Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project

A. Introduction and Background

San Diego Gas & Electric Company (SDG&E) filed an application in December 2005 and subsequently an amended application with a Proponent's Environmental Assessment (A.05-12-014, consolidated with A.06-08-010) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the proposed Sunrise Powerlink (SRPL) Project, also referred to as the Proposed Project. The proposed SRPL Project is a 150-mile transmission line between the El Centro area of Imperial County and northwestern San Diego County. SDG&E's stated purpose for the project is to bring renewable resources into San Diego County from Imperial County, reduce energy costs in the San Diego area, and to improve electric reliability for the San Diego area.

SDG&E has also filed an application for a Right-of-Way Grant with the United States Department of the Interior Bureau of Land Management (BLM). The CPUC and the BLM have developed and signed a Memorandum of Understanding (completed on July 17, 2006) that will direct the preparation of a joint Environmental Impact Report (EIR) and an Environmental Impact Statement (EIS) referred to as an EIR/EIS for the SDG&E Sunrise Powerlink Project. The CPUC, as the lead agency under California law, and the BLM, as the federal lead agency, will prepare a Draft and Final EIR/EIS to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

In September 2006, a Notice of Preparation (NOP) announcing a 30-day scoping period was sent to interested agencies and members of the public to inform recipients that the CPUC was beginning preparation of the Sunrise Powerlink EIR/EIS and to solicit information that would be helpful in the environmental review process. Also, the BLM published in the Federal Register a Notice of Intent (NOI) to prepare a joint EIR/EIS for Sunrise Powerlink (FR Vol. 71, No. 169, page 51848, August 31, 2006). Following the release of the NOP and NOI, seven public scoping meetings were held during the week of October 2, 2006, and a Scoping Report was prepared to document comments received. The NOP, NOI, and the Scoping Report can be viewed on the project website at the following link: http://www.cpuc.ca.gov/environment/info/aspen/sunrise/sunrise.htm

Summary of Alternatives Analysis and Preliminary Conclusions

Since the fall 2006 scoping period, the EIR/EIS team has completed preliminary assessment of nearly 100 alternatives, including 24 identified by SDG&E in its Proponent's Environmental Assessment. The rest of the alternatives were suggested by the public and public agencies during scoping (September/October 2006), or were developed by the EIR/EIS team in order to reduce or avoid impacts of the Sunrise Powerlink Project as proposed. In this notice, 30 alternatives are recommended for detailed EIR/EIS analysis and the remaining approximately 70 alternatives are recommended for elimination from detailed analysis. Research on the feasibility of a number of alternatives is ongoing, so they are still identified as "retained" pending receipt of additional information.

Final decisions on alternatives to be analyzed in the EIR/EIS will be made by the CPUC and BLM after consideration of all comments received during this second round of scoping. The Draft EIR/EIS will present these conclusions.

B. Purpose of Second Scoping Meetings

A second scoping period has been scheduled to allow the public to provide input to the EIR/EIS team on its preliminary assessment of all identified alternatives. Prior to the close of the first scoping period in October 2004, the Sierra Club and the Center for Biological Diversity filed a motion with the CPUC's Administrative Law Judge (ALJ) Weissman requesting that the scoping period be extended and that additional scoping meetings be held. These additional commenting opportunities were requested in order to give interested members of the public additional time to consider and react to possible southern transmission line routes identified by SDG&E in its October 2, 2006 filing to the CPUC, in response to a request by the Assigned Commissioner.

In an October 19, 2006 Ruling, the ALJ determined that rather than extend the scoping period, it would be more efficient and informative to allow the EIR/EIS team the time to develop alternatives and to allow the public an additional scoping period to provide comments to the team. Therefore, the ALJ ruled that there would be a second 30-day scoping period at the earliest practical time to solicit comments from the public on the alternatives proposed to be fully analyzed in the EIR/EIS, as well as those recommended to be eliminated from detailed analysis. After receiving this input, the CPUC and BLM, utilizing their independent judgment, will finalize their conclusions and proceed to prepare the Draft EIR/EIS.

C. Information Contained in this Second Scoping Notice

This notice contains the following information for the public's consideration on the process and preliminary conclusions on alternatives:

D. EIR/EIS Schedule

At the time of scoping in September and October 2006, the EIR/EIS schedule had not been finalized. After interagency planning and coordination, the anticipated schedule for release of the Draft and Final EIR/EIS is as follows:

Release of Draft EIR/EIS	July 13, 2007
Public Comment Period on Draft EIR/EIS	July 13, 2007 to October 12, 2007
Release of Final EIR/EIS	November 20, 2007

E. Public Meetings on Alternatives

In response to the ALJ's Ruling, the CPUC and BLM will conduct public meetings on alternatives in eight locations that relate to the preliminary determinations on alternatives, as shown in Table 1 on the following page. The purpose of these meetings is to describe the alternatives evaluation process, the preliminary conclusions of the EIR/EIS team, and to listen to the views of the public on the range of alternatives appropriate for consideration in the EIR/EIS.

Table 1. Public Meetings on Alternatives		
Location	Day, Date, Time	Directions
El Centro Imperial County Board of Supervisors 940 West Main St., Suite 219 El Centro, CA 92243	Monday Feb. 5, 2007 12:30 to 2:00 p.m.	From the west, take I-8 to Exit 114 directly onto northbound Imperial Ave. After 1.6 miles on Imperial Ave., turn right on W. Main Street. The Board of Supervisors building is across from the courthouse. From the north, take Hwy 86 south into El Centro and turn left on W. Main Street. The Board of Supervisors building is across from the courthouse.
San Diego–Rancho Peñasquitos Doubletree Golf Resort 14455 Peñasquitos Drive San Diego, CA 92129	Monday Feb. 5, 2007 7:30 to 9:30 p.m.	From the north, take I-15 to Exit 21/Carmel Mountain Road. Turn right (west) at the end of the exit ramp, then take the first right. The Doubletree is immediately on the right. From the south, take I-15 to Exit 21/Carmel Mountain Road. Turn left (west) at the end of the exit ramp, then take the first right. The Doubletree is immediately on the right.
Julian Wynola Pizza Express (The Red Barn) 4355 Hwy 78 Julian, CA 92036 (760) 765-3636	Tuesday Feb. 6, 2007 2:00 to 4:00 p.m.	From the west or north (Santa Ysabel and Warner Springs), take Hwy 78 through Santa Ysabel towards Julian. Wynola Pizza Express is on the left just north of the Wynola Road intersection (3 miles from the Hwy 78/79 intersection). From the east (Julian or Borrego Springs), take Hwy 78 for 3.7 miles towards Santa Ysabel to Wynola Pizza Express, on the right side of the highway.
Ramona San Vicente Inn (San Vicente Room) 24157 San Vicente Rd. Ramona, CA 92065 (760) 789-8290	Tuesday Feb. 6, 2007 7:00 to 9:00 p.m.	From the west take Hwy 67 North and continue as it becomes Main St for 0.4 mi. Turn right at Dye Rd and continue for 1.8 mi. Dye Rd turns left and becomes Ramona St, continue for 0.4 mi. Turn right at Warnock Dr for 0.7 mi Turn right at San Vicente Rd; continue for 4.6 miles. Pass the tennis courts to the parking lot on your right. From east SR78 take SR78 through central Ramona, turn south onto 10th Street. 10th becomes San Vicente Road; continue 6.6 miles from Main Street to San Vicente Inn on your right.
Boulevard Boulevard Fire Department 39223 Hwy. 94 Boulevard, CA 91905 (619) 766-4633	Wednesday Feb. 7, 2007 1:00 to 3:00 p.m.	From the east or west take I-8 to the Hwy 94/Boulevard exit. Turn south on Hwy 94, then right on Old Highway 80. At the fork of Old Highway 80 and Hwy 94 (Campo Road), take the left fork along Campo Road to the Fire Department.
Alpine Alpine Community Center (Sage Room) 1830 Alpine Blvd. Alpine, CA 91901 (619) 445-7330	Wednesday Feb. 7, 2007 6:30 to 8:30 p.m.	From the west take I-8 to Tavern Road exit. Turn right (south) on Tavern, then left on Alpine Boulevard, 0.2 miles to the Alpine Community Center on the left side of the street. From the east take I-8 to Tavern Road exit. Turn left (south) n Tavern, then left on Alpine Boulevard, 0.2 miles to the Alpine Community Center on the left side of the street.
Borrego Springs Borrego Springs Resort 1112 Tilting T Drive Borrego Springs, CA 92004 (760) 767-5700	Thursday Feb. 8, 2007 2:30 to 4:00 p.m.	From the west, take S22 which turns right onto Palm Canyon Dr. Proceed 1.4 miles. At the turnaround, turn right (south) onto Borrego Springs Road and drive south 1.8 miles. Turn left on Tilting T drive and follow its curves for 1.3 miles. From the east, take S22 which turns west in Borrego Springs as Palm Canyon Drive. Turn left on Borrego Valley Rd and your first right onto Tilting T Drive. Enter through the Borrego Springs Resort arches. The meeting room is in the main building.
Temecula City Hall (Council Chambers) 43200 Business Park Dr Temecula, CA 92590 (951) 693-3961	Friday Feb. 9, 2007 1:00 to 3:00 p.m.	From the north take I-15 to Rancho California Road in Temecula, then turn right. Continue until the third right on Business Park Drive. From the south, take I-15 to Rancho California Road in Temecula, then turn left. Continue until the third right on Business Park Drive.

F. Description of the Proposed Sunrise Powerlink Project

The transmission line and facility upgrades proposed by SDG&E are known as "Sunrise Powerlink" or "SRPL." The entire project would span a total of 150 miles (over 800 new towers), including a 91-mile, 500 kilovolt (kV) transmission line (in Imperial County and eastern San Diego County) and a new 59-mile 230 kV line (in central and western San Diego County) that includes both overhead and underground segments. It would also include a new 500/230 kV substation in central San Diego County and upgrades at four existing substations.

Future Phases of the Sunrise Powerlink Project

In responses to data requests from the EIR/EIS team, SDG&E has stated that the proposed Central East Substation will be constructed with the capacity for six 230 kV circuits leaving the substation. The Proposed Project includes only two circuits (on one set of towers), so at some point in the future, four additional circuits could be constructed. The timing of the need for these circuits is uncertain, but SDG&E states that one or two additional circuits would likely be required by 2020. Therefore, using the information provided by SDG&E, the EIR/EIS will consider the potential impacts of future transmission line routes from the Central East Substation to other SDG&E substations, including Sycamore Canyon (following proposed Sunrise Powerlink route), Peñasquitos (with or without tying into Sycamore Canyon), Escondido, Mission, and Los Coches. When and if these future phases of this project are actually proposed, SDG&E would be required to submit a new application to the CPUC, and separate CEQA and NEPA analyses would be completed.

