

CARMEL VALLEY COMMUNITY PLANNING BOARD
c/o MNA CONSULTING
427 C St., Ste. 308
San Diego, CA 92101
619-239-9877 10 / Fax: 619-239-9878
www.cvsd.com/planning.html

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

April 8, 2008

Re: Proposed San Diego Gas and Electric Sunrise Powerlink Project

Commissioners:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Sunrise Powerlink. The Carmel Valley Community Planning Board represents the nearly 32,000 residents, property owners and businesses in the Carmel Valley Planning area of the City of San Diego. Elected by the community, the planning board serves in an advisory capacity to the City of San Diego Planning Department and the San Diego City Council. This is a diverse board made up of property owners, residents, business owners and developers.

Our board has opposed the Sunrise Powerlink transmission project because:

- We favor the most efficient and environmentally friendly solution to meeting our energy needs. The DEIR lists 5 environmentally superior alternatives to this project and testimony suggests that several are more cost efficient as well.
- We feel that a massive transmission project such as this will undermine San Diego's ability to achieve many of the goals of the San Diego Regional Energy Strategy and the State's Energy Action Plan like maximizing local renewables and distributed generation and increasing energy efficiency and conservation.
- In addition to the environmental damage that this line will cause to our community's resources, it will cause irreparable damage to Anza Borrego Desert State Park and cause the first ever de-designation of state park lands.
- The City of San Diego has consistently expressed a preference for maximizing renewable generation in the SDG&E metro area and the expert witness hired by the City Attorney's Office has expressed concern about SDG&E's "insufficient reliance on and financial support for the development of low-risk, in-area renewable power projects..."(Monsen, June 23,2003, Exhibit 114R.01-10-024, page 3).

- The City Attorney's Office has "repeatedly urged caution about SDG&E's paramount and heavy reliance on new transmission projects to meet anticipated resource needs." And is on record that "this is a risky and imprudent strategy." (Letter from San Diego City Attorney, Michael Aguirre to Michael Niggli, March 25, 2008).
- Finally, we feel that SDG&E has not adequately examined the use of new and alternative technologies such as those available to upgrade the capacity and efficiency of existing transmission lines and expanding the use of local distributed and renewable generation. These include alternative cable designs and smart grid technology (for example Composite Technology Corp claims that "Aluminum Conductor Composite Core cable can double the current carrying capacity over existing transmission and distribution cable and can dramatically increase system reliability by virtually eliminating high-temperature sag.").

COMMENTS REGARDING DEIR IN CARMEL VALLEY PLANNING AREA:

San Diego Gas & Electric proposes to construct the western portion of the Sunrise Powerlink along the border of Carmel Valley Neighborhood 10 known as Carmel Country Highlands and the Los Penasquitos Canyon Preserve. There are two existing overhead facilities along the border of the preserve in Carmel Country Highlands: a series of wooden H-Frame towers supporting 69kV and 138kV circuits, and a series of lattice towers supporting a 230kV circuit. The project involves replacing the smaller wooden supports with new tall towers along with installation of additional 230 kV lines on these towers.

The Carmel Valley Planning Board wishes to make the following comments with respect to the Draft Environmental Impact Report for this project in their local planning area:

Incorrect Mapping of Carmel Country Highlands:

Carmel Country Highlands or Neighborhood 10, is a relatively newer area of Carmel Valley with some parts of the neighborhood still under development. It is south of the SR-56 Freeway within the City of San Diego and is bordered on the south by the Los Penasquitos Canyon Preserve, on the east by Del Mar Mesa Preserve, on the west by Torrey Hills and to the northwest is Carmel Mountain Preserve. It is disconcerting to note that all of the maps in the DEIR have misplaced Carmel Country Highlands to be north of the SR-56 freeway far from the proposed project and these preserves. There are many homes in this neighborhood along the edge of the Los Penasquitos Canyon Preserve adjacent to the Sunrise Powerlink's preferred route (approximately 200 and growing along the preserve and/or the utility easement). We are concerned that this mapping error may be part of the reason why the DEIR makes little mention of impacts on this neighborhood, much of which is within 2000 feet of the proposed route, including Sage Canyon Park and School and Carmel Mountain Road. The DEIR also makes no mention of any key viewpoints in Carmel Valley. The gazebo overlook park at the intersection of Carmel Country and Carmel Mountain Roads contains the Carmel Country Highlands monument signs and an overlook to the Los

Penasquitos Canyon Preserve. This view from the park to the preserve is already interrupted by a large metal lattice transmission tower in the existing corridor. This would be an example of a key viewpoint to the proposed transmission line in our community as would the public views from the Carmel Mountain Road bridges to the Los Penasquitos Canyon Preserve at the western (and in the future, eastern) end of the neighborhood. There are public trail accesses at both of these locations as well.

