



February 22, 2007

Billie Blanchard, California Public Utilities Commission
Lynda Kastoll, U. S. Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 84104

Subject: Proposed Sunrise Powerlink Project – Comments on Alternatives

To Ms. Blanchard and Ms. Kastoll:

RGP Planning and Development Services represents Zen Media Corporation/Castle Euroasia Corporation (ZMC/CEC), the property owners of a ±1,150 acre parcel in Imperial County that is directly and adversely impacted by the proposed Sunrise Powerlink Project and alternatives. On behalf of ZMC/CEC, RGP is providing comments on the Proposed Project and the project Alternatives for the Imperial Valley Link (formerly the Desert Link) portion of the Proposed Project. We have also suggested other alternatives to the Proposed Project alignment. Those corridor alignment options would preserve our clients' interests in the future use of their property, while also providing various means to feasibly achieve the Sunrise Powerlink Project objectives.

The APNs for the ZMC/CEC site are: 034-360-73-01; 034-360-75-01; 034-360-76-01; 051-260-26-01; 051-290-01-01; 051-290-03-01; 051-010-07-01; 051-290-02-01. We have attached the following exhibits (11" x 17") with the ZMC/CEC site shown to illustrate and explain the ZMC/CEC position on the alternatives for the proposed Sunrise Powerlink Project:

- Exhibit 1 – ZMC/CEC Site Boundaries on Composite of SDG&E Sunrise Powerlink Map Book Pages DE_PO4 through DE_PO8
- Exhibit 2 – Land Use Vicinity Map with Sunrise Powerlink Transmission Corridor Alternatives, Suggested ZMC/CEC Alternatives, and Sempra (2-07) Alternatives.
- Exhibit 3 – Aerial Vicinity Map with Sunrise Powerlink Transmission Corridor Alternatives, Suggested ZMC/CEC Alternatives, and Sempra (2-07) Alternatives.

Summary

ZMC/CEC adamantly opposes the Sunrise Powerlink Project location and Imperial Valley FTHL Alternative because they bisect the ZMC/CEC property and render pending development plans useless. ZMC/CEC believes that the highest and best use of the ZMC/CEC site is development, particularly a mixed use planned community. A 500 kV transmission corridor is incompatible with this type of development because of adverse impacts associated with safety, aesthetics, electric magnetic fields (EMFs), fire hazards, and land use incompatibility. These types of impacts and their incompatibility with planned development are well documented in planning and scientific literature. It is also our understanding that these environmental impacts will be fully addressed in the Draft EIR/EIS for the Sunrise Powerlink Project.

ZMC/CEC has provided the following comments (see below) on alternatives to the Proposed Sunrise Powerlink Project:

- The Sunrise Powerlink Project and Alternatives affecting the ZMC/CEC site;
- ZMC/CEC suggested alternatives
- Sempra Utilities Alternatives presented February 14 and 15, 2007 to ZMC/CEC
- Growth-inducing impacts

Comments by ZMC/CEC on the Sunrise Powerlink Project and Alternatives

As shown on Exhibit 1, the proposed Imperial Valley Link of the project would directly impact the ZMC/CEC site. The ZMC/CEC site is located in the southernmost portion of the Imperial Valley Link N2 to N6 segment, approximately 0.7 mile north of Structure AGR1 (Node N2). The Proposed Project would encroach upon the ZMC/CEC site at its southern boundary and would include five (5) 500 kV towers/maintenance pads, one (1) pull site and an access road, all within a 200-foot right-of-way (ROW) that would span 1.5 miles of the site. The north-south power line corridor would adversely bisect the ZMC/CEC site and would directly take over 35 acres of private property.

In terms of future land use potential, bisecting the ZMC/CEC site by the proposed 500 kV transmission line corridor would severely impact access to the eastern portion of the site and would drastically constrain any future development on the ZMC/CEC site. As shown on Exhibits 2 and 3, the ZMC/CEC site is divided by Interstate 8 (I-8), bounded on the west by BLM land, and bounded on the east by the Westside Main Canal. The only access to the ZMC/CEC site is from the Dunaway off-ramp of the I-8, which is to the west of the ZMC/CEC site. There is no eastern access to the ZMC/CEC site. Therefore, a 200-foot ROW with 160-foot towers for the proposed transmission line corridor will directly and adversely impact the use of the eastern portion of the site by limiting access and restricting land uses.

