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Boulevard Planning Group

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CPUC/BLM
2008
Co/Aspen Environmental Group
235 Montgomery Street, Suite 935
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April 10,

COMMENTS ON THE SUNRISE POWERLINK DEIR/EIS (CALIFORNIA SCH #2006091071, DES CONTROL NO. DES-07-58)

B0002-10

Dear CPUC and BLM,

The Boulevard Planning Group (previously known as the Boulevard Sponsor Group) is an elected body which advises San Diego County on local land use issues, it also serves as a forum for issues of local concern. Our planning group has been actively involved and has participated from the beginning of the public review process for this highly controversial project. We have also gone on record numerous times as opposing the project in its entirety. We hereby incorporate our previous comments. Our Boulevard neighborhood will be physically impacted by the I-8, BCD, Modified Route D Alternatives, the New In Area All source Generation, and the New In-Area Renewable Generation Alternatives, all of which placed in the top four overall environmentally superior alternatives as identified by the DEIR/EIS. We stand together with other communities, both human and natural, that will be negatively impacted by the Sunrise Powerlink project and other projects integrally connected to it, both directly and indirectly. As ratepayers we will all be negatively impacted by this shortsighted and wrongheaded project.

Those who have labored over this massive EIR process are commended for their in-depth review and amazing organizational skills. However, those of us who live in the impacted areas believe that this DEIR/EIS document contains material factual inaccuracies and deficiencies. It does not fully portray the legacy of impacts that we will be forced to live with day in and day out into the future.. At our regular meeting, held on April 3, 2008, our group reviewed my draft comments and voted 6-0-0, (one member absent), to have me complete them and submit them on behalf of the group. The majority of these comments are focused on our Southeastern San Diego County area and the Imperial Valley because that is where we have the most knowledge.

Summary:

It is our strong opinion that the Sunrise Powerlink *transmission only* project is not needed , nor has it proven itself to be a cost effective way, to provide renewable energy to San Diego. We believe the

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project will actually increase costs and Green House Gas impacts associated with the importation of dirty LNG, and the potential use of the line for transmission of fossil fuel generated power. There are also unknown costs related to remote renewable energy projects such as massive amounts of water for remote geothermal and solar projects. The cost and availability of water and fossil fuels is expected to escalate considerably in coming years. We believe the project will actually reduce reliability based on multiple connections and projects reliant on one remote and vulnerable substation in Imperial Valley. The Imperial Valley Substation is located near the US/Mexico border in an area of active faults subject to earthshaking and ruptures. There area is also known to be frequented by criminal smuggling syndicates, making it a viable and vulnerable target for acts of terrorism/sabotage. B0002-11 B0002-12 B0002-13

The San Diego region would be better served to follow the Southern California Edison example and produce their own in-basin energy on the rooftops of commercial, industrial and public facilities, as well as on parking structures, closed landfills, and military bases. To backup in-basin renewable energy generation, and for better distribution and added reliability, follow-up on energy efficiency initiatives, in addition to increased self generation and combined heat and power projects, will be needed. There is no need to desecrate and scar the wild and rural heritage and resources of Imperial and San Diego counties to tap into renewable resources that are available close-in. There is no need to add to the already elevated fire danger of the region by installing multiple overhead transmission lines and industrial turbines (which can ignite wild fires through malfunctions) in areas with high fuel loads and high winds. The October 2007 firestorms, some reportedly started by power lines, demonstrate that wildland fires threaten rural, suburban and urban neighborhoods. Sunrise Powerlink is not the way to achieve long-term, low-cost, or reliable sustainable energy for San Diego's future. B0002-14 B0002-15

Purposes of the Proposed Project (CPUC and BLM Objectives) B0002-16

1) Maintain Reliability:

Maintaining reliability with all your eggs in one basket is risky at best. The Imperial Valley Substation is that one basket. Earthquakes, were erroneously dismissed as Class III impacts and insignificant. In D.13 Geology, the DEIS/EIR discusses potential earthquake impacts on the proposed transmission line and various substations but it does *not* address the impacts on the main Imperial Valley Substation itself (D.13-47-48). The document is deficient in analyzing this major reliability issue which represents a significant error of omission

All of the following projects are rooted and/or connected at the IV Substation:

- **The existing 500 kV Southwest Powerlink (SWPL).**
- **Sempra's two existing Mexican gas-fired power plants near Mexicali.**
- **All of the potential routes for the Sunrise Powerlink (SPL).**
- **Stirling Solar's separate 230 kV line connection.**
- **Sempra's Baja Wind at LaRumarosa proposes to connect up to 1,240 MW via the**

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proposed Jacumba 500 kV Substation and SWPL.

