitting an application to the CPUC.
 - B. The Sterling Energy Project would use an unproven technology, rather than the more proven solar tower technology. This would be their problem, except that California Rate Payers are being asked to pay for a \$1.4 Billion Power Link to reach their project.
 - C. The proposed location for the Sterling Project appears to be located in a relatively poor solar location, the western portion of the Imperial Valley. Since the Sterling Solar Plant would use sunlight concentrating collectors, any sunlight that is scattered by clouds, dust or air pollution is lost – a serious performance concern. When I ask Mr. Avery about my concerns regarding Sterling's technology and location, he told me that if Sterling doesn't produce, SDG&E doesn't pay. I followed up by asking him about the usefulness of the Sunrise Power Link if the Sterling Project fails. Mr. Avery responded that there is a very large amount of geothermal energy in Salton Sea area.

SDG&E has selected a Solar Energy Project to justify the Sunrise Power Link that uses unproven technology. Further, the apparent location is in an area that is relatively poor for sunlight concentrating solar thermal electric systems.

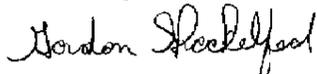
3. Geothermal? There are several issues that need to be reviewed to see if connection to geothermal resources in the Salton Sea area provide a viable "back-up" justification for the Sunrise Power Link.
- A. California has experienced a massive decline in production of the Geysers Geothermal Field in Northern California due to excessive harvesting of geothermal heat. What is a reasonable long-term projection for the amount of geo-thermal electricity that can be produced in the Salton Sea area?
 - B. Given an answer to 3A, above, how much long-term geothermal production is available after the electric production by existing, CPUC approved and projects submitted to the CPUC are subtracted?
 - C. Does SDG&E or Sempra have any long-term geothermal energy contracts with existing, CPUC approved or projects submitted to the CPUC in the Salton Sea area?
 - D. Does SDG&E or Sempra control, own or lease, land in the Salton Sea Area with proven geothermal resources?

In consideration of the issues above related to Salton Sea Area geothermal electricity, it appears to me that SDG&E's share, if it exists, would not justify a expenditure by California Rate Payers of \$1.4 Billion.

4. Utilization of the existing Southwest Power Link Recently it has been announced that California will no longer allow long-term electricity contracts with out-of-state coal-fired power plants. As a result, excess capacity on the existing Southwest Power Link should be expected. This excess capacity could then be used to transport renewable energy from Imperial Valley to SDG&E.

The proposed Sunrise Power Link should only be built if substantial renewable energy resources in Imperial Valley, that are contracted by SDG&E and cannot be transported over the Southwest Power Link exist. This is not proven at this time.

Sincerely,


Gordon Shackelford

From: CE Shimeall [mailto:ceshimeall@znet.com]
Sent: Saturday, February 24, 2007 12:03 AM
To: sunrise@aspenerg.com
Subject: Powerlink comments

Gentle people:

The following brief comments are forwarded from the viewpoint of my considerable experience as a privileged inhabitant of this earth (who has lived and worked as a professional geologist -19 years-and as a college Professor of Geology and Natural Resources -18 years-. In addition, I have lived in Borrego Springs from January '93 to the present (3 1/2 years in Tubb Canyon).

The proposed alternative routes for the Powerlink through all sections of Anza Borrego Desert State Park should NEVER be considered. My reasons for opposition include all those you have previously heard from ie. Bill Collins, Lauri Paul, and hundreds of others who have registered opposition to this project.

I favor the idea of inbasin solar generation and also "out of the box thinking" about 'non-wire alternatives' to resolve the problem (if it can be proved that there is a problem).

We need to look to a solution where we can all win, but the Powerlink plan makes losers of everyone. They do not factor in the eventual long term losses if this line is built. More and more, we experience people (resided and/or visitors) who want to use wilderness as a therapy .

The construction of a powerline in this corner of California would be an extension of the source of their discontent into this pristine desert location.

Continue to fight for 'doing the right thing'.

Clark M. Shimeall
P.O. Box 1022
Borrego Springs, CA 92004
Telephone (760) 767-3272)

From: Cynthia Soller [mailto:csoller@earthlink.net]
Sent: Saturday, February 24, 2007 09:46 PM
To: sunrise@aspenerg.com
Subject: Powerlink

I wish to add my voice to those vehemently against the SDG&E Powerlink for all the reasons given over and over. I believe there are a variety of other means to produce and distribute the energy we need. Not the least of these is energy efficiency!!!!!! But also, solar, geothermal, biomass, etc. produced close to where it is needed and according to what works best in each area. An additional benefit to this, which I haven't seen mentioned but should be considered, is that more local energy production would keep our society going in case of an attack or accident on large power production or transmission facilities. So I strongly support these and "non-wire alternatives" spoken of in the latest Borrego meeting.

Thank you for your work,

Cynthia C. Soller

PO Box 840

3299 Frying Pan Rd.

Borrego Springs CA 92004

DENIS TRAFECANTY
PO Box 305, Santa Ysabel, CA 92070
760-703-1149

February 24, 2007

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

RE: PROPOSED SUNRISE POWERLINK SCOPING COMMENTS

Dear Ms. Blanchard and Ms. Kastoll,

Thank you for the opportunity to provide the CPUC and the BLM with EIR/EIS scoping comments regarding the alternatives to the proposed Sunrise Powerlink Project. As you both know, I attended all the Scoping meetings in February, 2007 and I also attended the State Parks Commission Public Hearing. In addition, I have been attending numerous Planning Group meetings in the South County Inland to better understand their concerns about this project. I've gained a lot of knowledge from the landowners in both North and South County Inland as well as the communities of Carmel Valley and Rancho Penasquitos. My comments reflect the concerns of the landowners in these communities.

1. No Wires Alternative – We really don't need this proposed Sunrise Powerlink. We need you to take a hard look at the bundling of in area all-source generation, energy efficiency, in area renewable generation, transmission upgrades, demand response as well as conservation. Let's think about all the comments we heard out in the communities.
2. Imperial Valley (IV) – I remember the school teacher and mother from Imperial Valley that worried about all the air pollution coming from Sempra's dirty power plants south of our border. I remembered about the asthma problem for old people as well as young people here. And guess what! It affects the middle age people as well. This asthma health problem has not yet been properly investigated, and it's a significant health hazard for the IV. And what about the economy of IV? Also, the dairy farmers have stated that it has been proven that the fertility of their cattle will be impacted as a result of these T lines. If it has been proven, as stated by those farmers, shouldn't this be investigated further? The answer is not to circle around the existing ranches in IV. Other ranchers want to bring their cattle operations to this area, so this T line will prevent them from doing so. This T line will impact the economy of IV.
3. Anza Borrego Desert State Park – Yes, the Crown Jewel, with it's endangered species, the namesake of the Park – the Big Horn Sheep. We really don't know if these T lines will affect their migration, yet we are going to proceed anyway? What research have you done to determine whether the Big Horns will be impacted? There are experts that track these herds. There are undoubtedly some in the Park, and there is one I know about in the High Sierras. Have you spoken to them? Don't we need these reports and analysis before we proceed? Do you really think the CPUC will fix this problem by going underground? Today three of us ran for six hours up and down Grapevine Canyon Road. I cannot imagine a 500kV line going through this canyon, whether underground or the huge towers. There will be roads going all over the place, permanently scarring the Park. What about a report in the EIR/EIS on the effects of permanently scarring the Park with all these extra roads? Can we consider that issue? And how about all those people past

and present who donated additional lands for the Park with the understanding that those lands will be kept in a natural and pristine state? What shall we tell them now? Do we tell them that the population for In Basin San Diego is increasing, and we need to run a T line through our Park to take care of their power needs? Our Forefathers gave us this wonderful opportunity to experience this lovely Park in such a pristine state, and to enjoy it for the rest of our lives, and the lives of our children and their children and their children..... Now what legacy do you want to have for yourselves? Do you want to be the first ones in the history of our Country to designate this beautiful wilderness? Is this what you want the future inhabitants of the rest of our world to remember about you? Will you succumb to the Greed of an Investor Owned Utility (IOU)? You will let this utility company run Dirty Power from Mexico right down the heart of our Park? Yes, Dirty Power. Those Stirling Engines have been around for years and years, and the Company has never proven to anybody that they can produce this energy commercially. So, shall we build the T lines anyway? Shouldn't you be absolutely sure that this project isn't just an IOU Bait and Switch?

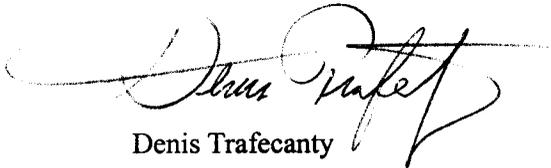
4. Our Landowners in Grapevine Canyon, Tubbs Canyon, San Felipe Valley, Ranchita, Lake Henshaw, Mesa Grande, Julian, Wynola and Santa Ysabel – Over generations and generations, these landowners have kept their lands in an Agricultural Preserve State under the Williamson Act. Isn't it still very beautiful because of this? We should be proud of our Forefathers who had the foresight leave their lands this way for our pleasure as we drive, hike, bike or run through this remote backcountry. Now what will your legacy be to our visitors from all world who enjoy this beautiful land as they drive to Anza Borrego? Should we keep it the way it is, or should we listen to the words of our IOU? By the way, why is this proposed T line so far north of In Basin San Diego at this point? Could it be that our IOU has their eyes set to the north (LA, Riverside, SB and OC)? Can we trust this IOU, just like we did during the So Called energy crisis? Oh yes! What about the Bald Eagles and Golden Eagles that are nesting in this area? Shouldn't we do some research to see if this T line may have a serious negative impact on their efforts to come back to this beautiful backcountry? Did you know that there are many areas (not just one or two) where these spectacular birds are nesting here? Shouldn't there be further investigation? What about the beef cattle? Who knows for sure that this T line will negatively affect the fertility of these cattle? Has there been a study on this? Shouldn't there be a study? And what about the possibility of another fire in this area? Do you know that we had a fire due to a downed power line in a windstorm late last year? Luckily for these landowners, the fire captain chose to attack the fire head on and was able to knock it down using an airplane at very low altitude. This stopped the fire from burning homes and watershed in communities to the west, like Ballena and Ramona. But will firefighters be able to knock down fires in the future if we have 160 foot T lines going across our lands? Don't we need to research this further? Also, what about the heliports in the backcountry? Will we still be able to land helicopters at night (or even in daylight) when there is a medical emergency in places like the helipad in Santa Ysabel? Or will we lose this opportunity to perform air rescue operations, which will result in the loss of the lives in an emergency?
5. Ramona, Ballena, San Diego Country Estates and Mussey Grade – These landowners are very afraid of the possibility of another devastating fire like the Cedar fire. What studies have been performed to assure our landowners that these T lines could cause another fire, or could prevent firefighters from been able to knock down a fire due to T line interference? Much of this land hasn't been burned in 50 years, and could ignite as a result of downed T lines. There needs to be much research to prove that these T lines are not a serious fire hazard.

6. South County Inland – These communities (Boulevard, Jamul, Dehesa, Descanso, Harbison Canyon, Pine Valley, Crest, Alpine and Granite Hills) have recently learned about the possibility of the proposed T line going right through their communities. Many of these communities experienced a devastating fire a few years ago, and they are very worried about a similar occurrence with the possible construction of T lines in their remote back country. Fire is a serious threat to these communities. Fire departments have indicated to them that they may be unable to fight fires in their areas, especially considering the possibility of additional T lines in their area.

7. In Basin San Diego – What we seem to be forgetting is that the need for power is an In Basin need. There is no need for this power in the no growth remote back country. The 2030 Energy Working Group put together a plan to meet the needs for new power sources in the basin. T lines were not considered a necessity until all the potential sources for power in item 1 above were considered first. The cold hard facts are that the Basin needs energy for the future, so the Basin must address this issue. Running 150 miles of power lines over our remote back county to satisfy the In Basin thirst for power is not the answer. It doesn't matter which possible route is chosen. The sun does shine In Basin, so renewable energy can be produced there. So let's quit talking about routing and let's start talking about In Basin power generation. The investors for In Basin power generation, including renewables, energy efficiency, conservation, as well as transmission upgrades and demand response are standing in line to provide this energy for San Diego.

Thanks for considering these comments.

Regards,



Denis Trafecanty

Mr. Trafecanty attached a copy of the Conservation Groups' 2/23 comment and signed, "Agreed."

DENIS TRAFECANTY
Po Box 305, Santa Ysabel, CA 92070
760-703-1149

February 24, 2007

Billie Blanchard, CPUC / Lynda Kastoll, BLM
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

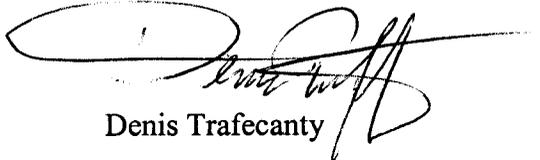
RE: Notice of Second Round of Scoping Meetings on Alternatives to the Proposed
Sunrise Powerlink Project

Dear Ms. Blanchard and Ms. Kastoll,

Enclosed please find copies of the signed petitions gathered by members of Communities United for Sensible Power (CUSP) at an Earth Day Event and from three merchants in Santa Ysabel over only a few months time. The CUSP members and merchants continue to gather signatures and are realizing that the majority of people, once they know the truth about this proposed project are more than happy to sign the petition opposing the proposed project.

The opposition to the proposed project continues to grow among the general public. Please consider the views of the signees and accept these petitions as more evidence that the proposed project should not be approved, and that a non-wires alternative is the right and only solution to preserving our future.

Regards,



Denis Trafecanty

Note from the EIR/EIS Team: The following page is a sample of the petition. Only one page is included as a sample to reduce printing cost, redundancy, and use of space. While not all signatures are shown, all contact information has been retained for reference.

COMMUNITIES UNITED FOR SENSIBLE POWER

- CUSP -

WE, THE UNDERSIGNED, OPPOSE SDG&E'S SUNRISE POWERLINK TRANSMISSION LINE PROJECT. WE AGREE WITH COMMUNITIES UNITED FOR SENSIBLE POWER THAT THERE ARE BETTER ALTERNATIVES AVAILABLE FOR PROVIDING RENEWABLE, RELIABLE AND INEXPENSIVE ELECTRICITY TO MEET SAN DIEGO COUNTY'S ENERGY NEEDS NOW AND IN THE FUTURE. ADDITIONALLY, WE DO NOT BELIEVE SDG&E SHOULD BE ALLOWED TO USE ANZA-BORREGO DESERT STATE PARK AS A CONVENIENT ROUTE TO INCREASE SEMPRRA ENERGY'S PROFIT.