Per the Sunrise Powerlink Project's Environmental Assessment (EA), "N1-N2 follows the existing SWPL 500 kV transmission line within the BLM Dedicated Utility Corridor for 4.04 miles using lattice structures. N2-N6 (16.39 miles) travels north through open desert land managed by the BLM until crossing north over Interstate 8 (I-8) and then crosses San Diego and Arizona Eastern Railroad. N2-N6 traverses through private agricultural land to a point near the existing IID 161 kV transmission line (N6). N2-N6 follows property boundaries and section lines and would primarily be constructed with steel poles and lattice structures" (see attached Exhibit 1 and page 2-23 of the EA).

The EA project description excerpt above is either incorrect or based on very general, non-specific property information for this portion of the Imperial Valley Link. The affected ZMC/CEC site is bisected by the section line that was used to route the Proposed Project in this area and, as a result, the N2-N6 link bisects the ZMC/CEC site. Therefore, the proposed transmission line corridor does not respect property boundaries in this portion of the Imperial Valley Link. In addition, only N1 and N2 are located in BLM land. Just north the N2 Node, the N2-N6 link bisects the ZMC/CEC site as shown on Exhibits 1, 2, and 3.

In addition to the physical impediments posed by the Imperial Valley Link, the Proposed Sunrise Powerlink Project also results in significant visual impacts in this area. The existing transmission lines to the south of the ZMC/CEC site are not substantially visually disruptive because of the distance (i.e., up to four miles) from the I-8. However, a new transmission line at its proposed location bisecting the ZMC/CEC site will adversely affect views from I-8 in this area, particularly along the segments approaching and driving through the 2.7-mile stretch between the Proposed Project corridor and the existing 500 kV transmission corridor that crosses I-8 to the west. While it is recognized that most alternatives would simply relocate the Proposed Project's adverse visual components, the intrusive presence of 160-foot towers in future residential, recreational, and/or commercial contexts would undoubtedly impact viewers and severely hinder the compatible land use goals that ZMC/CEC has for their site.

The Imperial Valley FTHL (flat-tailed horned lizard) alternative also directly impacts the ZMC/CEC site by limiting access to the eastern portion, creating significant adverse visual impacts, and bisecting the site. The Imperial Valley FTHL Alternative travels north-northwest from the Imperial Valley Station and skirts the western edge of agricultural lands along the Westside Main Canal but again cuts west and then north through the ZMC/CEC site. This alternative was proposed to avoid the BLM FTHL Management Area. However, the existing 500 kV transmission line to the south of the ZMC/CEC site already traverses this FTHL Management area. This BLM land is defined as an "Area of Critical Environmental Concern" because

of the FTHL. Therefore, why does this alternative not follow the eastside of Westside Main Canal to avoid all impacts to the FTHL?

ZMC/CEC Suggested Alternatives

ZMC/CEC requests other alternatives to the Proposed Sunrise Powerlink Project (N2-N6 Link) and the Imperial Valley FTHL alternative that avoid significant adverse land use incompatibility impacts to the ZMC/CEC site. These ZMC/CEC alternatives are also shown on both Exhibits 2 and 3. These alternatives are:

- **Western Alternative** - This alternative extends from proposed node N2 along the existing 500 kV transmission line corridor and then turns north at least ½ mile to the west of the Dunaway interchange (see DE_PO6 and DE_AO1 near existing Structures SWP 17, 18, or 19). This alternative then could turn east again beyond the I-8 near Highway 80 (Evan Hewes Highway) or other locations (as shown by arrows on Exhibits 2 and 3) where it could rejoin the planned DE_O9 link. This alternative avoids bisecting the ZMC/CEC site and reduces the numerous land use incompatibility impacts.
- **Eastern Alternative** - This alternative is a variation of the Imperial Valley FTHL Alternative. Instead of turning west onto the ZMC/CEC site at the northern edge of the BLM land at the juncture of the Westside Main Canal, the proposed transmission corridor would continue north until it joins the proposed 500kV transmission line corridor (near DE_O10). This alternative would again avoid bisecting the ZMC/CEC site. The EA states that canals may result in impermeable barriers to wildlife such as the FTHL. Therefore, we question why the Imperial Valley FTHL alternative did not continue to follow a more northerly path along the east side of the Westside Main Canal rather than suddenly turning west through the ZMC/CEC site and BLM land on the west side of the Westside Main Canal. For the FTHL and other wildlife, it would be more desirable to follow a more northerly path along the east side of the Westside Main Canal, thereby creating only one barrier (the canal) rather than two barriers (the canal and the separate proposed transmission corridor (the one bisecting the ZMC/CEC site). This Eastern alternative would further protect the FTHL and avoid bisecting the ZMC/CEC site.

