

Comment Set E0002  
San Diego Gas and Electric Company

Billie, Lynda and Susan,

Please find SDG&E's second comment letter on the CPUC/BLM Draft EIR/EIS in the Sunrise Powerlink proceeding. As indicated in the cover letter, SDG&E is providing preliminary comments on Sections B and D of the Draft EIR/EIS.

<<Sunrise SDG&E Second DEIR-EIS Comment Letter 2-11-08.pdf>> <<Sunrise SDG&E Second DEIR-EIS Comment Letter - Sections B and D 2-11-08.xls>>

In addition, SDG&E is submitting a slightly revised version of our first comment letter to provide a clarification. The changes in this revised letter are limited to the first full paragraph on page 4, and only to the last two sentences in that paragraph. There are PV systems that are installed that are outside of the CSI program and we don't want that point to confuse anyone, so we determined that it would be best to provide this update to make it perfectly clear. Although the changes in the revised letter are limited to just those two referenced sentences, please replace our initial first comment letter entirely with this revision. Our point remains that approximately 1000 installations is a small fraction of the 20,000 per year that is included in the New In-Area Renewable Generation Alternative. We trust that this will avoid any possible confusion.

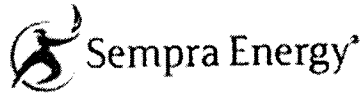
E0002-1

<<Sunrise SDG&E REVISED First DEIR-EIS Comment Letter 2-11-08.pdf>>

Please contact me with any questions regarding the comment letter.

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San Diego Gas and Electric Company



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February 11, 2008

Ms. Billie Blanchard  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Ms. Lynda Kastoll  
El Centro Field Office  
Bureau of Land Management  
1661 S. 4th Street  
El Centro, CA 92243

Dear Ms. Blanchard & Ms. Kastoll

SDG&E appreciates the opportunity to provide the attached comments to the California Public Utilities Commission and Bureau of Land Management (CPUC/BLM) Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). This comment letter covers SDG&E's preliminary comments on Sections B and D of the Draft EIR/EIS, thus focusing on the proposed project as submitted in our application of August 2006. SDG&E will provide additional specific comments in future letters for the CPUC/BLM to consider in preparation of the Final EIR/EIS, and may provide additional subsequent comments on Sections B and D of the Draft EIR/EIS as our review of the document continues.

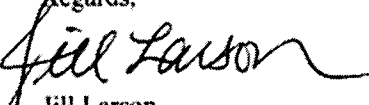
As the CPUC/BLM reviews our current comments on the Draft EIR/EIS, it should be noted that our current comments are from a technical standpoint and focus on identifying potential inaccuracies, omissions, inconsistencies and clarifications that can be fully addressed in the Project Final EIR/EIS. SDG&E engineers, environmental and land experts and the technical consultant team reviewed the Draft EIR/EIS in the spirit of providing assistance to the CPUC/BLM in making the Final EIR/EIS as complete and thorough as possible.

Many comments clarify elements of the project description in Section B, especially as they relate to feasibility issues and construction practices based on actual field experience in constructing extra-high voltage lines. This also applies to issues associated with operations and maintenance of transmission lines.

With regard to Section D, the Draft EIR/EIS appears to overstate project impacts in a conclusory manner. Therefore, many of the comments request clarification or amplification of the criteria used to make the significance determinations and suggest ways in which the Final EIR/EIS could be modified accordingly. Other comments include minor corrections and clarifying information to augment the document.

Thank you in advance for your consideration of SDG&E's comments.

cc: Michael Niggli  
E. Gregory Barnes

Regards,  
  
Jill Larson

E0002-1 cont.