SIGNATURE	PRINTED NAME	ADDRESS	EMAIL
<i>Rebecca Gray</i>	Rebecca R Gray	8365 Morand Mist Ct. San Diego CA 92119	rebecca.gray@cox.net
<i>Carol Foyxell</i>	Carol Foyxell	1634 Columbia St. Anzola Vista CA 91913	
<i>Douglas H Clements</i>	Douglas H Clements	260 Via Solana Fallbrook, Ca 92028	
<i>Mary Newfield</i>	Mary Newfield	12649 Darkwood Rd. San Diego CA 92129	
<i>Susan Roseman</i>	Susan Roseman	9810 Bonita Vista Mt Mesa, CA 91541	
<i>Cornie Dalton</i>	Cornie Codon	31202 Hickorywood Way Lake Forest, CA 92630	
<i>Judy Snow</i>	Judy Krouse	3665 Old Star Ave 128 Warner Springs, Ca. 92086	
<i>Valerie Ashley</i>	Valorie Ashley	PO Box 2020 2020 Third Street Julian CA 92056	
<i>Janet S. Anderson</i>	Janet S. Anderson	1121 Madison Ave Apt D Anzola CA	
<i>Roberta Mann</i>	Roberta Mann	18875 Quince Ct Fountain Valley	

From: Dave Voss [mailto:dwvoss@cox.net]
Sent: Sunday, February 24, 2007
To: sunrise@aspeneg.com
Subject: Comments On Alternatives Scoping for Sunrise Powerlink

Billie Blanchard, CPUC
Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002
sunrise@aspeneg.com

Dear Ms. Blanchard and Kastoll:

I would like to commend you on your efforts to evaluate alternatives to the project. The number of alternatives considered is impressive. However, the hardest work is yet to come. SDG&E is pouring money into making it's alternative look the best. These other alternatives do not have this benefit. It is up to the CPUC and BLM to represent the people and the environment, because we know that SD&E/Sempra will not do that.

SDG&E/Sempra would have us make a choice between State Park and National Forests, between desert and forest, between State Wilderness and Proposed Federal Wilderness.

Of course there are many alternatives and combination of alternatives, as the 100 or so identified can attest. SDG&E/Sempra wants us to stay in this binary paradigm. We must reject both and look for the real alternatives.

SDG&E/Sempra dismiss real alternatives out of hand, seemingly without even giving them a serious consideration.

- Re-power of Encina and/or South Bay Power Plants
- Conservation
- Local solar
- Impact of other transmission lines that are being planned such as the Green Path line

We all know that SDG&E makes money by building new transmission lines. That guaranteed rate of return on \$1.3 billion looks awfully nice to the shareholders.

The primary goal for SDG&E/Sempra is to make money for it's shareholder.

It does not care if by doing so the environment and ratepayers be forced to pay for an unneeded transmission line. They will still make their guaranteed rate of return.

Should the environment and ratepayers pay when SDG&E starts buying power from their own power plants after the solar plants never materialize?

Should the environment and people believe SDG when they won't buy power locally (from power plants they don't own) but they claim we will run out of power?

Should we believe SDG&E/Sempra when they claim they are bringing power to San Diego, but they run the line from South county all the way to Warner Springs?

SDG&E/Sempra says this line is too difficult to build anywhere else. This line should be difficult to build. This line should be the last resort. We would exhaust all other non-wire alternatives before even considering building this line.

What's the hurry? The proposed solar power plant in the desert hasn't even filed an application yet? Could it be that SDG&E is worried that if it waits too long these other alternative will happen on their own (without \$1.3 billion of our money on their pocket?)

Any alternative that enters or border State Parks, Wilderness Areas, Inventoried Roadless Area and/or National Forest are unacceptable. These areas are priceless and irreplaceable.

The No Wires alternatives are by far the nest alternative. But I think you should not believe SDG&E when they say that they can not underground 500 KV lines. If you look at the LEAPS project, Nevada Hydro has proposed undergrounding 5 miles of 500 KV lines (carrying 1000 MW) in the rugged and steep Santa Ana Mountains. How can one company say that this technology is doable and another company says it is impossible?

Don't listen to those that are just trying to make money. Take a look at the Siemens Gas Insulated Line (GIL) technology that Nevada Hydro is proposing to use.

SDG&E says that some alternatives are too expensive. But where do we draw the line. Of course it's "cheaper" to build a line in wilderness - but what is the cost to future generations?

David Voss
502 Springfield Ave
Oceanside, Ca 92057
760-630-1070
dwvoss@cox.net

--

Dave Voss
dwvoss@cox.net

From: Mike Voss [mailto:hikingmikev@yahoo.com]
Sent: Sunday, February 24, 2007
To: sunrise@aspenerg.com
Subject: Sunrise Powerlink Opposition

February 24, 2007

Billie Blanchard
CPUC
Lynda Kastoll
BLM

Dear Ms. Blanchard and Ms. Kastoll,

The scope of the impacts of the proposed Sunrise Powerlink through the Anza-Borrego Desert State Park is tremendous. About 90 percent of the California State Wilderness System is located in two-thirds of the ABDSP. 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 viewsheds -- more than 90,000 acres of viewshed 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! State wilderness held in public trust is not a commodity to be traded for "energy security," no matter how well-intended.

Additionally, noise levels emanating from the lines would also destroy the surrounding silence and the electromagnetic field from the lines, as well as the towers and lines themselves, may adversely affect humans and animals in close proximity -- including our Federally-endangered peninsular bighorn sheep, golden eagles, and Swainson hawks.

One of the great features of the world class ABDSP is its sense of timelessness and its very silence. My wife and I can look upon the same vistas that ancient peoples saw and that future generations will also behold. A 500kV line through the park would destroy this timeless connection to the past and future.

We strongly oppose the Sunrise Powerlink.

Sincerely,
Michael & Jennifer Voss
3250 Broken Arrow Road
Borrego Springs, CA 92004-0268
(760) 767-5794

From: Wang, Martin [mailto:mgwang@qualcomm.com]
Sent: Saturday, February 24, 2007 04:56 AM
To: sunrise@aspenerg.com
Subject: Scoping Comment to CPUC/BLM

Hi Billie/Lynda:

I'd like to comment on the second round of scoping meeting on alternatives for Sunrise Powerlink EIR/EIS.

I will still oppose the retained coastal link alternatives (Fig 6). For us in this neighborhood seem have no choice - few alternatives still going all the way along "Park Village Rd" in Rancho Penasquitos. Few major concerns:

- * This is the *main*/only street we commute in/out the Park Village neighborhood --> please don't put a powerline under here.
- * The proposed route will just go next to Park Village Elementary school. We have concern of safety and health of our children. Many families live around here and children go to this school.
- * Along Park Village Rd, seems in many sections the route is very close to houses. Again, what was the initial environment assessment that has been done? (by SDGE)

Thanks,

Martin

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: donnatisdale [mailto:donnatisdale@hughes.net]
Sent: Sunday, February 25, 2007 11:52 PM
To: sunrise@aspenerg.com
Subject: geothermal impacts

I realize my comments are a day late, but that does not change the facts. The Sunrise Powerlink proposes to use so-called clean alternative energy.

Please consider these impacts created by geothermal activities in Imperial County as reported to me by a former employee in this field. This information was reportedly developed as part of a site characterization report (unsure of date) for the Gemcor Project located at 950 Lindsey Road, Calipatria, CA:

a.. Geothermal wells create hazardous conditions with residual brines with high levels of metals.

b.. Geothermal brines in a 65 acre evaporation pond reportedly resulted in 132,000 tons of residual salts with elevated levels of lead, arsenic and barium.

c.. Arsenic levels reportedly reached 750 mg per Kg.

d.. Lead levels reportedly reached 1200 mg per Kg.

e.. These high levels require that these brines be treated as hazardous material.

f.. There was some reported groundwater contamination as well.

g.. Not sure what the emissions were from the evaporation ponds.

It is my understanding that the existing Southwest Powerlink was built on the premise that it would move power from geothermal plants in the Imperial Valley.

It is my personal experience that geothermal leases were not renewed when federal subsidies were removed and geothermal could not compete with lower oil prices. Now the same ploy is being used for the Sunrise Powerlink. What is different this time around? Where are the new wells? How much energy is being produced from new wells? What happens when the subsidies for alternative energy are pulled like they were in the 80's? What types and rates of contamination occur from these geothermal wells and plants? Where will the new evaporation ponds be sited? Where will the hazardous residual waste be disposed of and at what cost? Inquiring minds want to know.

Sincerely
Donna Tisdale
619-766-4170
donnatisdale@hughes.net
P.O. Box 1275
Boulevard, CA 91905

From: mike durrant [mailto:surfendoc@yahoo.com]
Sent: Monday, February 26, 2007 7:44 PM
To: Blanchard, Billie C.
Subject: SDG&E

Hello,

I have been coming to Borrego Springs, and the surrounding park, since I was 18 years old, almost 42 yeras ago, and about three years ago, decided to spend a significant amount of time here. This unique area of San Diego County is the most beautiful desert, not only in southern California, but literally anywhere on the west coast. Anyone that has spent more than a few days here, comes to the same conclusion. It needs to be kept that way, for our children and for generations to come. SDG&E has a long history of putting its own self interest in front of those it is supposed to serve, and it seems only appropriate and right that they not be allowed to determine what again is best for them, at the expense of all of us that treasure this great area. I hope that you will make the decision to preserve this wonderful treasure/

Professionally,
Michael Durrant DPM, MPH

From: joemoe@cox.net [mailto:joemoe@cox.net]
Sent: Monday, February 26, 2007 7:05 PM
To: Blanchard, Billie C.
Subject: Borrego Springs - Please do not allow Powerlink

Dear Ms. Blanchard

Our family has enjoyed the unspoiled Borrego Springs area for over 20 years because of it's unique and unspoiled beauty. We camp, hike, and own a condo and 2nd home in Borrego Springs. We currently drive out to Borrego 3 out of 4 weekends from San Diego to enjoy the State Park and Foundation activities. We respectfully request that the Powerlink lines not go through the State Park and highway 78.

Thanks

Joe Tatusko & Maureen Kirby

From: mjfinnane@juno.com [mailto:mjfinnane@juno.com]
Sent: Tuesday, February 27, 2007 3:20 PM
To: Blanchard, Billie C.
Subject: Sunrise Powerlink

Dear Ms. Blanchard,

I find the actions of SDG&E to put the Sunrise Powerlink through the Borrego Valley to be unnecessary and completely wrong. Not only does it destroy some very sensitive land but will also put at risk some of the wild animals that live there. So many people have spent a great deal of time and money for decades to preserve the quality of the Valley and to think that SDG&E will come in and build these huge towers across the valley is a huge mistake. I would appreciate your help in getting SDG&E to realize that this is a mistake and put the lines in much less sensitive areas.

Thank you for you help,
Michael and Susan Finnane
4845 Desert Vista Drive
Borrego Springs,CA 92004

From: Pat McArron [mailto:ptmcarron@cox.net]
Sent: Tuesday, February 27, 2007 04:41 AM
To: bcb@cpuc.ca.gov
Cc: 'Mark Jorgensen', sunrise@aspeneg.com, public.advisor@cpuc.ca.gov,
public.advisor.la@cpuc.ca.gov, webteam@ios.doi.gov,
info@borregospringschmaber.com
Subject: SDGE Powerlink impact
Importance: High

Attn: Ms. Billie Blanchard, California Public Utilities Commission

Billie,

I have some possibly new and deffinitely significant information regarding the proposed Sempra SDGE Powerlink.

It has come to my attention that in addition to having a significant impact on the largest state park in the United States & BLM Wilderness Land, the Powerlink project would also significantly impact a National Historic Trail - the Juan Bautista de Anza National Historic Trail.

For more information on this visit the Dept of the Interior - National Park Service website on this trail:
<http://www.nps.gov/juba/index.htm>

Sincerely,
Pat McArron
PO Box 124797
San Diego CA 92112-4797
619-865-4702

From: peter shapiro [mailto:borregomax@yahoo.com]
Sent: Tuesday, February 27, 2007 5:58 PM
To: Blanchard, Billie C.
Subject: Powerlink

Ms. Billie Blanchard
California Public Utilities Commission

Dear Ms. Blanchard,

I will make this short since I imagine you have received quite a bit of communication from people opposed to SDG&E's Powerlink through the Anza-Borrego State Park and environs. I want to add my name to the list of highly incensed people who find the pressure tactics and bullying of SDG&E an appalling abuse of power, pun intended. And, I am one of many who love the Borrego Springs area for what it doesn't have, super highways, traffic lights, chain stores and ugly high tension wires disrupting the absolute and uncompromised beauty of miles of natural desert. I have been visiting the Anza-Borrego area for over 20 years and also have a home at Montesorro, in Borrego Springs. The reason I and many others are there rather than Palm Springs area is because Borrego has retained its charm and openness to nature unfettered by huge and ungainly man-made objects such as the structures SDG&E proposes.

I implore you and the PUC to reject all attempts by SDG&E to erect a Powerlink anywhere through the Park or its environs.

Sincerely,

Peter M. Shapiro
3735 Cody Rd
Sherman Oaks, CA 91403
818 784 2184

From: gfderms@aol.com [mailto:gfderms@aol.com]
Sent: Wednesday, February 28, 2007 7:19 AM
To: Blanchard, Billie C.
Subject: SUNRISE & BORREGO

DEAR MS. BLANCHARD...

I AM WRITING THIS LETTER FROM BARCELONA ON A 4 MONTH TRIP
ACROSS EUROPE .

WHY RAPE NEW LAND..LAND THAT EVEN HERE IN EUROPE PEOPLE
COMMENT TO ME ABOUT, YES, MORE EUROPEANS THAT YOU COULD
BELIEVE KNOW ABOUT AND HAVE VISITED LITTLE BORREGO AND
COMMENT HOW INCREDIBLE IT IS THAT WE HAVE PRESERVED THIS
LITTLE TOWN, A GATEWAY TO OUR BEAUTIFUL DESERT. ONE NEED ONLY
RIDE OUT FROM BORREGO TO THE SALTON SEA AND COMING UP OVER
THE RISE SEE WHAT A BLIGHT EVEN ONE TALL TOWER CAN BE....THE
FIRST TIME I SAW THAT TOWER I HAD TO GET OUT AND TOUCH THE
FENCE, WONDERING WHO MADE THIS DECISION...THEN I SAW IT WAS
RIGHT ON THE LINE OF THE STATE PARK AND KNEW IT WAS THOSE THAT
DID WHAT THEY COULD GET AWAY WITH.

