

SDG&E Comments Regarding the Modified Route D Alternative

SDG&E submits the following comments with respect to the Modified Route D in response to the May 2007 CPUC and BLM Scoping Notice. The first portion of the comments addresses the Modified Route D Alternative. SDG&E also comments on the I-8 Route in order to better align the I-8 Route with the Modified Route D Alternative. The route considerations suggested below begin at the eastern end of the Modified Route D Alternative and end at the western end.

Overall Route

In comparing the Modified Route D Alternative in its entirety with the Proposed Project in its entirety, the following facts should be considered:

- Approximately 95% of the Proposed Project Route follows either an existing transmission line or disturbed linear feature as compared to the Modified Route D at approximately 80%. Therefore, the Proposed Project appears more consistent with the State Garamendi Principals and standard siting criteria for locating new transmission lines.
- The Proposed Project impacts 17 acres of designated USFS Designated Scenic Area while the Modified Route D impacts 379.2 acres. This could be considered a trade-off of impacts from the Anza Borrego Desert State Park to the Cleveland National Forest.
- The Proposed Project does not encroach at all into Cleveland National Forest designated Roadless Backcountry Areas while the Modified Route D Alternative encroaches by 389.8 acres. The construction of new access roads for a new transmission line may not be consistent with this land use designation.
- The Proposed Project does not impact any Indian Reservation Land while the Modified Route D Alternative impacts 80.2 acres.
- The Proposed Project potentially impacts 2,431 acres of environmentally sensitive areas while the Modified Route D impacts 2,570.6 acres. Thus, the Modified D route increases the acreage of potential impacts to environmentally sensitive areas.

Boulevard (I8-41)

At a point due east of Boulevard Substation, the new 500kV line could avoid two proposed I-8 crossings (one just east of Boulevard and the other west of the Golden Acorn Casino) by leaving the I-8 segment and paralleling the existing 69kV line west from Boulevard Substation to Miller Valley. This re-route appears feasible, however further preliminary engineering of the route would be necessary.

Miller Valley (approx. MD-1)

There is a new subdivision being developed east of Miller Valley on both sides of the existing 69kV line. The 500kV would, like the 69kV, bisect the development and potentially take homes. A re-route to the south should be considered.

U.S. Border Patrol (approx. MD-6)

The U.S. Border Patrol is installing a new facility at La Posta. The existing 69kV line currently bisects their 35 acre property. The Border Patrol also has plans to develop a helicopter pad on their property. This presents a safety hazard which should be carefully considered. Because the Border Patrol is a Federal Agency, SDG&E does not have eminent domain rights to condemn so a re-route to the south should be considered. Routing to the north would impact I-8.

Wetlands Area (between MD-6 & MD-7)

A riparian area west of La Posta will present a significant environmental challenge. The combination of the U.S. Border Patrol facility and the wet lands issue suggests that the proposed 500kV routing leave the 69kV alignment at a point east of the Border Patrol property and to the south until intercepting the present 69kV alignment heading south to Cameron Sub.

Structures East and North of Cameron Substation (MD-11 to MD 13)

The 69kV line currently exists with homes and buildings immediately adjacent to both sides of the 69kV line between these mile posts. The proposed 500kV alignment would require structure takes.

Chicken Ranch (MD-20)

A wire stringing site will be required along the south side of the Chicken Ranch. This site will be where wire reels will need to be located. Due to the south-to-north slope in this area, it would be preferable to have the 500kV centerline moved to the north for these few spans which may require either a crossing or a relocation of the existing 69kV facilities in parallel with the 500kV alignment. This movement of the 500kV alignment could potentially avoid the need for grading necessary to accommodate a wire stringing site along the steep slope.

Additionally, the Chicken Ranch property is currently in escrow to a tactical military training group called Blackwater

(http://www.signonsandiego.com/uniontrib/20070419/news_lz2e19hedlun.html).

Operations from this facility include military style training, shooting ranges and a 400 foot diameter helicopter landing pad. This presents a significant safety hazard which should be carefully considered not only for aircraft but for SDG&E's facilities in proximity to live fire training.

Structures North of Barrett Substation (MD-26)

North of Barrett Substation is a new home under construction that is approximately 25 ft. west of the existing 69kV line. The alignment for the 500kV line would put the house directly under the new line. There are two other existing homes in the same area that would interfere with the alignment for the 500kV line, with one house being to the east side and the other house to the west of the existing 69kV line.

Back Country Land Trust (MD-22 to MD-23)

The Back Country Land Trust, a nonprofit land conservancy, dedicated to preserving and enhancing natural, scenic and other cultural areas, owns approximately 361 acres of land in this area where the new 500 kV line would parallel the existing 69 kV transmission line.

Modified Route D Proposed Substation Site (MD-37)

The property owner of the proposed substation site has communicated a desire to relocate the sub on their property. Impacts to the substation site and transmission ingress/egress will not be known until the details of the relocation are known.

Alpine Boulevard (I8-71 to I8-79)

Design and construction of the double circuit 230kV underground proposed in Alpine Blvd. will be difficult. There are a number of existing underground facilities already occupying the street which may require relocation in order to accommodate the two 230kV circuits. In addition, any future 230 kV circuits cannot be installed in Alpine Blvd. and would require alternative routing solutions.

Peutz Valley Rd. (I8-78.5)

There is a possibility to avoid the currently proposed overhead crossing of Interstate 8 from the cable pole location at the West end of the Alpine Blvd. by re-route of the underground segment on to Peutz Valley Rd. This road crosses under Interstate 8 approximately 300 yards east of the proposed cable pole. The cable poles would be located where the overhead could span across Chocolate Canyon and resume with the I-8 route heading north towards Highway 67. Once on the north side of Interstate 8, the overhead visual impact would be greatly reduced since the conductors would be at or below the existing freeway elevation while crossing Chocolate Canyon. Further engineering of this route would be necessary, but if feasible, would eliminate any safety concerns during construction, future maintenance issues with Caltrans and any aerial contact by low flying aircraft such as helicopters.

In addition, the proposed I-8 alignment on the north side of the interstate should consider realignment to a lower alignment on the canyon slope towards Chocolate Canyon and the El Monte Road so as to utilize an existing access road. Further engineering of this re-route would be necessary, but if feasible, would avoid proximity to residents to the west and further reduce visual impacts.