February 2007 Meeting with Sempra Energy regarding Alternatives to Proposed Project

ZMC/CEC representatives met with Lisa Murphy and Jonathan Woldemariam of Sempra Utilities on February 14 regarding alternatives that avoid the ZMC/CEC site that Sempra will be submitting to the CPUC. The two alternatives discussed at the February 14, 2007 meeting are:

- **West of Dunaway Alternative** - This alternative would place the transmission line corridor west (at least ½ mile west) of Dunaway Road and avoid the ZMC/CEC property completely. This alternative is very similar to ZMC/CEC's Western Alternative discussed above and shown on Exhibits 2 and 3.
- **Imperial Valley FTHL Alternative (D-1)** - This (D-1) alternative is very similar to the Imperial Valley FTHL Alternative. However, the transmission line corridor would come out farther to the north and avoid the ZMC/CEC property completely. This alternative follows the Westside Main Canal and then cuts west at the northern boundary of the ZMC/CEC site. This is similar to ZMC/CEC's Eastern Alternative discussed above and shown on Exhibits 2 and 3.

Unfortunately, Jonathan Woldemariam sent an email dated February 16, 2007 stating that the West of Dunaway alternative discussed at the February 14 meeting was infeasible because it would negatively impact the Stirling Energy Systems (SES) project. This email proposed the following alternative as the best solution to satisfy the needs of SES and ZMC/CEC.

- East of Dunaway/West of ZMC/CEC Site Alternative (2/15/07) - This alternative would place the transmission line between Dunaway Road and the western boundary of the ZMC/CEC site as shown on Exhibits 2 and 3.

The East of Dunaway/West of ZMC/CEC Site Alternative is totally unacceptable to ZMC/CEC because the only access to both the north and south parcels of the ZMC/CEC site is from the west at Dunaway Road. This alternative would effectively cut off access to the site rendering any planned development infeasible because of land use incompatibility impacts. This situation occurs because of combined private property and BLM land at the Dunaway Road location.

We have been unable to determine any adverse impacts associated with the Sunrise Powerlink Project on the SES facility because we have not been able to locate the SES site. It has been difficult to find out any information on the proposed location of the SES project. The Cumulative Impacts (Chapter 11) of the Sunrise Powerlink Project EA states the SES project would consist of 36,000 solar dishes spaced over nine square miles (5,760 acres). The EA states that the SES Proposed Project location is north of I-8 and south of the Alternative Alignment N2-N4 which is west of the existing Imperial Valley Substation. This description is far too general to determine the nine square miles of the SES Proposed Project. The N2-N4 link appears to be south of the I-8. Therefore, this location description is very inadequate. The pending Public Scoping Report due in March 2007 as well as the Sunrise Powerlink Project EIR/EIS should provide a location map of cumulative projects, including the SES Proposed Project. The Sunrise Powerlink Project EA also states that the SES project has filed a ROW application with the BLM for full build-out of the project at the proposed location. Again, why is the location of the SES project not identified?

In a recent communication with ZMC/CEC, Linda Kastoll of BLM indicated that SES does not own any lands in the form of public and/or private agreements at this time. However, SES has submitted a ROW proposal to BLM and is performing feasibility studies in this area. We question why a transmission corridor is incompatible with a solar energy facility. We also question why the tentative SES project has priority over the ZMC/CEC.

The Sunrise Powerlink Project takes over 35 acres down the middle of the ZMC/CEC site. A 5,760-acre SES solar energy plant would provide more planning flexibility for the location of the proposed transmission line than the ZMC/CEC site. The nine square miles for the SES project should be able to accommodate a loss of approximately 35 acres. It would be better to place two energy-related projects together rather than to divide alternative land uses in the project vicinity. These two energy uses are not incompatible. A transmission corridor is an incompatible land use with planned development.

The scale (nine square miles) of the SES project would seem to drastically block many alternative locations to the existing Sunrise Powerlink Project transmission line in this area of Imperial County. Again, we question why a solar energy plant and transmission line corridor are incompatible land uses in light of nine square miles.