In addition, the evaluation of alternatives takes into account the future project phases. The routes between the 500/230 kV substation, wherever it is located, and the western substations (Sycamore Canyon, Escondido, and others) will also need to accommodate additional 230 kV lines.

Proposed Project Links

The entire transmission line route as described above is illustrated in Figure 1 (Sunrise Powerlink Project Overview) at the end of this Notice, and in more detail on Figures 2 through 7, project links. The proposed route and right-of-way (ROW) requirements were described in detail in the September 2006 NOP, summarized below by project link.

Imperial Valley Link. The first segment of the project would consist of 60.9 miles of the route, including the entire Imperial County portion and a few miles in San Diego County. The SRPL would start at SDG&E's Imperial Valley Substation located about five miles southwest of the center of the City of El Centro. It would be on BLM land and private land, following about four miles of the existing 500 kV Southwest Powerlink (SWPL) transmission line to the northwest, then turning north, following the eastern edge of BLM land adjacent to agricultural lands. From Milepost 20 to 41, the route would follow an existing IID transmission line. It would turn west to follow State Route (SR) 78 for 9.6 miles, then south along another existing IID 92 kV transmission line for 2.8 miles. The route would approach Anza-Borrego Desert State Park westward along Old Kane Springs Road for 10.8 miles.

The Imperial Valley Link also includes upgrades to the existing SDG&E Imperial Valley Substation to accommodate the termination of the new 500 kV transmission line. The substation modifications would be within the existing substation fence in previously disturbed areas.

Anza-Borrego Link. The Proposed Project would include 22.6 miles through the Anza-Borrego Desert State Park (ABDSP). It would continue through ABDSP adjacent first to Old Kane Spring Road for 7.3 miles, then to SR78 for about 10 miles, passing the Tamarisk Grove Campground and then following County

Route S3 to Borrego Springs, and finally to Grapevine Canyon Road, turning northwest. The route would pass through approximately 5.6 miles of the Park within Grapevine Canyon Road.

Central Link. The project within the Central Link is 27.3 miles long and would include 7.4 miles of 500 kV line and 19.9 miles of 230 kV line. The 500 kV line would continue northwest from the western boundary of the Park within Grapevine Canyon for about four miles, then turning west and staying south of S22 for about 2.5 miles. At this point, the 500 kV line would cross S2 and turn south for one mile, into the new Central East Substation.

The 230 kV line would exit the substation to the north, staying west and south of S2 for about seven miles. Then it would turn south for two miles, paralleling SR79 on its east side. It would cross to the west side of SR79 at the intersection of SR79 and SR76 (southeast of Lake Henshaw). Heading south, it would parallel SR79 at a distance of between one-half mile and three miles west of the highway. The line would parallel a portion of Mesa Grande Road running southeast, then turn south to cross SR78 about 3/4-mile west of Santa Ysabel (at the intersection of SR79 and SR78), then continue south-southwest for 2.5 miles on the east side of SR78.

The proposed Central East Substation, requiring approximately 106 acres of disturbance, would be located on a privately owned parcel that SDG&E has purchased. It is located in an undeveloped rural area, about a mile west of S2 and about 1.2 miles south of the S2/S22 intersection in northern San Diego County. The electrical facilities of the substation would include 500 kV and 230 kV air insulated, breaker and half design electrical buses, one 500 kV transmission circuit, two 230 kV transmission circuits, two 1120 MVA transformer banks, one series capacitor, two 230 kV shunt capacitors and associated breakers, disconnect switches, protective relays, metering, and Supervisory Control and Data Acquisition (SCADA) equipment. The substation general arrangement would include the 500 and 230 kV transmission lines, as well as 500/230 kV transformer banks.

Inland Valley Link. The 25.5-mile project route in this area would extend from southwest of Santa Ysabel, pass south of central Ramona, and end at the existing Sycamore Canyon Substation on the north edge of Marine Corps Air Station Miramar. The first segment in this link would generally parallel the existing SDG&E 69 kV transmission line that connects Santa Ysabel and Creelman Substations, except for a mile-long segment would diverge west of the 69 kV line to avoid United States Forest Service property. Entering Mount Gower County Preserve from the northwest, the lines would be installed underground, first along a dirt road within the Preserve, then continuing underground in Gunn Stage Road and San Vicente Road. The lines would transition to overhead on San Vicente Road just west of Wildcat Canyon Road, then cross San Vicente Road to the north side for about one mile. At this point, the route would follow an existing SDG&E 69 kV transmission line to the southwest to the Sycamore Canyon Substation.

Coastal Link. A new, 13.6-mile single-circuit 230 kV transmission line would begin at the existing Sycamore Canyon Substation on MCAS Miramar south of the City of Poway, and terminate at the existing Peñasquitos Substation in the Torrey Hills area of the City of San Diego. A 5.9-mile segment from the Sycamore Canyon Substation to the Chicarita Substation would turn northwest and would be installed within existing SDG&E ROW. Immediately west of Chicarita Substation a 4.3-mile underground segment would start. The first 1.9 miles would be in a 50-year-old dedicated SDG&E utility right-of-way that is currently vacant. The 230 kV line would be constructed within Park Village Drive and the Los Peñasquitos Canyon Preserve for 2.4 miles (underground), then transition to overhead in another SDG&E corridor at the western end of Park Village Drive. For the last 3.3 miles, the new 230 kV circuit would be overhead within existing SDG&E ROW into the Peñasquitos Substation.

The Coastal Link would include modifications to the existing Sycamore Canyon and Peñasquitos Substations. The Sycamore Canyon Substation would be modified to accommodate termination of three new 230 kV transmission circuits (the new double circuit entering the substation from the new Central East Substation and the new single circuit exiting the substation towards the Peñasquitos Substation). The scope includes installation of support structures, circuit breakers, disconnect switches, insulators, foundations, control cable, power cable, protective line relays, and communication and SCADA interfaces. The Peñasquitos Substation would be modified to accommodate the new 230 kV circuit; all improvements at this site would be within the existing substation fencing.

Other System Upgrades. The SRPL Project would require upgrades to three existing substations described above (Imperial Valley, Sycamore Canyon, and Peñasquitos), as well as construction of a new substation (Central East Substation), also described above. In addition, the Sunrise Powerlink Project would require that SDG&E upgrade other portions of its electric system that are physically separate from the corridor described in the five links above:

- A reconductor[1] of the existing Sycamore Canyon to Elliot 69 kV transmission line would be required. Along this 8.5-mile segment, new conductors would be installed primarily on existing towers, but several towers would have to be replaced with new towers in order to support the weight of the new lines.
- The San Luis Rey Substation would be modified with the addition of a third 230/69 kV transformer and a 230 kV, 69 MVAR shunt capacitor.
- The South Bay Substation would be modified with the addition of a 69 kV, 50 MVAR shunt capacitor.

G. Alternatives Screening Process

In compliance with CEQA and NEPA, an EIR/EIS must describe a reasonable range of alternatives to the project or project location that could feasibly attain all or most of the basic project objectives and avoid or lessen any of the significant environmental impacts of the Proposed Project. Alternatives may include different routes for the transmission line or alternative methods of providing electric power to the SDG&E area. The No Project/No Action Alternative must also be analyzed in the EIR/EIS. The No Project/No Action Alternative will describe what would likely occur in the absence of Proposed Project implementation and is defined in Section H below. Further, the EIR/EIS must evaluate the comparative merits of the alternatives.

In the Proponent's Environmental Assessment (PEA) for SRPL, SDG&E evaluated a variety of project alternatives, including alternative routes, alternative transmission projects, and non-transmission alternatives. The CPUC and BLM have re-evaluated the feasibility and potential impacts of SDG&E's alternatives and made a preliminary determination on which of them meet CEQA and NEPA requirements for being carried to full analysis. In addition, the CPUC and BLM have evaluated a large number of alternatives suggested by members of the public and alternatives developed by the EIR/EIS team.

In order to comply with CEQA and NEPA requirements, each alternative that has been suggested or developed for this project has been evaluated in three ways, as described in Sections G.1 through G.3.

[1] Reconductoring is the installation of new, higher capacity conductors, generally on existing towers (some new towers would be required when existing towers cannot support the greater weight of the new conductors).

G.1 Does the alternative accomplish all or most of the basic project objectives?

SDG&E has presented the following eight objectives in its PEA:

1. Ensure SDG&E's transmission system satisfies minimum CAISO, NERC and WECC reliability criteria throughout the planning horizon of SDG&E's Long Term Resource Plan (LTRP) and beyond, including the requirement that there be no loss of load within the San Diego area under G-1/N-1 contingency conditions.[2] Avoid siting the Proposed Project parallel to SWPL for long distances especially avoiding areas with fire history or fire potential.
2. Provide transmission facilities with a voltage level and transfer capability that (a) allows for prudent system expandability to meet both anticipated short-term (2010) and long-term (2015 and beyond) load growth through a total San Diego area import capability of at least 4,200 MW (all lines in service) and 3,500 MW (under G-1/N-1 contingency conditions) and (b) supports regional expansion of the electric grid.
3. Provide transmission capability for Imperial Valley renewable resources for SDG&E customers to assist in meeting or exceeding California's 20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020.
4. Reduce the above-market costs associated with maintaining reliability in the San Diego area while mitigating the potential exercise of local market power, particularly the costs associated with inefficient generators such as the South Bay and Encina Power Plants.
5. Improve regional transmission system infrastructure to provide for the delivery of adequate, reliable, and reasonably priced energy supplies and to implement the transmission elements of state and local energy plans.
6. Obtain electricity generated by diverse fuel sources and decrease the dependence on increasingly scarce and costly natural gas.
7. Avoid, to the extent feasible, the taking and relocation of homes, businesses or industries, in the siting of the transmission line, substation and associated facilities.
8. Minimize the need for new or expanded transmission line ROW [right-of-way] in urban or suburban areas of the SDG&E service territory already traversed by multiple high voltage transmission facilities and, to the extent feasible, assist in implementing local land use goals.

Having taken into consideration the eight objectives set forth above, the CPUC and BLM have identified the following three basic project objectives:

- Basic Project Objective 1: to maintain reliability in the delivery of power to the San Diego region;
- Basic Project Objective 2: to reduce the cost of energy in the region; and
- Basic Project Objective 3: to accommodate the delivery of renewable energy from geothermal and solar resources in the Imperial Valley and wind and other sources in or outside of San Diego County.

The determination of whether to eliminate or retain alternatives in this EIR/EIS will be based on the alternative's ability to meet most of these three objectives, in accordance with CEQA Guidelines section 15126.6(a), which requires consideration of "a range of reasonable alternatives" to the project, or to

[2] "G-1" is the term used for transmission system analysis assuming that the largest generating facility is offline; "N-1" assumes that the largest transmission line is out of service.

the location of the project, that could accomplish "most of the basic objectives of the project" and "avoid or substantially lessen one or more of the significant effects. The determination will also be based on the CPUC requirement to consider alternatives "capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly." (California Public Utilities Code § 1002.3).