Comment Set E0002, cont.  
San Diego Gas and Electric Company

Chapter #	Page #	Paragraph #	Comment	
B.2	B-2	1	Pages B-1 (B.2, last paragraph) to B-2 (first paragraph): "Relocation of an existing 69 kV transmission line to parallel the proposed 230 kV overhead transmission lines between the junction of State Route (SR) 76 and SR79 and a point near the existing Santa Ysabel Substation. To accommodate the proposed relocation, this segment would also include removal of the existing 69 kV structures, and placement of new towers <u>tubular steel poles</u> along a nine mile segment to accommodate the relocated 69 kV line." This is corroborated on Page B-14, 5 <sup>th</sup> paragraph where it refers to "new tubular steel poles" and not "towers".	E0002-1 cont.
B.2	B-2	Last bullet	The plan of service for capacitor additions is: 63 MVAR at San Luis Rey 230 kV, 126 MVAR at Central 230 kV and 50 MVAR at South Bay 69 kV.	E0002-2
B.2.1	B-6	1	The text says "...SRPL would be constructed approximately 450 feet north of the existing SWPL towers." This should be 400 feet.	E0002-3
B.2.1	B-6	2	The text should be corrected to include (as in bold underlined text) "... continuing through <u>open desert and private agricultural land</u> west of the outskirts of the unincorporated town of Seeley."	E0002-4
B	B-6 B-10	4th x	The EIR/EIS should indicate that BLM has asserted its continuing federal interest and jurisdiction in those portions of the ROW for which it granted easements previously.	E0002-5
B	B-9	1	Describes statutory or recorded easement through majority of ABDSP as 100 feet, "but may be narrower in several areas." Should accurately describe existing ROW as being at least 100 feet in all areas, to which SDG&E has full rights derived from both prescriptive, equitable and granted easements.	E0002-6
B.2	B-9	2	Designated wilderness by definition does not include existing easements and associated access roads	E0002-7
B.2.2	B-9	1st	SDG&E has indicated that Proposed Project could be built within existing 100-foot-wide transmission corridor.	E0002-8
B.2.2	B-9	1st	Statement that easement is narrower or non-existent in several places is misleading. Private easements are silent regarding width, and SDG&E believes that surrounding circumstances and intent of parties indicates they are 100-foot-wide. Prescriptive and equitable easements have not yet been perfected, but SDG&E believes that they are 100-foot-wide.	E0002-9
B.2.2	B-9	3rd	Neither existence of transmission corridor nor SDG&E's rights to maintain existing line within corridor have been contested by any party.	E0002-10
B.2.2	B-9	14th	SDG&E has equitable rights, in addition to recorded and prescriptive easements.	E0002-11

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 San Diego Gas and Electric Company

Chapter #	Page #	Paragraph #	Comment	
B.3	B-9	2	States that all lands in Grapevine Canyon except for SDG&E's current easement has been classified as designated wilderness. This disregards the access roads and any public roads.	E0002-12
B	B-10	Last	Should clarify that SDG&E contends that ROW for transmission infrastructure was not excluded from Sec. 16 lands, and that BLM's easement grant to SDG&E expressly included these lands.	E0002-13
B	B-10	FN3	In footnote 3, second sentence, should be "from State to the federal government for power lines"	E0002-14
B	B-10	FN 3	In footnote 3, DEIR makes a legal conclusion about the nature of Section 16 lands despite previous acknowledgment that review of easement rights through the Park was still being conducted. SDG&E contends that the Section 16 lands in question were proprietary lands of the State. Additionally, the State has recognized that rights-of-way could be granted over such lands in certain circumstances.	E0002-15
B	B-13	1st	At the top of the page, the Draft EIR/EIS concludes that interpretation could be made of existing easement restricted to actual occupation. This is an incomplete assessment, should also note other interpretations, namely where an easement grant omits width, the width is interpreted based on the purpose of the easements, the intent of the parties, and the nature of the property. SDG&E received easement grants from the federal government, which expressly granted a 100 foot ROW. For those portions of the easement for which SDG&E received grants from other parties where a width was not specified, it is reasonable to assume that the width granted was also 100 feet. Additionally, the width of the ROW is that width reasonably necessary for the maintenance and safety of a transmission line, and standards dictate that this width is 100 feet for a 69 kV line. Finally, State Parks' own land records reflect a 100 foot corridor throughout ABDSP.	E0002-16
B.2.2	B-13	3rd	SDG&E performed survey in connection with 1955 BLM ROW application and another GPS survey in 2006, which was submitted after BLM ROW renewal application. SDG&E did not perform survey in 2005.	E0002-17
B.2.2	B-13	2	Change "field monuments" to "property corner monuments".	E0002-18

