

Comment Set F0010
San Diego County Department of Planning and Land Use
(Portions of this comment appear on DVD only)



County of San Diego

ERIC GIBSON
INTERIM DIRECTOR

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
www.sdcountry.ca.gov/dplu

August 25, 2008

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

To Whom It May Concern:

The County of San Diego (County) has received and reviewed the Recirculated Draft Environmental Impact Report/ Supplemental Draft Environmental Impact Study (DEIR/EIS) for the Sunrise Powerlink dated July 8, 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. Our previous comments dated April 9, 2008, reviewing the DEIR/EIS, remain applicable to the project as revised.

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 Recirculated DEIR/EIS. Overall, the Recirculated DEIR/EIS still does not establish the need for the Proposed Project. The additional analysis continues to demonstrate the great degree that the Proposed Project will degrade the quality of the environment in the unincorporated area, particularly in terms of visual, biological, fire ignition threat, agriculture resources, air quality, noise, traffic and numerous other elements of importance to the quality of life

F0010-1

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 2 of 11

August 25, 2008

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 and impact the County's planning efforts for a Multiple Species Conservation Plan Program (MSCP) Plan for the East County.

F0010-1 cont.

Public Review Extension

On August 4, 2008, a Scoping Memo and Ruling was released regarding possible violations of the CPUC's Rules of Practice and Procedure by SDG&E. Under this ruling, SDG&E has been ordered to appear and show cause as to why it should not have fines or other sanctions imposed for possible violations. Such violations include the misrepresentation of key facts when SDG&E representatives provided project updates to various energy advisors to CPUC Commissioners. The Scoping Memo and Ruling states that SDG&E asserted in several of these meetings that the Forest Service had rejected any southern alternative route to circumvent tribal lands and that any southern route is infeasible. As such, SDG&E represented that the CPUC should approve the proposed northern route through Anza Borrego State Park. SDG&E has been ordered to file a response to the Scoping Memo and Ruling explaining why it should not be found to have violated the rules within 15 days of the effective date of the ruling.

Based on this ruling and new information, particularly with respect to key facts on the environmentally superior southern route, the comment period for the re-circulated DEIR/EIS should be extended. Interested parties should have the benefit of reviewing SDG&E's response to the ruling, which could set forth additional information that should be included in the full environmental review of the project. Currently, the comment period for the Re-circulated DEIR/EIS will close prior to the resolution of these new issues released on August 4, 2008. As a result, the comment period should be extended until the issues raised under the ruling have been resolved and all interested parties have had a chance to review any new information raised pursuant to those proceedings.

Related Actions

One of the main reasons this document is being recirculated was the lack of information on related facilities. However, several other actions and projects are currently in process that would also appear to either rely on the Sunrise Powerlink or will become feasible only with the development of the project. In particular, the following projects appear to be related but are not fully discussed as related actions:

- BLM South Coast Resource Management Plan Revision
- BLM Eastern San Diego County Resource Management Plan Revision
- BLM Solar PEIS
- Sempra or SDG&E LNG power plants in northern Baja Mexico

F0010-2

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 3 of 11

August 25, 2008

The County's comment letters for the first two projects listed above are attached for your reference.

The enclosed comments focus on a number of general issues identified in the Recirculated DEIR/EIS. Also enclosed are more detailed comments specific to the recreational, biological, water, erosion, visual, fire, and circulation or road-related impacts analyzed in this document.

Please feel free to contact Thomas Oberbauer, Chief, Multiple Species Conservation Program, at (858) 694-3701 with additional questions.

Sincerely,



ERIC GIBSON
Interim Director, Department of Planning and Land Use

F0010-2 cont.

CC: 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
Bob Goralka, Project Manager, County of San Diego Department of Public Works, MS-0385
Nick Ortiz, Project Manager, County of San Diego Department of Public Works, MS-0383

Comment Set F0010, cont. San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 4 of 11

August 25, 2008

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

Impacts to Public Lands:

1. High Meadows Reroute – The southwest portion of this reroute, including associated structures and access roads, will traverse Louis Stelzer County Park (Park) lands. However, direct impacts to Stelzer Park were not previously identified in the DEIR/EIS as the previous route only passed within a mile of the Park. Impacts to the Park should be fully evaluated and actual acreage of Park loss needs to be calculated. Equal amounts of acreage need to be preserved so that there is a no-net-loss of Park lands. Acreage calculations will include tower locations and ROW, new access roads, any proposed widening of existing trails to access road widths, and relocation of trails (if necessary).

