

From: Michael Thometz [mailto:thometz@sciti.com]
Sent: Monday, October 8, 2007 05:28 AM
To: sunrise@aspenerg.com
Subject: Modified Route D letter

This email is forwarding as an attachment a letter written by Theodora L. Davis Inman. A copy will be mailed through the United States Postal Service.

If you have any problems or questions, please email either imstheod@aol.com or thometz@sciti.com

ATTACHMENT: Teddy_Sunrise.doc

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4 October 2007

Billie Blanchard
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Lynda Kastoll, Realty Specialist
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1661 South 4th Street
El Centro, CA 92243

Also transmitted electronically to sunrise@aspeneg.com

Dear Ms. Blanchard and Ms. Kastoll: Sunrise Modified Route D Alternative

I have followed the Sunrise project carefully and this letter is to advise you I am totally and unalterably opposed to Sunrise Modified Route D Alternative and I am also totally opposed to the entire Sunrise project.

I cannot believe the general route you are proposing for Alternative D as shown on your recent maps. At every hearing and in many of the written documents the proponents for this project have stated that running a route close to an existing route is a very bad thing. In addition, you have stated that you believe the southern route now used by the Southwest PowerLink has many fire problems. However, the modified Alternative D you are currently proposing runs within a very a short distance of the existing Southwest PowerLink. When the proposed D route reaches the Cameron Corners vicinity and proceeds West, it appears to be less than 2 miles from Southwest Powerlink. Furthermore, the proposed route D as it moves west then parallels Southwest for a number of miles. How can you justify that route? You have rejected that concept in the past because of the proximity of another line and because of problems you ascribe for both the difficult terrain, the fires threat and the proximity to an existing route. You must realize that fires in the Back Country are not the 25 or 50 acres along the side of a freeway you see reported on TV. Fires cover large areas both in acreage and in the length of the fire zone as fires move with the wind and are narrow and long. Both lines would be implicated in a fire event.

I also object to the methods you utilized in proposing this route. I am especially concerned because I can not comment on a route if I do not know where it is located. Even today only hours before the comment deadline on Modified Route D Alternative we do not have a map showing the route. I live a short distance from the possible route about a mile east of Buckman Springs Road and north of Highway 94 yet I received no notice of your decision to have a modified Route D Alternative. I live in the community and am involved in the community and am fairly knowledgeable about events that occur. However, your notice that there might be a route in our area that would affect so many of us was not sent to me and the few people who did receive your notices did not get them until long after the scoping meetings that were held

early in 2007 and long after public testimony was closed. No hearings were held in the community and this lack of notice and communication with the community certainly seems to me to be a violation of the California Environmental Quality Act. CEQA is violated because we were not notified and we have not had the required opportunity to comment. Despite requests for a copy of exactly where you believe this route would go, we have been unable to obtain copies. We still do not know how you have modified the original route D in response to complaints from the Border Patrol about your sending the Modified Route D over their new multi million dollar station on Old Highway 80. The lack of preparation and diligence and analysis demonstrated by routing the proposed line over the new Border Patrol station is one more reason why the lack of maps and precise routing and ability to evaluate proposals should eliminate consideration of any route in this area. We also do not know how the route was modified after you received complaints from the United States Navy and their Seals operation. We have heard rumors but even your people at the Campo community meeting could not tell us where the route is proposed. The only map we have has a bunch of circles on which are areas where the route may go or may change or may not go. This makes it impossible to provide details and specific comments about impacts. How can you evaluate our input, if we are unable to address our comments to a specific route? How can you have an EIR that is defensible. This new D route should be rejected. Go back to the drawing board and come up with a specific route and let the community look at it. Give the community a hearing and adequate time to comment on the route.