Comment Set E0002, cont.  
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Chapter #	Page #	Paragraph #	Comment	
B.2.2	B-13	3	The Draft EIR/EIS states "SDG&E asserts that maps of the facilities to date, including results of the 2006 GPS survey, are inaccurate." We are uncertain of the source of this statement or what is meant by this sentence. The 2006 GPS survey accurately positions the location of the facilities.	E0002-19
B.2.2	B-13	4	Page B-13 (B.2.2, fourth paragraph): "As part of the Proposed Project, SDG&E would remove the 92 kV conductors from the existing wood poles between MP 60.9 and MP 68.2 and attach (or "underbuild") them to replace them with new conductors underbuilt on the new 500 kV lattice steel towers." Note that the old conductors would not be reused, but would be replaced with new conductors.	E0002-20 E0002-21
B.2.3	B-14	2	Existing 69 kV poles will be topped after 69 kV circuit is removed (cut off top of poles, mainly for aesthetics, leaving about 1 foot above the distribution-level).	E0002-22
B.2.4	B-17	4	MP117.2 - MP121.9 is southwest, not southeast	E0002-23
B.2.5	B-18	2	Page B-18 (B.2.5, second paragraph): "Just outside of the existing Chicarita Substation (MP 142.3), the existing 69 kV, 138 kV, and 230 kV lines would deviate from the consolidated ROW transition from one SDG&E ROW to a connected ROW, and the new single-circuit 230 kV overhead line would transition from overhead to underground."	E0002-24
B.2.5	B-18	5	Replace "all work" with "all proposed substation work".	E0002-25
B.2.5	B-18	4	Replace "all proposed modifications" with "all proposed substation modifications".	E0002-26
B.2.7	B-23	4	Central East Substation is designed for a future 500 kV connection but not necessarily going north.	E0002-27
B.2.7	B-23		Confusing paragraph may misrepresent SDG&E's import capability. SDG&E only needs two 230 kV lines to maintain the SDG&E 4200 MW all lines in-service import capability and SDG&E 3500 MW G-1, N-1 import capability.	E0002-28
B.2.7	B-24		It is not true that "The most likely trigger for additional 230 kV circuits out of Central East Substation is reliability needs and operational constraints or mitigation required by NERC/WECC reliability criteria for the outage of one or both of the two Central East - Sycamore Canyon 230 kV circuits ...". SDG&E only needs two 230 kV lines to maintain the SDG&E 4200 MW all lines in-service import capability and SDG&E 3500 MW G-1, N-1 import capability. WECC considers the Northern Route a "Category D", and NERC/WECC reliability criteria would not need additional 230 kV circuits out of Central East Substation.	E0002-29

Comment Set E0002, cont.  
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Chapter #	Page #	Paragraph #	Comment	
B.3.1	B-32	1	Page B-32 (B.3.1, first paragraph): "The proposed 500 kV circuit would be supported by three types of structures: lattice steel towers (Figure B-13), tubular steel poles (Figure B-14), and steel H frame structures (Figure B-15). The SRPL 230 kV structures would be lattice steel towers (Figure B-16), tubular steel poles (Figure B-17), and single-circuit overhead to underground transition structures (Figure B-18)." Note that the Title Block for Figure B-18 should be changed as follows: Typical 230 kV Single Circuit Steel Overhead to Underground Transition Tower Structure: Inland Valley and Coastal Links. The Title Blocks for Figures B-21, B-22 and B-23 should also be changed to replace "Tower" with "Structure".	E0002-30
B.3.1	B-32	1	Page B-32 (B.3.1, first paragraph): "Additionally, some 500 kV structures within ABDSP would have a third <u>one</u> circuit underbuilt, as described in Section B.2 and illustrated in Figure B-19."	E0002-31
B.3.1	B-32	2	"The replacement wooden poles for this segment of the Proposed Project would have the <u>same</u> dimensions as the existing wooden poles." - Should restate this as having <u>relatively similar</u> dimensions as the existing structures.	E0002-32
B.3.1	B-32	4	For the Imperial Valley Link, since this link includes both transmission towers and steel poles, delete the word "tower" in the second sentence of the paragraph so that the sentence now reads "Each new structure would be approximately 160 feet tall."	E0002-33
B.3.1	B-32	5 & 6	Anza-Borrego Link shows a total of 127 structures - need verification.	E0002-34
B.3.1	B-44	1	"The 230kV portion of this segment (Central Link) would be supported by tubular steel poles. However, lattice towers would be required where inaccessible terrain requires helicopter construction as steel poles are too heavy for helicopters to transport..." - This is one of many locations where SDG&E is directed to: 1) Use towers where there is helicopter only access and 2) use steel poles unless helicopter only access. Both of these statements are restricting the design for non-environmental reasons.	E0002-35
B.3.1	B-44	1	Replace "and" in the first sentence with "and/or" to not restrict design choice of tower use in the Inland Valley Link to areas where visual impacts are not an issue and where helicopter only access exists.	E0002-36
B.3.1	B-44	1	Central Link, shows 37 - 500 kV towers and 119 - 230 kV towers and 117 steel poles - needs verification (Says 35 structure on A-3)	E0002-37