- **New wind projects in the Boulevard area are proposed to connect to SWPL and the IV substation through the Jacumba Substation.**

B0002-16 cont

With the close proximity to the Imperial Valley Substation (see Figure D.13.2) to the San Andreas Fault, the Laguna Salada Fault, the Elsinore Fault, the Imperial Valley/Brawley Seismic Zone, the San Jacinto Fault Zone, the Superstition Fault, the Superstition Mountain Fault, the Yuha Wells Fault, and others, disruption of service due to severe earth shaking or rupture is a very real possibility. There is also a concern for liquefaction in the general area.

In addition to the potential for both 500 kV lines being knocked out of service at the same time, the Sempra gas fired power plants at Mexicali and La Rosita, and the Baja pipeline that feeds them, which currently provide cross border power via SWPL, would also be subject to disruption/destruction by the same or different earthquakes, land ruptures and liquefaction.

On the Mexican side of the border is the Cerro Prieto geothermal field. It is our understanding that Mexico does not fully require reintroduction of fluid to replace the geothermal fluid that is withdrawn from the underground resource. This has caused some cases of severe ground subsidence. Some believe that this change in underground dynamics may be contributing to the recent swarm of earthquakes felt throughout the Mexicali and Imperial Valleys as well as Eastern San Diego County. I personally experienced the 1968 and 1979 earthquakes in Imperial Valley and land ruptures that occurred. I have spoken directly to those who experienced the 1940 quake which was more even destructive with more extensive land ruptures. As recently as March 29th another 4.2 earthquake rattled that area. California passed SB-1953 in response to the Northridge quake that made hospitals a target for retrofitting. **It is my understanding that there are no current laws mandating the retrofitting of existing power plants to that same stringent code.**

Acts of Terror/sabotage were also erroneously dismissed as an insignificant Class III impacts (D.10.25, E.4.10-5, Impact PS-4 & PS-5 for Connected Actions). Again the DEIR/EIS is deficient in analyzing the co-location issue for both 500 kV lines, and multiple generation sources, at one vulnerable substation which represents a major Achilies' Heel for the project. Connecting both the Southwest Powerlink (SWPL) and the Sunrise Powerlink (SPL) to the IV Substation could impact reliability based on the substation's location in a remote, isolated, and vulnerable area of the US/Mexico border (see Fig. ES-5, ES-10, ES-12, Ap.1-27a & B-30). The area is known to be frequented by organized criminal smuggling syndicates, as is the Eastern San Diego sector of the border where the Jacumba Substation is proposed. . According to agents that work the border in Imperial and San Diego Counties, aliens, and criminal aliens, associated with known and suspected terror groups, and countries of interest, have been apprehended in both the Imperial and San Diego County ,and other, border regions. Those of us who live here have to deal with numerous federal checkpoints on our local and regional byways and highways: Historic Route 80, I-8, Hwy 94, S-2, Hwy 86, and more. We also deal with criminal human and drug smuggling activities in our communities and across our own properties. The lack of control at the

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US/Mexico border has permeated our every day lives. The threat level in our area is chronically rated as "Elevated". (Exh. 1: Illegals From Terror-Sponsoring Nations at Large in US, cnsnesw.com, 8-8-06 &US-Mexico Border As A Terror Risk, Christian Science Monitor 3-22-05).

The primary mission of the Department of Homeland Security and the US Border Patrol is to "prevent terrorists and terrorist weapons from entering the country". According to the Governor's Office of Homeland Security (www.ohs.ca.gov), since 2002 the San Diego region has received numerous federal grants, totaling $85,084,758, to address homeland security issues based on elevated terror threats. The Imperial Valley has received $2,765,533.. Various public officials and elected representatives have repeatedly demanded more federal aid to address the threat of terrorism. Based on these figures, and the actions of public agencies and officials, the threat of terrorism is very real. The IV Substation, and the main transmission line(s) for the San Diego region, SWPL and the proposed Sunrise Powerlink and the Jacumba Substation, are all viable and valuable targets for terrorist groups or individuals wishing to inflict harm to critical infrastructure and key assets. **How much money has been requested or invested in protecting the IV Substation and the remote transmission lines? What would be the cascading effect of that main junction being taken out? To dismiss this issue as a Class III impact is not only a major error, it is dangerous.**