STEWARDSHIP...THIS IS WHAT WE TEACH THE IMPORTANCE OF TO OUR
CHILDREN...THAT MEANS PUTTING SOMETHING THAT IS SEEMINGLY
DEFENSELESS FIRST. CARING FOR SOMETHING PRECIOUS, THIS LITTLE
SPOT THAT IS NOT IMPORTANT TO SDGE, BUT IT IS A JEWEL THAT EVEN
PEOPLE 7000 MILES AWAY ACKNOWLEDGE.

DO NOT LET THIS HAPPEN TO BORREGO..., DON'T WALK INTO INNOCENT
LAND , USE IT , RAPING IT IN THE PROCESS AND NOT THINKING BEFORE
YOU PLUNDER IT. WHERE ARE THE WISE PEOPLE IN THIS COMPANY.

I, AGAIN, AM SHOCKED AT THE BEHAVIOR OR SDG&E. THEIR BOTTOM
LINE SHOULD BE THE COMMON GOOD, I.E. USING ROUTES THAT THEY
ALREADY HAVE TO DO WHAT THEY HAVE TO DO...

ANN DERMODY
BARCELONA, SPAIN
2.28.07

From: LBluesman@aol.com [mailto:LBluesman@aol.com]
Sent: Wednesday, February 28, 2007 12:38 PM
To: Blanchard, Billie C.
Subject: Powerlink

Please stop the Sunrise Powerlink Project from going through state parks, deserts, and protected lands. It's time for officials to stand up for the people & listen to their wants and needs. As elected or appointed officials you can help make the people's voice heard. Please stop this project and have SDG&E place the Powerlink where it doesn't destroy valuable protected lands. Wouldn't it be nice to leave these beautiful areas intact for our children, and future generations? Thank you for your time & consideration.

Larry D. Luers
1620 Las Casitas
Borrego Springs, CA

From: Nancy Zadrozny [mailto:nzadroz@cox.net]
Sent: Wednesday, February 28, 2007 01:10 AM
To: sunrise@aspeneg.com
Subject: Oak Hollow Underground Alternative

Dear Sirs,

I live and ride horses on the Mt Gower/Starlight Mountain Trail system. I am concerned about the overhead utility lines proposed for this area. These towers and overhead lines will surely impact the open, natural beauty of this area. Please utilize the Underground Plan in order to maintain this open space in it's pristine condition for all who use it.

Sincerely,

Nancy Zadrozny

24738 Gallineta Way

Ramona CA 92065

March 1, 2007

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

Re: SDG&E Sunrise Powerlink

Dear Ms. Blanchard:

I strongly urge you to permanently reject SDG&E's proposed Borrego Valley route for its Sunrise Powerlink transmission line. My weekend residence in Tubb Canyon is at the center of the bull's eye for this project. I have more than a fifty year association with the house and property, which has been the backdrop for everything from saying my marriage vows to the scattering of a loved one's ashes. Losing those memories, the house, and its unique desert setting would be devastating for my entire family.

Of graver consequence than my personal loss, however, would be the sacrilege of diminishing parts of Anza-Borrego Desert State Park and its wilderness regions with this terrible scheme. My grandfather, Clinton Abbott, was one of the early advocates of our state park system. As director of the San Diego Natural History Museum (1922-1946), he and his colleagues recognized the incomparable value of our local desert and pressed hard to protect it for subsequent generations. To this day, a cascade in Borrego Palm Canyon bears his name.

Every time I visit Borrego, I thank him for his foresight. As a proud descendant of one of the Park's architects, I feel obligated to protect for my grandchildren that which was saved for me. There are alternatives to solving San Diego's potential energy problems, but there is only one Park, and it is irreplaceable. Compromising any part of it for private corporate profit or convenience is lunacy, and spoiling a wilderness area that hosts endangered bighorn sheep would be criminal.

Please don't be party to the desecration of, not only the state's finest desert park, but the spiritual landscape for thousands of Californians.

Respectfully,



Bill Evarts
1831 Lendee Dr.
Escondido, CA 92025
760-746-5710

From: Pat McArron [mailto:ptmcarron@cox.net]
Sent: Thursday, March 1, 2007 07:53 PM
To: sunrise@aspeneg.com
Subject: Sunrise Powerlink

Dear Billie & Lynda,

Regarding the continuing discussion on the proposed SDGE I have some further thoughts to share:

The argument continues to be: A) Is there a need for this power line & B) If yes - where should it go?

The original premise that SDGE continues to put forth is that the Power line is the ONLY solution to the problem. That premise continues to be false because all other alternatives have not been thoroughly explored by SDGE. In its deliberations I am hopeful that the CPUC, BLM, State Park Service, National Park Service & other government agencies will note that there ARE viable alternatives to constructing another power line and a power line should be a last resort. In addition to the irreparable damage this line will cause to the environment on various levels, it does not eliminate Southern California's dependence on outside sources for electricity. The obvious alternative to the power line is to utilize all possible sources that will produce electricity locally and utilizing renewable resources: wind, water (ocean currents), and solar (lots of sunshine in southern California).

In all of the discussions on this topic I can't help but imagine how our dependence on more electricity would be lessened if the power companies would invest in solar panels on commercial and residential rooftops. In this day and age it is inexcusable NOT to utilize the advanced technology available to us now. It is time to think outside the box.

In addition there continues to be a tremendous waste of electricity by businesses that leave lights on in high-rise towers day and night. A waste of energy - pure and simple. From my own high-rise condo in downtown San Diego I see building after building with lights on all night long and for NO reason at all.

Another area of energy conservation that needs more attention is the replacement of incandescent light with fluorescent light. Fluorescent lighting alone uses 70 % less than incandescent. Imagine the reduction in power consumption that would result if businesses and residences made the switch where ever possible. I have made the change in my own home.

Respectfully submitted,
Patrick T. McArron
550 Front St # 804
San Diego CA 92101
619-865-4702

From: charlie [mailto:dogbitten1@cox.net]

Sent: Friday, March 02, 2007 8:18 PM

To: Blanchard, Billie C.

Subject: power line

I have looked at the maps of the new power lines that are being proposed by sdge. Looking at the maps any 2 year old can see the direct route with the interstate 8 would cause the less damage to the environment and property loss.

Charles petrach

Resident of Borrego springs

From: charlie [mailto:dogbitten1@cox.net]
Sent: Saturday, March 3, 2007 03:37 PM
To: sunrise@aspeneq.com
Subject: power line

I think any two year old can see that running the power lines next to the interstate 8 would cause the least amount of property damage and environmental damage.

Charles petrach

Resident of Borrego springs ca

From: BettyBackus@aol.com [<mailto:BettyBackus@aol.com>]
Sent: Monday, March 05, 2007 5:20 PM
To: Blanchard, Billie C.
Subject: SDG&E Sunrise Powerlink

Dear Ms. Blanchard,

I am a home owner in Tubb Canyon, Borrego Springs, and I am very confused.

I attended both the CPUC Scoping Meeting and the California State Parks meeting held for the public at the Borrego Springs Resort in February. At both meetings the response of the people attending was overwhelmingly against the Sunrise project as planned, and especially against going through Anza Borrego State Park.

The information put out by the CPUC states that the purpose of this second round was to inform the public about the alternatives for the project. It included descriptions of the routes recommended for retention, and those recommended for elimination. My understanding, from the maps and descriptions, was that Borrego Valley and Tubb Canyon, along with many other sensitive routes, were recommended for elimination.

Then, along comes the SDG&E report selecting their "preferred route" through the Anza Borrego Desert and their "alternative route" right up Tubb Canyon!

According to the San Diego Union, the SDG&E is willing to "mollify environmentalists" by choosing the Tubb Canyon route as though this were their only possible option.

Who is in charge? Does the SDG&E really get to overrule the CPUC? I imagine the CPUC and Aspen went to extraordinary lengths to research the situation and come with possibilities that take into consideration the endangered wildlife, respect for open space and wilderness, and the long term consequences of abdicating stewardship of public lands.

Also, I would like to have been informed directly, that the SDG&E intends to drill on the land which is my only source of water and run other tests near the springs where the bighorn sheep get their water. I had to hear from my neighbors and the newspapers. I was not notified.

Please let me know how the situation stands.

Sincerely,

Betty Backus, (858) 792-0529
Mailing address: 1111 Klish Way, Del Mar, CA 92014

5 March 2007

Billie Blanchard, CPUC/Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Comments on the Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project.

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for the opportunity to provide these comments about topics and alternatives that should be included in the Draft EIR/EIS that will be prepared for the Sunrise Powerlink Project (SWPL). We are 25-year residents of the Crest-Dehesa-Granite Hills-Harbison Canyon Subregion of San Diego County, our home is within 300 feet of the proposed corridor for the West of Forest Alternative (WF), and we are personally familiar with about 10 miles of its proposed route.

Most of our comments below focus on specific constraints that we know about concerning the West of Forest Alternative. We oppose this alternative and think it should be eliminated from any further consideration due to the many serious constraints along its route, and due to the many ways that its construction and operation would harm the best public interest.

Comment 1. Sycuan Peak–Sweetwater River Ecological Preserve. The proposed route for the West of Forest Alternative between WF-11 and WF-13 passes through the eastern side of the Sycuan Peak–Sweetwater River Ecological Habitat Preserve, which is State land managed by the California Department of Fish and Game.

This preserve was established with its east boundary contiguous with the west boundary of the Cleveland National Forest, specifically to take advantage of a location where it could be part of a larger region of undeveloped natural habitats. The contiguous public National Forest land on the east side of the Preserve has since changed ownership and is now owned by Sweetwater Authority, which manages it as undisturbed natural habitat to protect the watershed of Loveland Reservoir. The Sycuan-Sweetwater Ecological Preserve has grown through the addition of mitigation purchases to the west and south and now is about 1,200 acres in size. All of its values are significantly increased by the seamless, unbroken habitat connections it shares with the Sweetwater Authority lands to the east (which additionally provide many ecological benefits due to its large lake resource, which is almost entirely free of human recreational impacts). The Preserve harbors a number of sensitive plant and animal species of concern. Its varied habitats are near-pristine, with remarkably little disturbance due to humans or development. It was created by the purchase of Sloane Ranch with voter-approved public bond funds, and enlarged by the purchase of contiguous parcels for mitigation by public agencies using public funds, as well as mitigation purchases funded by private developers.

A 500 kV transmission line on the West of Forest Alternative alignment would significantly disrupt and degrade the high ecological, natural resource qualities of both the Sycuan-Sweetwater Ecological Preserve and the protected watershed of Loveland Reservoir by creating a corridor of disturbed lands between them. This amputation of the Sycuan Peak-Sweetwater River Ecological Preserve from Sweetwater Authority lands by construction of the transmission line on this proposed alternate route would significantly harm the public interest by diminishing the value of the investment of millions of dollars of public and private funds to establish the Sycuan-Sweetwater Ecological Preserve.

The public interest would also be harmed by the Sunrise Powerlink Project creating yet another competing urgent need for additional mitigation elsewhere, if it could even be done, given the diminishing opportunities for comparable lands for accomplishing that in San Diego County. Also, please consider how ludicrous it would be to have to mitigate the loss of all the mitigations already embodied in this Ecological Preserve.

The Sycuan-Sweetwater Ecological Preserve is a State Sensitive Management Area and Potential Special Status Species Habitat, which are high-level constraints identified in the project's refined environmental routing criteria.

Comment 2. Bureau of Land Management Parcel. Immediately south of WF-13 the West of Forest Alternative crosses a 40-acre parcel of Bureau of Land Management Land (APN 5210202100). BLM ownership is a high-level constraint identified in the project's refined environmental routing criteria. This parcel is contiguous with the Sycuan-Sweetwater Ecological Preserve and increases the Preserve's value by adding to the total area of contiguous acres of intact, undisturbed natural habitat owned by the public that is protected from development. Redtail hawks, Golden eagles and other raptors forage there now, but the West of Forest transmission lines would significantly impact these (and many other) ecological functions on this BLM land.

Comment 3. Golden Eagles, Bald Eagles, Other Raptors, and Pallid Bats. The West of Forest Alternative alignment centerline through the Sycuan Peak-Sweetwater River Ecological Preserve is located within 200 feet of an historic, traditional Golden eagle nest site that was recently used and produced three fledging young. Construction, operation and maintenance of a 500 kV transmission line from WF-11 to WF14 over Sycuan Peak and across the head of Sloane Canyon would jeopardize and most likely eliminate any future Golden eagles nesting at their traditional site here. Driving eagles away from a traditional nest site can not be mitigated.

At another site on the Sycuan-Sweetwater Preserve a traditional Redtail hawk nest is located only 800 feet from the proposed alignment centerline. This nest has been used annually with great success for several years, typically producing three fledging young each year. Prior to their current nest, Redtail hawks nested and successfully raised young for decades in another tree in the vicinity, as did Red-shouldered hawks and other smaller hawks, until that tree fell. Since then these other raptors have also relocated their family efforts to nearby trees. Also in the vicinity of the proposed powerline, Black-shouldered kites have been observed pairing, nesting as well as foraging. All of these raptors are not only mating, nesting and feeding in the immediate area, but then their fledging young are trained and practice there as they learn to fly and hunt.

In the immediate area of our concern (WF-12 to WF 13), the Sycuan-Sweetwater Preserve contains and protects the confluence of two different canyons and their watercourses. The topographic differences between the steep canyon walls and the valley bottom at their intersection creates a huge volume of unrestricted airspace in which raptors can freely catch updrafts and ride thermals not only vertically, but also laterally great distances across the canyon.

The 500 kV transmission lines and tall towers would present a significant hazard for flying, soaring, hunting, perching, mating and parenting Golden eagles and other raptors. Bald eagles visit Loveland Reservoir, which is only 600 feet east of part of WF-11 to WF 14, so the West of Forest 500 KV transmission lines would force these aerial species to avoid using significant airspace that is part of their current habitat or face dangerous, potentially lethal hazards. Numerous migrating and resident species of waterfowl, and raptors are attracted to the large Loveland Reservoir, as well as the riparian pools and habitat of the Preserve. One of the permanent deep pools of the Sweetwater River would lie right under the Powerlink transmission lines.

A large roost of Pallid bats is located within a few hundred yards of the WF-11 to WF-14 portion of the West of Forest Alternative. Like the Golden eagles, Bald eagles and other raptors, this population of Pallid bats would be forced to avoid using significant airspace in which they currently fly and hunt, or face dangerous hazards to flying.