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Chapter #	Page #	Paragraph #	Comment	
B.3.1	B-44	3	Inland Valley Link shows 120 - 230 kV poles/towers and 4 transition poles - needs verification.	E0002-38
B.3.1	B-44	4 & 5	Coastal Link shows 50 new structures, which conflicts with 30 - 230 kV double-circuit steel poles (eastern boundary of Coastal Link to Chicarita Substation), 2 transition poles and 16 - 230 kV double circuit steel poles starting at MP 146.7. The 16 is incorrect and should be 18 (States 48 poles on A-4, should be 50.)	E0002-39
B.3.1	B-48	Table B-1	Coastal Link shows 50 new structures with 30 - 230 kV poles, 2 transition poles and 18 - 230 kV poles - this appears to be the correct representation.	E0002-40
B.3.1	B-48	Table B-1	Category "Height" should be "Average Height"	E0002-41
B.3.2.1	B-49	3	Spacing is between phases, not circuits.	E0002-42
B.3.2.1	B-49	Bullets	500 kV steel pole phase spacing is 34.8 feet vertical, and 34.8 feet horizontal.	E0002-43
B.3.2.2	B-49	4	Deadend assembly description only notes jumper string, not ahead and back deadend assemblies.	
B.3	B-51	Table	Under Inland Valley, the existing ROW is not 200 feet, it is 100 feet.	E0002-44 E0002-45
B.4	B-52	Table B-4a	Numerical values in the table agree with SDG&E's response to Data Request PD-21. However, revise the titles in the "Activity" column by replacing "Average" with "total" five times. The quantities represent total water usage by link, not the average per structure.	E0002-46
B.4	B-52	Table B-4a	Central East Substation - Landscape Water Usage - total water quantity is not correct - the correct number is 5,500,000 gallons per year.	E0002-47
B.4	B-52	Table B-4a	Central East Substation - Substation Fire Protection - Water Usage of 1.0M gallons is not correct, Replace with 100,000 gallons.	E0002-48
B.4.1.1	B-54	5	The sentence should be changed as indicated in bold underlined text. "At each structure location, an area approximately 100 feet by 100 feet <u>plus an adjacent area approximately 35 feet by 75 feet that is an extension of the access road</u> would be cleared using a bulldozer or backhoe." This will then match the response given by SDG&E to CPUC Energy Division Data Request 17, PD-26, on 8/24/07.	E0002-49