San Diego Gas & Electric has made it very clear that they do not want any part of Route D, original, modified or modified modified. One of the most egregious errors the PUC and SDG&E have committed is the cavalier approach to proposing alternative projects. CEQA and NEPA require identification of alternatives and an analysis of those alternatives with detail and thoroughness you give to your preferred project. You have failed to do that in all aspects of the Sunrise project and this is obvious in the proposal for Route D. How can you now propose an alternative that SDG&E has not studied and which it appears you have provided only cursory analysis. This Modified Route D Alternative should be rejected first because SDG&E rejects it and has clear stated that in numerous public meetings and second because it has so many problems.

Without a route that we can evaluate there is no way we can provide comments on the impacts of such a route. Among the important assets of our community which would be very negatively impacted by a route through this area include wildlife movement corridors of regional, national and international significance, Pacific Crest National Trail, numerous hiking and equestrian trails used by residents throughout the County for recreation, Scenic Highways that have been designated by the County as important visual resources, community character of this area which would clearly be destroyed by very large noisy and obtrusive towers since our community character is dedicated to large open spaces with ranching and few roads and sweeping vistas, and the land use planning objectives for our area as envisioned by the County of San Diego, Bureau of Land Management and numerous environmental organizations.

The Campo Lake Morena area is a haven for wildlife of all types. Conservation Biology Institute has prepared two extensive scientific studies which look at the wildlife movement corridors in our area and at some of the many species of wildlife (including birds and bats) that are found in our area. The first report is very specific to the Campo and Cameron Corners area and is titled "La Posta Linkages" report. A second study called the "Los Californias Linkages" report covers a broader area that looks at biological hotspots in Mexico and in the

United States and movements between those sites. The modified Route D Alternative transgresses large sections of this important landscape which must be preserved. The towers and the construction and the associated roads and the various trips in and out in service of your proposed project would have a very serious impact on threatened and endangered species. Your Modified Route D alternative is inimical to the functioning of the linkages.

I do not see how could possibly it put this route D in with out serious impacts on wildlife and/or very extensive and costly mitigation efforts. How can you possibly write an EIR without evaluating these impacts? And how could you reach a conclusion that this project will have substantial impacts on our wildlife? You do not even know what the threatened endangered and sensitive species are in this area. The area through which you want to run Route D is prime habitat for Quino Checkerspot Butterfly and the towers and the associated infrastructure and maintenance activities would have a serious impact on the survival of the butterfly. There are other T&E species in the area that will also be threatened and impacted. You make no mention of the County of San Diego Multiple Species Conservation Plan being developed for our area and it appears clear that it will present a number of environmental conflicts with this proposed route.

Campo Lake Morena is a very rural area. The limited rainfall dictates that most homes are on large parcels of five or eight or even larger acreage. The roads with the exception of La Posta Road, Buckman Springs Road and Highway 94 are dirt roads and people like it that way. Many residents have horses and cattle and large gardens, and dogs and cats and many other kinds of animals that thrive in this rural setting. At night we have very dark skies and the stars seem to be as close as the end of your nose yet the towers that you are proposing would destroy for many this magnificent nightscape that is one of the reasons we live here. Large parcels and animals and the nightscape and the peace and quiet and privacy are all part of our community character. The industrialization you are proposing will seriously degrade our environment. Your project will destroy that community character. Today most residents can hear dogs barking 2 miles away or can hear voices up to a mile and a half distant. That is a reflection of how very quiet the area is. The noise from these transmission lines will destroy the nighttime peace and quiet as well as the daytime peace and quiet that we all enjoy. This is an impact that cannot be mitigated. How can you put in this a project of this magnitude without mitigating the effects, and I see no way that you can mitigate the impacts and effects this will have on our community character and on our community.

An extremely important part of community character is our natural viewshed. Scenic highways are part of those viewsheds. Houses are not located on the top of ridgelines. Roads are not visible for the most part. Homes are often not visible as they are screened and set back on large parcels. The viewshed you see coming down Buckman Springs Road south from Oak Drive is something that everyone enjoys and it will be seriously degraded by this project. Other projects that will degrade visual impacts are denied or are forced to do substantial redesign and/or mitigation to minimize and eliminate the impact. There is no way that you can do this with a 300 foot right away and 150 foot tall towers with big flashing red lights on top.