G.2 Is the alternative feasible?

The feasibility analysis considers whether an alternative can be constructed using existing technology and whether it can be permitted given applicable regulatory requirements. The State CEQA Guidelines (Section 15364) define feasibility as:

> ***. . . capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.***

The alternatives screening analysis is largely governed by what CEQA terms the "rule of reason," meaning that the analysis should remain focused, not on every possible eventuality, but rather on the alternatives necessary to permit a reasoned choice. Furthermore, of the alternatives identified, the EIR is expected to fully analyze those alternatives that are feasible, while still meeting most of the project objectives.

According to the State CEQA Guidelines (Section 15126.6(f)(1)), among the factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or other regulatory limitations, jurisdictional boundaries, and proponent's control over alternative sites in determining the range of alternatives to be evaluated in the EIR. For the screening analysis, the feasibility of potential alternatives was assessed taking the following factors into consideration:

- **Economic Feasibility**. Is the alternative so costly that implementation would be prohibitive? The State CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of project objectives or would be more costly" (Guidelines Section 15126.6(b)). The Court of Appeals added in *Goleta Valley v. Board of Supervisors* (2nd Dist. 1988) 197 Cal.App.3d, p. 1181 (see also *Kings County Farm Bureau v. City of Hanford* (5th Dist. 1990) 221 Cal.App.3d 692, 736 [270 Cal. Rptr. 650]): "[t]he fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are *sufficiently severe* as to render it *impractical* to proceed with project."

- **Environmental Feasibility.** Would implementation of the alternative cause substantially greater environmental damage than the Proposed Project, thereby making the alternative clearly inferior from an environmental standpoint? This issue is primarily addressed in terms of the alternative's potential to eliminate significant effects of the Proposed Project, as discussed in the following section and in Attachment 1.

- **Legal Feasibility**. Does the alternative have the potential to avoid lands that have legal protection that may prohibit or substantially limit the feasibility of permitting a high voltage transmission line?

- **Regulatory Feasibility**. Do regulatory restrictions substantially limit the likelihood of successful permitting of a high-voltage transmission line? Is the alternative consistent with regulatory standards for transmission system design, operation, and maintenance?

  Lands that are afforded legal protections that would prohibit the construction of the project, or require an act of Congress for permitting, are considered less feasible locations for the project. These land

use designations include wilderness areas, wilderness study areas, restricted military bases, airports and Indian reservations. Information on potential legal constraints of each alternative has been compiled from laws, regulations, and local jurisdictions, as well as a review of federal, State, and local agency land management plans and policies.

- **Social Feasibility.** Would the alternative cause significant damage to the socioeconomic structure of the community and be inconsistent with important community values and needs? Similar to the environmental feasibility addressed above, this subject is primarily considered in consideration of significant environmental effects.
- **Technical Feasibility.** Is the alternative feasible from a technological perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?

G.3 Does the alternative avoid or substantially lessen any significant effects of the Proposed Project?

A key CEQA requirement for an alternative is that it must have the potential to "avoid or substantially lessen any of the significant effects of the project" (State CEQA Guidelines Section 15126.6(a)). If an alternative is identified that clearly does not have the potential to provide an overall environmental advantage as compared to the Proposed Project, it is usually eliminated from further consideration. At the screening stage, it is not possible to evaluate all of the impacts of the alternatives in comparison to the Proposed Project with absolute certainty, nor is it possible to quantify impacts. However, it is possible to identify elements of an alternative that are likely to be the sources of impact and to relate them, to the extent possible, to general conditions in the subject area. During evaluation of alternatives, a preliminary assessment of project impacts was made by the EIR/EIS team in order that an appropriate range of alternatives is developed; see Attachment 1 for a summary of impacts.

H. No Project Alternative

Both CEQA and NEPA require an evaluation of a No Project or No Action Alternative in order for decision-makers to compare the impacts of approving the project with the impacts of not approving the project. Consideration of the No Project Alternative is required by Section 15126.6(e) of the CEQA Guidelines, and NEPA requires the consideration of a No Action Alternative (40 C.F.R. 1502.14(c)). The analysis of the No Project Alternative must discuss the existing conditions at the time the Notice of Preparation was published (September 13, 2006), as well as: "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" [CEQA Guidelines Section 15126.6(e)(2)]. In other words, the analysis should provide a comparison of the environmental impacts that would occur if the Proposed Project is approved with those that would occur if it is not approved [CEQA Guidelines Section 15126.6(e)(1)]. The requirements also specify that: "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed" [CEQA Guidelines Section 15126.6(e)(3)(B)].

The No Action Alternative required under NEPA [40 C.F.R. 1502.14(c)] serves as a basis for comparison even if it would not satisfy the proposed action's purpose and need. The definition of the No Action Alternative depends on the nature of the project and in the case of the Proposed Project the No Action Alternative describes what would occur without the federal agency's (BLM) approval.

Any combination of the following scenarios could occur as part of the No Project Alternative.

- **Increased Dependence on Generation in San Diego.** Power plants in San Diego would continue to run or run more frequently to make up for the import deficiency under the No Project Alternative.
- **Accelerated Development of Other Major Transmission Projects or Upgrades.** Other major transmission projects and/or upgrades may be built to achieve objectives similar to those of the Proposed Project.
- **Accelerated Development of New Generation in San Diego.** New, relatively efficient generation may be built to meet the need for in-area capacity and to replace existing, less efficient generation.

Table 2 shows projects that would be expected to occur if the Sunrise Powerlink Project were not approved.

Table 2. Foreseeable Development Under No Project Alternative

Projects and Sponsors	Transmission Import Capability	Generation Capability
LEAPS Project (Nevada Hydro Company and Elsinore Valley Municipal Water District)	Import 750 MW (all lines in service) Import 500 MW (non-simultaneous)	500 MW of pumped storage generation near SDG&E territory
Crestwood/Boulevard Area Wind Power (would require SDG&E entering into Power Purchase Agreements with various generators similar to those identified in 2004 and 2005 RPS RFO process)	No change, upgrade in-area existing 69 kV to 138 kV and interconnect with existing 500 kV	Up to 308 MW of wind generation
Crestwood/Boulevard Area Transmission including Jacumba Substation (SDG&E system upgrades for in-area wind generators)		
New In-Area Thermal Power Plants: Repower South Bay or Encina or new San Diego Community Power Project (would require SDG&E entering into Long-Term Power Purchase Agreement)	No change	At least 500 MW of base-load generation
Mexico Light 230 kV Upgrade and/or Path 44 Upgrade (would require SDG&E coordination with neighboring utilities in Mexico and Orange County to implement)	Import 140 MW to 300 MW (non-simultaneous)	No change

I. Preliminary Conclusions on Alternatives

Following is a list of all alternatives considered to date in the alternatives screening process. Within each link or topic area, alternatives recommended for detailed EIR/EIS analysis are listed first and alternatives recommended for elimination are listed second.

Imperial Valley and Anza-Borrego Link Alternatives

Imperial Valley and Anza-Borrego Link Alternatives Retained. Figure 2 illustrates Imperial Valley alternatives and Figure 3 illustrates alternatives within Anza-Borrego Desert State Park. In these two project segments, the following alternatives are recommended for detailed analysis in the EIR/EIS:

- **SDG&E Desert Western Alternative:** Would replace proposed route from MP 4.0–54.2. Avoids agricultural lands and more heavily traveled highways, but located near wilderness areas and wildlife habitat. Retained pending further consultation between the Imperial Irrigation District and the

Department of Defense regarding regulatory feasibility constraints due to airspace restrictions limiting height of transmission towers.

- **Imperial Valley FTHL Alternative:** Travels north-northwest from Imperial Valley Substation and skirts western edge of agricultural lands. Retained because it would avoid BLM Flat-Tailed Horned Lizard Management Area.
- **Partial Underground 230 kV ABDSP SR78 to S2 Alternative:** Expand IID San Felipe Substation to 500/230/12 kV and construct underground 230 kV line from substation to SR78. Continue underground within SR78 to one mile east of SR78/S2 intersection where the line would transition overhead for crossing of the Earthquake Valley Fault zone, requiring several towers within State-designated wilderness. Transition back to underground at the SR78/S2 intersection within Highway S2 for three miles, then transitioning to overhead along the east side of the highway at the second crossing of the Earthquake Valley Fault zone. Follow Highway S2 to Central East Substation area and rejoin proposed route. It is recommended for retention because it would reduce visual impacts within ABDSP, and would reduce effects on State-designated wilderness, avoid cultural resources in Grapevine Canyon, and avoid need for construction of Central East Substation. If towers at the fault crossing are required to be located within State Wilderness, this alternative would also require a re-designation of Wilderness Area and a State Park Plan Amendment, thus facing potential regulatory infeasibility and the potential delay of the in-service date.

  This alternative would also present a challenge in the future phases of the project (see discussion of future phases under Section F above). Additional 230 kV circuits could be required underground and overhead in SR78/S2 or underground through Borrego Springs, if feasible (an overhead route along S22 would be within State Wilderness). All future phases would require complete CEQA/NEPA review when proposed. The potential future phase 230 kV line through Borrego Springs may be able to be installed underground. A new 230/69 kV substation associated with this future phase could allow removal of several existing transmission lines in ABDSP and in the Borrego Valley, as well as the Narrows Substation.
- **Overhead 500 kV ABDSP Within Existing 100 Foot ROW:** In order to stay within the existing 100-foot ROW, more towers would be required in order to follow the route of the 69 kV line. More towers would create more severe visual impacts, and substantially more ground disturbance. In addition, a major cultural site within Grapevine Canyon would be directly affected. However, this alternative is retained because it would not result in direct effects on State-designated wilderness and would not require a State Park Plan Amendment.
- **SDG&E Bullfrog Farms Alternative:** Diverges from the Proposed Project at MP 13.5 and would continue east then north across agricultural land following the property lines. Eliminates operational impacts to Bullfrog Farms dairy.
- **Huff Road Bullfrog Farms Alternative:** Diverges from the Proposed Project at MP 13.8 to parallel Payne Road to the east and then Huff Road to the north. Eliminates operational impacts to Bullfrog Farms dairy.

Imperial Valley and Anza-Borrego Link Alternatives Eliminated. Alternatives evaluated and recommended for elimination from detailed analysis in the EIR/EIS within these links are illustrated on Figures 2 and 3, and described below along with the reason for elimination.

- **SDG&E Alternative Segments 3, 3B, 3D:** These three segments are variations of the SDG&E Desert Western Alternative above that were considered as routes for connecting the SWPL corridor with the existing IID 92 kV corridor along the western Imperial Valley floor. Eliminated because of potential

conflicts with existing land uses, greater biological impacts, and regulatory feasibility of crossing through the Desert Range height restriction and/or obstruction-free zones.