General Proposed Project Alternatives Comments

SDG&E Desert Western Alternative

ZMC/CEC supports the SDG&E Desert Western Alternative which relies heavily on the use of the existing 500 kV transmission line through BLM land. Because transmission corridors already exist at this and other locations on BLM land, transmission corridors are not an incompatible land use with BLM land. This alternative would also eliminate new visual impacts in the region. This alternative would result in maintenance and construction efficiency because of existing service roads. Construction impacts would also be lessened because of these existing service roads. There would be fewer long-term impacts because of the pre-existing transmission line impacts. These land uses are not incompatible

Per the EA, construction of transmission lines can impact the FTHL by temporarily disrupting and/or displacing the FTHL. Long-term impacts may result in the physical displacement of habitat by structural foundations and access roads. However, the EA did not identify any significant adverse impacts associated with the existing transmission line on the FTHL. There is also no indication in the EA that the existing 500

kV transmission line on BLM land has adversely and significantly impacted the FTHL. The EA only states that the FTHL may have increased mortality as a result of increased human activity. Per BLM signage at the Dunaway interchange, BLM land in this area allows off-highway vehicle (OHV) use. OHV usage would seem to be more adverse to FTHLs than construction and/or maintenance vehicles associated with transmission corridors. 500 kV transmission lines do not require a high frequency of human activity during maintenance activities. OHV usage would seem to be more detrimental to the FTHL than transmission lines.

Therefore, ZMC/CEC supports the SDG&E Desert Western Alternative as the preferred alternative because it uses or expands the existing transmission right-of-way (ROW) rather than requires the construction of new access roads and easements. The use of more existing access roads and easements would result in fewer impacts to visual quality, land use, biological resources, and other known environmental concerns.

Generation and Non-Wires Alternatives

ZMC/CEC understands the importance of providing reliable electrical services to this region. However, any project of this scope and magnitude will have a major and long lasting impact upon the Imperial Valley and San Diego County. Therefore, it is imperative that the selected Project variation(s) and/or alternatives provide a cutting-edge solution to the provision of electricity while minimizing both short- and long-term impacts on the environment. ZMC/CEC supports finding generation and other non-wire alternatives that provide these reliable electrical services without the adverse impacts (i.e., air quality, visual, land use, biological resources, etc.) associated with traditional electrical power generation and transmission.

Growth-Inducing Impacts

ZMC/CEC is also aware of the Imperial Irrigation District's (IID) Green Path Project. Information regarding this Green Path Project is located on the IID website. The Green Path Project appears to have three components: the Green Path Transmission Expansion Plan (upgrading the 161-kV System to 230-kV while optimizing the use of existing utility corridors); the Green Path Los Angeles Connection (100 miles of new 500-kV transmission lines, upgrades to current LADWP transmission lines and the creation of two new substations); and Green Path Southwest (a new 500-kV bay at the existing Imperial Valley Substation, 50 miles of new transmission lines, and a new substation near Borrego Springs, and a new 500-kV line by SDG&E to interconnect with the Green Path Southwest project).

The IID Green Path Project is directly related to the proposed Sunrise Powerlink Project. The Sunrise Powerlink Project EIR/EIS should evaluate the impacts of all the IID Green Path Project components on the region. Again, with both of these coordinated transmission projects, it is imperative that the selected project/alternative provide a cutting-edge solution while minimizing significant impacts on localized areas and the region.

Conclusion

The ZMC/CEC position supports the following alternatives in order of preference:

1. SDG&E Desert Western Alternative and/or Generation and Non-Wire Alternatives
2. West of Dunaway (Sempra) or Western (ZMC/CEC) Alternatives
3. Eastern (ZMC/CEC) or Imperial Valley FTHL (D-1) Alternatives

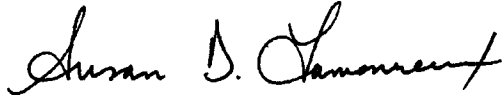
ZMC/CEC is adamantly opposed to the following:

- Sunrise Powerlink Project
- East of Dunaway/West of ZMC/CEC Site Alternative
- Imperial Valley FTHL Alternative

Thank you for your consideration of our public scoping input to the alternatives for the proposed Sunrise Powerlink project. Please feel free to contact ZMC/CEC if you have any questions concerning these or other alternatives that avoid the ZMC/CEC site. We look forward to reviewing the Draft EIR/EIS. Please notify both ZMC/CEC and RGP when it is available for review. The ZMC/CEC address is P. O. Box 7450, Moreno Valley, CA 92553.

Sincerely,

RGP Planning and Development Services

A handwritten signature in black ink, reading "Susan D. Lamoureux". The signature is written in a cursive style with a large, stylized initial 'S'.