B0002-18

2)Promote Renewable Energy.:

The Sunrise Powerlink is a bait and switch project which proposes to import renewable energy from numerous speculative remote projects, few of which have materialized. On the other hand, the recent announcement of Southern California Edison's (SCE) plan to install up to 250 MW of advanced solar on 65 million square feet of roofs on commercial buildings (Exh. 2:Renewable Energy World.com 3-28-08 & North County Times 4-9-08) gives credence to the DEIR/EIS's top two environmentally superior alternatives and to the San Diego Smart Energy 2020 plan authored by Bill Powers, P.E. (October 2007), as the 21st century alternative to the old school Sunrise Powerlink proposal. The SCE project was prompted by recent reductions in the cost of installed solar photovoltaic (PV) generation. The estimated cost is $875 million. When combined with the size of SCE's investment the resulting costs per unit are projected to be half that of common PV. SDG&E has disingenuously ridiculed this type of urban based solution as impractical and infeasible. If approved and built, Sunrise will destroy the incentive to follow SCE"s forward looking direction and condemn our area to more steel in the ground and ever expanding and destructive large scale projects and transmission corridors through sensitive natural and human communities in rural areas. As demonstrated by SCE, renewable energy options are best pursued in the close in urban-suburban use basin to ensure better distribution, more reliability, and less reliance on vulnerable and remote industrial scale wind and solar farms with their miles and miles of vulnerable transmission lines needed to move the energy. This would also eliminate a significant amount of line loss and, and placing full reliance on the at-risk IV substation.

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3)Reduce Energy Costs:

How can investing in a boondoggle transmission *only* project, that will cost ratepayers in excess of $1.5 billion, be legitimately portrayed as reducing energy costs? There are no guarantees that fossil fuel generation will not be the main source of energy transmitted. Fossil fuel prices and availability are highly volatile and subject to many unpredictable geo political influences. There are no guarantees that proposed remote renewable energy facilities will succeed or continue to be supported with federal subsidies, tax credits, and more. Nor is the cost or availability of massive volumes of water needed for remote geothermal and solar projects known. Following in SCE's footsteps to install 250 MW of roof-top solar projects in basin appears to be a prime example of insuring sustainable energy at reduced costs.

New In-Area Renewable Generation Alternative

B0002-20

E-S-64:This alternative is correctly reported to *"create significant impacts as a result of the extensive ground disturbance, habitat loss, and visibility of large wind and solar thermal components"* However, The DEIR/EIS is deficient in analyzing the cumulative negative impacts of numerous large scale and highly visible industrial-scale wind components in the Crestwood/Boulevard/Jucumba/La Rumarosa area, in combination with multiple 230 and 500kV transmission lines and substations. **Turbines also represent ignition sources for wildfire, in areas known for their howling Santa Ana winds. Turbines can also cause groundwater contamination through malfunctions and explosions of turbines and transformers**. A transformer explosion at a wind turbine facility released over 400 gallons of oil which contaminated a residential well (Watertown Daily News 12-29-07). Just Google wind turbine fires/explosions and volumes of articles, pictures, videos and commentary and will pop up (Exh. 4). The change in location for the Jacumba Substation further to the east, also increases the length and impacts of the necessary transmission line connection for wind proposals on BLM lands in the McCain Valley/Crestwood area. **These issues represent deficiencies, significant errors of omission, and significant new information. Pursuing projects like SCE's 250 MW of rooftop solar, and smaller rooftop turbines, along with renewable energy projects located on closed landfills and military bases makes much more sense. A local representative for Allied Waste stated to me that they would be interested in hosting solar or other renewable projects on the closed sections of their San Diego landfills which include Otay, Sycamore, and Ramona. Military bases are now being made available for renewable energy projects with 50 year leases(Renewable Energy Transmission Initiative minutes for January 2008).**

B0002-21

B0002-22

ES -3, Figure ES-1, ES-56: The Campo North Option of the I-8 Alternative: This route is no longer available: is no longer viable due to the opposition of the Campo Kumeyaay Nation as relayed to SDG&E in letter form and verbally, by Chairman H. Paul Cuero, Jr., at the CPUC PPH held at Mountain Empire High School on February 25, 2008. Some have argued that tribal opposition is not a show stopper. To find an answer to that question, I spoke directly to