- **SDG&E Segment A/Northern Borrego Springs via S22 Alternative:** Overhead 500 kV line that would follow highways SR86 and S22. Eliminated because it would pass through more populated areas (Borrego Valley) and would be constructed within bighorn sheep habitat adjacent to Highway S22. It would also create a new transmission corridor within four State Wilderness areas along Highway S22, requiring a re-designation of Wilderness Area and a State Park Plan Amendment, thus facing potential regulatory infeasibility and the potential delay of the in-service date.
- **SDG&E Segment 1/Imperial Valley via 92 kV Alternative:** A 500 kV line would exit Imperial Valley Substation following existing IID 92 kV transmission line to Narrows Substation. Eliminated because would affect more agricultural land, pass through Desert Range Military Facility (which has tower height restrictions), and would traverse a much greater distance through Flat-Tailed Horned Lizard Designated Management Areas.
- **SDG&E SR78 West of Anza Alternative:** Follows SR78 from the east into ABDSP. Eliminated because would it be highly visible along the main entrance to ABDSP, would pass by residential and commercial receptors, and would need to be relocated due to FAA regulations to avoid Ocotillo Wells Airport.
- **SDG&E Segment 4/ABDSP via S2 Alternative:** Follows 500 kV Southwest Powerlink (SWPL) from Imperial Valley Substation and then parallels Highway S2 through ABDSP to SR78/S2 junction. Eliminated because of the high-value scenic viewshed, greater amounts of bighorn sheep habitat, and a greater length of new transmission corridor within State-designated wilderness. A new corridor in State Wilderness would require a re-designation of Wilderness Area and a State Park Plan Amendment, thus facing potential regulatory infeasibility and the potential delay of the in-service date.
- **SDG&E ABDSP North Side of SR78 Alternative:** At MP 61.9 the alternative would travel north to SR78 and would follow the north side of SR78. Eliminated because longer, would establish a new highly visible transmission line corridor along SR78, and would not reduce any significant impacts of the proposed route.
- **SDG&E Borrego Valley Alternative:** New overhead 500 kV line and new Borrego Springs 500/12 kV Substation in Borrego Springs, allowing removal of existing Narrows and Borrego Substations and the existing Narrows-IID San Felipe 92 kV, Narrows-Borrego 69 kV, and Narrows-Warner 69 kV transmission facilities. Would result in a shorter length of transmission line through ABDSP. Eliminated because it would create new transmission corridor within State-designated Pinyon Ridge Wilderness Area, requiring a re-designation of Wilderness Area and a State Park Plan Amendment, thus facing potential regulatory infeasibility and the potential delay of the in-service date. In addition, the route would be within bighorn sheep habitat, would be highly visible in the Borrego Valley and from Highway S22 scenic overlooks, and would pass near residences in both Borrego Springs and Ranchita.
- **SDG&E SR78 Julian Alternative:** Follows SR78 through Julian to Santa Ysabel. Eliminated because would require difficult construction due to steep, rocky slopes along Banner Grade, would create a new transmission line corridor through Grapevine Mountain Wilderness Area, and would pass by Julian High School, residences, and through the center of the Town of Julian.
- **SDG&E Overhead ABDSP SR78 to S2 Central Alternative:** Follows SR78 and S2 in new transmission corridors, within State-designated wilderness adjacent to highways. Eliminated due to establishment of a new transmission line corridor through designated wilderness, and SR78 and S2 are more heavily traveled roadways through the scenic and currently undeveloped San Felipe Valley.

Note that components of this overhead alternative are included in an overhead/underground alternative along these same highways, retained for analysis and described above.

- **Overhead 230 kV ABDSP Alternative:** Expand San Felipe Substation and construct only a double-circuit 230 kV transmission line from that point, following proposed route. This alternative would eliminate need for the Central East Substation. Eliminated because impacts of the proposed route would not be noticeably reduced, and because future 230 kV expansion would require additional disturbance within ABDSP.
- **HVDC Light Underground Alternative:** Installation a proprietary transmission line system called HVDC Light (developed by ASEA Brown Boveri/ABB) with converter stations (converting alternating current [AC] power to direct current [DC] power) at a new location near IID's existing San Felipe Substation and a second set of converter stations (DC to AC) at the location of the proposed Central East Substation. Three HVDC Light circuits, each with approximately 350 MW capacity would be installed underground in roadways through ABDSP and along Highway S2, with potential overhead segments at fault crossings. This alternative would reduce impacts of the Proposed Project by avoiding Grapevine Canyon, but it would increase project costs by at least $500 million due to the high costs of the converter stations. Although the ability to place HVDC Light transmission cables underground for extended distances offers the ability to avoid the impacts of the proposed 500 kV overhead lines through ABDSP, the higher costs of this alternative make it infeasible using CEQA guidelines.

Central Link Alternatives

Central Link Alternatives Retained. The following alternatives (illustrated on Figure 4) are recommended for detailed analysis in the EIR/EIS:

- **Santa Ysabel Existing ROW Alternative:** Overhead route following existing transmission line right-of-way along west then east side of SR79. Retained because it would reduce visibility of new 230 kV lines through Santa Ysabel Valley by locating the 230 kV line along the base of the hills on the east side of the valley, parallel to the existing 69 kV line and because it would reduce agricultural impacts. Locating the new line closer to SR79 may reduce fire risk in comparison to Proposed Project.
- **Santa Ysabel Partial Underground Alternative:** Overhead 230 kV line would diverge from Proposed Route at MP 100, following the existing 69 kV transmission line right-of-way west of SR79. It would transition to underground south of Elsinore Fault zone crossing, at the point where the existing 69 kV line crosses SR79. The underground line would be located within SR79 and then turn west within SR78, transitioning to overhead to rejoin proposed route at MP 108.3 (the point where the proposed route crosses SR78). Retained because it would greatly reduce and/or eliminate visibility of new 230 kV lines through Santa Ysabel Valley, would reduce agricultural impacts, underground route would reduce fire risk, and would allow use of an existing transmission corridor.

Central Link Alternatives Eliminated. Alternatives evaluated and recommended for elimination from detailed analysis in the EIR/EIS within the Central Link are described below (see also Figure 4), along with the reason for elimination.

- **SDG&E Central East Substation to SR79 Alternative:** Begins at Central East Substation and would travel west and northwest approximately 5.0 miles to rejoin the proposed route at MP 97.4. Eliminated because it does not reduce impacts of the Proposed Project and Vista Irrigation District,

the landowner, prefers the proposed route because of its limited visibility and it avoids disturbance to existing land uses.

- **SDG&E Warners S2 to SR79 Alternative:** Parallels S2 from Central East Substation area, and then along SR79 to rejoin the proposed route at MP 100. Eliminated due to much greater visual impacts than proposed route.
- **Santa Ysabel SR79 All Underground Alternative:** Transition underground at MP 98, two miles north of SR76/SR79 intersection, and travel south underground within SR79 to intersection of SR78, transitioning overhead and rejoining proposed route at MP 108.3. Eliminated due to technical infeasibility of an underground crossing of the active Elsinore Fault zone which parallels SR79 for about 5 miles just south of its intersection with SR76. Underground transmission lines would be severely damaged in a major earthquake along this fault, which is a state-designated active Alquist-Priolo fault zone.
- **SDG&E San Dieguito Park Alternative:** Begin at MP 103.5 and travels south through San Dieguito River Valley Regional Open Space Park and east of the Mesa Grande Reservation, following parcel and agency boundaries to rejoin the Proposed Project at MP 110.5. Eliminated because would place the transmission line in a new corridor on pristine County Park land that is highly visible to recreationists, would cross Santa Ysabel Open Space Preserve, and would cross two parcels of the Santa Ysabel Reservation, which could create legal feasibility issues as well.
- **Volcan Mountain Alternative:** This alternative would diverge from the **"**Partial Underground 230 kV ABDSP SR78 to S2 Alternative" described in the Desert Link above, at the intersection of SR78 and Highway S2. From this point, it would continue underground within SR78 and then turn north-northwest across BLM land and west across Volcan Mountain to Santa Ysabel. Rejoins the Proposed Project at MP 110. Eliminated because it would transfers impacts from ABDSP to an equally sensitive preserve area, and because it would create a new corridor across Volcan Mountain Open Space Preserve and Santa Ysabel Open Space Preserve. These areas are areas rich in biological and cultural resources and are important watershed areas. The line would be visible from a portion of SR78 and SR79, from the preserves which have many hiking trails, and from around the town of Julian.

Inland Valley Link Alternatives

Inland Valley Link Alternatives Retained. The following alternatives are illustrated on Figure 5 and are recommended for detailed analysis in the EIR/EIS:

- **CNF Existing 69 kV Route Alternative:** At MP 111.3 the alternative would remain in the existing 69 kV ROW heading southwest through Cleveland National Forest for approximately 0.5 miles, rather than following the proposed route around the Forest on private land. May require amendment of Forest Plan. Retained because route would be shorter and less visible to nearby residences, no new access roads would be required, and relocation of the existing 69 kV transmission line would not be required.
- **Oak Hollow Road Underground Alternative:** Transitions underground farther east of the Gun Stage Road transition point and travels through a fenced pasture to follow Oak Hollow Road. Retained because it would eliminate visual impacts to residents in the valley area east of Mt Gower Open Space Preserve.

Inland Valley Link Alternatives Eliminated. As shown on Figure 5, alternatives evaluated and recommended for elimination from detailed analysis in the EIR/EIS within the Inland Valley Link are described below, along with the reason for elimination.

- **SDG&E Segment 10/Inland Valley SR78 Alternative:** Begins at proposed route MP 108.3 and would parallel SR78 to the west and then south to the existing Creelman Substation. Eliminated because it would establish a new transmission line corridor along SR78, which is heavily traveled and a main route into Ramona, would be longer, and would pass a greater number of residences, through agricultural land, and through designated critical habitat.
- **SDG&E Creelman Alternative:** Replaces proposed route from MPs 117.1–123.3. Avoids use of paved roadways (Gunn Stage Road and San Vicente Road) and follows existing transmission rights-of-way. Eliminated because it would transfer the impacts without reducing any impacts of the Proposed Project due to its longer length, greater ground disturbance, and location in more sensitive habitat.
- **West of San Vicente Road Underground Alternative:** Would extend the underground segment in San Vicente Road approximately two miles further to the west, to MP 123.3 and then would continue west underground in SDG&E's 69 kV ROW for 1.0 mile to MP 124.3 where it would transition overhead and turn south along the proposed project route. Eliminated because underground construction would be required through the Barnett Ranch Open Space Preserve, resulting in much greater ground disturbance and effects to important biological resources. Also eliminated due to topography and construction/erosion impacts of installing underground line on steep slopes.