Susan D. Lamoureux
Principal

Attachments - Exhibits 1 - 3



- Proposed Structure
- Existing Structure
- Proposed Project Centerline
- Alternative Alignment Centerline
- Access Roads**
- Access Road to be Constructed
- - - Light Grading
- No Grading
- Existing Roads**
- - - Trail
- Gravel Road
- Paved Road
- Temporary Construction and Maintenance Pad
- Pull Site
- Proposed Right of Way

Source: Aspen Environmental Group

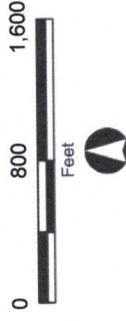
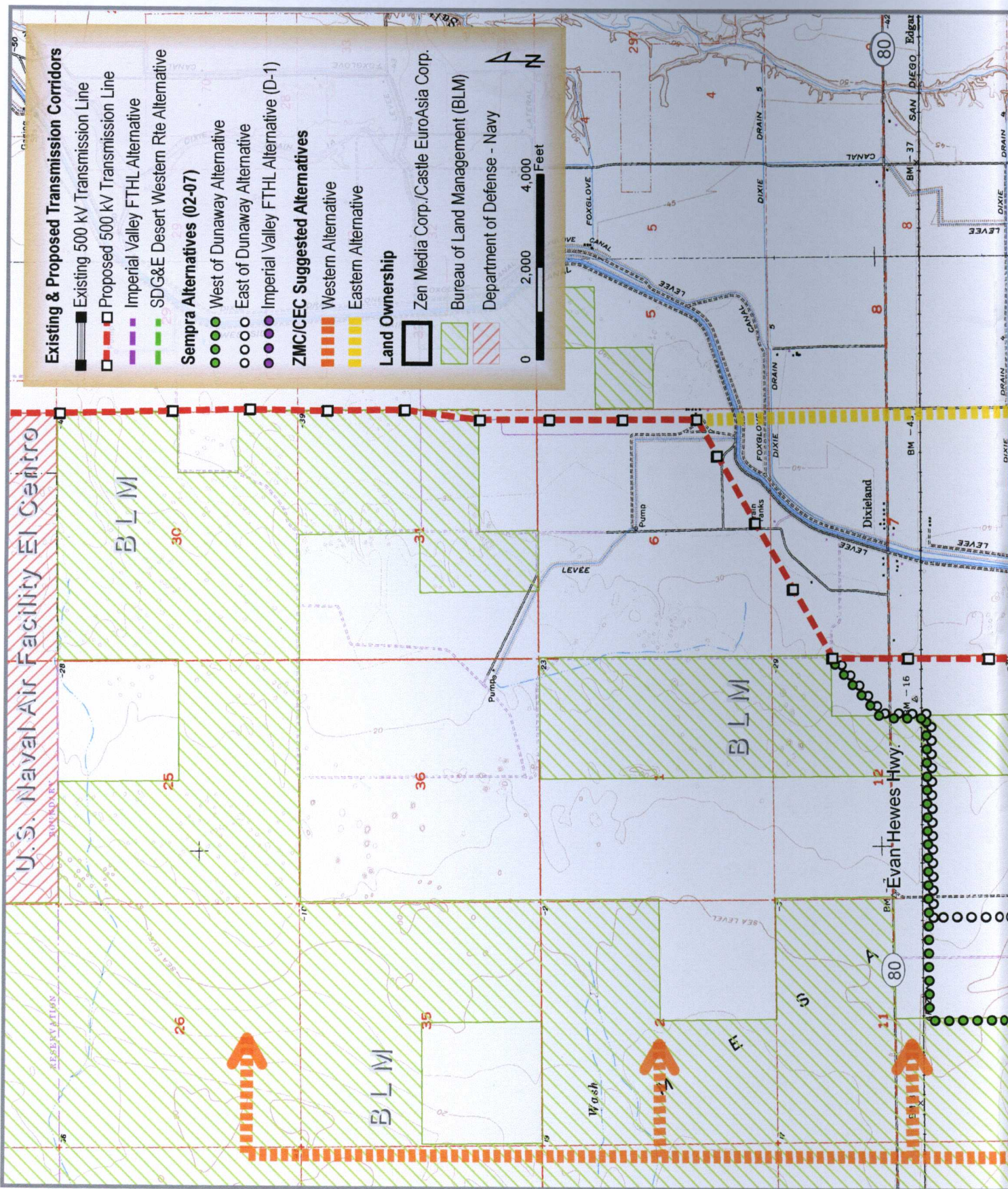




Exhibit 1
ZMC/CEC Site Boundaries on Composite of SDG&E Sunrise Powerlink Map Book Pages DE_P04 Through DE_P08



Existing & Proposed Transmission Corridors

- Existing 500 kV Transmission Line
- Proposed 500 kV Transmission Line
- Imperial Valley FTHL Alternative
- SDG&E Desert Western Rte Alternative

Sempra Alternatives (02-07)

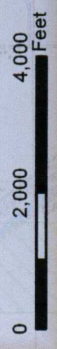
- West of Dunaway Alternative
- East of Dunaway Alternative
- Imperial Valley FTHL Alternative (D-1)

ZMC/CEC Suggested Alternatives

- Western Alternative
- Eastern Alternative

Land Ownership

- Zen Media Corp./Castle EuroAsia Corp.
- Bureau of Land Management (BLM)
- Department of Defense - Navy



U.S. Naval Air Facility El Centro

BLM

30

25

26

36

35

BLM

31

36

BLM

31

5

4

Evan Hewes Hwy.