F0010-3

In addition, Stelzer County Park is considered a San Diego County Multiple Species Conservation Program (MSCP) preserve. As previously stated in County comments provided on the DEIR/EIS dated April 9, 2008, the EIR/EIS should examine impacts to areas within the existing MSCP plans. Consistency with the MSCP needs to be demonstrated. Also, impacts to species covered under the South County Subarea Plan, including Golden eagles and Lakeside ceanothus known to be present in the area, must be adequately analyzed and have identified mitigation in conformance with species specific requirements presented in Table 3-5 of the Final MSCP Plan.

F0010-4

2. Pacific Crest Trail Reroute – This proposed reroute would eliminate two crossings of the Pacific Crest Trail (PCT), but it also includes one additional tower, one additional pull site, and a greater total length of access roads. While supportive of reducing the number of crossings of the PCT, the County still has concerns regarding the placement of transmission towers and access road collocation along the PCT.
 - a. As previously stated in County comments provided on the DEIR/EIS dated April 9, 2008, the PCT is considered a regional trail and a National Scenic Trail. Towers placed on or adjacent to the PCT would have significant unmitigable visual impacts. The placement of a transmission tower on any regional trail thus precluding its use is not considered acceptable and regional trails should be excluded from the placement of transmission towers.
 - b. As previously stated in County comments provided on the DEIR/EIS dated April 9, 2008, the PCT is a non-motorized trail for hiking and horseback riding only. A mitigation measure that includes security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles.

F0010-5

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 5 of 11

August 25, 2008

Impacts to Roads, Infrastructure and Facilities

The County is limiting comments regarding the proposed project's impacts to roads and infrastructure to the locations where the proposed routes and acceptable alternatives intersect with County maintained roads. For any overhead crossings SDG&E must obtain the proper traffic control permits and encroachment permits such that public health and safety along County maintained roads is not compromised. Also, for any underground alternatives, there will need to be thorough traffic control plans tied to encroachment permits that detail how these roads will stay in operation simultaneously with the installation of the under grounding work. This applies to one or more alternatives.

F0010-6

The County also expects that all Regional Standards would be followed regarding construction within County road right of way and that the DPW road cut policy would be observed. The permitting language found within the encroachment permit and traffic control permit should include all specifications (or references thereto).

Replacement of affected and/or damaged culverts within County maintained rights of way as well as striping, signs and other traffic control devices shall be the responsibility of SDG&E and/or its agents. Utility coordination plans should be sent to the County's DPW Utility Coordinator.

The County has not identified any adverse impact to County Airports. All the proposed lines would be outside flight path approaches of our County Airports. However, the proposed lines do impact some of the agricultural and sport aircraft flying areas and may cause adverse impacts to these operators. The Warner Springs Glider Port and other private airstrips may suffer negative impacts. We understand these other airport/aircraft operators would have to comment independently.

F0010-7

The following comments apply to each route alternative that is currently being considered for the proposed project:

F0010-8

1. The EIR/EIS indicates that the proposed project will result in temporary construction impacts to several County maintained roads. The temporary impacts include road and lane closures, disruption to pedestrian and bike circulation, elimination of parking spaces, road damage, added traffic to LOS E/F roads, and access restrictions to properties and businesses. It should be noted that road and lane closures along County Circulation Element roads should be avoided.
2. The EIR/EIS indicates that the proposed project could result in temporary road and lane closures during construction. The EIR/EIS should more clearly identify which County Circulation Element roads may be subject to a potential road and lane closure. For example, Table D.9.18 identifies several County Circulation Element roads such as Del Dios Highway and Wildcat Canyon Road that would be impacted by

F0010-9

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 6 of 11

August 25, 2008

the future transmission system expansion and page 9.53 identifies impacts caused by temporary road and lane closures. It is not clear if road and lane closures could occur along all County roads listed in Table D9-18. The EIR/EIS should more clearly identify which County Circulation Element roads could be subject to road and lane closures. Tables D.9-2, D9-3, D9-14, D9-15, D9-16, D9-18, and D9-19 all identify County Circulation Element roads that would be impacted by the proposed project

F0010-9 cont.