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Chapter #	Page #	Paragraph #	Comment
B.4.1.1	B-55	2	Page B-55 (B.4.1.1, second paragraph): "Where solid rock is encountered, blasting (see Section B.4.4.1), rock hauling, or the use of a rock anchoring or mini pile system may be required. The rock anchoring or mini-pile system would be used in areas where site access is limited or adjacent structures could be damaged as a result of blasting or rock hauling activities. <u>Such anchoring systems may also be used where economically and technically justified.</u> In environmentally sensitive areas, a HydroVac, which uses water pressure and a vacuum, would be used to excavate material into a storage tank. In areas where it is not possible to operate large drilling equipment due to access or environmental constraints, hand digging may be required."
B.4.1.1	B-55	3	Page B-55 (B.4.1.1, third paragraph): " <u>Reinforcing steel For tubular structures, reinforcing steel rebar cages and anchor bolt cages would be installed after excavation and prior to concrete placement and structure installation. For lattice towers, steel rebar cages and stub angles would be installed.</u> These cages are designed to strengthen the structural integrity of the foundations and would be assembled in pieces at the nearest project laydown yard and delivered to the structure site via flatbed truck or helicopter. These cages would be inserted in the holes prior to pouring concrete."
B.4.1.1	B-55	6	Page B-55 (B.4.1.1, sixth paragraph): "Lattice towers and <u>tubular steel support structures</u> would be assembled on site, except where helicopter delivery is required, as described in Section B.4.4.2. Steel members for each structure would be delivered to the site by flatbed truck. Assembly would be facilitated onsite by a small truck-mounted crane. Subsequent to <u>full or partial assembly, the entire or the lower portion of the structures</u> would be lifted onto the foundation using a large crane designed for erecting towers. The crane would move along the ROW as towers are erected."
B.4.1.1	B-56	5	The Draft EIR/EIS says "Underbuilding is the term for attaching two or more transmission lines to the same transmission line support structure." That more accurately should say "Underbuilding is the term for placement of one or more lower-voltage circuit under one or more higher-voltage circuit."

E0002-50

E0002-51

E0002-52

E0002-53



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Chapter #	Page #	Paragraph #	Comment	
B.4.1.2	B-57	2	Page B-57 (B.4.1.2, second paragraph): "The majority of the underground duct banks (described below) would be installed in a vertical configuration using open-cut trenching techniques. A vertical duct bank configuration would place the three cables of the circuit in a pyramid, with two cables on the bottom and one cable stacked on top and separated by spacers (Figures B-24 and B-25) as shown in Figures B-24 and B-25." Note that Figures 24 and 25 show a vertical configuration, not a pyramid configuration.	E0002-54
B.4.1.2	B-57	4	"Trenching would be staged so that open trench lengths would not exceed that required to install the duct banks." - Not quite sure what is meant by this. The first and second sentence should probably be combined to read: "Trenching activities would be staged so that a maximum of 300 to 500 feet of trench length would be open at one time at any one location, depending on applicable permit requirements."	E0002-55
B.4.1.2	B-58	3	"Respectively" to what, at the end of the first sentence	E0002-56
B.4.1.2	B-58	6	Earthquake loading is normally not considered in underground vault design.	E0002-57
B.4.1.2	B-58	Table B-8	Figure B-29 shows correct 30" manhole diameter, not 36" as stated here for 230 kV vaults. The 36" should be corrected to 30".	E0002-58
B.4.1.2	B-59 thru 61	Fig. B-27, B-28, B-29	Figures may indicate 4 instead of 6 UG conductors per manhole.	E0002-59
B.4.1.2	B-62	5	The second sentence should be revised as follows: "Transition structures ... would consist of a tubular pole structure with an anchor-bolted pier foundation for each set of 3 or 6 cables, depending on site parameters."	E0002-60
B.4.1.2	B-63	1	SDG&E has not committed to leaving the steel casing in place for horizontal borings. Use of fiber reinforced mortar pipes is preferred in areas where technically feasible.	E0002-61
B.4.1.2	B-63	2	The text indicates a casing is to be used for the directional drill. This will not be determined until the engineering is finalized (which requires the necessary Geotech information).	E0002-62
B.4.2	B-63		Central East Substation - "800,000 gallons" of water a day would be required for grading and site work, landscaping, fire protection, and concrete for substation from batch plant. "800,000 gallons is incorrect. Replace with 600,000 gallons of water a day. Note that all activities in Table B-9 do not occur at the same time, therefore the total daily amount is not merely the sum of the parts.	E0002-63