The West of Forest Alternative would cause significant, direct, adverse impacts to the populations of all these (and other) species in its vicinity, causing specific harm to populations harbored and protected on the Sycuan-Sweetwater Preserve that can not truly be undone by mitigation actions undertaken there or elsewhere.

Comment 4. California Hiking and Riding Trail. The West of Forest Alternative alignment centerline at WF-13 is less than 600 feet from the California Hiking and Riding Trail in the parcel APN 5210201900. It crosses this historic public hiking and riding trail in the parcel APN 5201000900. Five miles of the West of Forest Alternative transmission lines and towers from WF-10 to WF-15 would be highly visible and intrusive to users of this recreational trail on the portion climbing north out of Sloane Canyon and going along Sycuan Truck Trail to Japatul Valley Road. Creation of this public dedicated State trail that connects to the Pacific Crest Trail was begun in the 1940s, and the segment through Sloane Canyon has survived to the present as a trail through a virtually unpopulated, wild, natural landscape without being degraded by visible, intrusive development. A 500 kV transmission line along the West of Forest Alternative alignment, besides imposing visual and noise impacts to trail-users, would destroy the trail's natural environment, and this could not be mitigated.

The California Hiking and Riding Trail is identified as a moderate-level constraint in the Sunrise Powerlink Project's refined environmental routing criteria. This is a mischaracterization that unreasonably devalues this historic, public recreational trail; the California Hiking and Riding Trail properly should be identified as a high-level constraint on a par with a Designated Recreational Use Area, or with Regional and Local Parks.

Comment 5. Loveland Substation. In the Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project, Figure 8 ("Southwest

Powerlink Alternatives”) depicts a Loveland Substation presumably associated with the West of Forest Alternative just northeast of WF-14. The pertinent text on pages 18-19 states: “...due to SDG&E’s plan for future project phases by 2020 (requiring additional 230 kV transmission lines exiting the new 500/230 kV substation), substation locations near the SWPL were not considered because they would require additional corridors for future 230 kV lines to be identified for service to the northern part of San Diego County.”

If SDG&E has future plans for an expanded Loveland Substation that are linked in any way with the Sunrise Powerlink Project transmission system upgrade, then the Draft EIR/EIS must include descriptions of this substation component of the Project and of associated additional 230kV transmission lines, and it must include analyses of the potential impacts of these future Project components. Neglecting to include anticipated future phases of the Project in the Draft EIR/EIS would be a major violation of the California Environmental Quality Act (and possibly the National Environmental Policy Act as well).

The existing 69 kV Loveland Substation is on the watershed of, and within a few hundred feet of, Loveland Reservoir. If future expansion of Loveland Substation is an anticipated outgrowth of the Sunrise Powerlink Project, then Sweetwater Authority should have been consulted in this Second Round of scoping, and further planning for the West of Forest Alternative should not proceed without involving Sweetwater Authority at this time.

An expanded Loveland Substation would also have significant adverse impacts on the California Hiking and Riding Trail, sensitive biological resources such as Golden eagles and Bald eagles, watershed protection for Loveland Reservoir, and more.

Comment 6. Crestlake Subdivision. Southwest of WF-21 the West of Forest Alternative centerline alignment passes through three parcels of the Crestlake Subdivision (APN 3961300400; APN4022102000; APN 4022101900). This residential subdivision for dozens of homes has been approved for development, but it has not yet been built. The aerial photograph with overlays depicting the West of Forest Alternative route through this approved subdivision does not show the development design, so there is no indication of the potential impacts of the Project here to the future residential housing. This is an approved, but as yet unbuilt, Residential Use Area, which is considered a high-level constraint in the Project’s refined environmental routing criteria.

The West of Forest Alternative would physically divide the Crestlake Subdivision and displace a number of its planned residences, necessitating the construction of replacement housing elsewhere to maintain the amount of approved housing in this region of the unincorporated County. Relocation of this allotment of housing, depending on where, could be considered locally growth-inducing.

Comment 7. Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Plan. The West of Forest Alternative traverses the Crest-Dehesa-Granite Hills-Harbison Canyon planning subregion of unincorporated San Diego County from south of WF-12 to near WF-21. This proposed route has been carefully threaded through the Subregion on an alignment designed to minimize direct impacts to existing residences, while locating as much of the route on private property as possible.

The West of Forest Alternative route skirts the edges of residential areas of Dehesa Valley, Alpine, Harbison Canyon and Crest. Although only several existing homes are closer than 400 feet to the alignment centerline between WF-12 to WF-21, there appear to be 15 or more within 800 feet. Just in this small subregion of the county, the centerline of this proposed alignment crosses approximately 50 parcels of private ownership, many of which are large (20-acres or more) and not yet subdivided. Future residential growth in this unincorporated subregion of the County would be expected to occur on these properties.

Construction of the West of Forest Alternative would significantly impact the opportunities for future residential development here. This obviously impacts the individual owners of impacted parcels, but cumulatively this also significantly impacts and constrains land use planning for the whole subregion. Among other considerations: each subregion is expected to accommodate a certain proportion of the County population increase, allocating its share within its area based upon publicly determined land-use designations. The West of Forest Alternative impacts may reduce the allocation, and may well place future private development constraints, along its proposed route. This would increase the need to alter other land-use designations in our subregional plan or else force a shortfall in accommodating population increase. Such forced changes to the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Plan may not be compatible with subregional goals, policies and rural character, and could have to occur in areas where the result would be locally growth-inducing.

As the proposed West of Forest Alternative corridor passes through this rugged rural landscape it follows major ridgelines and crosses prominent skylines. One of the most important development design policies in the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Community Plan is its ridgeline protection policy. This policy strives to protect ridgelines, skylines and horizons from visually intrusive development in order to preserve the natural landscape views and rural community character of the subregion. The West of Forest Alternative conflicts with this adopted community plan policy and would cause significant adverse impacts in this regard that could not be mitigated. Our Community Plan ridgeline protection policy is equivalent to an Agency-Designated Viewshed, which is considered a moderate-level constraint in the Project's refined environmental routing criteria.

Comment 8. San Diego County General Plan. The West of Forest Alternative route passes through other areas of San Diego County in addition to the Crest-Dehesa-Granite Hills-Harbison Canyon Subregion. Its proposed alignment across private properties in these other subregions would significantly impact the opportunities for future residential development there, constraining land use planning in those other subregions.

The County has been working for several years on an update of its General Plan, a project known as GP 2020. GP 2020 planning is based on determining areas and opportunities for future development in the unincorporated County that can accommodate anticipated residential and commercial growth in locations that can be provided the necessary infrastructure (roads, water and sewer, schools, fire and police protection, etc.) economically and efficiently while minimizing adverse impacts. This has been an arduous, time-consuming, expensive process requiring major investments by the County Department of Planning and Land Use, the various Subregional and Community Planning

Groups, the Planning Commission and the Board of Supervisors and many, many individual property owners and private citizens.

If the West of Forest Alternative is retained for future consideration in the Sunrise Powerlink Project, the Draft EIR/EIS must address and analyze its impacts to the existing San Diego County General Plan and the GP 2020 Plan Update. The analysis must identify and catalog all development projects, whether fully approved but not yet built, or whether still in the formal County approval process, that would be impacted by the proposed transmission line corridor for the West of Forest Alternative. Sunrise Powerlink Project impacts to private properties with or without approved or partially planned development projects could conflict with (or render meaningless) various public planning decisions that have been made about land use designation categories, local zoning, resource protection ordinances, circulation element design, and community plan policies in the existing General Plan, and in the GP 2020 Plan Update.

Comment 9. Sycuan Tribe Traditional Cultural Property. The Sycuan Tribal Reservation is located a short distance to the west of the West of Forest Alternative route between WF-11 to WF-15. The State-owned Sycuan Peak-Sweetwater River State Ecological Preserve contains a number of archeological sites that presumably could be sites of significance to the Sycuan Tribe. Some of the sites are less than just a few hundred feet from the proposed alignment centerline. We do not know if the archeological sites in the vicinity of this West of Forest Alternative have all been located and recorded, or if any of the sites have special spiritual or ceremonial significance to the Sycuan people.

Traditional Cultural Property of California Native Indian tribes is ranked as being a very high level constraint in the refined environmental routing criteria used for the Project. The West of Forest Alternative could not be included for further consideration in the Draft EIR/EIS without archeological investigation and consultation with the Sycuan Tribe of the Kumeyaay Nation.

Comment 10. Wildfire, Winds and Public Safety. The proposed West of Forest Alternative would significantly increase the risk of wildfire for many residential communities and individual homes. The towers and transmission lines create a three-dimensional zone along the corridor route that presents a significant risk and danger that restricts limits the use of ground and aerial wildfire fighting techniques in the vicinity of the corridor. Electric transmission line corridors also are a potential source of initiating wildfire, whether from equipment failure, maintenance operations, extreme weather, human activities associated with them, or offroad activity enticed by them.

Along its proposed route the West of Forest Alternative skirts just along the edges of residential subdivisions in Alpine, Harbison Canyon, Crest and elsewhere, and it is threaded along, dodging between and among individual homes through regions of large estate properties in other places such as Lawson Valley and Dehesa Valley. Hundreds of rural residences that are located in zones of high wildfire risk would also be located in the zone of compromised wildfire fighting created by the West of Forest Alternative transmission line corridor. This includes our home and several others within or in the vicinity of the Sycuan-Sweetwater Preserve.

Sloane Canyon and the Preserve area have experienced two catastrophic wildfires, almost three, in the past 30 years. Twice our family has lost dwellings, equipment and belongings. Aerial fire combat is absolutely crucial as land access is so difficult. The same can be said of most of our subregional area. Needless to say, Harbison Canyon and Crest were devastated by the Cedar Fire in 2003, Dehesa and Sloane Canyon were threatened by it; these areas and Lawson Valley and the Preserve were not so lucky in the 2001 Viejas Fire. Flanks of Sycuan Mountain burned where the WF-12 to WF 13 alignment is proposed. All these areas burned in the 1970 Laguna Fire.

The environs around our home in Sloane Canyon, and the Preserve consist of much dry rugged terrain, steep slopes and botanical fuel lining the basin-like intersection of two canyons. Smoke from wildfires can fill up the canyon which would create a dense atmosphere around the transmission line in the West of Forest Alternative corridor there. A chimney effect can occur driving fire up canyon or upslope. Strong gusting Santana winds are funneled through the canyon. They have blown down branches, trees, and phone poles. They and/or fire-generated winds can drive wildfire along the terrain burning it clean, or erratically, jumping from ridge to ridge, place to place, leaving a patchwork of intact unburned habitat. Subsequent heavy rains in a burned area can create sudden and erosive run-off which can scour gulleys and hillsides, creating massive debris-flows. All these make for strong natural forces that impact residents, roads and powerlines.

If the West of Forest Alternative is retained for further consideration in the Draft EIS/EIR the impacts of increased wildfire risks and dangers and decreased public safety caused by it must be determined and analyzed, The potential impacts from the transmission lines, towers and substations of the Sunrise Powerlink Project which have suffered any effects of strong or severe winds, storms and storm runoff/flooding must also be analyzed.

Comment 11. Corridor Right of Way and Private Property. The proposed West of Forest Alternative is designed with its alignment located on private property as much as possible. This, in turn, maximizes the number of property owners that must become involved in negotiations with San Diego Gas & Electric regarding right of way easements and agreements needed for establishing the transmission line corridor, constructing the line, and maintaining it. Under the best of circumstances, it would be a daunting task to conduct all of the negotiations necessary with all of the impacted private property owners to arrange the West of Forest Alternative corridor right of way.

While studying the aerial photographs we noticed that the parcel where our home is located is not correctly depicted, as its boundary is misshaped and misplaced by a distance of more than 200 feet. (We are absolutely certain about this, as we wrote the metes and bounds description that is the legal basis for the deed.) This is one definite mapping error concerning a private property potentially impacted by the proposed alignment for the West of Forest Alternative.

On this same aerial photograph it appears that a second parcel belonging to a neighbor is similarly misplaced by a distance of 100 feet or more. Also, something labeled "Sloane Canyon Road", isn't. And the California Riding and Hiking Trail is not labeled at all. How many other mapping errors exist along the proposed route of this Alternative? How might mapping errors such as this affect the right of way acquisition process for this

Alternative, compared to other alternatives? How might such inaccuracies affect citizens and decision-makers (and the public and regulatory processes) in correctly understanding where the Sunrise Powerlink Project alternative routes and infrastructures will lie, and therefore correctly assessing their correct potential impacts?

Comment 12. Nonwire and System Alternatives. The Draft EIS/EIR for the Sunrise Powerlink Project must include a complete analysis of the cost and feasibility of utilizing Nonwire Alternatives and System Alternatives for meeting the region's future electric energy needs in place of the proposed 500 kV transmission lines. This analysis should be based on combining all reasonable and feasible Nonwire and System Alternatives into an integrated, comprehensive program that maximizes the cumulative energy supply available by this approach. These combined (bundled) Alternatives would include regional programs of increased electric use efficiency, increased energy conservation, load demand scheduling, co-generation, commercial and residential photovoltaic systems, fuel cells, re-powered generation facilities, as well as all other feasible opportunities.

We support selection of the Nonwire and System Alternatives as the Preferred Alternative for the Sunrise Powerlink Project, and we look forward to a fair and thorough analysis of these in the Draft EIS/EIR.

Comment 13. Diversification and Decentralization. The Project Draft EIS/EIR analysis of Nonwire and System Alternatives should include consideration of the benefits of diversification and decentralization of electric generation capacity that could be incorporated into widespread regional application of these Alternatives. The potential for aggressive application of a diversified, decentralized Nonwire and Systems Alternatives program to increase the stability, reliability and security of the region's electric system must be analyzed and compared to the 500 kV transmission line Alternatives.

Comment 14. Meeting the Public's Best Interests. The Sunrise Powerlink Project proposed by SDG&E is designed to meet primarily the special interests of private corporations and their shareholders, while ostensibly and coincidentally doing something about theoretical, projected future regional electric energy needs. Unfortunately, in this planning approach the best interests of the public are sacrificed or compromised in many ways.

We find much to support and recommend in the assessments by several groups, including Border Power Plant Working Group, Ratepayers for Affordable Clean Energy (RACE), Utility Consumers Action Network (UCAN), Center for Biological Diversity, Sierra Club and others who are able to analyze and compare the many varied aspects of SDG&E's and Sempra's operations: transmitting and generating energy, their various applications for the many changes they seek at diverse levels of their operations; what testimony, data and arguments they offer for and against each aspect at the many different widespread hearings, coalition meetings, and regulatory sessions they attend.