3. SDG&E should coordinate very closely with the County's DPW Traffic staff in the development of the following types of plans: 1) Construction Transportation Plans; 2) Transportation Management Plans; and 3) Traffic Control Plans. On a project-by project basis, the plans should attempt to ensure that all feasible measures are implemented to minimize the project's significant traffic impacts to the extent possible.
4. The construction impact plan should identify the length of the potential road and lane closures and feasible alternate routes.
5. For any overhead crossings, SDG&E must obtain the proper traffic control permits and encroachment permits for work conducted along County maintained roads.
6. For any underground running of transmission lines within the public right of way, SDG&E will have to provide detailed traffic control plans tied to encroachment permits that detail how the roads will stay in operation simultaneously with the installation of undergrounding work.
7. The EIR/EIS mentions the construction of several miles of access roads. The EIR/EIS should identify where the proposed access roads would traverse and/or connect to County maintained public roads.
8. The EIR/EIS should clearly identify where proposed project's access roads would require a new driveway along County maintained public roads.
9. The EIR/EIS should provide an operational assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.
10. For the proposed project and all future system expansions, SDG&E should consider impact thresholds for roads operating at LOS F. For example Wildcat Canyon Road and San Vicente Road (Pg.D9-39/52) currently operate at LOS E/F. The proposed project should avoid measures during construction that would potentially worsen traffic operations by adding traffic and/or restricting traffic flow along roads that currently experience substantial daily traffic congestion.

F0010-10

F0010-11

F0010-12

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 7 of 11

August 25, 2008

11. The EIR/EIS should clearly identify where transmission lines would traverse existing and planned County roads. The construction of transmission lines should not preclude the planned future construction of the County Circulation Element roads.
12. SDG&E should follow all regional standards regarding construction within the County right of way and that the DPW road cut policy would be observed.
13. SDG&E should reference the County's Guidelines for Determining Significance adopted September 26, 2006, and revised December 5, 2007.

F0010-13

If you have any questions relating to the above comments, please contact Tom Duffy, Environmental Management Specialist, Department of Public Works, at (858) 874-4039

Impacts to Rural Character and Border

The proposal to construct two substations near Jacumba would introduce industrial uses into an area that is currently undeveloped and planned to remain rural. The growth inducing aspects of new industrial uses in an undeveloped area should be analyzed in the report.

F0010-14

In addition, the transmission lines proposed to cross the border typically have roadways along the corridor but it was not apparent in the document how maintenance personnel will access lines crossing the border.

F0010-15

County of San Diego Detailed Comments regarding the Sunrise Powerlink Transmission Line Project Re-circulated DEIR/EIS

F0010-16

Page 2-22, second paragraph – The document states that the Jacumba Substation and the transmission corridors do not occur within special habitat management areas. As stated in both the comments to the Notice of Preparation (NOP) and the DEIR, the County of San Diego is working with the US Fish and Wildlife Service and California Department of Fish and Game to draft a Multiple Species Conservation Program (MSCP) Plan and the Natural Community Conservation Plan (NCCP) for the eastern portion of the unincorporated county. The document should acknowledge that a planning process is underway and industrial development, new road construction, fencing, and land clearing could potentially impact the conservation planning for this area.

The County has enrolled in the Natural Community Conservation Planning (NCCP) process by adopting the Multiple Species Conservation Program (MSCP) South County Subarea Plan and has entered into a planning agreement with the US Fish and Wildlife Service and the California Department of Fish and Game for the North County MSCP and East County MSCP. Discussion of the effects of the Proposed Project on the

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 8 of 11

August 25, 2008

existing and planned MSCP plans should be included in this section. MSCP plans that are in place or in preparation will address several hundred species of plants and animals that have a high potential for being listed as endangered or threatened by either state or federal wildlife agencies. This Proposed Project and its alternatives would result in a major disruption to the completion and implementation of these plans.

F0010-16 cont.