Fire and Fuels:

According to the DEIR, Los Penasquitos Canyon Preserve is the most heavily developed and urbanized fireshed along the Proposed Project route. The heavy fire fuels, steep topography, and exposure to Santa Ana winds give it a higher burn probability and a higher potential for an ignition to escape. The DEIR concludes that potential for an ignition to result in a catastrophic fire is significant.

There is a false assumption in the DEIR of rapid response times due to the urban location of this fireshed. However, the 2005 San Diego Fire Accreditation Report (<http://www.voiceofsandiego.org/pdf/cedarfire3.pdf>) found significant gaps in service in this area that may well have gotten worse since then due to the increase in population and development. According to the 2005 report, this area does not usually have an effective response force within 12 minutes (far exceeding the guideline of 5 minutes). The area also exceeded guidelines in square miles covered and number of incidents. In addition, the DEIR notes very high wildfire containment conflict along the route in some of these areas no doubt due to the presence of power lines already.

Slow fire response times, fire containment conflicts and a heavy fire load that hasn't burned in recent years, coupled with lots of capital loss potential, equates to a catastrophe waiting for a spark. The Sunrise Powerlink is that spark and a contribution to a "defensible space grants fund", as suggested in the DEIR, is not adequate mitigation for this risk. The homeowners in the Carmel Country Highlands area that are most at risk are not guaranteed to benefit from any of the fund's grants and the community feels strongly that mitigation should occur within the affected area. A contribution toward improved fire fighting services in the affected area would be more appropriate mitigation. Fire services in the area must be able to adequately address the increased fire risk associated with this new infrastructure.

Effect on Pending Development

The DEIR also stated that there is no potential effect from the project on pending and future development. Pardee Homes still has plans to build on their entitlements at both ends of this neighborhood right up the SDG&E ROW. We are not convinced that there is no potential effect on this development as no comparison is made between the project route and Pardee's now approved maps.

Carmel Valley Community Plan

In fact, the study fails to demonstrate or even discuss conformance with the Carmel Valley Community Plan in this area at all. As stated in the N10 Precise Plan "Open space defines the character of Neighborhood 10 (AKA Carmel Country Highlands) and provides the community with a valuable asset that not only preserves and enhances natural resources, but also provides a psychological benefit to the area wide residents....Much of the open space area represents '*sensitive lands*' as defined by the City's Resource Protection Ordinance." This asset is dying a death of a thousand cuts as the open space is encroached upon further and further by projects such as this, producing an industrialized effect. The DEIR noted the potential for additional 230kV transmission lines to follow after the one in the proposed project. The cumulative effects of these additional transmission lines need to be studied further.

Cumulative Effects from Existing and Future Transmission Lines

The DEIR notes the potential for additional 230kV transmission lines to follow as a result of the Proposed Project at a later date; "The Central East Substation that would be built as a part of the Proposed Project would accommodate up to six 230 kV circuits".¹ At least one of these additional lines is likely to follow the same path as the proposed project into the Penasquitos substation through Carmel Valley.² The final result would be three 230 kV lines (including one pre-existing), one 138kV line (pre-existing) and one 69kV line (pre-existing) all following the same path through Carmel Country Highlands.

Furthermore, SDG&E's 2007-2017 Long Term Procurement Plan dated December 11, 2006 discusses an additional "Encina –Penasquitos 230 kV #2" planned for development by June of '09. The timing and placement of this north-south connection out of the Penasquitos Substation through Carmel Mountain Preserve and Carmel Valley North suggests that it is necessary to accommodate the excess power from the Sunrise Powerlink connection(s) into the Penasquitos substation from the west. This transmission expansion should be evaluated further to determine if it is actually a necessary part of the Sunrise Powerlink project. Carmel Mountain is a small preserve, approximately 350 acres, which contains the largest remaining stand of Southern Maritime Chaparral in the world, including the federally listed *Dudleya brevifolia*, and associated listed bird, mammal and reptile species. Twenty-four acres scattered throughout the Preserve are vernal pool and fairy shrimp mitigation for development impacts elsewhere. The north-south transmission line ROW across Carmel Mountain and its approach tracks border vernal pool areas and traverse greater than 2:1 slopes, with several extreme elevation changes which are characterized by scenic red rock formations and sandstone bluffs, and which require that the towers and lines be accessed by roundabout routes for both construction and routine maintenance. Most of the views westward from the public multi-use trails on Carmel Mountain to Torrey

¹ Draft Environmental Impact Report / Environmental Impact Statement and Draft Land Use Plan Amendment for San Diego Gas & Electric Company's Sunrise Powerlink Project (Applications A.05-12-014 and A.06-08-010), p.D10-45, Section D10.11.1

² Ibid

Pines State Reserve, Los Penasquitos Lagoon and the ocean would be impacted by additional towers and transmission lines.