We urge that close attention be given to these groups' concerns and analyses of all nonwire and systems alternatives and the plethora of associated issues, among which would be solar energy and a creative diversity of other renewable resources, congestion or bottlenecking in transmission, power routing, real versus contrived necessity, real versus contrived costs and cost comparisons; conservation of all sorts, plant and

substation repowering & upgrades, transmission line upgrades, networking of many lower voltage lines, sharing and building line networks through cooperative contracts with other utilities or other entities (i.e., LADWP-IID/Greenpath and various V-R Devers transmission lines), in lieu of SDGE's having their own new big expensive line.

Lines and generation created nearer to points of consumption (i.e. to the north of San Diego County) would be a key component in decentralizing the system. Utilizing already impacted areas (i.e., the Interstate 8 corridor) for additional transmission lines, if such are truly necessary, would be preferable to sacrificing pieces of the ever-dwindling resource of lands which are pristine or preserved or open or undeveloped or environmentally rare or sensitive; or already dedicated to mitigation, open space, parks and wilderness. The creation of false or lame route alternatives that are then eliminated in order to promote the preferred route, and the limited choice of alternatives to the same end, do not serve the public interest.

The concept of bundling for greatest cumulative impact on meeting future energy demands is critical. We need an honest assessment of the best logical and phased paradigm that will dovetail with a future where Biggest won't always be best, pollution and environmental degradation won't be standard collateral damage, and nonrenewable energy resources have been exhausted.

Comment 15. Global Heating. The Draft EIS/EIR should include full consideration and analysis of the potential impacts of the Sunrise Powerlink Project on the phenomenon of global heating, also known as global warming or global climate change. The analysis for each Alternative retained and studied should estimate the cumulative contributions it would make to the atmospheric changes linked to global heating by its construction, operation and maintenance.

Impacts to global heating should be estimated for all of the different potential sources of electricity that would be transmitted by the Sunrise Powerlink so that comparisons could be made between the impacts of the different Alternatives operating during different electricity purchase and transmission scenarios, and so that comparisons could be made to the impacts to global heating that could be attributed to the Nonwire and Systems Alternatives.

Comment 16. Elimination of the West of Forest Alternative. We urge that you eliminate the West of Forest Alternative as a potential alternative in the Draft EIR/EIS, and that you give it no further consideration as an alternative for the Sunrise Powerlink Project.

The West of Forest Alternative does not provide good system reliability due to its many miles of collocation with the Southwest Powerlink.

The path of this transmission line corridor Alternative is through a landscape that simultaneously:

- (1) is a rugged, natural landscape (potential for numerous biological environmental impacts; costly challenges to economic construction and maintenance);
- (2) is a fire-prone landscape (potential for Powerlink to decrease public safety by causing wildfires and interfering with aerial and ground fire fighting operations; potential for Powerlink reliability to be impacted by wildfires originating elsewhere);

(3) is primarily comprised of private property, meaning it is a landscape owned and inhabited by people (potential for numerous impacts, property conflicts, quality of life issues, economic issues, etc.);

(4) includes public-owned, irreplaceable wildlife conservation lands (potential for Powerlink to irreversibly degrade natural resources and devalue public investments and interests); and

(5) includes an irreplaceable historic recreation trail that would be degraded and devalued by the looming and overhead presence of the Powerlink towers and lines.

The many significant constraints and potential impacts associated with the West of forest Alternative, some of which we have identified in this letter of comment, are more than sufficient cause for eliminating this Alternative from further consideration in the Sunrise Powerlink Project planning and approval process.

A 500 kV Powerlink along the West of Forest route is the worst possible affront to our family's efforts to preserve for future Californians the several-hundred-acre property initially acquired 3 generations back, in a canyon subsequently named after the family who founded Sloane Ranch. After the remaining family members generously came to that decision, and laboriously created and initiated the plan to do so, we expected to live out our lives enjoying the peace of knowing that development would not blight the Ecological Preserve which the ranch became. It was not created to be a preserve for a 500 kV transmission corridor. It was created for the preservation of its unique habitats, vegetation and wildlife. And from that core has grown the Sycuan Peak-Sweetwater River Ecological Preserve, in order to do just that. Let it do so! Keep the Powerlink out. Eliminate this West of Forest Alternative. Four generations of this family, each in its turn, have appreciated the special ecological resources of the old family place in the heart of Sloane Canyon and the Preserve. If the Powerlink followed the West of Forest Alternative, imposing its visual, aesthetic, environmental, health and noise impacts on us, we would know no mitigation nor compensation for our losses.

Comment 17. Public Notification and Involvement. The process followed for the Second Round of Scoping Meetings for the proposed Sunrise Powerlink Project has been deficient and flawed. As affected property owners, we received the "Notice" for the February 5 – 9, 2007, public meetings on 25 January 2007. At this time and through the week of the scoping meetings, media coverage in the local papers and on TV continued to describe the project as concerning only the routes considered in the first round of scoping meetings (i.e. as located in the east and north of the County), without mentioning that additional alternate routes in southern San Diego County were now also being considered.

The only document available at our local library (El Cajon Branch) prior to the scoping meetings was Part 1, comments of the First Scoping process, and this provided no direct information about the original project or the later additional alternatives. In it, the West of Forest Alternative affecting our region of the County was described very vaguely: "It would diverge from the Route D Alternative at Milepost D-16, passing through unincorporated San Diego County and southwest of the community of Boulevard. It would pass northeast of Lakeside, and then turn north along SR 67, joining the proposed route where it would cross SR 67." (Notice, page 19) At first reading we did not understand that this alternative would pass through Lawson Valley, Sloane

Canyon, Dehesa, Harbison Canyon and Crest, and it was only upon careful study of the map (Figure 8) that this became evident.

Many people can not read maps, so if the accompanying text of the Notice is misleading or incomplete, those people reading it would not be adequately informed about the route taken by the West of Forest Alternative. Most of our neighbors, including affected property owners also receiving the Notice, did not understand the corridor route alignment and the potential impacts of the West of Forest Alternative to their community and property, and they would not have attended the scoping meeting had they not been alerted by telephone calls and emails from others. We feel that this rural neighborhood “word-of-mouth” system of notification missed many more people who possibly do not even yet have any idea that such a huge transmission apparatus might loom up very near to them, including neighbors of the half-dozen households nearest us, who well might feel that such an intrusion would degrade the rural life they have chosen to build out at the end of Sloane Canyon and near the Reservoir (and, likely, over the ridges from us in Lawson Valley or Beaver Hollow.) And, you should know that not everyone has a computer, or reliable computer access out in the “boonies” (land phone lines impacted by weather or rodents or vandals, slow downloads which take forever if the information files are large let alone huge, which drive up phone bills, cell phone signals not accessible due to topography.)

We mentioned informally at the February 7 scoping meeting that the El Cajon Branch library did not have useful, complete documentation, and was thus not serving as an effective document repository for the project as claimed in the Notice. This lack of documents diminished the public’s opportunities to prepare for effective involvement at the scoping meeting. And, indeed seemed likely to impede well-informed comments up to the Comment Period deadline. Were there similar lacks of complete documentation at the other public document repositories listed in the Notice? The El Cajon Library was never sent documents for the first Scoping process as the proposed Sunrise Powerlink Project routes were nowhere near our part of the County. It was just by luck that we discovered on 18 Feb. 2007 that 7 mostly thick, relevant, past documents were now on the library shelves (including the 2 volumes of “Amended Application for Certification of Convenience and Necessity”, a “Supplement to the Application”, and 4 volumes of the PEA and its Appendices.) The library had been swamped by them the previous Thursday and had just managed to get them shelved by that weekend. Unfortunately, though all this information was now at hand. the organization of the documents in ring binders was hampered by the lack of tabs. There were colored divider pages, but the documents were so thick and so full of the multi-fold thick pages of figures, that it was hard to find the colored divider pages short of combing through page by page. Document pagination would have helped, as would Tables of Content that were more complete (i.e. lists of figures). The next day was President’s Day holiday, and the library was closed. That left only 4 days before the 24 Feb. Comment Deadline, with no ability to spend long hours at study.

The scoping meeting that we attended provided the only opportunity to see the close-up aerial photos which informed residents for the first time exactly where the proposed routes would be relative to roads, landmarks, topography, parcels, and even houses! At that February 7 meeting we requested a set of aerial photographs (WF-08 through WF-22) in order to more fully understand the proposed alignment of the West of Forest

Alternative and its potential impacts in the Crest-Dehesa-Granite Hills-Harbison Canyon Subregion of the County. When these were provided by Aspen Environmental Group, unfortunately photos WF-10 and WF-12 (the key map showing our residence and neighborhood: near neighbors and part of the Sycuan-Sweetwater Preserve) were omitted from the sequence. After a timely followup request, we received the missing aerials on February 21 (response delayed due to the 19 Feb Presidents' Day holiday). This did not leave sufficient time for detailed study and analysis before the nominal comment deadline of February 24. Although our experience in this regard may have been unique, the fact that complete aerial photo documentation of the southern alternatives was not available at the document repository prior to, or soon after, the Second Round scoping meetings is another instance of hampering the public's informed and effective involvement in the scoping process.

We think that every property owner sent the Notice of Second Round of Scoping Meetings on Alternatives also should have received at that time the appropriate aerial photograph(s) showing parcel boundaries and the proposed transmission line alignment affecting his or her property. We think that prior to the scoping meetings the public document repositories should have included a complete set of all aerial photographs showing parcel boundaries, the transmission line alignment, and the substation locations for all alternatives. Without the specific details inherent on aerial photographs depicting parcel boundaries and project components, it is not possible for the public to formulate and offer informed comments about potential constraints to, or impacts of, the proposed project.

At the scoping meeting in Alpine on 7 February we learned that during 2006 a number of San Diego County Planning Groups and Sponsor Groups had been informed about the original Sunrise Powerlink Project alternatives, and had been given presentations about the project by representatives of SDG&E, and perhaps others. This had occurred on a timeline that allowed those community groups to become informed and provide comments for the First Round of scoping on the original project. This also resulted in those communities being already informed and well-prepared to effectively react to the Second Round of scoping on additional alternatives. Indeed, this advantage applied to all members of the public who had participated in the first Scoping process: better background, bigger picture, fuller context in which to understand the second Scoping phase and to compare the Alternatives.

Ten miles of the West of Forest Alternative alignment cuts through the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Plan area, but this public community planning group was not provided notice about the Second Round of scoping meetings. A few (three?) members of the Planning Group attended the Alpine meeting on February 7, as a result of receiving the Notice as affected property owners. The scoping meeting did not provide any information about the corridor right-of-way requirements, specific impacts to affected property owners, right-of-way size/acquisition issues, locations/size/construction details of transmission line towers and substations, all of which are matters of great importance to individual property owners, to residents, to community planning, and for providing informed comments about the project. We were told at the scoping meeting that it would be necessary to have a representative of SDG&E address the Planning Group on these matters, but it was not feasible to schedule this for the next Planning Group meeting on February 12. Thus, in order to take action and

provide comments by the February 24 deadline, the Crest-Dehesa-Granite Hills-Harbison Canyon Planning Group was forced to provide its comments about the Sunrise Powerlink Project based solely on the limited information brought to the group by attendees of the Alpine scoping meeting.

The Second Round of scoping meetings was scheduled and conducted on a timeline that denied the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Planning Group the opportunity for involvement in the scoping process with the best possible base of information.

Comment 18. Extended Deadline For Scoping Comments. Confronting the inadequate time available for developing and providing our personal comments by the February 24, 2007 deadline announced in the Notice for the Second Round of Scoping, we requested an extension. We greatly appreciate that we were granted a submission deadline extension until 5 March 2007, enabling us to compose and provide to you our comments for your consideration while preparing the Draft EIS/EIR for the Sunrise Powerlink Project.

Sincerely yours,

William L. Bretz, Ph.D. and Lesley A. Barling, M.S.

Post Office Box 20543
El Cajon, Ca 92021

From: tina myrdal [mailto:tinamyrdal@yahoo.com]

Sent: Monday, March 05, 2007 3:40 PM

To: Blanchard, Billie C.

Subject: Borrego Springs Powerlink situation

Dear Ms. Blanchard,

My name is Tina Myrdal and my husband Peter and I live in Borrego Springs and own 70 acres on the South Slope in the possible path of the alternative Powerlink route. We were present in Superior Court/Vista on February 21. We attempted to deny SDG&E access to our property because we had been informed at the February 8th meeting that this route was to be eliminated. Mr. Davis, legal counsel for SDG&E was not able or willing to specifically inform us how often, when, with what kind of equipment etc. they were going to do inspections on our land. We had been in escrow, selling one of our parcels when this alternative route became known and our buyers canceled the escrow. Now SDG&E says that they have the right until December 2008 to do their inspections. This is an extremely long period and leaves us personally unable to sell or use any part of this property. Our property is just south and east of Tubb Canyon and is abutting the state park. (APN:200-020-06,08,15,16, and 17). To the east of our property is the Avery Trust encompassing 1145 acres, east of this is the Lundberg project where a development should shortly be started and east of this is Montesorro, a large gated community with 800 units being developed. The powerline (as planned) is to be established on a diagonal east/west line just behind or across all of these properties. All of the property owners are alarmed, because the south section of Borrego Springs is one of the most beautiful, areas of the valley. Glorietta Cyn, in the State Park, is in this area as well and the whole uninhabited slope is a refuge for all wildlife.

Sincerely,

Tina and Peter Myrdal

P.O. Box 1101

Borrego Springs, CA 92004

Tel. 760-522-9134

**ROBERT L. STAEHLE
LORI L. PAUL
153 JAXINE DRIVE
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626 798.3235**

2007 March 5

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: Second Round 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,

Thank you for the opportunity to comment in this new round of public input, this time on an extended deadline granted by CPUC staff through March 5. These comments and recommendations are in addition to those supplied in the first round by Robert Staehle, dated October 19, 2006. Focused questions and comments are underlined in this letter for clarity.