As was stated in County comments provided on the NOP dated October 20, 2006, and the DEIR/EIS, impacts to areas designated as high biological value areas or Pre-Approved Mitigation Area within the existing and proposed MSCP plans need to be examined. Consistency with the MSCP needs to be demonstrated. In particular, impacts to species covered under the South County Subarea Plan or proposed for coverage under the North or East County MSCP Plans must be adequately analyzed and mitigation must be identified sufficient to maintain and not preclude the County's take authorization for these species under these plans. This includes significant, unmitigable impacts to a wide range of species that may be affected by the Proposed Project as outlined in the DEIR/EIS, such as: various bird and bat species; flat-tailed horned lizard, Peninsular bighorn sheep, and the Quino checkerspot butterfly. The MSCP plans and/ or proposed sensitive and covered species lists may be found online at: <http://www.sdcounty.ca.gov/dplu/mscp/index.html>.

Page 2-24, list of species – The potential for the California Condor to utilize the area should also be addressed and impacts evaluated.

F0010-17

Page 2-27, last paragraph – The document states that it is estimated that 85 acres of permanent disturbance to vegetation will remain after restoration efforts. The biological analysis appears to be based on a large temporary disturbance, major restoration efforts, and minimal permanent disturbance. However, on page 2-208, the DEIR states that up to 2,125 acres would be permanently disturbed. The 2,125 acres estimate is consistent with the disturbance around the wind generation turbines in the Boulevard area which have 1.5 to 3 acres of disturbance at the base of each turbine with additional disturbed areas for roadways, utility lines, and staging/maintenance areas. The amount of temporary and permanent disturbance should be clarified and used consistently throughout the document.

F0010-18

Page 2-54, third paragraph – The document states that up to 7,500 acres of chaparral, pine forest, and possibly desert communities may be impacted by the Rumorosa Wind Energy Project (RWEPP) Wind Farm. There are several mitigation measures associated with the impacts to vegetation that involve revegetation of native habitats. However, the permanent impacts to wildlife movement appear to be substantially understated in Impact B-9. Wildlife movement and habitat value will diminish significantly due to the amount of temporary and permanent vegetation removal, ground vibration, noise, and constant overhead movement of the turbines. To our knowledge, studies have not been conducted on wildlife movement within wind generation facilities with this concentration of turbines. Therefore, the impacts should

F0010-19

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 9 of 11

August 25, 2008

be disclosed and mitigation measures proposed to offset the impact as much as feasible.

F0010-19 cont.

In addition, the assumption that no fencing would occur has also not been substantiated or restricted by mitigation measures. If fencing along all or portions of the site were to occur, the conclusions of the report would be invalidated.

Page 2-63, Visual Resource Section – Lighting is not addressed for the Jacumba Substations, Boulevard Substation, or the RWEF. If lighting will be utilized, either for security, aircraft warning lights, or other reasons, the impacts to Astronomical Dark Sky need to be discussed, evaluated, and mitigated. Mount Laguna Observatory is the vicinity and could be significantly impacted by light pollution.

F0010-20

Figure 2.3-7B, Photo Simulation – One of the most prominent features of the existing wind farms in the Boulevard area is the 1.5 to 3 acres of land disturbance at the base of each wind turbine, the numerous access roadways, and the trenching scars from the underground utility lines. In addition, page 2-6 indicates that buildings and a 300,000 gallon water tank would be built as part of the Jacumba substation yet these uses were not depicted on the simulation. The photo simulation does not include any of these visual impacts in the analysis and yet the magnitude of the project is still illustrated by the long sweeping impacts to the viewshed. The County agrees that the visual impacts to Table Mountain, Jacumba, and the surrounding area remain significant after mitigation as it due to the substantial reduction in scenic quality for the area. However, the photo simulation understates the impact, as the impacts from vegetation clearance associated with the project are not represented.

F0010-21

Page 2-71, Visual Resources – Aesthetic impacts from RWEF should be evaluated to viewsheds in Anza Borrego State Park, Ocotillo, and higher elevations in the community of Boulevard (Tierra Heights, Tierra del sol Road area, and Jewel Valley Road area).