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Chapter #	Page #	Paragraph #	Comment	
B.4.3.3	B-77	1	In the first paragraph under B.4.3.3, referring to the Sycamore Canyon to Elliott Substation 69 kV Transmission Line Reconnector, it refers to replacing conductors with "... ACSS/AW conductors, which have a higher voltage capacity." The term "voltage capacity" should be deleted, and replaced with "current-carrying (ampere) capacity".	E0002-64
B.4.4.2	B-84	1	Need to add a sentence before the last sentence that reads "Helicopter may be used in other areas to facilitate construction dependent upon the recommendations of the installation contractor."	E0002-65
B.4.4.2	B-84	1	The Draft EIR/EIS states that tubular steel poles are excepted from helicopter placement. SDG&E has not committed to this, so the Final EIR/EIS should state this.	E0002-66
B.4.4.2	B-84	1 and 3	It is noted that "Helicopters would be unable to lift and install typical 230 kV or 500 kV tubular steel poles, due to their excessive weight." While that may be generally true, the option should be kept open for installing steel poles by helicopter in case a contractor could jack the pole sections together from the air, making use of a helicopter in that manner.	E0002-67
B.4.4.2	B-84	2	Fly yards do not appear to be shown on Figures B-3 through B-9 as stated.	E0002-68
B.4.4.2	B-84	3	Revise the first sentence to read "Prior to installation of helicopter-aided tower assemblies, each tower structure would be assembled in approximately 3 to 6 sections at the fly yard."	E0002-69
B.4.4.2	B-84	4	Revise first sentence as follows: "In areas requiring helicopter-aided construction, laborers, materials, and equipment would be flown in by helicopter. To the extent feasible, facilities to allow personnel to walk to the helicopter access only sites will be provided."	E0002-70
B.4.4.2	B-84	4	Add an additional sentence (after Foundation excavation would be completed ... prior to delivery of structure sections) stating "Concrete would be placed in the excavated foundation by helicopter using suspended buckets, or by pumping from accessible areas."	E0002-71
B.4.4	B-84	4	3rd row from the bottom sentence of this paragraph, change to "atop the previously installed structure section".	E0002-72
B	B-86	1	SDG&E suggests new wording as follows for this discussion "SDG&E intends to refine the design of the Proposed Project during the CPUC/BLM approval process in order to immediately commence right of way acquisition and permitting activities leading to construction if the project is approved."	E0002-73

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Chapter #	Page #	Paragraph #	Comment	
B.4.8	B-97	Tables B-16, 17	Numerical values in these tables agree with SDG&E's response to Data Request PD-21. However in Table B-16 revise the titles in the "Activity" column by deleting "Average" in five places. In Table B-17 revise titles in the "Activities" column by replacing "Average" with "Total" in five places.	E0002-74
B.5.1	B-99	1	"SDG&E's overhead transmission line and substation.." should be "transmission line and structures" since the section is for transmission line maintenance.	E0002-75
B.6.1.2	B-112 - B-113		The San Felipe Substation would not be 20 acres as stated in the Draft EIR/EIS. Figure Ap.1-5 shows a 40 acre site for San Felipe Substation, which seems to be correct. San Felipe Substation fenced area will be similar to Central East Substation, and cannot be smaller than 40 acres. The initial equipment requirement sets the 40 acre footprint. Future equipment, if any, will fit in the 40 acres.	E0002-76
B.6.2	B-133		Jacumba Substation would be about 60 acres, not 20 acres as stated in the Draft EIR/EIS. Figure B-47 shows a 60 acre site for Jacumba Substation. The text should be corrected to reflect approximately 60 acres.	E0002-77
B	B-142	LU-APM-7	SDG&E suggests new wording as follows for this discussion "SDG&E would pay just compensation to affected property owners based upon the impact to the property caused by the facility locations identified by SDG&E."	E0002-78
B	B-146	WQ-APM-6	SDG&E suggests new wording as follows for this discussion "SDG&E will negotiate with affected landowner to provide alternative water supplies in the event a supply well or springs dry up directly caused by project activities. Negotiation shall be by either a remedial cash payment to the landowner or by SDG&E contracting for the drilling of a replacement well."	E0002-79

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Chapter #	Page #	Paragraph #	Comment
D.1	D.1-2	D.1.2.1 Third bullet under Central Link	Page D.1-2 (D.1.2.1, third bullet under Central Link): "Construction of the new Central East Substation capable of accommodating with termination of one 500 kV transmission line and two 230 kV transmission lines" This point of clarification is important since Central East Substation is designed to be capable of accommodating up to six 230 kV and two 500 kV lines in the ultimate configuration (as on Pages ES-9 and in Paragraph D.1.2.3), but for the proposed Sunrise Powerlink only one 500 kV and two 230 kV lines would actually terminate at the substation.

E0002-80