Based on your document, *Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project*, we most strongly support selection of your "New In-Area Renewable Generation" alternative that you state is to be retained, on page 20, as distributed at your February 8, 2007 Borrego Springs Public Meeting on Alternatives. We have one caveat, however, and that is that we believe SDG&E's assumption of rooftop solar "firm capacity" of 10 MW in 2010 and 150 MW in 2016¹ is vastly conservative, in part because they find this alternative less profitable than others. Our comment C.2 below responds directly to this with a legislative and regulatory proposal that could be 1) easily implemented, and 2) could lead to Southern California becoming a net exporter of electrical energy while earning commercial utilities a reasonable return. We believe that such legislative and regulatory changes should be considered in-scope, as they can lead to a broader range of solutions to the purported problem that gave rise to the Sunrise Powerlink proposal, with benefits to ratepayers and utilities alike. We propose that the CPUC (not SDG&E with their profit bias) calculate "firm power" yielded over 5-years' time from 100,000 home and

¹ Per the Table at the top of page 21.

10,000 commercial/government/school building installations at 6 kW (nameplate capacity) per home and 150 kW (nameplate capacity) per building and associated parking area, respectively. We have already learned of potential interest among Los Angeles-area warehouse owner/operators in supplying roof space for such installations, and interest in the San Diego area would seem even more likely with new building construction proceeding at a rapid pace. Further, the geophysical and meteorological location of the service area (San Diego) is nearly ideal for localized, distributed solar generation on residential and commercial rooftops, including parking lot shade ramada arrays that would increase the supply of shaded parking spaces while generating income for the lot owners.

The comments of my (Robert Staehle's) 2006 October 19 letter stand; I have not seen an adequate response to those comments, especially regarding the metrics, analyses, and Independent Stirling Technology Assessment Panel I recommended. Thank you for paying additional attention to these at this time. To summarize, these comments and recommendations covered:

- A. Quantitative metrics for Viewshed, Residential Impact, and Construction Impact.
- B. Quantitative assessment of the Vulnerability to Terrorist Attack of Sunrise Powerlink and its Alternatives.
- C. Quantitative assessment of the Vulnerability to Aircraft Impact and Resulting Range and Forest Fires.
- D. Additional Alternatives (some of which are addressed, probably too conservatively by SDG&E, to protect their desired profit growth) including time-of-use (TOU) metering, remote A/C shutdown, zoning requirements for solar production capacity to be part of 50 – 90% of new construction.
- E. Independent Expert Panel on Stirling-based Technology Readiness.
- F. Disclosure by Sempra Energy of their Internal Assessment of Stirling-based Technology Readiness.
- G. Lack of complete Notification of Potentially Affected Property Owners. (This has still not been completed for some landowners in Tubb Canyon, and perhaps other areas as well.) Please refer to the court hearing "Respondent's Request for Continuance" dated 2007 February 21, copy sent to Billie Blanchard, for evidence of SDG&E's lack of information and adequate notice to Tubb Canyon landowners and homeowners who, along with endangered and rare wildlife species, would be adversely impacted by the various versions of the constantly changing "Borrego Valley / Desert Alternative Route."

Our detailed new comments follow, to be added to the comments in our second paragraph, above:

A. Technology Readiness of Stirling Generators and the Proposed Stirling Plant in Imperial County; Potential for more polluting power from parent company sources in Mexico.

To better inform the public, SDG&E and CPUC staff should separately prepare to the best of their knowledge answers to the following questions as part of the EIR/EIS process. Answers are expected to be different from the different organizations because, while SDG&E is the applicant whose detailed internal business plans are likely to contain such answers, only the CPUC can be considered objective. Because the answer to each of these questions bears on the potential long term environmental impact of the proposed Sunrise Powerlink Project, they are necessary as part of

the public disclosure required for public officials to make their informed CEQA- and NEPA-mandated decisions regarding the Project.

1. Given that the Sunrise Powerlink transmission line itself will generate exactly 0 kW-hrs of electrical energy, what is the plan in the event that the asserted Stirling powerplant does not come to fruition because of technical, regulatory, or other delays? It is clear that the Stirling power generation technology is nowhere near commercial maturity, and its availability in time for completion of the Sunrise Powerlink is highly speculative. I (Robert Staehle) am personally familiar as an engineer with Stirling technology for spacecraft application, and while promising on paper, Stirling generators capable of multi-year operation (needed for spacecraft as well as commercial applications) have never been built at the size or in the configuration necessary to operate in a powerplant. Such performance always seems to be “one or two years in the future,” as it was claimed in the 1990s, and appears to be claimed today.
2. The importance of the Stirling powerplant to the Sunrise Powerlink merits closer examination of the alleged working prototype for the Stirling technology cited by Stirling. Reports that there have been serious technical setbacks for the single, small prototype Stirling generator should be investigated with full disclosure of past and current operational flaws involving this power system, along with a realistic analysis of future dependability based on prototype performance. In fact, a verification that the prototype system exists and functions should be sought by the CPUC.
3. If there is no new Stirling powerplant in Imperial County, where will the power come from to feed Sunrise Powerlink?
4. What power would be available from Sempra Energy (or their various subsidiaries) at what locales lying what distances from the planned eastern terminus of Sunrise Powerlink?
5. Assuming all legislative and regulatory hurdles could be overcome to obtain power from various power sources at moderate distances from the eastern terminus of Sunrise Powerlink, which of these power sources/power plants are in Mexico, what environmental laws apply to power generated there, and what environmental impact would result from feeding Sunrise Powerlink with power from Mexico?
6. What are SDG&E’s projections of revenues and profits that would derive from selling Mexican-generated power to the San Diego and Los Angeles markets and beyond?
7. Given that SDG&E filings indicate the possibility of running up to three more parallel lines at a later date along the Sunrise Powerlink corridor, what are the revenue and profit forecasts for these multi-gigawatt options?
8. What are SDG&E’s plans to seek to overcome the legislative and regulatory hurdles to obtaining power from their parent and sibling companies’ generating capacity in Mexico? Surely they would want to do this in the future to maximize their parent company’s profits, as opposed to obtaining power from existing in-Basin powerplants owned by other entities, or accepting power in-Basin from rooftop residential and small business rooftop/parking lot photovoltaic generation, regardless of how much environmental, practical, and local economic sense this makes for San Diego and other service areas served by SDG&E. Meeting SDG&E and Sempra Energy profit objectives should not be the goal of the CPUC’s proceedings in this case. Meeting reasonably expected future San Diego power needs in an environmentally responsible manner should be the goal even as SDG&E tries to expand the goal to its parent company’s profits while attempting to appear environmentally responsible.

9. What have SDG&E, Sempra Energy and their related companies learned from the Enron experience of energy supply manipulation to assist in fabricating a “power shortage” to pressure legislators and regulators to relax cross-border power generation and transmission laws and rules?
10. Which SDG&E executives and key managers and traders were formerly employed by Enron and related companies, in what positions, and what roles did they have in creating and fanning the “power crisis” of a few years ago that resulted in criminal convictions of several of Enron’s executives?
11. Which Sempra, SDG&E, and related companies’ legal staff and executives stand to be paid what magnitude of bonuses for opening a route from Sempra’s Mexican generating capacity to U.S. markets to the north? Such determinations directly affect the future reliability and trustworthiness of SDG&E and Sempra services to its customers in California.

B. Importance to SDG&E’s Revenue and Profit Plans of a Northerly Route.

1. Why does SDG&E insist on continuing environmental and related surveys of the “Borrego Valley / Desert Alternative Route” running through Tubb Canyon immediately southwest of Borrego Springs? While this route has been recommended for elimination by Aspen Environmental and the CPUC, SDG&E is still seeking court orders from affected landowners to enter their property and conduct intrusive and potentially damaging surveys and tests on this route. Apparently SDG&E has stopped seeking right of entry orders on other routes recommended for elimination, but not this route closest to Borrego Springs. In addition to other reasons, could it be that this most northerly of the proposed routes makes it that much easier for Sempra Energy companies to sell power and earn profits from the Los Angeles and rest-of-California markets in the future?
2. What are Sempra Energy’s plans to further penetrate the Los Angeles market? Today they own “The Gas Company” (formerly Southern California Gas Company); what additional revenues and profits are forecast to come from penetrating the electrical power market, and what fraction of these revenues and profits are dependent on Sunrise Powerlink and parallel transmission lines that could be built in the future? Which legal staff and executives stand to be paid what magnitude of bonuses for opening a route to Los Angeles and northerly markets, now within the “turf” of competitor Southern California Edison?
3. If SDG&E does not gain access to the Tubb Canyon route next to Borrego Springs, what future internal plans are impacted, and what are the forecasted revenue and profit impact for each such internal plan to open future energy markets and service areas beyond the San Diego area?
4. SDG&E suggests that certain Anza Borrego Desert State Park wilderness area acreage be de-designated as a wilderness area in order to take the Sunrise Powerlink from private property in Tubb Canyon, across State Park lands to the west that are presently wilderness, and then continue over private property near Ranchita and to the west. SDG&E proposes to newly-designate a greater acreage of other land as wilderness, asserting that this net gain in wilderness acreage is a public benefit. This flies in the face of the intended permanence of “Wilderness” designation. Nothing new is to be gained by the public in this proposed scheme other than a new label on land already owned by the public. The original wilderness designation, a portion of which SDG&E proposes to rescind, was determined as a result of a painstaking, expert-guided evaluation of the natural values and environmental sensitivity of

portions of Anza Borrego Desert State Park. To de-designate even one acre of Wilderness in order to enable SDG&E and its parent company to earn greater profits would set a dangerous precedent for all State and Federal Wilderness designations in the country. For SDG&E to even suggest this bait-and-switch mirage is an insult to the public, biologists, and archeologists everywhere, and suggests great insensitivity to the devastating environmental impact of their whole project, for which viable in-Basin alternatives and routes not crossing any portion of Anza-Borrego Desert State Park or adjacent natural lands and viewsheds exist.

5. Even the act of conducting environmental and related surveys and geological testing within Tubb Canyon and adjacent wilderness areas in the State Park would further endanger the Peninsular Bighorn population there (at ~40 individuals, it contains approximately one-tenth of the entire remaining Peninsular Bighorn population on Earth), and would violate State Park, U.S. Fish & Wildlife Service, and California Department of Fish & Game guidelines for protecting the Peninsular Bighorn Sheep population.^{2,3,4} The Peninsular Bighorn Sheep (*Ovis canadensis*) is of course the “Borrego” of Anza-Borrego Desert State Park.

During dry periods (as the during the present severe and prolonged drought), the primary water source for this herd of approximately 40 Peninsular Bighorn Sheep lies within private, protected land in Tubb Canyon. Any disturbance near a desert water source may cause ewes to abandon that source and even abort their lambs (to preserve their own lives and future breeding capacity). Adult sheep may risk dying of thirst by staying away from any water source that is in proximity to human intrusion. These behaviors are the result of evolution involving complex predation patterns by cougars and other predators who may lay in wait to slaughter sheep coming to drink at springs, especially during lambing season when ewes are particularly vulnerable and during serious drought when prey species must come to isolated water sources. The entire resident herd in Tubb Canyon could be decimated or perish entirely as a cohesive viable herd as result of the very field work attempting to assess the impact of SDG&E’s project on the bighorn sheep.

In addition, the San Diego Horned Lizard (*Phrynosoma coronatum sp: blainvillei / frontale*) – a Federal Special Concern (FSC) Threatened Species as well as a California Species of Special Concern (CSSC) and the Burrowing Owl (*Athene cunicularia hypugea / Athene cunicularia*) – a California Species of Special Concern (CSSC) are present on the private lands targeted for SDG&E’s access against the wishes of the parcel owners who provide safe harbor for both the natural habitat and these specific species.

² Department of the Interior, Fish & Wildlife Service, 50 CFR Part 17, RIN 1018-AB73, “Endangered and Threatened Wildlife and Plants: Endangered Status for the Peninsular Ranges Population Segment of the Desert Bighorn Sheep in Southern California,” Final Rule, in *Federal Register Vol. 63, No. 52*, Wednesday, March 18, 1998/Rules and Regulations, pp. 13134.

³U.S. Fish & Wildlife Service, 2000. *Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California*, U. S. Fish & Wildlife Service, Portland, OR. xv + 251 pgs, October 25, 2000. Esther Rubin/UC Davis, primary author.

⁴Attached letters from Esther Rubin, PhD (bighorn sheep biologist, lead author of the USFWS *Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California*) and Walter Boyce, DVM, PhD (Professor and Executive Director, U.C. Davis School of Veterinary Medicine, Wildlife Health Center)

A further example of SDG&E's insensitivity to environmental concerns is the following attitude "An SDG&E spokesman at the time said it was easier to deal with issues involving private landowners than public agencies" (referring to protests over the power line running through San Dieguito Park open space resulting in SDG&E moving the route eastward across private land where it would be visible from a wider area). Quote from "Utility Offers Reroute," in the March 1, 2007 San Diego *Union Tribune*, J. Harry Jones, staff writer. Critical species are often present and protected on private lands as well as designated parkland and wilderness. SDG&E would obviously find private property owners easier to bully and overwhelm than public agencies who can draw on government legal resources. Few private landowners, even those protecting natural resources, can fight a dollar for dollar legal battle for their wildlife or land, and SDG&E knows this. The species and habitat many of us protect as private landowners are indistinguishable from those on State Park, Bureau of Land Management, Indian reservation and other lands that have more direct government protection.

While utility companies such as SDG&E are granted broad access rights by state law for proposed project routes, those rights must not be allowed to supercede the Federal Endangered Species Act nor put California Department of Fish and Game "California Species of Special Concern" at significant risk in the course of access and their activities. It is ironic that the justification for SDG&E's aggressive attempts to gain court ordered "Right of Entry" to multiple parcels has been stated as the need (imposed by the CEQA and NEPA process and the CPUC) to survey for identification of the very threatened species SDG&E's intrusion would adversely impact.