I reject your rationale that Modified Route D Alternative is necessary because running a route through United States Forest Service land would of require a revision or rewrite of the recently adopted management plan for the Cleveland National Forest. This is such an illogical argument that I find it hard to find words to dispute this decision. Acquiescing to this USFS request is not a valid basis for eliminating better alternatives and your decision to accept the

USFS request seems to me to be the basis for a successful lawsuit challenging Modified Route D. You have rejected alternatives that involve USFS without study and analysis and that is not how the process should work. You must look at alternatives and study them and not reject them with not analysis and on the basis of a subjective decision.

The Bureau of Land Management is almost complete with their Eastern San Diego County Resource Management Plan. Are you going to avoid BLM land in that area (which would be part of any route that would come through Campo) because they have a new resource management plan? The Bureau of Land Management is redoing their South Coast Resource Management Plan, although it will be three years before its complete. It appears the only reason you are running a route through BLM lands in the Campo area (which is in the South Coast region) is because BLM has not completed the South Coast Resource Management plan. That is not right. The same standards should be in effect for all public lands through which a route might pass.

You seemed to overlook the fact that USFS lands are not owned by some faceless entity. Forest Service land is owned by me and by all the residents of Campo and by all the citizens of San Diego and California and the United States. BLM land is also our land. I own private property that will be affected by this line, yet you say you want to avoid private property (and Forest Service land) and want to use BLM land. Placing the route on BLM land is equivalent to putting it on private land because BLM land is mine. Routes should not segregate by ownership and should select the best route and not one that avoids Forest Service. You should go back to the drawing board and reevaluate where the routes could possibly go once you have eliminated the USFS restriction. Then come back to the community with hearings and let the citizens evaluate and comment on what is the best route. It seems fairly clear from the many routes that were presented in your hearings in Alpine and Ramona and Borrego Springs with the various proposals of Interstate 8 and Routes B, C and D, there are very likely other better alternatives once you use Forest Service lands. No decision should be made until ALL routes are evaluated.

The Modified Route D Alternative does not limit its impacts to only public lands. Your presentations have made it sound like private property owners would not be impacted. Yet we are told that there will be lines passing over private property, that some houses will be condemned and that towers will be located on private property. I've heard conflicting reports on the numbers of private properties that would be impacted in the Campo area at the number appears to be substantial. How do you reconcile your statements that this will go through public lands with the apparent route that has been described to homeowners and landowners in the Campo area?

In addition, as a ratepayer I object to Modified Route D Alternative. You would unnecessarily be increasing my rates by selecting modified Route D Alternative. This route adds many miles to the line. Every additional mile means a larger investment for San Diego Gas & Electric. Every mile means additional profit for San Diego Gas & Electric since their profit is a fixed percentage based on their investment and Modified Route D alternative would, by its greater distance and circuitous routing and by the construction costs in the difficult terrain, require a larger investment and therefore generate more profit. I would have to pay for both that larger investment and that larger profit The selected route should not be one that maximizes San Diego Gas & Electric investment and profit. All rate payers are the ones that will end up paying not only for the line, but also for this incremental profit. Every year will be paying more

and that is wrong. Investment should be minimized; you should be selecting an alternative which minimizes investment and minimizes rate increases. There are numerous alternatives that have been proposed throughout these proceedings, which can provide the needed energy for the San Diego area with far less gross investment than would be required by Sunrise PowerLink and its modified Route D alternative. You should reject route D and go for the alternative that produces the lowest rates for consumers. Sunrise Powerlink is not the alternative that does that and Sunrise should be rejected. Modified Route D is even worse as it makes Sunrise even more expensive and environmentally damaging.

