PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



April 21, 2008

Sheila Donovan Community Plans & Liaison Office Naval Facilities Engineering Command SW 937 North Harbor Drive San Diego CA 92132

Re: Request for Information Regarding Sunrise Powerlink Project Alternatives

Dear Ms. Donovan:

The California Public Utilities Commission (CPUC) and the U.S. Bureau of Land Management (BLM) appreciate receiving the Navy's letter of April 9, 2008 (copy attached) presenting comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for SDG&E's proposed Sunrise Powerlink Transmission Project. We have three follow-up questions that will allow us to better define the Navy's concerns with the Modified Route D Alternative and the Interstate 8 Alternative.

1. Chocolate Canyon Option

This Option was developed in order to minimize views of the transmission line from the residential area on the west rim of the Canyon (on Chocolate Summit Drive) and to use existing access roads along the edge of the reservoir and in the Canyon. It is illustrated in Figure E.1.1-4d (attached) and in a topographic map following that figure. The original Interstate 8 Alternative route was at about 1,300 feet of elevation, just below the residences. The segment along the canyon is about 2.5 miles long. The Option would be at about 800 – 1,000 feet of elevation as it runs north through the Canyon and around the edge of the reservoir.

The Navy commented that this option would conflict with helicopter training operations that use the canyon. We would like to avoid placement of this transmission line at the highest elevation in residential views, and maximize use of existing roads. Is there a mid-level location for this route segment that would prevent a Navy training conflict but still reduce the impact of the transmission line on the adjacent residences?

2. La Posta Mountain Warfare Training Facility (MWTF)

Your letter comments that the Navy has low-level helicopter flights between Camp Morena and the La Posta MWTF. The La Posta MWTF is located about one mile west of the western boundary of the La Posta MWTF. Based on a meeting held last fall with Scott Penwell and Sheila Donovan, we were under the impression that this route segment would not cause any problems for Navy helicopter flights. Please clarify whether the current route of the Modified

Route D Alternative (as illustrated on Map 2, attached) is located at an acceptable distance from flight routes.

3. Modified Route D Alternative – Lenac Revision

We have received a request from Randolph Lenac that we consider the "Lenac Option" which would move the Modified Route D Alternative at about Milepost (MP) MRD-5 further east on the Lenac property, thus lessening the impact to his property. Mr. Lenac met on his property with Scott Penwell, Environmental Program Manager for Naval Special Warfare Command, and has informed us that Mr. Penwell told him that this route modification would not affect future operations in the Navy Withdrawal area of the adjacent BLM land.

Additionally, the Lenac Option recommends that the power lines that traverse the Navy training space be constructed using the reduced height, single poles, to further reduce possible adverse impacts of the proposal. Please see the attached map, which was provided to us by Mr. Lenac. On this map, the Lenac Option is in yellow and possible access roads identified by Mr. Lenac are in purple.

3a. Would a 500 kV overhead transmission line be an acceptable as depicted by Randolph Lenac?

3b. If any part of this route would <u>not</u> be acceptable for a transmission line, please let us know if other segments would be acceptable for a transmission line.

3c. Does the Navy have any comment on tower design styles or tower heights that would be most appropriate in this area given the existing and future helicopter operations? The 500 kV towers can as short as 100 feet, but are generally in the 140 to 170 foot range.

We would appreciate your prompt responses to these requests; if possible, please reply by May 5, 2008, or as soon as possible. Any questions on this information request should be directed to me at (415) 703-2068.

Sincerely,

Bíllíe C. Blanchard

Billie C. Blanchard, AICP, PURA V Project Manager for Sunrise Powerlink Project Energy Division, CEQA Unit

Attachments:

Navy Comment Letter of April 8, 2008 Map of Lenac Alternative

cc: Sean Gallagher, CPUC Energy Division Director Ken Lewis, CPUC Program Manager Steve Weissman, ALJ Traci Bone, Advisor to Commissioner Grueneich Nicholas Sher, CPUC Legal Division Lynda Kastoll, BLM Susan Lee, Aspen Environmental Group



DEPARTMENT OF THE NAVY COMMANDER NAVY REGION SOUTHWEST 937 N. HARBOR DRIVE SAN DIEGO, CA 92132-0058

A0017

IN REPLY REFER TO: 11000 Ser N411/212 9 Apr 08

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

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report/Environmental Impact Statement (DEIS/EIR) for San Diego Gas and Electric's application to build and operate the Sunrise Powerlink Transmission Line Project (January 2008).

The DEIS/EIR identifies 27 alternatives and the proposed project that would construct a new 91-mile, 500 kilovolt transmission line from Imperial County to San Diego. The Navy has reviewed all alternatives for compatibility with its operations and training, and has the following comments.

The Navy has concerns with the proposed Environmentally Superior Southern Route Alternative and route options.

1. Interstate 8, Chocolate Canyon Alternative:

This alternative has potential significant impact to Naval aviation. The unique topography of the Chocolate Canyon is used for helicopter low level, terrain following flights. Specifically, Chocolate Canyon is used by the Navy to train helicopters to use terrain to camouflage their transition to/from tactical situations. Installing power lines down this valley will have significant impact on this valuable training. To avoid impacting this training, the Navy recommends installing the power lines to the west, along the Interstate 8 Alternative.

2. Modified Route D Option:

The Modified Route D option will place the power line at or below the west side of the ridge line located northwest of La Posta Mountain Warfare Training Facility (MWTF). This area is commonly used for helicopter low level access flights between Camp Morena and La Posta MWTF in support of unique Naval Special Warfare training, therefore, there will be minor impact to Naval aviation. As long as the power lines are located on the down slope, west of the ridge, the lines would not pose a significant impact.