C. Providing SDG&E Return on In-basin Household and Small Business Alternatives.

1. Like any utility, SDG&E needs to earn a profit to continue operation. Nothing in these comments denies a reasonable profit to SDG&E or its parent company and its stockholders. What is questioned is Sempra Energy's plan for *ever-growing* profits at the expense of the many natural values of Anza Borrego Desert State Park and surrounding lands owned by the Bureau of Land Management and private individuals. These landowners are stewards for unspoiled natural areas in which the affected portions can never be replaced once Sunrise Powerlink is constructed across them.
2. SDG&E's reluctance to embrace residential and small business in-basin generation may be based in part on State law designed to provide an incentive for homeowners and small businesses to install rooftop and parking lot photovoltaic generation. Right now, homeowners, like us in Los Angeles County, are credited for excess power generation *at the same rate we would pay for power consumed at the same time of day.*⁴ That is, if peak afternoon power is billed to us at (for example) \$0.14/kW-hr, we are in turn credited the same \$0.14/kW-hr for excess power we generate. Our power provider (Southern California Edison, or SCE) can sell this excess power to others on the grid, but they have just "paid" for it by crediting our account at the same rate they can sell it for to another customer who is consuming instead of generating power at that time. Thus, there is no "margin" for SCE to earn a profit on the excess power generated by our installation. When the total power

⁴ For us, this is enabled by Time-of-Use metering, where we are on SCE Rate Schedule TOU-D-2.

generated in this fashion across their service area is small, this is not a serious impediment to their business operation, and, aggregated across many households like ours, may even save them the considerable expense building new power plants. SCE is fully cooperative in this arrangement. Where they make up for this lack of margin is from one of our two house installations, where we generate enough power on an annualized basis to totally offset the power charge on our bill. By agreement with SCE, they will reduce our electrical energy charge (but not the transmission charge, connection fee, taxes, etc.) over the 12-month billing period to zero, but they will not actually pay us for any *excess* energy we generate over the amount we need. This excess they are free to sell, and they have paid nothing for it. The rub for them is that homeowners like us try to size our systems to get our billing down close to or at zero, but there is no financial incentive for us to generate an excess that SCE can sell where their effective acquisition cost is zero. A legislative correction for this could take the following form: the Utility pays the Residential or Small Business customer for all customer-generated kW-hr at 80% of the published, CPUC-approved rate they would charge that customer for power delivered to that customer at the same time. The Utility then charges other customers 100% of the published, CPUC-approved rate for the customer-generated power they sell to other customers. They thus earn 25% above what they paid when they sell customer-generated power to other customers (100% - 80% = 20%, which is 25% of the 80% they paid). Customers would continue to pay connection charges, transmission costs and taxes. The 25% profit that California Utilities would thus earn on customer-generated power is a handsome return on nearly any business investment, especially when it is considered that the customer is paying to install his or her own generating capacity and to keep it maintained to Utility standards. We would personally be willing to switch to such a rate structure, even though initially we would have to pay more for our electricity. Where we would benefit (in addition to contributing to a cleaner environment) is by installing a somewhat larger photovoltaic system than we need, guaranteeing SCE a source of power they can sell at a profit, and providing us a small stream of income beyond simply offsetting the electric charge on our bill. With a modest expansion of our system, we could earn an extra \$50-100/month just for having the sun shine on our property, SCE could earn money on all our generation, and customers who choose not to install photovoltaic systems would get a reliable source of peak loading power for their air conditioners without SCE needing to build more power plants or import more power. We won't get rich on \$100/month, but we'll be glad to have it to pay back our system cost and earn into the future in ten or so years after we have paid it off. This arrangement could lead to SDG&E, SCE and other utilities becoming net electrical energy exporters from Southern California. This would reward stockholders, ratepayers, and forward-looking politicians, not to mention the environment and global warming. Everybody wins, small businesses create lots of new jobs installing 100,000 new systems over ten years, and some people even get shade where they park their cars at work under newly-installed photovoltaic awnings.

3. Similar economic benefits may be generated by commercial warehouse, mall and outlet complex, and other business buildings that install, or lease to others to install, solar arrays on otherwise "wasted" rooftop space. Incentives can be devised to profit all involved in such distributed, local solar generation. Such power generation encourages "green" building practices that will stimulate local business and jobs specializing in environmentally responsible architectural design and construction.

The economic impact of recommendation C.2 above should be considered. Per my October 19 letter, I estimate this at ~\$1 billion going into local small business and local jobs for installers for the 100,000 home and 10,000 small business/government/school installations.

The CPUC and other agencies are at a watershed for California and the United States with Sunrise Powerlink. They may either perpetuate the 20th-Century paradigm of mega-projects rolling over a myriad of environmental, small business and private landowner interests, or they may decide to effect a major course change into a 21st-Century of economic prosperity *enhanced by* environmental stewardship as a first consideration for long term sustainability. The two approaches cannot be pursued at the same time, and there is no better time to switch than the present. The switch away from global warming and to local generation in ideal locations like San Diego must be made now.

Thank you for your patience and consideration.

Sincerely,



Robert L. Staehle



Lori L. Paul

cc:

Gov. Arnold Schwarzenegger

Hon. Adam Schiff, U. S. House of Representatives

Hon. Anthony Portantino, California Assembly

Hon. Jack Scott, California Senate

Hon. Dianne Feinstein, U. S. Senate

Hon. Barbara Boxer, U. S. Senate

Michael L. Wells, California State Park Superintendent V, Colorado Desert District

Linda Carson, Anza-Borrego Foundation and Institute

Betsy Knaak, Anza-Borrego Desert Natural History Association

Judy Winter Meier, Editor, Borrego Sun

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February 15, 2007

Lori Paul
153 Jaxine Drive
Altadena, CA 91001

Dear Ms. Paul,

This letter is written in response to your request for my professional opinion regarding Tubb Canyon. As a scientist who has studied and published numerous scientific articles on wildlife in eastern San Diego County since the early 1990's, I must express my deep concern over the potential negative impacts of the proposed powerline through Tubb Canyon.

Tubb Canyon is a critically important habitat for a number of different wildlife species including bighorn sheep. The proposed powerline, and all of the attendant construction and maintenance activities, would literally bisect the population of bighorn that live in a narrow ribbon of habitat along the eastern slopes.

It is essential that we consider the cumulative effects of habitat degradation and fragmentation. While it is difficult to state with certainty what the impact of the powerline alone will be on wildlife such as bighorn sheep, we can be absolutely certain that this activity will add to the cumulative negative impacts that have driven species like bighorn to the point of near extinction.

From a wildlife perspective, there are clearly much better choices for a powerline route than through Tubb Canyon. I strongly encourage the selection of options that do not put wildlife in jeopardy.

Sincerely,

A handwritten signature in cursive script that reads "Walter Boyce".

Walter Boyce DVM, PhD
Professor and Executive Director
UC Davis Wildlife Health Center

13 February 2007

To: Superior Court of California, County of San Diego, North County Division

Re: Case #GIN057752 and related Case #s involving Tubb Canyon and Vicinity
“Right of Entry” Court Order Petition by SDG&E for Preliminary Precondemnation Surveys

It has come to my attention that the San Diego Gas and Electric Company (SDG&E) is seeking a court order against several landowners in Tubb Canyon and its immediate vicinity adjacent to Anza-Borrego Desert State Park for the purpose of conducting a preliminary condemnation surveys including parcel boundary markers, radio signal GPS sensors, geotechnical, seismic, biological, botanical, and cultural studies, etc. It is my understanding that this access would involve vehicular access on unpaved, narrow, undedicated roads and trails into sensitive habitat for several threatened species, and that this access could occur at any time, and possibly multiple times, between April 1, 2007 and December 31, 2008.

I am concerned that these court orders, without revision, may result in possible negative impacts to a federally endangered population of bighorn sheep.

Tubb Canyon and its bajada provide important habitat and water for a resident population of ~38 federally listed (Endangered) bighorn sheep (*Ovis canadensis*). It is my understanding that SDG&E is planning to conduct various types of studies in this area, and that these studies may involve drilling and seismic studies, archeological investigations, botanical and biodiversity surveys, etc. Although I recognize that these types of studies are needed prior to projects being initiated, it is my opinion that these studies in this particular canyon are currently unnecessary and may cause unnecessary disturbance to the bighorn sheep. First, the Sunrise Powerlink’s proposed “desert alternative route” for its 500kV transmission line down Tubb Canyon has been recommended for elimination by the California Public Utilities Commission 2nd Scoping Report along with several other routes; therefore these studies may not be necessary at all. Second, and most importantly, there apparently has not been any consideration of the timing of the studies or the impact that this may have on sensitive species.

Bighorn sheep in this population are currently entering their lambing season, with most lambs born during the months of February through April, but some born in summer months (Rubin et al. 2000). Females will seek remote quiet places when they are ready to give birth, and females with young lambs are particularly susceptible to disturbance, which can occur via a number of human activities. As the lambing season comes to an end, bighorn sheep face one of their toughest times of the year – our harsh desert summer. During the summer, bighorn sheep use Tubb Canyon heavily, due to the presence of a natural spring and an artificial drinker (“guzzler”), constructed and maintained by one of the landowners. This water source may be especially important this summer, due to the prolonged current drought.

I am concerned that SDG&E’s survey activities, especially if they involve drilling, seismic studies, use of large trucks and other large equipment, together with repeated visits, may disturb the bighorn sheep during these sensitive periods. I strongly suggest that SDG&E’s studies in Tubb Canyon be restricted to the autumn and early winter months (ideally October and November).

I have studied the endangered bighorn sheep in these mountains for approximately 13 years. During that time, I worked for the California Department of Fish and Game, monitoring the abundance, distribution, and reproductive status of bighorn sheep in the Peninsular Ranges, and for the Zoological Society of San Diego, conducting a study of habitat use and behavior of bighorn sheep. I am an invited member of the U. S. Fish and Wildlife Service’s (USFWS) Recovery Team for this population and am a lead author of the “*Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California*”. The Recovery Plan for this population provides guidelines for reducing disturbance to bighorn sheep, and recommends, for example, that activities

such as helicopter surveys be conducted in the autumn months to minimize disturbance from early spring through the summer months (USFWS 2000, p. 206).

With my particular expertise, I respectfully ask that you restrict SDG&E's access to this canyon to autumn and early winter months (ideally October and November) to reduce any potential, and possibly unnecessary, disturbance to the bighorn sheep.

Thank you for your consideration of this important issue. Supporting documentation for this request, excerpted from the USFWS "*Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California*," is attached.

Respectfully,

[email copy]

Esther S. Rubin, Ph.D.

PO Box 369
Borrego Springs, CA 92004
esrubin@consbio.org

Literature Cited

Rubin, E. S., W. M. Boyce, and V. C. Bleich. 2000. Reproductive strategies of desert bighorn sheep. *Journal of Mammalogy* 81(3):769-786.

U.S. Fish and Wildlife Service. 2000. *Recovery plan for bighorn sheep in the Peninsular Ranges, California*. U.S. Fish and Wildlife Service, Portland, Oregon. xv + 251pp.

Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California

U.S. Fish and Wildlife Service, Region 1

25 October 2000

Excerpts:

p. 42

5. OTHER NATURAL OR MANMADE FACTORS AFFECTING THEIR CONTINUED EXISTENCE (excerpts)

Drought: Prolonged drought is a natural factor that can have negative impacts on desert bighorn sheep populations, either by limiting water sources or by affecting forage quality (Rosenzweig 1968, Hansen 1980a, Monson 1980, Douglas and Leslie 1986, Wehausen *et al.* 1987, refer to section I.B.1). During drought years, the concentration of bighorn sheep near remaining water sources may increase competition for forage as well as water, thereby limiting population growth through density dependent regulation (Caughley 1977, Gotelli 1995). In addition, increased density potentially renders animals more susceptible to diseases or parasites (Anderson and May 1979, May and Anderson 1979).

Human Disturbance [pages 43-45]: Human development affects sheep through habitat loss, fragmentation, or other modification (refer to section I.D. 1 .1), but these impacts also extend into bighorn sheep habitat beyond the urban edge. Though a growing human population and increased activity adjacent to and within bighorn sheep habitat have potential to adversely affect bighorn sheep, accurate mapping of trail locations and quantitative monitoring of recreational trail use have not been conducted. In addition, incremental proliferation of trails has gone largely unaddressed.

Numerous researchers have expressed concern over the impact of human activity on Peninsular bighorn sheep (*e.g.*, Jorgensen and Turner 1973, Hicks 1978, Olech 1979, Cunningham 1982, DeForge and Scott 1982, Gross 1987, Sanchez *et al.* 1988), as well as on sheep in other areas (Graham 1980, Gionfriddo and Krausman 1986, Smith and Krausman 1988). Leopold (1933) considered bighorn sheep a wilderness animal because they fail to thrive in contact with urban development. A variety of human activities such as hiking, mountain biking, hang gliding, horseback riding, camping, hunting, livestock grazing, dog walking, and use of aircraft and off-road-vehicles have the potential to disrupt normal bighorn sheep social behaviors and use of essential resources, or cause bighorn sheep to abandon traditional habitat (McQuivey 1978, MacArthur *et al.* 1979, Olech 1979, Wehausen 1979, Leslie and Douglas 1980, Graham 1980, MacArthur *et al.* 1982, Bates and Workman 1983, Wehausen 1983, Miller and Smith 1985, Krausman and Leopold 1986, Krausman *et al.* 1989, Goodson 1999, Papouchis *et al.* 1999). Attempts to ascribe relative importance, distinguish among, or generalize the effects of different human activities on sheep behavior are not supportable, given the range of potential reactions reported in the literature and the different variables impinging on given situations.

Although cases have been cited in which bighorn sheep populations did not appear to be affected by human activity (*e.g.*, Hicks and Elder 1979, Hamilton *et al.* 1982), numerous researchers, including these authors, have documented altered bighorn sheep behavior in response to anthropogenic disturbance. Even when bighorn sheep appear to be tolerant of a particular activity, continued and frequent use can cause them to avoid an area, eventually interfering with use of resources, such as water, mineral licks, lambing or feeding areas, or use of traditional movement routes (Jorgensen and Turner 1973, McQuivey 1978, Graham 1980, Leslie and Douglas 1980, DeForge and Scott 1982, Hamilton *et al.* 1982, Krausman and Leopold 1986, Rubin *et al.* 1998). In addition, disturbance can result in physiological responses such as elevated heart rate (MacArthur *et al.* 1979, 1982), even when no behavioral response is discernable. It was repeatedly cautioned

that human disturbance threatened the viability of a bighorn sheep population in the Santa Catalina Mountains, outside of Tucson, Arizona (Etchberger *et al.* 1989, Krausman *et al.* 1989, Krausman 1993, Krausman *et al.* 1995). In these mountains, Etchberger *et al.* (1989) found that habitat abandoned by bighorn sheep had greater human disturbance than occupied habitat. Today, this population is extinct, or nearly so, and human activities apparently contributed to its demise (Schoenecker 1997; Krausman *et al.* in prep.; P. Krausman, pers. comm.).