Coastal Link Alternatives

Coastal Link Alternatives Retained. Figure 6 illustrates the following alternatives, which are recommended for detailed analysis in the EIR/EIS:

- **Pomerado Road to Miramar Area North – Combined Underground Alternative and Underground/Overhead Alternative** is a hybrid alternative combining two alternatives suggested by the public. Retained because it offers substantial avoidance of impacts to residents in Rancho Peñasquitos and Los Peñasquitos Canyon Preserve. Research is ongoing at the City of San Diego to determine whether adequate space exists within the City streets where the line would be buried.
- **MCAS Miramar – All Underground and Underground /Overhead Alternative** would be a hybrid alternative combining two alignments recommended by members of the public during scoping. Preserves design flexibility and could be underground or overhead as needed and remains located on the base the entire distance. Retained pending coordination with MCAS Miramar to determine feasibility and permitting requirements, because it could offer enhanced land use compatibilities, avoid impacts to Rancho Peñasquitos residential areas, and reduce impacts on biological resources compared to the Proposed Project.
- **Rancho Peñasquitos Boulevard Bike Path Alternative** would diverge from the Proposed Project at the Chicarita Substation and would relocate transition structure to the south. It would avoid impacts to riparian area within View Park West. Retained pending coordination with City of San Diego to determine feasibility (width of ROW and other underground utilities). The alternative would move the line away from residences and would avoid a portion of SDG&E's vacant right of way used by residents as open space.
- **Carmel Valley Road Alternative** would diverge from the proposed route at the Chicarita Substation, avoiding undergrounding through the Los Peñasquitos Canyon Preserve proximity to residences. Recommended for retention because the line would be located farther from residences and would avoid impacts to the Los Peñasquitos Canyon Preserve.
- **Los Peñasquitos Canyon Preserve and Mercy Road Alternative** would follow the Project to the intersection of Mercy Road transitioning to underground continuing under Mercy Road under I-15,

continuing northward under Black Mountain Road. The line would connect with the Project alignment underground at Black Mountain Road and Park Village Drive. Visual impacts minimized as more of the line would be buried. On-going research with the City of San Diego to determine if space exists in the roadways. Pending the outcome of coordination with the City of San Diego regarding utilities in the affected roadways, this alternative is recommended for detailed EIR/EIS analysis because it offers a viable route to avoiding Los Peñasquitos Canyon Preserve and reduces land use impacts within a residential community.

- **Black Mountain to Park Village Road Underground Alternative** would deviate from the proposed alignment where the line approaches Black Mountain Road, and would be installed underground in the road rather than in the vacant ROW. It would be located farther from residences. Retained pending the outcome of coordination with the City of San Diego regarding utilities in roadways, for consideration in the EIR/EIS because it reduces land use impacts in the Rancho Peñasquitos community by moving more of the alignment into a roadway further away from residences.
- **Coastal Link System Upgrade Alternative** includes three optional approaches to the Project segment between the Sycamore Canyon and Peñasquitos Substations. Findings based on 2004 STEP report. CAISO is studying options for upgrades within this segment that could benefit SDG&E. Retained for further analysis of feasibility of the recommended upgrades because it would eliminate all impacts associated with the project segment between Sycamore Canyon and Peñasquitos Substations.

Coastal Link Alternatives Eliminated. Alternatives recommended for elimination from detailed analysis in the EIR/EIS within the Coastal Link are shown on Figure 7 and described below, along with the reason for elimination.

- **SDG&E Northwest Corner Alternative** would replace proposed route in Rancho Peñasquitos area from MP 143.8–146.7. Follows existing SDG&E easement; avoids use of Park Village Drive and undergrounding in Los Peñasquitos Canyon Preserve. Eliminated because of potential conflicts with existing vernal pool complex and other biological resources impacts.
- **SDG&E Mannix-Dormouse Road Alternative** (considered in combination with Northwest Corner Alternative) would replace proposed route in Rancho Peñasquitos area from MP 143.8–146.7. Follows existing SDG&E easement; avoids use of Park Village Drive and Los Peñasquitos Canyon Preserve. Eliminated because of potential impacts to vernal pools and conflicts with existing residential land uses.
- **SDG&E Segment 12 Poway Substation to Peñasquitos Substation Alternative** would be considered in combination with either Segment 14 or 15 which deviate from the Proposed Project route west of Ramona. Overhead route would avoid Los Peñasquitos Canyon Preserve. Eliminated as it would require acquisition of significant new right of way in undeveloped areas and greater land use incompatibilities would be expected particularly in developed areas of the City of Poway.
- **SDG&E Segment 13 Scripps Ranch Alternative** is an alternative to the Proposed Project between Creelman and Peñasquitos Substations and would be entirely above ground. Portions of this route are within an existing SDG&E transmission line ROW and portions of the line would require new ROW. From the Sycamore Canyon Substation the line parallels an existing ROW to Pomerado Road. The line continues parallel to Pomerado Road through Scripps Ranch which is a narrow and heavily traveled portion of the roadway and where no existing ROW exists. Eliminated because of residential land use conflicts, visual impacts, potential effects on MCAS Miramar as well as proximity to Alliant International University.

- **SDG&E Segment 14 Poway Alternative** would be considered in connection with SDG&E PEA Alternative Segment 15 and would connect with Segment 12, creating a straight east-west alignment. Eliminated due to the potential for increased biological resources impacts due to the presence of critical habitat with potential effects on special status species. This alternative would also potentially affect natural resources within County of San Diego's Blue Sky Canyon Ecological Preserve.
- **SDG&E Segment 15 Warren Canyon Alternative** would be considered in connection with SDG&E PEA Alternative Segment 14 and would connect into Segment 12 at or near the existing Poway Substation. This route would require acquisition of new ROW. Eliminated due to potential effects on the County of San Diego and local open space and parks, and potential for increased biological resources impacts due to the presence of critical habitat in the general vicinity of the alignment.
- **SDG&E Segment 16 North of Peñasquitos Alternative** would rely heavily on the use of Route 78. Reaches further north and west than any other alternative and is longer than the Project route Eliminated because of the regulatory, environmental and legal hurdles, as well as, the inability to substantially reduce potentially significant impacts on aesthetics, hydrology floodplains, and traffic with little environmental benefit.
- **Pomerado Road to Miramar Area North – Combination Underground/Overhead Alternative** would follow Proposed Project route to MP 138 at Pomerado Road then deviate to the south-southwest along city streets and through existing operating sand and gravel operation located in Carroll Canyon. Eliminated because of conflicts with an existing sand and gravel quarry operating in Carroll Canyon.
- **MCAS Miramar–Combination Underground/Overhead Alternative** would be a hybrid combining sections of the Pomerado Road to Miramar Area North–Combination Underground/Overhead Alternative and MCAS Miramar–All Underground and Underground/Overhead Alternative. Coordination with MCAS Miramar representatives is on-going to verify whether the alternative is feasible, but this alternative is recommended for elimination because it is redundant with a similar alternative that is recommended for retention.
- **MP 146.5 to Peñasquitos Substation Underground and Consolidation Alternative** would follow the Proposed Project route but would remain underground the entire length from Chicarita to Peñasquitos Substation. Includes under grounding/consolidation of existing electrical transmission lines and additional ground disturbances to biological and cultural resources, soil, and erosion water quality. Eliminated as legally infeasible because it would require burial of existing transmission lines not affected by the project. Also, topography of existing ROW (steep slopes) would result in substantial erosion from undergrounding.
- **Scripps-Poway Parkway to State Route 56 Alternative** would follow the Proposed Project alignment but line would be buried under roads, within SR56, and would include burial within an existing overhead transmission corridor. Avoids use of Los Peñasquitos Canyon Preserve. Eliminated as regulatorily infeasible because of Caltrans regulations prohibiting longitudinal encroachments within limited access freeways.
- **Scripps Poway Parkway – Pomerado Road Underground Alternative** would follow the Proposed Project route from the Sycamore Canyon Substation to Pomerado Road heading north and west underground toward Chicarita Substation along Pomerado Road to Scripps Poway Parkway, rejoining the Project alignment overhead. Requires a new right of way through highly developed and constrained area. Eliminated because it would require new ROW in close proximity to an existing ROW, would cause greater short term traffic impacts and would result in increased visual

impacts from the additional transition structures adjacent to residential units. Additionally, has questionable aesthetic benefit because the existing lines would remain in place, offsetting any perceived visual benefit from burial of a new line.

- **State Route 56 Alternative** diverges from the Project at the Chicarita Substation. From this point the line continues overhead transitioning to underground near Rancho Peñasquitos Boulevard at the SR56 overpass. The line would remain buried and enter the median of SR56 continuing west until it reaches the existing overhead lines north of the western terminus of Park Village Drive. The line would continue overhead and south along this ROW until it rejoins the Project at MP 146.5 Avoids Los Peñasquitos Canyon Preserve and Park Village Drive. Eliminated because it is regulatorily infeasible as longitudinal encroachments into limited access freeways are prohibited by Caltrans regulations.

Substation Alternatives

Substation Alternatives Retained: The following substation alternatives are illustrated on Figure 4 and are recommended for detailed analysis in the EIR/EIS:

- **SDG&E Central South Substation Alternative:** Located about one mile south of the community of Santa Ysabel. Provides visual resources advantages, would be within an existing 69 kV right-of-way, and Santa Ysabel Substation would be removed.
- **Mataguay Substation Alternative:** Located east of SR79 near MP 98 on land owned by Vista Irrigation District. Existing access roads would be used and less grading and earthwork would be necessary, resulting in less temporary and permanent habitat impacts and less of a potential to encounter known and unknown cultural and archaeological resources.

Substation Alternatives Eliminated. Two additional substation alternatives were evaluated and are recommended for elimination from detailed analysis in the EIR/EIS as described below (see also Figure 4), along with the reason for elimination.

- **SDG&E Warner West Substation Alternative:** Located southwest of the proposed Central East Substation and Lake Henshaw between two boundaries of the Santa Ysabel Reservation. Eliminated because of increased transmission line length required, numerous private parcel owners, high density of historical and archaeological sites, and agricultural and residential land-use constraints.
- **Warners Substation Alternative:** Includes expansion of existing Warners 69 kV Substation, which is located at the intersection of SR79 and S2. Eliminated because located on Vista Irrigation District preserve land in flat open space and so would be highly visible to travelers on SR79 and for a far distance across the valley. Longer transmission line would be required as well, with increased ground disturbance.

Southwest Powerlink Alternatives

Southwest Powerlink (SWPL) alternatives are those that would require a 500 kV line parallel to some portion of the existing SWPL within Imperial and San Diego Counties. Due to reliability concerns resulting from high fire risk in the SWPL corridor, priority alternatives were determined to be those that diverged from the SWPL as far east as possible in order to minimize the distance of collocation of two 500 kV lines in high fire risk areas.