80

12

8

5

80

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

Imperial

San Diego

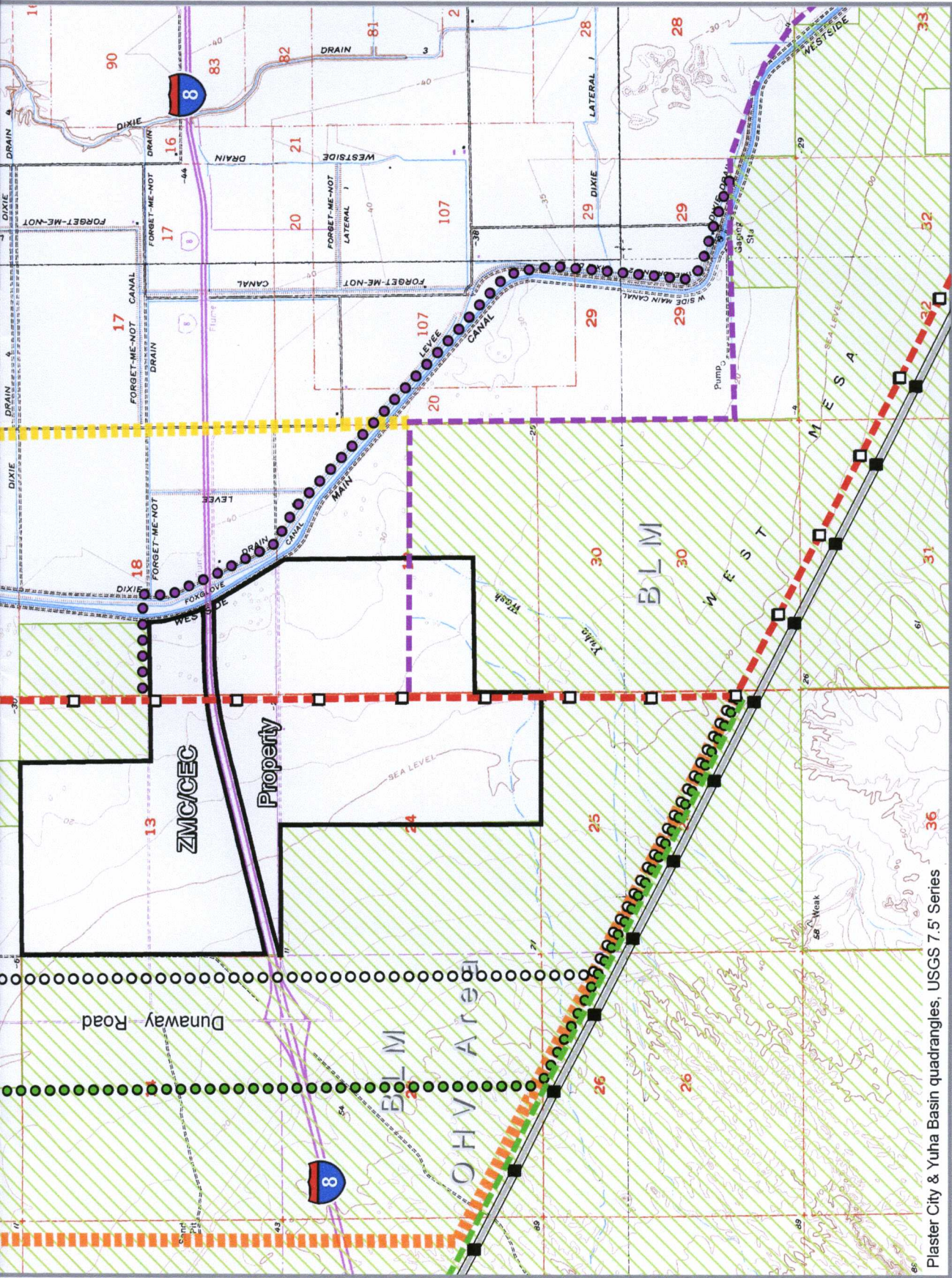
Imperial

San Diego

Imperial

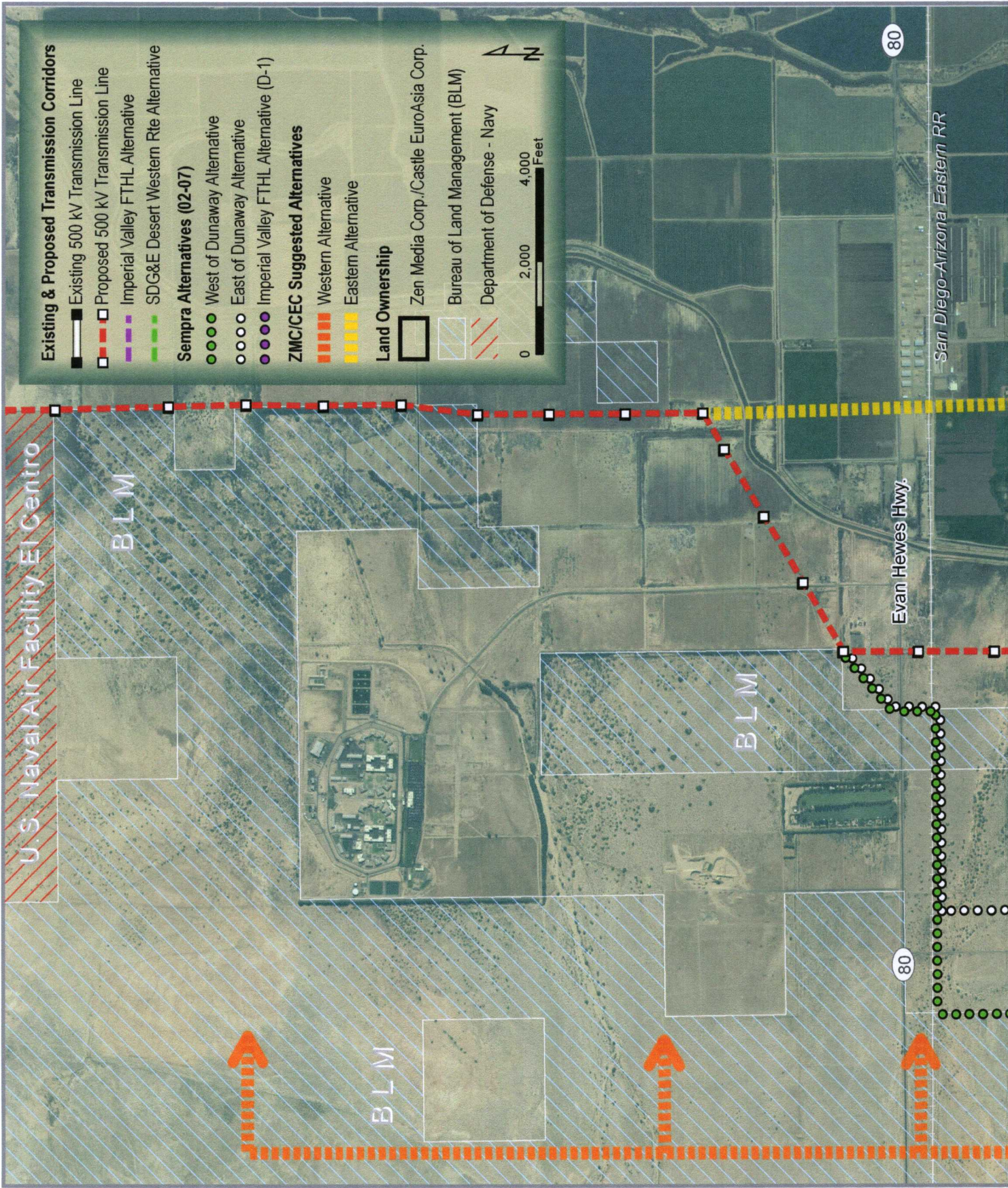
San Diego

Imperial



Plaster City & Yuha Basin quadrangles, USGS 7.5' Series

Exhibit 2
Land Use Vicinity Map with Sunrise Powerlink Transmission Corridor Alternatives, Suggested ZMC/CEC Alternatives, and Sempra (2-07) Alternatives



Existing & Proposed Transmission Corridors

- Existing 500 kV Transmission Line
- Proposed 500 kV Transmission Line
- Imperial Valley FTHL Alternative
- SDG&E Desert Western Rte Alternative

Sempra Alternatives (02-07)

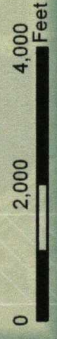
- West of Dunaway Alternative
- East of Dunaway Alternative
- Imperial Valley FTHL Alternative (D-1)