A high level of human activity occurs in the habitat of Peninsular bighorn sheep. For example, during a recent 10-hour period in spring, 49 hikers, 2 mountain bikers, and 13 dogs (9 unleashed) were counted in Carrizo Canyon in the northern Santa Rosa Mountains (Bureau of Land Management, unpublished data). This trail bisects a lambing area that has received reduced levels of sheep use in recent years. A ewe and her lamb were observed to wait for over 5 hours to come to water because of continuous off-road vehicle traffic (Jorgensen and Turner 1973). Jorgensen (1974) reported that bighorn sheep use of important waterholes was 50 percent lower on days with off-road vehicle traffic. In Carrizo Canyon, Hicks (1978) observed a group of bighorn sheep flee from a spring area when a Navy helicopter passed overhead, Olech (1979) noted that bighorn sheep did not use waterholes when motorcycles were heard nearby, and Cunningham (1982) speculated that the use of springs by humans (recreationists and persons entering California across the U. S.-Mexico border) reduced use of this resource by bighorn sheep. Sanchez *et al.* (1988) recommended that future management efforts should attempt to reduce human impacts on bighorn sheep in Carrizo Canyon. As the human population of the southern California desert grows, such human activity in bighorn sheep habitat will increase.

Bighorn sheep responses to human activity are difficult to predict (Miller and Smith 1985) and depend on type of activity, season of the activity, elevation of the activity relative to resources (Hicks 1978, Graham 1980), and distance of the activity from resources critical to bighorn sheep (Miller and Smith 1985), among other variables. For instance, ewes with lambs typically are more sensitive to disturbance (Light and Weaver 1973, Wehausen 1980), as are animals that are approached from higher elevations (Hicks 1977, Graham 1980). Papouchis *et al.* (1999) found bighorn sheep to be more sensitive to disturbance during spring and fall, corresponding with the lambing and rutting seasons. Etchberger and Krausman (1999) observed the abandonment of lambing habitat while construction activities were ongoing.

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Develop and implement a trails management program with affected land management agencies, scientific organizations, and user groups

c. *Lambing and rearing habitat.* Seasonal restrictions are needed on selected trails that bisect lambing habitat. In this Recovery Plan, the lambing season is defined as January 1 to June 30, and lambing and rearing habitat is defined as those areas in which ewes and lambs are observed during this period. These definitions were chosen to provide protection for the majority of lambs during the first 3 months of life and to allow ewes undisturbed access to lambing areas prior to the peak parturition months (February through April).

d. *Water sources.* Seasonal restrictions or trail relocations may be appropriate for selected trails that lead to water sources. Trail use should be avoided near critical summer water sources from June 1 through September 30, and other times, as well, if water is scarce. Trail use is prohibited by regulation [see California Government Code, Title 14, Section 630(b)(1)(A) and (30)(A)] at Magnesia Springs and Carrizo Canyon Ecological Reserves.

1.2.2.2 *Manage activities within bighorn sheep habitat that fragment or interfere with bighorn sheep*

resource use patterns or other behaviors to reduce or eliminate adverse effects. This task includes but is not limited to road traffic, trail use, off-trail activity, and aerial activities, such as hang gliders and helicopters, which may have a negative effect on bighorn sheep. For example, the U.S. Navy currently implements a 457-meter (1,500-foot) minimum ceiling for military flights above bighorn sheep habitat in the north end of the Anza-Borrego Desert State Park and a 60-meter (200-foot) minimum ceiling in the remainder of the park. The 457-meter (1,500-foot) minimum ceiling should apply to all flights over any bighorn sheep habitat.

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Protocols for Monitoring Population Abundance

Helicopter surveys should be conducted ideally between late September and early November. This method reduces the risk to bighorn sheep by avoiding periods when young lambs are present, periods when ewes reach late gestation, and months of high summer temperatures.

From: donnairerearea@netscape.net
Sent: Tuesday, March 6, 2007 05:31 AM
To: sunrise@aspeneg.com
Subject: Powerlink through Anza Borrego Desert State Park

I am writing to urge you to oppose the proposal to put transmission lines across Borrego. Borrego is a treasure of solace, beauty and natural habitat. One of its most precious qualities is the openness, the freedom to let your eyes roam across miles of open country, and the freedom from visual intrusion. The transmission lines will do irreversible damage to the viewshed, unavoidable damage to the terrain in order to install and maintain them, and further the threat of extinction for many threatened and endangered species.

Our greed for power to light empty city parking lots, huge car lots, stadiums, mile after mile of subdivisions, millions of giant signs - has to stop somewhere. The waste is enormous. Please don't let them desecrate the beautiful magic that is Borrego.

Thank you.

Donna Rea Jones
20622 John Born Road
Penn Valley, CA 95946

From: Bill Powers [mailto:bpowers@powersengineering.com]
Sent: Thursday, March 08, 2007 9:45 AM
To: Brewster Birdsall; Susan Lee
Subject: RE: do you know if or who is modeling SWPL2 to Miguel?

Brewster,

Thank you for the list. Is it too late in the game for a party to request this option be modeled? I ask because SDG&E seems to have tacked a bit on the SWPL2 issue. They imply an N-2 standard may be applicable instead of only G-1, N-1. Also, the two reasons offered up by SDG&E for rejecting SWPL2 out-of-hand, 1) fire danger in the ROW and 2) congestion at Miguel are debatable. In its DR responses to UCAN, SDG&E has confirmed that SWPL has experienced remarkable reliability in the last decade, >99.8%. There have been fire related outages, but they have been minor and quickly resolved (apparently). Combining that level of reliability with the handful of hours per year that a G-1, N-1 or N-2 situation would actually trigger a reliability shortfall in San Diego under SDG&E basecase Sunrise scenario would probably be a 1 in 10,000 possibility.

SDG&E is testing a 69 kV HTLS line in its territory and extolling its performance in informal venues. At this point in time I think most parties would agree that 230 kV HTLS is commercial and reasonably priced. The "downstream 230 kV congestion at Miguel" issue could readily be resolved (if it is even real after the 10-yr Sempra DWR contract expires in 2011) by replacing the current downstream 230 kV lines with HTLS 230 kV lines.

Of general interest, Jim Avery and I debated Sunrise on KPBS public television on Jan. 31st. It was right after Jim conceded to the SDUT that even though the local combined-cycle option might be more cost-effective, Sunrise provided other benefits. The debate is online at:
http://www.kpbs.org/tv/full_focus?id=7223

Bill

4016 20th Street
San Francisco, CA 94114

March 9, 2007

Billie Blanchard/Lynda Kastoll
California Public Utilities Commission/Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104

e-mail: sunrise@aspene.com, bcbl@cpuc.ca.gov

Subject: Second Round 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 Ms Blanchard and Ms Kastoll:

We are the owners of land located on Tubb Canyon Road in Borrego Springs (APN 198-320-03). We would like to take this opportunity to provide comments on SDG&E's February 24, 2007 letter to you with subject "RE: Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise PowerLink Project".

Thank you for the opportunity to comment in this new round of public input, this time on an extended deadline granted through March 5. We respectfully request to give you these comments now: until recent communications from other Borrego Springs property owners, we had been unaware of this extended opportunity for comment. We had also been unaware of SDG&E's letter of February 24. In particular, we were unaware of SDG&E's request that the CPUC and BLM carry forward the "SDG&E Borrego Valley Alternate" route for further consideration and analysis.

We oppose this request by SDG&E, as we oppose any route that would site a new transmission line through any part of Anza Borrego Desert State Park (ABDSP).

As lovers of ABDSP for thirty years, and as more recent owners of property near the Park, we have watched with alarm any proposals to impinge upon the Park, its wilderness areas and wildlife. We support any alternatives – transmission upgrades along the SWPL, or accelerated development of new generation in San Diego, for example – that do not violate the sanctity of the Park.

As residents of San Francisco, we were unable to attend the second round of scoping meetings on alternatives that were held in San Diego County in February of this year. At the time, we were relying on the information in the "Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project", which we received in January. This Notice included the information that the SDG&E Borrego Valley Alternate had been eliminated for further consideration because, among other things, it would create a new transmission corridor within a State-designated wilderness area (the Pinyon Ridge Wilderness Area), requiring a re-

designation of Wilderness Area and State Park Plan amendment. In addition, this Alternate route would be within bighorn sheep habitat.

This precedent-setting "de-designation" of State wilderness would be, we understand, a first in California history. If wilderness is de-designated here, it can and likely will happen anywhere, and such change should not be allowed. Wilderness, especially fragile desert wilderness, cannot simply be recreated when disrupted. (Nor do we place much credence in SDG&E's claim in its discussion of this Alternate that it can "restore" the wilderness in other portions of ABDSP.) All of the other objectives SDG&E hopes to achieve with the Sunrise line – meeting growing demand, increasing reliability, developing renewables – can be met without harming ABDSP and its wilderness. We believe that preservation of Park lands in general, and Wilderness areas in particular, should be given "first priority" by State policy makers as they weigh public and private needs.

We have a further interest in ensuring that SDG&E not be allowed to proceed with further consideration of the SDG&E Borrego Valley Alternate. We have been working on a plan for our parcel of land that would create a 7 acre (approximately) desert resource protection zone alongside Tubb Canyon Road (that is, along Tubb Canyon Road and extended up to hundreds of feet into our property). This plan currently is being developed and will be submitted to San Diego County soon. If the Alternate is allowed to proceed, SDG&E may proceed with its announced plans to perform tests on our property, presumably within this resource protection zone. These tests in this zone will have unknown impacts on the fragile environment in the zone. Further, if the Alternate were built, our plans to create this restoration and preservation zone obviously will be undermined. We are attempting to protect habitat for the dozens of sensitive or protected plant and animal species with the potential to occur in this zone, and on our parcel, but these efforts will be adversely affected by testing or construction that can, we believe, be avoided. We have suffered along with other Tubb Canyon landowners and homeowners from SDG&E's lack of information and adequate notice, and unanswered requests for information. We, along with endangered and rare wildlife species, would be adversely affected by the utility's plans.

Please eliminate consideration of the SDG&E Borrego Valley Alternate. Please also encourage SDG&E to abandon any plans for any route through ABDSP. Protect this jewel.

Thank you for your consideration.

Sincerely,

[signed]

Bruce R. Bowen
Junona A. Jonas

From: Bill Powers [mailto:bpowers@powersengineering.com]
Sent: Friday, March 09, 2007 10:21 AM
To: Brewster Birdsall
Cc: Susan Lee
Subject: ISO letter disingenous, Case 212 - SWPL2 - is already modeled

Brewster,

Thank you for sending along the Oct 2006 ISO letter regarding SWPL2. The ISO letter is quite disingenous. The option being considered by Aspen involves paralleling SWPL for only the eastern portion of the corridor, then goes north of SWPL. I believe most of the outages cited by SDG&E have occurred farther west, in the more heavily forested part of San Diego County rather than the desert of Imperial County and the first 10-20 miles into San Diego County. I am aware that the UCAN data request 10-1b (sent 1/18/07) specifically asked for outage data for SWPL by geographical segment. On February 1st, SDG&E answered DR10-1a and said the answer to 10-1b would be coming on February 6. More than a month later, it has not yet arrived.

So the ISO has no factual basis for claiming that there is any particular probability that there will be: 1) double outages of SWPL on the section of SWPL east of Boulevard, CA, 2) that those outages will occur when combined flows on the two parallel lines are above 1900 MW, the level of flow that the single existing SWPL can carry and whose loss SDG&E can survive without dropping load, and 3) that those outages will occur when total imports into SDG&E are above 2500 MW, the level at which loss of two lines from IV substation would overload the south of SONGS path.

Also, since SDG&E has now put in play the equivalency of an N-2 outage to an N-1, G-1 outage, how is losing both SWPL1 and SWPL2 in the same ROW any different than losing SWPL1 and Sunrise Powerlink in SDG&E's preferred corridor? Previously, SDG&E has bad-mouthed the SWPL2 alternative by saying that the risk of having two lines in the same corridor is unacceptable, consistent with the ISO Oct 2006 letter. In their Jan. 26, 2007 workpapers, specifically the file entitled "Jan26-07_Alt_parallel_SWPL_v2.xls", SDG&E takes a slightly different line. SDG&E still says that reliability would have to be based on an N-2 of both SWPL lines, but they no longer claim it would have to be based on an N-2 **and** loss of Otay Mesa generator.

N-2 equivalency to N-1, G-1 in the SWPL2 case means the ISO and Aspen should very definitely be assessing the SWPL1/SWPL2 scenario to Miguel per SDG&E modeled Case 212. Given SDG&E has modeled SWPL2 in Case 212, Aspen can incorporate the model results "off-the-shelf" in the alternatives analysis. No additional modeling work is required, unless the results of the Case 212 modeling exercise are obviously incongruous.

One incongruity might be that SDG&E is already planning one new 230/138 kV transformer at Miguel by 2010 (see the ISO draft 2007 transmission plan, on-line at <http://www.aiso.com/18c6/18c6cd6f504d0.pdf>, Table 2-3, item 17) but didn't include it in their 1/26/07 modeling of Case 212 (per their response to UCAN DR9-36b).

Bill

proceed

MAR 14 2007

P.O. Box 375
Santa Ysabel, CA 92070
March 10, 2007

Public Utilities Commission
State of California
505 Van Ness Avenue
San Francisco, CA 94102

A.06-08-010

RECEIVED
PUBLIC UTILITIES
STATE OF CALIFORNIA
2007 MAR 20 PM 2:48
DOCKET OFFICE (MAIL)

Re: Application A0608010, SDG&E Sunrise Powerlink Transmission Project

Dear Sir/Madam:

On December 13, 2006 the San Diego Union Tribune ran an article entitled **"SDG&E says its power line won't be buried."** SDG&E should not be allowed to get away with this in the Santa Ysabel Valley, near Lake Henshaw or in the Anza Borrego State Park.

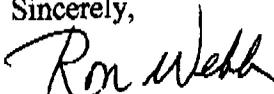
Several years ago they did the same thing in Lakeside with a massive new power line that blighted the area and everyone has to look at it every day. They now want to spread that visual blight to the rest of East County by erecting steel towers up to 155 feet high.

After the Cedar Fire on 2003, much of the forest by the road through Cuyamaca was destroyed. The Santa Ysabel Valley is one of the last relatively untouched valleys in San Diego County and should not be destroyed SDG&E's greed. This scenic valley is enjoyed by thousands of San Diegans each weekend.

Santa Ysabel is an area of extreme fire danger throughout the year with extreme heat and wind conditions. During major fires in the area many helicopters land and takeoff in the fields adjacent to the downtown area of Santa Ysabel. Most of these fires are accompanied by extremely windy conditions. Landing and launching aircraft near 150 foot high electric towers would be a disaster in the making. If they (SDG&E) insist on a power line through the Valley it should go underground.

RECEIVED
PUBLIC UTILITIES
STATE OF CALIFORNIA
2007 MAR 20 PM 2:48
DOCKET OFFICE (MAIL)

Sincerely,



Ron Webb