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John Rydzik, the regional Chief of Environmental and Cultural Resources for the Bureau of Indian Affairs, at the February 25th hearing and again over the phone on March 27, 2008. Mr. Rydzik confirmed to me that it would be highly unlikely for the Bureau, or the Department of Interior, to approve an easement for the Sunrise Powerlink ,or other related projects, over the objections of the host tribal government. He also stated that, due to their sovereign status, tribal trust lands are treated differently than other federal lands and the federal government would not force the granting of an easement. **This is significant new information that renders the Environmentally Superior Southern Route no longer feasible, and places new focus the BCD South option.**

B-54: Install Structure Foundations: This section is deficient: It fails to recognize or analyze numerous impacts related to blasting and drilling for tower foundations. At the February 25th CPUC's PPH hearing held at Mountain Empire High School, Campo resident Jack White, testified that he works for a major industrial drilling firm and raised the fact that chemical drilling fluids and dewatering processes can contribute to groundwater contamination. Mr. White also stated that they would need huge cleared staging areas for preparing each and every and every tower foundation, in order to accommodate the drilling rigs, numerous generators, and all the other associated construction equipment. (see Exh. 5 for photo of similar construction site on I-15) Mr. Chris Noland, a licensed geologist, also testified at that same hearing regarding the seismic waves created by blasting which can damage private wells. Noland testified that backcountry residents are reliant on wells and that many times those wells are open, with no outer casings, making them vulnerable to cave-ins or fouling by sediments caused by blasting and the seismic waves. They are drilled to varying depths in fractured rock, and at great expense to the owners. Blasting can also alter the flow of water through fractures which may have adverse impacts on a wider area of influence **This issue was not raised in the DEIS/EIR and is a serious deficiency and error of omission (see E.4.10.3, Impact P-1& P-5).** Especially, due to the reliance on vulnerable at-risk groundwater resources for the majority of the proposed project and alternate routes through eastern San Diego County. All of the southern route alternatives pass through the federally designated Campo/Cottonwood Creek Sole Source Aquifer and the Ocotillo/Coyote Wells Sole Source Aquifer. This means that the federal government has already confirmed that there is no economically viable alternate supply of water available to replace those groundwater resources. **SDG&E needs to ensure that adequate alternate water supplies will be provided to affected landowners in the event a supply well or springs dry up in response to project activities, and demonstrating how that will be accomplished in light of our sole source aquifer status. SDG&E should be required to respond immediately by either rehabilitating or reconstructing a new water supply well for the landowner at SDG&E's expense.** B0002-24

B-96: Removal of Facilities and Solid Waste: The DEIR/EIS fails to discuss San Diego County's mandatory construction and demolition debris recycling ordinance. This is a deficiency and significant error of omission. Effective April 21, 2007, debris from construction and demolition projects, 40,000 square feet or greater, must be diverted away from landfill disposal in the [illegible] The ordinance requires that 90% of inerts and 50% of all other B0002-25

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materials must be recycled from a project. In order to comply with the ordinance, applicants must submit a Construction and Demolition Debris Management Plan and a fully refundable Performance Guarantee prior to building permit issuance.

B0002-25 cont.

B-99 Vegetation Management the use of chemical herbicides: Occasional chemical herbicide use is mentioned to remove vegetation from around foundation of transmission towers. In the aftermath of the 2007 firestorms, much more extensive vegetation management may be required. It is our concern that this may result in a much wider and increased application of herbicides which can lead to an increase in the potential for groundwater contamination (see comment on B-54 above). The March 28th Phase II Testimony of Richard Halsey on behalf of the Center for Biological Diversity, and his comments regarding new and significant increased fire risks is hereby incorporated. **This also represents potentially new and significant impacts to, groundwater quality, habitat, wildlife, landscape scarring, fugitive herbicide emissions, greater dust generation from denuded soil, and more.**

