

Comment Set A0018
County of San Diego – Department of Planning and Land Use



ERIC GIBSON
INTERIM DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

April 9, 2008

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

**RE: PROPOSED SUNRISE POWERLINK DRAFT ENVIRONMENTAL IMPACT
REPORT/ ENVIRONMENTAL IMPACT STUDY**

To Whom It May Concern:

The County of San Diego (County) has received and reviewed the Draft Environmental Impact Report/ Environmental Impact Study (DEIR/EIS) for the Sunrise Powerlink dated January 3, 2008. The County appreciates Aspen Environmental Group's efforts to communicate with and obtain information from the County in order to provide a thorough analysis of the project impacts in the Unincorporated area. Enclosed are the County's comments in response to this document.

The County is the land use authority for the Unincorporated area of San Diego County. The public looks to the County to establish regulations that guide reasonable and environmentally sensitive growth, especially in rural communities. The County is also responsible for maintaining the quality of County road right-of-ways and public facilities, and the recreational and biological value of the parks, preserve areas, and trail systems.

Staff from the County of San Diego Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and the Department of Parks and Recreation (DPR) have reviewed and commented on the content of the DEIR/EIS. Overall, the DEIR/EIS does not establish the need for the Proposed Project. The analysis also demonstrates that the Proposed Project will degrade the quality of the environment in the Unincorporated area, particularly in terms of visual, biological, and agriculture resources, air quality, noise, traffic and numerous other elements of importance to the quality of life in the Unincorporated County of San Diego. The Proposed Project will also have extensive significant negative affects on lands purchased by the County for conservation and recreational purposes.

A0018-1

The enclosed comments focus on a number of general issues identified in the DEIR/EIS, including the need for the Proposed Project and the potential growth-inducing effect of the Proposed Project. Also enclosed are more detailed comments specific to the

Comment Set A0018, cont.
County of San Diego – Department of Planning and Land Use

recreational, biological, air quality and circulation or road-related impacts analyzed in this document.

Please feel free to contact Thomas Oberbauer at (858) 694-3701 with additional questions.

Sincerely,



ERIC GIBSON
Interim Director, Department of Planning and Land Use

CC: Vince Nicoletti, Staff Officer, County of San Diego Land Use and Environment
Group Executive Office, MS-A6
Jeff Murphy, Deputy Director, County of San Diego Department of Planning and
Land Use, MS-0650
Thomas Oberbauer, Chief, County of San Diego Department of Planning and Land
Use, MS-0650
Trish Boaz, Chief, County of San Diego Department of Parks and Recreation,
MS-029
Nick Ortiz, Project Manager, County of San Diego Department of Public Works,
MS-0383

Comment Set A0018, cont.
County of San Diego – Department of Planning and Land Use

**County of San Diego General Comments regarding the Sunrise Powerlink
Transmission Line Project DEIR/EIS:**

1. Need for the Proposed Project

The DEIS/EIR does not support the need for the Proposed Project. It is unclear why this alternative was selected for analysis as the Proposed Project considering its relatively low ranking among the transmission projects and alternatives identified and the ability of the Overall Environmentally Superior Alternative (New In-Area All-Source Generation Alternative) to meet most of the project objectives. In the analysis of the "No Project/ No Action Alternative", this document explicitly states "...the No Project/ No Action Alternative would have fewer impacts than those of the Proposed Project [and several other alternatives]...and impacts equivalent to [several other alternatives]... Only about 1,000 MW of in-basin generation or transmission import capacity would be required to replace the Proposed Project, so any one of the three top ranked alternatives would provide adequate resources" (ES-4). The DEIS/EIR states that this alternative may not meet all major project objectives, including the requirement for access to renewable energy resources. However, a combination of other alternatives with fewer significant, unmitigable impacts, including New In-Area All-Source Generation, would achieve this objective.

In addition, the Proposed Project has a greater number of significant, unmitigable impacts than all other alternatives. Of particular concern to the County of San Diego are the magnitude of the significant, unmitigable impacts to visual resources (including the Santa Ysabel valley and other County communities), biological resources, air quality and County lands utilized for recreational and conservation purposes. The future expansion that is anticipated as a result of the Proposed Project will most likely result in additional significant impacts in these areas.

The DEIR/EIS also does not establish need for the following alternatives; LEAPS Transmission-Only Alternative (3), Environmentally Superior Southern Route (SWPL) Alternative (4), Environmentally Superior Northern Route Alternative (5), LEAPS Generation and Transmission Alternative (7).

Based on the DEIS/EIR (ES-66), the least impactful alternatives that still meet all or most of the project objectives include the (1) New In-Area All-Source Generation Alternative, (2) New In-Area Renewable Generation and the No Project/ No Action Alternative. Any of these three alternatives eliminate or substantially reduce significant impacts of concern to the County of San Diego.

A0018-2

Comment Set A0018, cont.

County of San Diego – Department of Planning and Land Use

In addition, the (1) New In-Area All-Source Generation Alternative and the No Project/ No Action Alternative would imply that planning to meet regional energy needs would continue primarily through existing venues such as local jurisdictions and established, successful regional energy partnerships. The County recognizes the need to establish long-term energy capacity, reliability, and access to renewable energy sources. The County has been involved in local and regional energy planning through these mediums and supports these ongoing efforts.

A0018-2 cont.

Additionally, existing state programs encourage the development of local renewable energy through the Million Solar Roofs Plan. This plan is in process, the associated technology has been proven to be effective, and the project will not result in significant biological impacts because it would be constructed on existing development. The Stirling Energy Systems solar facility and the La Rumorosa wind project from which the Proposed Project would obtain renewable energy would have a range of significant biological impacts affecting thousands of acres of land containing ecosystems and recreational areas connected to those in the Unincorporated area (B.6.1).