In addition, due to SDG&E's plan for future project phases by 2020 (requiring additional 230 kV transmission lines exiting the new 500/230 kV substation), substation locations near the SWPL were not

considered because they would require additional corridors for future 230 kV lines to be identified for service to the northern part of San Diego County.

SWPL Alternatives Retained. Four alternative routes are recommended for detailed analysis in the EIR/EIS. These routes diverge from the SWPL at two different points, both in the eastern half of the county where fire risk is less. While collocation of two 500 kV lines would still result in reduced reliability in comparison to a new 500 kV line in a completely separate corridor, the selection of routes to minimize fire risk is more consistent with the reliability objective. All SWPL alternatives are illustrated on Figure 8.

- **Route D Alternative:** This route was modified from the Route D identified by SDG&E in its application, which followed existing 69 kV lines. The original route followed a transmission line passed through many residential areas in which there was not adequate room for a 500 kV line. The line would diverge from the SWPL at SWPL Milepost 52, turning north along the eastern boundary of the Hauser Mountain Wilderness Area, then paralleling an existing SDG&E 69 kV corridor for 15 miles. In the Japatul Valley and Descanso areas, the route would be located west of the existing 69 kV lines in order to avoid residences. Much of the northernmost 12 miles of this route would be parallel to the existing 69 kV line. This route would be about 6 miles shorter than the proposed route and is recommended for retention primarily because it would avoid Anza-Borrego Desert State Park.
- **Interstate 8 Alternative:** This route was suggested by numerous members of the public and several agencies. It would follow the SWPL for over 35 miles, then turn northwest to meet the I-8 just east of Boulevard. It would then follow the I-8 to the west for over 32 miles, crossing the freeway 5 times. It could turn north following the Route D Alternative through Boulder Creek, or it could cross the freeway one more time, then continue east as a 230 kV line to join the West of Forest Alternative at the point where it crosses the I-8. This alternative would be approximately 16 miles shorter than the proposed route and is recommended for retention because it follows an existing linear corridor and would avoid Anza-Borrego Desert State Park.
- **BCD Alternative:** This route was developed by SDG&E in response to a request from the EIR/EIS team that it develop a southern route that would avoid residential areas. It would follow the SWPL for over 35 miles, then turn northwest to cross the I-8 just east of Boulevard. It would continue north, through primarily BLM land, then west through BLM and National Forest land, crossing the I-8 twice and passing south of the community of Descanso, then joining the Route D Alternative. This route would be about 15 miles shorter than the proposed route and is recommended for retention because it would avoid Anza-Borrego Desert State Park, and it would avoid most residential areas.
- **West of Forest Alternative:** This alternative would cross primarily private property, and was developed in response to public concerns that park and forest land were being targeted for transmission line development. It passes through primarily through private lands and rugged open space, avoiding most residential areas. It would diverge from the Route D Alternative at Milepost D-16, passing through unincorporated San Diego County and southwest of the community of Boulevard. It would pass northeast of Lakeside, then turn north along SR67, joining the proposed route where it would cross SR67. This alternative would be about 28 miles shorter than the Proposed Project and is recommended for retention because it would avoid Anza-Borrego Desert State Park, as well as National Forest lands and other protected areas.

SWPL Alternatives Eliminated. The following four routes and route segments are also illustrated on Figure 8 and are recommended for elimination from detailed EIR/EIS analysis:

- **SDG&E Route B Alternative:** This route would diverge from the SWPL after 39 miles, and would follow county Highway S1 in a highly scenic area through a portion of Anza-Borrego Desert State Park, the Cleveland National Forest, and pass through the center of Julian. Recommended for elimination because of the high scenic value (Highway S1 is a National Scenic Byway), residences around Julian, likely infeasibility of constructing a 500 kV transmission through central historic Julian, and because it would pass through a portion ABDSP.
- **SDG&E Route Segment C:** This route would follow existing SDG&E 69 kV transmission lines and would pass through the communities of Campo, Pine Valley, and Descanso, and many residences would be located adjacent to the corridor. Recommended for elimination because of the large number of residences along the corridor.
- **SDG&E Route Segment BC:** This route segment would connect the Route B Alternative with the Route C Alternative, and would run from the area of Boulevard to an area north of Campo. It would follow an existing SDG&E 69 kV transmission line, roughly parallel to but south of I-8, passing through many residential areas. Recommended for elimination because of the large number of residences along the corridor.
- **West of Forest/Route D Western Origination Segments:** Two alternative segments were considered in which a 500 kV line would be collocated with the SWPL from either SWPL Milepost 63 or SWPL Milepost 73 before diverging to the north. These routes are recommended for elimination because they would pass through more residential areas along the SWPL (in the vicinity of Highway 94) and because they would require a longer collocation of 500 kV lines within "Very High Fire Risk" areas, reducing the reliability value of the new line.

Non-Wires Alternatives

Potential non-wires alternatives to the project consist of energy efficiency, demand response, renewable generation, distributed generation, and clean fossil-fired generation. These alternatives are all located within the SDG&E service territory, which allows them to help meet SDG&E's reliability targets (e.g., 192 MW in 2010 and 482 MW in 2016).[3] The renewable resources help SDG&E comply with the Renewable Portfolio Standard targets (e.g., 20% of sales met by renewables in 2010 with a long-term goal of serving 33% of sales from renewables in 2020).[4]

Non-Wires Alternatives Retained: The following alternatives are recommended for detailed analysis in the EIR/EIS:

- **New In-Area Renewable Generation:** An aggressive program of renewable resource procurement and development can meet SDG&E's reliability goals for 2010 and 2016. This alternative would include the elements listed in the following table:

[3] Sunrise Powerlink Transmission Project Purpose and Need, Volume 2, p. II-47, August 4, 2006.

[4] 2006 Integrated Energy Policy Report Update, p. E-2

Year	2010	2016
Solar Thermal	0	290
Rooftop Solar PV	210	84.5
Wind	48	96
Biomass/Biogas	50	100
Total	192	512.5

Table Notes:

- Values in table are incremental firm on-peak capacity relative to capacity included in SDG&E's reliability targets. Firm on-peak capacity is equal to nameplate capacity multiplied by Effective Load Carrying Capability (ELCC) of each resource.
- Solar Thermal assumed to have an Effective Load Carrying Capability (ELCC) of 80%.
- Rooftop Solar Photovoltaics (PVs) assumed to have an ELCC of 50%. SDG&E assumes rooftop solar provides firm capacity of 10 MW in 2010 and 150 MW in 2016.
- Wind assumed to have an ELCC of 24%

- **New In-Area All-Source Generation:** In addition to the Renewable Generation Alternative presented above, there are various other generation options available to SDG&E to meet its reliability targets. The All-Source Generation Alternative adds distributed generation (DG) and clean, fossil-fired central station generation to the Renewable Generation Alternative. In addition to the renewable resources discussed above, this alternative would include 70 MW of incremental distributed generation by 2015 and conventional gas-fired generation (i.e., 620 MW from the South Bay Replacement Project that is assumed to come online in 2010 and 250 MW of peaking power generators that is assumed to come online in 2008. The peaking generators could be sited at several locations (Encina Power Plant site, MMC Escondido, MMC Chula Vista, NRG Kearny Mesa, or several SDG&E substations.

- **Resource Bundle 1: In-Area All-Source Generation Plus Demand Response.** This alternative would add 231-249 MW of demand response between 2010 and 2016, respectively, to the New In-Area All-Source Generation Alternative presented above. The demand response levels are consistent with the CPUC's demand response goals and SDG&E's recent long-term plan.5

- **Resource Bundle 2: In-Area All-Source Generation, Demand Response, and Renewable Energy Certificates (RECs).** This alternative would be the same as "Resource Bundle 1" above, but would also include the use of RECs, which were defined in Senate Bill 107, authorizing the CPUC to allow utilities to use RECs for meeting renewable portfolio standards. Use of RECs would allow meeting Renewable Portfolio Standards without requiring delivery of renewable generation to the grid of the California Independent System Operator.

- **In-Area Generation Plus Transmission Upgrades:** LS Power, a party to the CPUC proceeding suggested that new in-area generation (i.e., repowering South Bay) alone may not be sufficient to replace the function of the Sunrise Powerlink Project's renewable project objectives, and that some smaller transmission upgrades may be required. The EIR/EIS Team is investigating this alternative to determine whether it is a feasible alternative that would meet project objectives.

Non-Wires Alternatives Eliminated. The following alternatives are recommended for elimination from detailed EIR/EIS analysis. The primary reason for elimination of any particular resource alternative is because it is not, by itself, able to meet SDG&E's reliability targets in both 2010 and 2016. However,

5 R.06-02-013, Volume 1, p. 189.

note that components of these alternatives are also included in "bundles" of alternatives retained for analysis, described below.

- **Demand Response**. Eliminated as a standalone alternative. This alternative would reduce electricity usage when energy costs are at their highest. It is recommended for elimination because demand reduction programs alone would not meet anticipated demand growth. However, Demand Response is included as a component of the alternative "bundles" that have been recommended for retention in the EIR/EIS.
- **Energy Efficiency**. Eliminated as a standalone alternative because reductions in demand resulting from efficiency measures would not meet regional demand growth. Also, the levels of energy efficiency in SDG&E's PEA are considered to accurately portray expected future levels of cost-effective energy efficiency impacts.
- **Solar Thermal, Solar Photovoltaics, Wind, Ocean Energy, Biomass, and Geothermal Power**. These renewable generating technologies are eliminated as standalone alternatives because they could not meet future demand requirements on their own, but several are components of the New In-Area Renewable Resource Alternative and the other resource alternative "bundles" that have been recommended for retention in the EIR/EIS.
- **Non-Renewable Distributed Generation:** Eliminated as a standalone alternative because this technology alone would not achieve the amount required by regional demand growth. Included as a component of alternative bundled that have been recommended for retention in the EIR/EIS. Also part of the New In-Area All-Source Generation Alternative discussed above.

System Alternatives

"System Alternatives" rely on different transmission line upgrades and interconnections. Within the project area, these alternatives include upgrades to the existing transmission infrastructure, different voltage configurations of the proposed lines, interconnections to points other than the Imperial Valley Substation, or alternative transmission technologies. Over 20 system alternatives were evaluated and are illustrated on Figure 10. Three alternatives are recommended for retention in the EIR/EIS for detailed analysis.