The Navy has no comments on the following Alternatives and various route options:

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- 1. New In-Area All-Source Generation Alternative
- 2. New In-Area Renewable Generation Alternative
- 3. LEAPS Transmission-Only Alternative
- 4. Environmentally Superior Northern Route Alternative
- 5. Proposed Project

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6. LEAPS Generation and Transmission Alternative

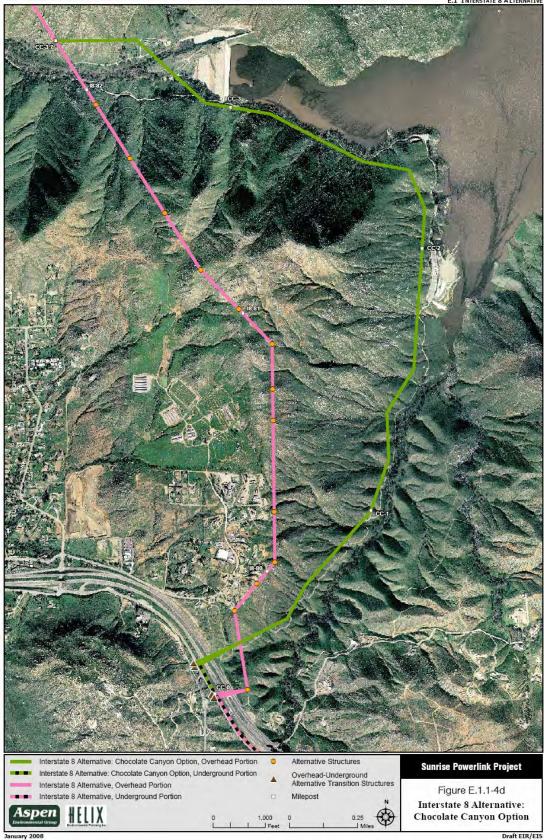
The Navy appreciates the excellent working relationship established with the CPUC/BLM Sunrise Powerlink project team. We continue to be available to meet with you to provide Navy input.

My point of contact for this project is Ms. Sheila Donovan who can be reached at (619) 532-1253.

Sincerely,

HR/HERING Rear Admiral, U.S. Navy Commander, Navy Region Southwest

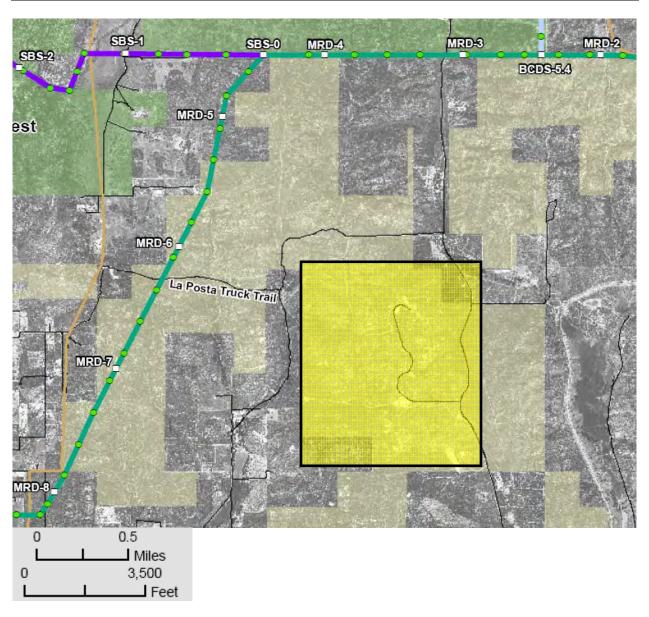
Sunrise Powerlink Project E.1 INTERSTATE 8 ALTERNATIVE



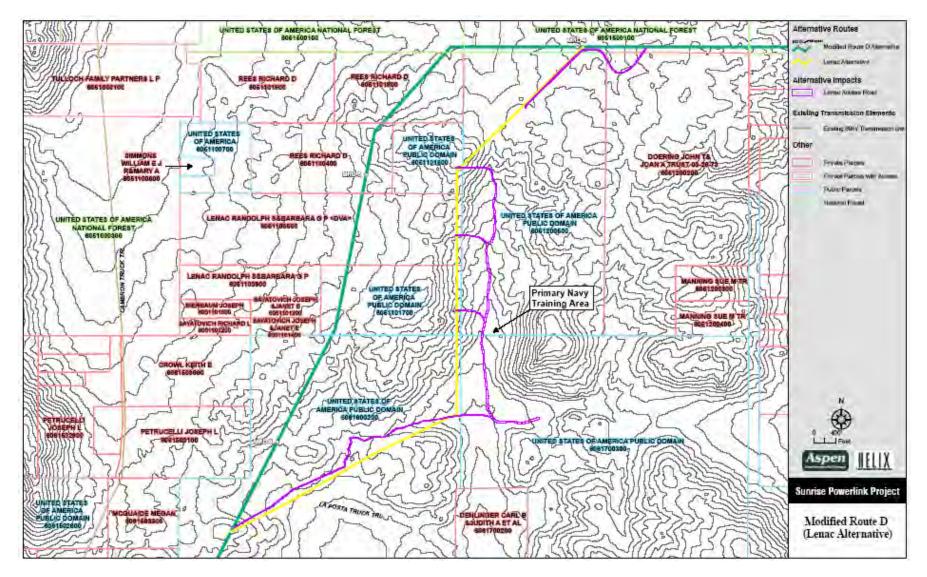


Chocolate Canyon (west end of Town of Alpine)

MAP 1. Chocolate Canyon Topography



MAP 2. La Posta MWTF shown in yellow. Modified Route D Alternative shown in green line.



Map 3. Lenac Option