2. F.2 Growth-Inducing Effects

The County concurs and is concerned with the conclusion that the Proposed Project "...would facilitate growth indirectly by removing obstacles to population growth through the additional increased capacity of electric power that it would make available..." (F.2.2). Growth-inducing impacts could affect Unincorporated San Diego County particularly along the Central Link and Inland Valley Link. Planned growth in these areas is minimal and population capacity is currently constrained by physical, geographical and other factors including limited access to infrastructure and services. Development of the Proposed Project would extend the capacity for electrical power in these areas and, more significantly, could facilitate the expansion of other infrastructure into these locations, such as water and sewer facilities.

A0018-3

The statement that "...Growth in the Proposed Project areas is expected to occur with or without implementation of the Proposed Project..." (F.2.2) does not adequately convey the very limited scope of the growth expected in some areas of the Proposed Project located within Unincorporated San Diego County. The County of San Diego General Plan provides limited growth capacity in this area. In addition, the General Plan Update that is currently in process proposes very low density in the rural communities potentially affected by the Proposed Project.

A0018-4

3. Impacts to Visual Resources/ Community Character

Impacts to visual resources within the County are of great concern to the County. As noted in previous comments pertaining to the scoping phase of this project, the community character of rural communities would be

A0018-5

Comment Set A0018, cont.
County of San Diego – Department of Planning and Land Use

significantly impacted by the Proposed Project and all of the transmission-only alternatives. Should the need for the Proposed Project or another transmission-based alternative be established, complete undergrounding of visually impactful lines should be incorporated into all alternatives. Permanent visual impacts within the Unincorporated area would be eliminated by undergrounding all lines within the County's jurisdiction. Of particular importance would be undergrounding of transmission lines proposed within or visible from rural communities, and proposed within other notable vistas such as the Santa Ysabel valley. Undergrounding of these lines should only occur solely along existing transmission line easements and/ or in road Right-Of-Way (ROW) (in coordination with the respective jurisdiction) to avoid additional temporary or permanent impacts to biology and community character.

A0018-5 cont.

4. Impacts to Biological Resources

The Proposed Project will have a range of significant, unmitigable biological impacts to lands within the jurisdiction of the County of San Diego, including lands within the adopted Multiple Species Conservation Program (MSCP) South County Subarea Plan and within the North and East County MSCP Plan currently under development. This includes impacts to biological resources planned primarily for conservation through the County of San Diego Multiple Species Conservation Program (MSCP) as further described in the detailed comments below regarding biological resources.

A0018-5A

5. Reliability

"Maintain Reliability" is stated as one of the primary goals of the Proposed Project (ES-19). The DEIS/EIR does not demonstrate how the Proposed Project satisfies the reliability mandate with respect to 1) the reliance on other connected actions outside of the United States and 2) the high fire-risk associated with proposed powerlines through the backcountry of San Diego County.

A0018-6

International Power Generation Sources:

The DEIS/EIR indicates that renewable wind energy from this source will be distributed via the SWPL based on the ability of the Proposed Project to transmit some of the power now carried by the Southwest Powerlink (SWPL).

Fire:

The location of the Proposed Project within high fire risk areas raises concerns regarding the potential for these lines to be impacted during the event of one or more simultaneous fires throughout the region. Fire hazard is significant in the eastern portion of San Diego County in much of the Proposed Project location. This could have serious impacts with regard to the reliability of this powerline. In addition, the DEIS/EIR

A0018-7

Comment Set A0018, cont.
County of San Diego – Department of Planning and Land Use

indicates that Fire Prevention and Response Plans (FPRPs) will be created for the Proposed Project. This does not address the fundamental issue of fire hazard from downed powerlines. Also, the fact that two power lines into the County in widely separate locations had simultaneous fires in October would seem to negate or reduce their claim about the problems with lines that are close together. It now seems that it is just as likely that two separate lines would be threatened by burning as two lines with close proximity.

A0018-7 cont.

6. Air Quality

The DEIR/EIS states that "...because total construction GHG [Greenhouse gas emissions] emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact..." (ES-25). The County is involved with ongoing programs and efforts to improve air quality and is concerned that the increase in GHGs from the Proposed Project would be higher than the continued operation of in-basin power plants even though one of the basic concepts of the project was that it would provide for renewable energy with reduced greenhouse gases.

A0018-8

7. Agriculture

Agriculture is the fifth largest industry in San Diego County. The County Board of Supervisors has adopted Board Policy I-133, "Support and Encouragement of Farming in San Diego County" (<http://www.sdcountry.ca.gov/cob/policy/I-133.pdf>). The Proposed Project would have significant, unmitigable impacts to hundreds of acres of Department Of Conservation mapped Farmland, Active Agricultural Operations, and Williamson Act Lands (D.6-46). Negative impacts to farmland via the Proposed Project conflict with Board Policy I-133. No significant, unmitigable impacts to farmland should be allowed to occur.

A0018-9

8. Need for Additional Inter-Agency Coordination

The County appreciates SDG&E's ongoing communication with the County and SDG&E's efforts to meet with County staff at key junctures of the project. This has provided County staff with the opportunity to ask basic questions regarding the project and the structure of the environmental analyses. However, elements of the stated project impacts require further description, analysis and coordination with the County in order to establish an adequate assessment of impacts (particularly stated "significant unmitigable" impacts) and/ or mitigation measures. These elements are described further in the detailed comments below.

A0018-10

In addition, the DEIS/EIR states that the Bureau of Land Management (BLM) "...has not yet defined its Agency Preferred Alternative, so the