System Alternatives Retained. The following alternatives are recommended for detailed analysis in the EIR/EIS:

- **LEAPS Project or Serrano/Valley-North 500 kV Alternative:** Approximately 30 miles of new 500 kV transmission line between a new Lee Lake Substation (or Serrano/Valley 500 kV Substation) and a new Camp Pendleton Substation (North or Talega/Escondido 500/230 kV Substation), and a new transmission connection to SDG&E's existing Talega-Escondido 230 kV line. The Lake Elsinore Advanced Pumped Storage (LEAPS) Project Alternative would include a pumped storage reservoir and generator capable of producing 500 MW of power, as proposed by the Lake Elsinore Municipal Water District and the Nevada Hydro Company. The Serrano/Valley-North 500 kV Alternative would include only the transmission components of the LEAPS Project. The LEAPS Project is the subject of a Draft EIS published by U.S. Forest Service and Federal Energy Regulatory Commission (FERC Project No. 11858, FERC/EIS-0191D, February 2006), with a Final EIS and decision currently expected to occur before May 2007. The LEAPS Project appears to meet the reliability and cost objectives. Although impacts would occur to the lands in Riverside and rural northern San Diego Counties, including the Cleveland National Forest's Trabuco Ranger District, this route would be substantially shorter than the Proposed Project and it would avoid impacts to Anza-Borrego Desert State Park as well as San Felipe and the central Santa Ysabel Valley.

- **Mexico Light 230 kV Alternative:** Build a short 230 kV transmission line in Mexico between circuits that are normally disconnected, to provide an optional path for export-designated generators through the Comisión Federal de Electricidad (CFE) grid rather than through the existing SWPL (Imperial Valley-Miguel 500 kV line). This also involves upgrading the two 230 kV lines connecting La Rosita generators to CFE's La Rosita 230 kV Substation. Amenable conditions would need to be reached with the CFE regarding ownership and operation of the associated facilities. Objectives would not fully be met because an incremental increase of approximately 140 MW would provide only a short-term solution to SDG&E's need for additional import capacity, but this alternative is recommended for retention because it may be part of the No Project Alternative or another combination alternative.
- **Path 44 Upgrade Alternative:** Build upgraded transmission corridor in SCE territory to increase the import rating of Path 44 (South of SONGS) into SDG&E territory by approximately 300 MW. CAISO is studying options for upgrades within Orange County that could benefit SDG&E. Objectives would not fully be met because an incremental increase of approximately 300 MW would provide only a short-term solution to SDG&E's need for additional import capacity, but this alternative is recommended for retention because it may be part of the No Project Alternative or another combination alternative.

System Alternatives Eliminated. The following alternatives are recommended for elimination from detailed EIR/EIS analysis.

- **SDG&E Southwest Powerlink (SWPL) No. 2 Alternatives:** The SWPL No. 2 Alternative would require building a new 500 kV transmission line between the existing 500 kV Imperial Valley Substation and the existing Miguel Substation, forming a second Southwest Powerlink or Imperial Valley-Miguel 500 kV transmission line in new or expanded right-of-way parallel to the existing line. Other options for the existing SWPL corridor include: **Convert SWPL to Direct Current (DC)**; and **Upgrade Series Capacitors along SWPL**. These alternatives would not meet objectives, and there are numerous technical feasibility issues. The reliability objective would not be met because there would be few options to prepare for a simultaneous loss of an expanded SWPL. The objective to reduce energy costs would not be met because of congestion problems around the Miguel Substation and north of Miguel, which would require prohibitively costly upgrades to resolve. Finally, construction of additional lines out of the Miguel Substation would be extremely challenging and expensive due to the need to re-design the existing lines within this heavily used and constrained corridor. If feasible, these new lines would create potentially significant impacts on the many developed areas adjacent to the Miguel-Mission transmission corridor.
- **SDG&E 230 kV CFE Alternative:** Build new 230 kV lines from Imperial Valley to Mexico's CFE La Rosita Substation and from La Rosita to Tijuana and then to SDG&E's Miguel Substation. Although technically feasible, the CFE 230 kV system is already interconnected with SDG&E's system and under CFE control. This alternative involves uncertain timing and potentially insurmountable regulatory and legal feasibility issues. CFE is not subject to the FERC so there would be no overriding authority to direct the outcome of negotiations.
- **Serrano/Valley-Central 500 kV Alternative:** Build a new 500 kV interconnection from SCE's Serrano-Valley 500 kV transmission line through the Cleveland National Forest, Trabuco Ranger District in Riverside County, then along SDG&E's existing Talega-Escondido 230 kV corridor, via the Rincon and Valley Center area and parallel SR-76 to the Warner Springs area. Because it would create a new corridor through highly sensitive areas of the Cleveland National Forest, resulting in substantial ground disturbance and visual impacts. This alternative would have environmental impacts as severe as those of the Proposed Project.
- **Valley-Rainbow 500 kV Alternatives:** These alternatives would either build a new single-circuit 500 kV line from SCE's Valley Substation to a new 500/230 kV Rainbow Substation in northern San Diego

County or implement a Valley-Rainbow alternative that was evaluated in the November 2002 Interim Preliminary Report on Alternatives Screening for the SDG&E Valley-Rainbow 500 kV Interconnect Project (the V-R Alternatives Report). Valley-Rainbow was the subject of SDG&E's filing for a CPCN and a PEA on March 23, 2001, and the CPUC denied the CPCN in December 2002 with the view that a reliability need had not been demonstrated. In the vicinity of Temecula, the Great Oak Ranch property, and the Pechanga Indian Reservation, a feasible corridor for Valley-Rainbow does not exist. Other Valley-Rainbow 500 kV Alternatives recommended for elimination include: **Devers-Pala**, **Devers-Ramona**, **Coachella-Ramona-Miguel**, **Devers-Miguel via Northern San Diego County**, and **Devers-Miguel via Imperial County**. Due to potential land use impacts to national monuments, Roadless Areas on national forest lands, Indian reservations, the Beauty Mountain Wilderness Study Area, and ABDSP, no corridors are available that would reduce impacts in comparison to those of the Proposed Project.

- **V-R Serrano-Talega Alternative:** Build a new 500 kV interconnection along the existing transmission corridor between SCE's Serrano Substation in the Anaheim foothills south of SR-91 through the urbanized portion of Orange County to SDG&E's coastal 230 kV system at the existing Talega or SONGS Substations. This alternative was also identified in the 2002 V-R Alternatives Report, but the feasibility of this alternative succeeding in the regulatory process is doubtful. The feasibility of using this route is highly questionable because surrounding urban development constrains the corridor with little or no space for addition of new 500 kV towers at reasonable cost.
- **Valley-Central 500 kV Alternative:** Build a new single-circuit 500 kV line from SCE's Valley Substation to the proposed 500/230 kV Central East Substation. This alternative could travel south from the Hemet area to become generally parallel to SR-79, north of the Agua Tibia Wilderness Area, then follow SR-79 to Warner Springs. Due to potential land use impacts to the Southwest Riverside County Multi-Species Reserve and communities of Winchester, Hemet, and Temecula, a feasible corridor for this alternative has not been identified.
- **SDG&E 500 kV Full Loop or Full Loop North Alternatives:** Full Loop Alternatives would build a new 500 kV transmission line from the existing Imperial Valley Substation to either the Proposed Project's new Central East Substation or to another new substation in northern San Diego County (e.g., Rainbow Substation), then continue the new 500 kV line to a new substation in SCE's territory between the existing Serrano and Valley Substations. Other, partial implementations of the Full Loop Alternatives recommended for elimination include: **Imperial Valley-Ramona 500 kV**; **Imperial Valley-Rainbow 500 kV**; and **Imperial Valley-East of Escondido 500 kV**. These alternatives do not pose an option to, but rather an expansion of the Proposed Project. By expanding the Sunrise Powerlink Project to include a 500 kV link to Ramona, or further west, or an interconnection with the SCE system, these alternatives would enhance the Proposed Project's ability to meet reliability and import capability objectives. However, these alternatives would add to the impacts of the Proposed Project due to the additional construction and ROW required.
- **Northern Service Territory Upgrades Alternatives:** Build a new 500 kV line as in the V-R Serrano-Talega Alternative described above, with a new Talega-Escondido 230 kV #2 line on existing poles and a new 230 kV line from Talega or SONGS to San Luis Rey Substation to create a fourth South of SONGS 230 kV line, and loop one of SCE's four existing North of SONGS 230 kV lines into SDG&E's Talega Substation. Northern Service Territory Upgrades recommended for elimination include **SONGS Light** and **SONGS Heavy 230 kV Alternatives** that were studied by CAISO and found to be infeasible. CAISO concluded that SCE's Barre-Ellis 230 kV would require upgrades in order to improve SDG&E's import capability (i.e., the **Path 44 Upgrade Alternative**, which is recommended for retention). The feasibility of using the Serrano-Talega route is highly questionable because

surrounding urban development constrains the ROW. The existing Serrano-Talega corridor has little or no space for addition of new 500 kV towers at reasonable cost.

- **SDG&E Imperial Valley-Central 230 kV ("Four 230 kV Circuits") Alternative:** Build four new 230 kV circuits from the existing Imperial Valley Substation to the proposed Central East Substation in San Diego County. This alternative would involve a combination of overhead and underground facilities for the Imperial Valley-Central segment. Although this alternative may satisfy most of the project objectives, albeit at higher construction and operating costs, the environmental impacts of the additional towers needed with this alternative would be more severe than those of the Proposed Project, and they would outweigh the environmental advantages of placing portions of the Imperial Valley-Central segment underground.
- **HTLS Composite Conductor Alternative:** Install high-temperature low-sag (HTLS) composite material conductors along the Proposed Project alignment instead of the proposed industry-standard aluminum-core steel-reinforced (ACSR). To date there are no examples of 500 kV HTLS conductor in use or being installed. However, HTLS conductors could provide slightly greater span lengths and a marginal reduction in the number of towers required. The same ROW width would be required. Although HTLS conductors could be used elsewhere in the SDG&E system to improve the capacity of existing transmission lines that operate near thermal limits, installing HTLS along the Proposed Project would dramatically increase project costs while resulting in impacts similar to those of the Proposed Project. The higher costs of this alternative make it prohibitive.
- **All Underground 230 kV or 500 kV Alternative:** Build all of the components of the Four 230 kV Circuits Alternative (described above) so that no overhead transmission would occur. Placing 500 kV segments underground is generally not feasible except for very short line segments in areas where ground disturbance impacts would not be severe. This alternative would involve higher construction and operating costs. Under-grounding all of the multiple 230 kV circuits included in the Four 230 kV Circuits Alternative would involve ground-disturbing impacts that would outweigh the environmental advantages.

J. Public and Agency Comments on Alternatives

At this time, the CPUC and BLM are soliciting information regarding the topics and alternatives that should be included in the EIR/EIS. **All comments must be received or postmarked by February 24, 2007.** You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail, (3) by fax, or (4) by attending a Public Scoping Meeting (see times and locations in Table 1 above) and making a verbal statement or handing in written comments at the scoping meetings.

By Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIR/EIS to:

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

By Electronic Mail: E-mail communications are welcome; however, please remember to include your name and return address in the e-mail message. E-mail messages should be sent to sunrise@aspeneg.com.