ZMC/CEC Suggested Alternatives

- Western Alternative
- Eastern Alternative

Land Ownership

- Zen Media Corp./Castle EuroAsia Corp.
- Bureau of Land Management (BLM)
- Department of Defense - Navy



U.S. Naval Air Facility El Centro

BLM

BLM

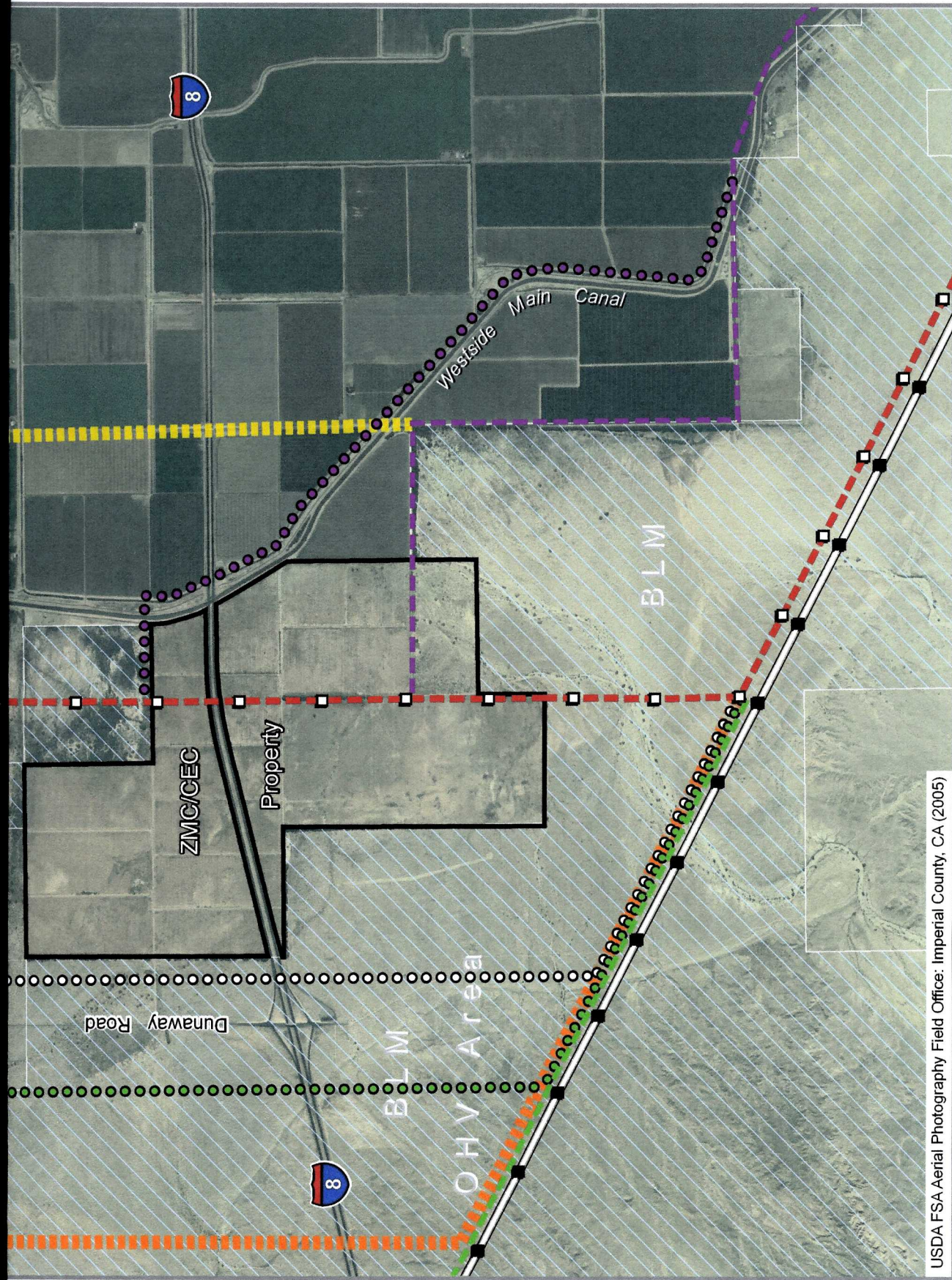
BLM

Evan Hewes Hwy.

San Diego-Arizona Eastern RR

80

80



USDA FSA Aerial Photography Field Office: Imperial County, CA (2005)

Exhibit 3
Aerial Vicinity Map with Sunrise Powerlink Transmission Corridor Alternatives, Suggested ZMC/CEC Alternatives, and Sempra (2-07) Alternatives