Among the alternatives that you have not adequately considered for our area is the use of solar energy. Campo and Lake Morena have more sun than any place in San Diego County. We have no May Gray or June Gloom. We have very few clouds and endless hours of sunshine. This is an area in which every single house should have a solar roof and an area in which SDG&E should pay home owners for all excess electricity generated from the solar installations. The ever increasing efficiency of solar combined with the ever decreasing costs of solar panels and the continually increasing capacity of battery backup and the continually decreasing costs of battery backup combine to make the perfect situation for alternative energy right here in our area. Rather than spending millions on an ill advised line through this area with all the problems SDG&E should be spending their money on converting every residence and every business to efficient solar generation of electricity which would eliminate any need for even considering Sunrise Powerlink. Again this is an alternative that you are not analyzing even though it is obviously the best choice for our area. You must analyze all the relevant alternatives. You can not accept Modified Route D alternative in a vacuum. You must consider Route D in relation to all the other options commonly named the “non wires” alternatives. These show that Sunrise Powerlink is not the solution to our energy future which then makes it clear Modified Route D is not the solution to our future.

I also object to this “rush to judgment” process. Why are the PUC and SDG&E in such a rush to finalize everything? Your argument that you can not provide the right percentage of renewables by 2010 has already been proven to have no basis in fact. The proposed solar energy facility that would possibly use Sunrise including Route D is years into the future under even the most optimistic of assumptions and projections. There is no proof that the Stirling system works, and that it can work. Even if it were to work in some form it will be years before the facility is in place. And yet you want to have Sunrise and Route D up and operating in less than two years. But there will not be anything to move on the system. When new power plants are built, efficient, modern and environmentally sensitive in basin power plants are built in San Diego producing low cost energy and when homes and businesses have solar roofs and utilize all the other forms of technology, the demand for energy will be reduced. But you want to rush to construct a project ahead of its time. The proposed Sunrise Powerlink would be sitting there for years with no renewable energy to carry. Of course, it would be available for energy from Sempra LPG powered plants in Mexico which further increases Sempra profits but that is not the purpose of the line.

Southwest PowerLink was built to carry renewables, and it can carry renewables. Today, it can carry all the renewables that we need to meet the goals in San Diego. Southwest PowerLink with some upgrades could carry even more energy than it does now. We have heard that capacity could be increased by 10% with a modest investment by the utility. Today it is reported that the line does not reach full capacity even with the Mexican power that is being sent over the line combination with any of renewables from Imperial County. You

already have an alternative to modified Route D alternative and that is Southwest PowerLink. Use the Southwest PowerLink and eliminate modified Route D alternative. Your analysis should tell us exactly what energy is going over the Southwest PowerLink, where the energy is generated and how much of the capacity is used. And you should have an independent outside auditor evaluate the usage of the line and especially the instances where congestion is being created on the line to help provide evidence of would support the need for an additional transmission line.

In following this project I have seen little to convince me that Sunrise PowerLink is needed. I have seen even less evidence that supports selection of modified Route D alternative for this route if the project were to be approved. There are so many problems with the environment, wildlife, our rural community character, fire, proximity to Southwest Powerlink and so many other issues Route D should be eliminated from all consideration. Just as you have summarily eliminated other routes, eliminate Route D.

In Campo and Lake Morena we understand that our rural community with widely spread homes and a relatively small population and very large area, of which about half is public lands, makes us a target for avoiding the confrontation and community involvement you have encountered in other areas. Because we are small is not a valid reason to ignore us and impose an unwanted project on us. Campo and Lake Morena are similar to other areas in that we are reacting to a bad project. In our case we have not even had the opportunity to adequately study and evaluate and comment on the project that other communities have had. But we all want the same thing and that is for CPUC to reject this flawed project.

Reject Modified Route D and reject Sunrise. Direct SDG&E to proceed with the many other options and alternatives that would provide the energy future we all need.

Sincerely yours,

Theodora L. Davis Inman

**CC: Board of Supervisors, County of San Diego
California Senators and San Diego Area Representantives
Sand Diego State legislators**