By Fax: You may fax your comment letter to our information line at (866) 711-3106. Please remember to include your name and return address in the fax, to write legibly, and use black or blue ink.

A second **Scoping Report** will be prepared, summarizing all comments received (including oral comments made at the Public Meetings on Alternatives). This report will be posted on the project website at: http://www.cpuc.ca.gov/environment/info/aspen/sunrise/sunrise.htm, and copies will be placed in local document repository sites listed in Table 3 below. In addition, a limited number of copies will be available upon request to the CPUC or BLM Project Managers.

K. For Additional Project Information

Internet Website. Information about this application and the environmental review process will be posted on the Internet at:

http://www.cpuc.ca.gov/environment/info/aspen/sunrise/sunrise.htm

This site is used to post all public documents during the environmental review process and to announce upcoming public meetings. In addition, a copy of SDG&E's PEA may be found at this site, and the Draft EIR/EIS will be posted at the site after it is published.

Project Information Hotline. You may request project information by leaving a voice message at (866) 711-3106 or sending a fax, using the same telephone number.

Document Repositories. Documents related to the SRPL Project and the EIR/EIS will be made available at the sites listed in Table 3.

Table 3. Sunrise Powerlink EIR/EIS – Document Repositories

Imperial County – Public Libraries and BLM Office	
Brawley Public Library	400 Main Street, Brawley, CA (760) 344-1891
Calexico Public Library	850 Encinas Avenue, Calexico, CA (760) 339-2470
El Centro Public Library	539 West State Street, El Centro, CA (760) 337-4565
Imperial Public Library	200 West 9th Street, Imperial, CA (760) 355-1332
BLM – El Centro Field Office	1661 South 4th Street, El Centro, CA (760) 337-4400
San Diego County – Public Libraries and CPUC Office	
Alpine Branch Library	2130 Arnold Way, Alpine, CA (619) 445-4221
Borrego Springs Public Library	571A Palm Canyon Drive, Borrego Springs, CA (760) 767-5761
Campo-Morena Village Branch Library	31356 Highway 94, Campo, CA (619) 478-5945
Carmel Valley Branch Library	3919 Townsgate Drive, San Diego, CA (858) 552-1668
Descanso Branch Library	9545 River Drive, Descanso, CA (619) 445-5279
El Cajon Branch Library	201 East Douglas, El Cajon, CA (619) 588-3718
Jacumba Branch Library	44605 Old Highway 80, Jacumba, CA (619) 766-4608
Julian Branch Library	1850 Highway 78, Julian, CA (760) 765-0370
Lakeside Branch Library	9839 Vine Street, Lakeside, CA (619) 443-1811
Pine Valley Branch Library	28804 Old Highway 80, Pine Valley, CA (619) 473-8022
Potrero Branch Library	24883 Potrero Valley Road, Potrero, CA (619) 478-5978
Poway Public Library	13137 Poway Road, Poway, CA (858) 513-2900
Ramona Public Library	1406 Montecito Road, Ramona, CA (760) 738-2434
Rancho Peñasquitos Library	13330 Salmon River Road, San Diego, CA (858) 538-8159
San Diego City Central Library	820 E Street, San Diego, CA (858) 484-4440
Scripps Miramar Ranch Library	10301 Scripps Lake Drive, San Diego, CA (858) 538-8158
Spring Valley Branch Library	836 Kempton Street, Spring Valley, CA (619) 463-3006
CPUC – San Diego Office	1350 Front Street, Room 4006, San Diego, CA (619) 525-4217

Table 3. Sunrise Powerlink EIR/EIS – Document Repositories (continued)	
Riverside County– Public Libraries	
Grace Mellman Community Library (Temecula County Center)	41000 County Center Dr, Temecula, CA 92591 (951) 600-6270
Lake Elsinore Branch Library	600 W Graham Ave., Lake Elsinore, CA 92530 (951) 674-4517
Other Government Offices	
BLM – El Centro Field Office	1661 S. 4th Street, El Centro CA 92243 (760) 337-4490
BLM – North Palm Springs Field Office	690 West Garnet Avenue, North Palm Springs, CA (760) 251-4849
CPUC – Los Angeles Office	320 West 4th Street, Suite 500, Los Angeles, CA (213) 576-7000
CPUC – San Francisco Office	505 Van Ness Avenue, Room 2103, San Francisco, CA (415) 703-2074

Attachment 1. Summary of Potential Impacts: Sunrise Powerlink Project [6]

Environmental Issue Area	Potential Issues or Impacts
Aesthetics / Visual	Visual contrast, industrial character, view blockage, and skylining[7] resulting from the placement of the structures in all project segments: • New 500 kV transmission line through BLM land outside of designated utility corridor • New 500 kV transmission line through Anza-Borrego Desert State Park • New 500 kV and 230 kV transmission lines through inland and coastal San Diego County
Agricultural Resources	• Imperial Valley Link crosses Prime Farmland, Farmland of Statewide Importance, and Williamson Act Non-Prime Farmland
Air Quality	• Impacts during construction would occur when heavy equipment, support vehicles, and other internal combustion engines creates fugitive dust and/or generates exhaust containing: carbon monoxide (CO), reactive organic compounds (ROC), nitrogen oxide (NOx), sulfur oxides (SOx), and particulate matter (PM10). • Impacts would result from fugitive dust generated from ground clearing, grading, vehicle traffic on the access roads, and vehicle traffic at the construction sites. • Potential ongoing impacts from emissions and fugitive dust produced during operation and maintenance of proposed transmission line. • Potential air quality impacts from power plants providing imported power. • Potential impacts resulting from violation of the Federal Air Quality Conformity Rule in nonattainment areas for one or more air pollutants. • Potential temporary and long-term impacts from toxic air contaminants including diesel particulate matter that have localized effects.
Biological Resources	• Construction activities and project facilities would result in temporary and permanent loss of native wildlife and habitat. • Loss of habitat for sensitive species designated by State and federal resource agencies. • Construction and operation of the proposed project could disturb wildlife and cause changes in wildlife behavior. • Construction activities may conflict with local policies or ordinances protecting biological resources.
Cultural & Paleontological Resources	• Construction of new towers and access roads could damage or destroy historic and archaeological sites or traditional cultural properties. • Temporary use of staging areas and conductor pull sites could damage or destroy historic and archaeological sites or traditional cultural properties. • In the Imperial Valley Link, excavation of tower footings and grading of access spur roads on the transmission line corridor could disturb outcroppings of the following areas of high or undetermined paleontological sensitivity: Bautista Beds, Palm Springs Formation, and Imperial Formation. • In the Central Link, excavation of tower footings and grading of access spur roads on the transmission line corridor could disturb 2.4 miles of a scientifically significant paleontological area. • In the Inland Valley Link, excavation of tower footings and grading of access spur roads on the transmission line corridor could disturb outcroppings of a scientifically significant paleontological area. • In the Coastal Link, construction could damage paleontological resources of unknown significance in the Mission Valley Formation, Friars Formation, Poway Formation, and Santiago Formation.

[6] A thorough and detailed analysis of impacts will be completed for the EIR/EIS. This overview is presented to assist the public and agencies in presenting scoping comments.

[7] Skylining is the aspect of viewing transmission towers, which are highly visible when located on ridge lines.

Attachment 1. Summary of Potential Impacts: Sunrise Powerlink Project [6]

Geology and Soils	• Highly corrosive soils could damage uncoated steel in all Links of the Proposed Project. • Soil erosion on low fill slopes and steeply graded areas could result in sedimentation of water bodies. • Soil volume changes resulting from change in moisture content in the Inland Valley and Coastal Links could damage proposed facilities. • Seismic activity in the San Jacinto, Elsinore, Coronado Bank, Superstition Hills, Rose Canyon, and Earthquake Valley Faults, which are known to be active, could damage project facilities. The towers along the alignment in this area would be subject to severe seismic shaking within the lifetime of the Proposed Project. • Ground surface rupture could occur where the proposed transmission line would cross active fault lines. • Landslides, mudslides, or other related ground failures from seismic activity, could occur and damage facilities, particularly where the proposed transmission line would cross active fault lines.
Hazards and Hazardous Materials	• Wildfires could be caused by the transmission lines or could damage Proposed Project facilities. • Temporary relocation of residents along parts of the project might be required where helicopter construction is required (FAA safety regulations of helicopter flight paths). • Improper storage or handling or hazardous materials and/or hazardous wastes during project construction, operations, or maintenance could present hazards to construction workers or the public. • Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater. • The inadvertent uncovering of hazardous materials during excavation activities could cause toxic releases to the environment.
Hydrology and Water Quality	• Increased surface water runoff, erosion, siltation, and sedimentation could diminish water quality • Water quality of streams or washes could be diminished from violation of water quality standards or waste discharge requirements. • Tsunami or seiche at crossings of creeks associated with Lake Henshaw could damage project facilities. • Mudflows in the Poway and Miramar Reservoir watersheds along portions of the Coastal Link could damage project facilities.
Land Use	• Possible conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. • Construction would temporarily disturb the land uses it traverses or adjacent land uses. • Operation would result in permanent preclusion of land uses it traverses or adjacent land uses.
Noise	• During construction, noise generated by construction equipment could create nuisance to nearby residents, park users, or other sensitive receptors. Volume range could be 80 to 100 dBA at a range of 50 feet from the active construction site. • Corona noise generated during the operation of the proposed transmission line would increase ambient noise levels surrounding the corridor. • Construction or corona noise in residential areas along the proposed transmission corridor could violate local noise ordinances (for volume and hours of operation).
Socioeconomics	• Employment of construction personnel could be beneficial to regional economy. • Remote areas of Imperial and San Diego Counties could lose access to temporary housing due to the possible influx of construction labor, if housing is required during construction of the proposed transmission line. • Additional property-taxes could be provided to local jurisdictions. • Potential for project impacts to disproportionately affect low-income or minority populations (environmental justice).
Public Services and Utilities	• Construction activities could cause increased usage of public resources, services, and utilities, including need for additional fire fighting capabilities. • Construction activities could result in increased generation of waste and disposal needs.

Attachment 1. Summary of Potential Impacts: Sunrise Powerlink Project [6]

Recreational Resources	• Construction or operation could cause conflicts with established or pending resource management or conservation plans. • Recreational land users would be disturbed by construction and operation where the proposed transmission line would cross or be near Anza-Borrego Desert State Park, Off-Highway Vehicle (OHV) designated areas, open spaces and parks, the Trans-County Trail, the Pacific Crest Trail, and the San Dieguito River Park Trail. • Road closures and increased traffic during construction activities may impede access to recreational areas.
Transportation and Traffic	• Construction could result in a temporary disruption of traffic flow, disruption of transit services, or disruption of rail services.
Other Issues	• Cumulative impacts could occur (considering other projects that are proposed or under construction in the project area) • Growth-inducing effects could occur