If the “Encina –Penasquitos 230 kV #2” discussed above is determined to be necessary preparation for the Sunrise Powerlink Project, this would amount to at least 3 additional 230 kV transmission lines through Carmel Valley resulting from this project and its planned transmission system expansion. We would like this potential piecemealing of the project to be examined further. The cumulative effects of all of these transmission lines taken as a whole are not included in the DEIR and need to be analyzed. As stated in the letter to Commissioner Dian M. Grueneich from the Carmel Valley Community Planning Board on March 13, 2006, “Carmel Valley is already overloaded with transmission lines in the community. Our neighborhoods and preserves suffer from significant visual impacts from these lines and adding any more is simply not acceptable to the residents. Community volunteers have dedicated a lot of time, effort and coordination with SDG&E to plan a community-funded undergrounding of the existing overhead transmission lines through Carmel Valley. Those hours of hard work were wasted as it appears the undergrounding project is infeasible. Now SDG&E may be planning to add several additional transmission lines to Carmel Valley.”

EMF Mitigation Concerns

In addition to visual and construction impacts, Carmel Valley is concerned about potential health and safety effects associated with additional power lines in or near the community and the adequacy of SDG&E’s EMF mitigation plan. Our community is already impacted by a large amount of electromagnetic fields from transmission lines – and we are not open to allowing additional exposure to our residents. We understand studies have differed on the impacts of electromagnetic fields to human health, and we are not accepting of even a slight potential risk. We feel that the cumulative effects of additional transmission lines on Electromagnetic Fields and the proximity of homes to these power lines should be studied further. A number of epidemiological studies, particularly in the US and in Scandinavia, have suggested an association between the incidence of childhood leukemia and EMFs. Not every study has found the same association, but taken as a whole, the epidemiological studies certainly show a statistical association (source: http://www.emfs.info/sci_Intro.asp). With current and planned housing now in close proximity to these towers, prudent avoidance is applicable and should be exercised regardless of previous thoughtless impacts.

Conformance to Existing State and Local Energy Strategy

Finally, we consider these impacts on our community to be even more unacceptable because the DEIR confirms that they would be forced upon us by an unnecessary, environmentally damaging and ill conceived project. It is our understanding that some of the environmentally superior alternatives noted in the DEIR have been vetted through expert testimony in this case to also be more efficient and less costly. We, as ratepayers, favor the most efficient and environmentally friendly solution to meeting our energy needs. The DEIR and case testimony show that the Sunrise Powerlink project does not fulfill these goals.

We feel that a massive transmission project such as this will undermine our ability to achieve many of the goals of the San Diego Regional Energy Strategy and the State's Energy Action Plan like maximizing local renewables and distributed generation and increasing energy efficiency and conservation.

With this in mind the CVCPB supports the environmentally superior alternatives of in-area all source generation and in-area renewable generation because they:

- 1) Negate all impacts of transmission line.
- 2) Encourage replacement of old, inefficient and polluting plants
- 3) Provide better conformance with San Diego Regional Energy Strategy and the State's Energy Action Plan which emphasize renewable and distributed local generation over imported energy and transmission.
- 4) Provide more efficiency with lower risk: Energy should be produced closest to where it is needed. In-county generation is lower risk for those of us in fire prone Southern California and local generation is what kept the lights on during the October, 2007 wildfires when all transmission failed.

The CVPB would also like to express support for the Coastal Link Upgrade Alternative as it has become clear in testimony that the coastal link is not needed even if the CPUC finds in favor of the proposed project. The Coastal Link Upgrade Alternative has been proven to be less costly and environmentally superior to the proposed coastal link while accomplishing the same goals.

In closing, we would like to take this opportunity to thank Aspen Environmental, the Federal Bureau of Land Management and the California Public Utility Commission for their conscientious evaluation of this project. We recognize the pressures on the Commission from various stakeholders and appreciate your efforts to make an unbiased decision based solely on the facts and merits of the case.

Sincerely,

Frisco White
Chair, Carmel Valley Community Planning Board



Jan Fuchs
Chair, Regional Issues Subcommittee
Carmel Valley Community Planning Board



Laura Copic
Neighborhood 10/Carmel Country Highlands Representative
Carmel Valley Community Planning Board