F0010-22

Page 2-109, Section 2.4 Land Use – The document should acknowledge the County's future plan for the area surrounding Jacumba, including the site for the new Jacumba substations. The County intends this area to remain rural. The General Plan Update Draft Maps all designate the area as 1 dwelling unit per 80 acres to maintain the rural character. Introduction of the proposed uses would change the character of the area substantially and be inconsistent with what the County of San Diego has planned.

F0010-23

Page 2-187 Impact AQ-3 – The statement is made that in building the RWEF and the associated transmission lines, it would result in reduced emissions from fossil fuel-fired power plants. If development of the project could potentially facilitate connection to SDG&E or Sempra LNG power plants in Baja Mexico, this statement would not be valid.

F0010-24

Page 2-188, Water Resources – The Water Resources section should discuss the water needed to restore 7,500 acres of potentially disturbed area back to natural

F0010-25

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 10 of 11

August 25, 2008

habitat. Restoration programs typically utilize irrigation until plants are established. Otherwise in an arid environment, plants may not survive or be established for many years and over time and may be impeded by erosion.

F0010-25 cont.

In addition, on page Ap.1-9, it is estimated that approximately 6,000 gallons of water would be needed for concrete mixing on-site for each wind turbine. This substantial water use (3 million gallons) should be discussed in the DEIR.

F0010-26

Finally, on page 2-6, a 300,000 gallon water tank is discussed for the Jacumba Substation. The water resources need to be discussed for this tank and the amount of water use of the facility should be addressed in the Water Resource Section. In addition, the visual analysis should have included a tank of this size in the simulation.

F0010-27

Page 2-191, Impact H-1 – With the amount of ground disturbance potential from construction of the RWEP, the erosion control measures will need to be done on a massive scale and well monitored for impacts to be considered less than significant. Considering the remote location and steep terrain, it is more likely that impacts will result even with the best efforts. In addition, on page 2-208, second to last paragraph, it states that up to 2,125 acres of permanent impact could occur, this could significantly impact water quality due to increase erosion and sedimentation.

F0010-28

Page 2-208, Impact G-1 – Same comment as H-1 above.

Page 2-220, second paragraph – Same comment as page 2-188 on water use for biological restoration efforts.

F0010-29

Page 2-222, Mitigation Measures – The requirement to prepare a Fire Prevention and Response Plan (FPRP) should be included as a mitigation measure since it is recommended at the bottom of page 2-221.

F0010-30

Page 2-223, Impact S-5 – The Sempra RWEP will have significant visual impacts to the residents on the US side of the border. However, the DEIR only discusses the impacts to property values on the Mexican side of the border. This analysis should also include impacts to the US property values.

F0010-31

Page 2-227, Mitigation Measures for impact F-1 – A Fire Prevention Response Plan (FPRP) should be created specifically for the RWEP project and there should be consultation with fire service providers on both sides of the border. This project presents a significant new source of ignition in an area with very rugged and inaccessible terrain. Fire hazard is significant in the eastern portion of San Diego County in much of the Proposed Project location. In addition, the DEIS/EIR indicates that FPRPs will be created for the Proposed Project. This does not address the fundamental issue of fire hazard from downed powerlines or turbine failure.

F0010-32

Comment Set F0010, cont.
San Diego County Department of Planning and Land Use

Sunrise Powerlink Recirculated DEIR/EIS
County of San Diego LUEG Comments

page 11 of 11

August 25, 2008

Page 2-230, first paragraph – This section discusses the ignition potential that the wind turbines themselves pose in a very rugged and inaccessible area and the limited ability of fire suppression crews to effectively fight fires hundreds of feet above ground. On the next page, no mitigation or fire clearance is proposed for the areas surrounding the turbines for this significant potential impact to the environment, human life, and property of nearby communities.

F0010-33

Section 3, Revisions to Alternatives – Many of the proposed route revisions relate to avoidance of site specific issues. The County remains supportive of the three alternatives discussed in our DEIR comment letter dated April 9, 2008 (New In-Area All Source Generation Alternative, New In-Area Renewable Generation, and the No Project Alternatives). However, the County is concerned that the BCD Alternative and the BCD South Alternative appear to have been routed through even more rugged terrain and sensitive areas than the original alternatives. The sensitive areas, including floodplains and wetlands, of upper McCain Valley and Thing Valley through the La Posta Creek area will be impacted by the new routes.

F0010-34