B0002-26

B-103 and B-111: Stirling Technology is discussed but the potential for negative impacts to the mirrored surfaces from damaging sand storms and dust accumulation from adjacent off-highway vehicle activities, and emissions from the US Gypsum wallboard factory at Plaster City is not. There are also concerns with the proximity to the Laguna Salada and other faults and the potential for earthquake damage. There is a lack of discussion or analysis on how much water would be needed, and the source of that water, to keep the plant operating and the mirrored surfaces clean and receptive. There is an ongoing court battle underway between the Sierra Club and the County of Imperial over US Gypsum's excessive and perhaps illegal usage of groundwater resources from the federally designated Ocotillo/Coyote Wells Sole Source Aquifer. A new hearing has been scheduled in June 2008. All of these represent deficiencies significant errors of omission. According to farmers in the Imperial Valley, the IID has advised them of cutbacks in water availability to comply with Colorado River water allocations. IID has also discussed the potential to require renewable energy projects to use recycled rather than potable water supplies. This issue needs to be addressed for both solar and geothermal projects. This requirement would add significant new costs for infrastructure to move recycled water as well as an EIR to determine the source of the recycled water and any environmental impacts associated with the rerouting of that recycled water from its current usage. Especially, if that water currently replenishes the Salton Sea.

B0002-27

B-112: The IID: transmission system upgrades are discussed. As noted in numerous letter/documents from the IID there is new information regarding those upgrades. IID has expressed concerns that those tens of millions in investments will be stranded if Sunrise Powerlink is allowed to move forward as proposed causing economic harm to their district and ratepayers.

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Jacumba Substation and SCE La Rumarosa projects: These are now 4-6 times

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B0002-29 cont.

bigger than estimated in the DEIR/EIS. They are also in different locations with greater impacts on Big Horn Sheep, Quino Checkerspont Butterfly Habitat and Visual Resources. There is new information from Sempra's DOE filing regarding the changes in location and the size of both the substation and the wind facility, which translates into a four-six fold increase in impacts and a significant increase in cumulative impacts. As for the La Rumarosa Baja Wind US Transmission, LLC, site in Mexico , referred to in the DEIR/EIS as Rumarosa Wind Developers II, new information is available in Sempra's December 2007 filing with DOE ,and noticed in the February 22, 2008 Federal Register (Exh. 6: OE Docket No PP-334) increases the size of the project, substation, and cross-border transmission capacity. The location of the Jacumba substation as well as the apparent location of the wind generation site (Fig. B-48) have also changed.

The proposed project increased from 250 MW (pg. B-123) to 1,250 MW. The generation location changed from Eastern side of the Sierra Juarez Mountains (pg. B-124) to what appears to be a more westerly location. The proposed substation location changed from northwest of Jacumba (Fig. B-47) to the east of Jacumba, closer to the Jacumba Wilderness Area and Big Horn Sheep habitat. The size of the substation has increased from 20 acres (pg D.2-236) to 80 acres. The proposed transmission line has increased from 230kV (pg. D.2-244) to one 500 kV or two 230 kV transmission lines per the Sempra DOE application for a Presidential Permit.

B0002-30

Due to the size, scale, and location of this project it will also be highly visible from Tierra Del Sol Road, Ribbonwood Road, and homes located on higher elevation locations throughout the Boulevard area, as well as from Historic Route 80, adding significant Visual Resource impacts as well as additional cumulative impacts. These impacted viewing points were not included on the list of significant impacts at page D.3-205, or at D.3-202 under Long term visibility or under cumulative Visual Resources impacts at page G-39. At D3-202 it wrongly states that there is "no impact for the United States". At D.3-205 it is noted that there will be impacts from La Rumarosa and Jacumba, but I-8 and Historic Route 80 were erroneously left out. While Figure B-50 shows views *from* La Rumarosa, there is no figure showing views *of* La Rumarosa from these impacted viewing points. Impacts to the views on the I-8 and Historic Route 80 corridor will also be significantly impacted with the potential combination of the Jacumba Substation, the I-8 Alternate Route 500 kV line, the existing SWPL 500 kV line, and the much expanded Baja Wind Project all crammed into a very scenic and sensitive area. If you go to the link below, for a slide show (unrelated to this project) of aerial views of the Jacumba/Jacume general area, you will be able to see the ridge line of the Sierra Juarez Mountains (not identified in the slide show) to the southeast of Jacumba. A Sempra representative confirmed that the Baja Wind project would include lighting similar to that at the existing Kumeyaay Wind facility. Day time strobe lighting and night time red blinking lights atop the turbines will have major visual and dark sky impacts as well. Turbines placed in that area could not be camouflaged or hidden

There are long-term cross-border efforts and investments to protect and conserve important

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