

San Dieguito River Valley
Regional Open Space Park
18372 Sycamore Creek Road
Escondido, CA 92025
(858) 674-2270 Fax (858) 674-2280
www.sdrp.org

B0031

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Executive Director

April 7, 2008

CPUC/BLM

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

Subject: Comments on Sunrise Powerlink Draft EIR/EIS

To Billie C. Blanchard, CPUC and Lynda Kastoll, BLM:

The San Dieguito River Park JPA considered the Sunrise Powerlink Draft EIR/EIS at their March 21, 2008 meeting. The proposed project Central Link is within the San Dieguito River Park Focused Planning Area (FPA) and the JPA took positions in May 2006 (see attached letter) and January 2007 opposing the project as proposed for the reasons cited in the attached resolution (R07-01). The JPA opposes the SDG&E project alignment through the FPA because it would cause severe impacts to the San Dieguito River Park open space corridor by placing nineteen 230 kV transmission towers and miles of maintenance roads in this scenic landscape.

The JPA agrees with the impact conclusions reached in the Draft EIR/EIS, which cites 25 significant and unmitigable impacts through the Central Link alone. This level of impact would be unacceptable. The JPA urges the CPUC to seriously consider the feasible alternatives included in the Draft EIR/EIS that do not involve transmission towers in scenic recreational areas like the San Dieguito River Park. The JPA specifically urges the CPUC to give further consideration to the north/south alternative, known as the Talega-Escondido/Valley-Serrano Project. This alternative was considered in the Draft EIR/EIS and was ranked Environmentally Superior to the Central Link project. The JPA also recommends that additional emphasis be given to roof top solar and distributed generation.

If the CPUC does determine that a transmission line is needed and if the CPUC does approve the Central Link project, then the JPA strongly recommends that the CPUC require the towers to be undergrounded through the River Park as described for the "Santa Ysabel Partial Underground" or "Santa Ysabel All Underground" alternatives. These alternatives are listed as Environmentally Superior alternatives.

In particular, the Partial Underground would (1) be shorter in length than the proposed project, (2) eliminate overhead structures and visual impacts within the

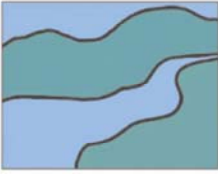
River Park FPA between Mesa Grande Road and the south end of the valley, (3) have less impact on native habitat since the alignment would be placed under existing roads, (4) eliminate bird collisions with towers and building towers within golden eagle foraging habitat, (5) eliminate permanent impacts to agricultural land, and (6) reduce fire risk. The All Underground Alternative would have the same benefits within a longer corridor since undergrounding would begin further north at the intersection of SR76 and SR78. Also, because these alternatives are along paved roads, access roads to service the line would not be needed. Although impacts from undergrounding the lines would still cause impacts in the area, these impacts would be greatly reduced. If the project is approved through the FPA, an adequate mitigation plan to compensate for the lost scenic value to this area will be necessary. The JPA would work with SDG&E and the CPUC to develop that plan.

We would appreciate your serious consideration in this matter. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Dick Roberts for". The signature is written in a cursive, slightly slanted style.

David W. Roberts
JPA Board Chair



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Lesa Heebner
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Dr. Philip Pryde
Citizens Advisory Committee

Kelly Burt, Ex Officio
22nd District Agricultural Assoc.

Dick Bobertz
Executive Director

May 2, 2006

Ms. Laura McDonald
San Diego Gas and Electric
8330 Century Park Court
San Diego, CA 92123

Subject: Sunrise Powerlink Project

Dear Ms. McDonald:

The San Dieguito River Park Joint Powers Authority (JPA) Board of Directors considered the Sunrise Powerlink alignment at their April 21, 2006 Board meeting. The JPA strongly opposes the preferred transmission route selected by SDG&E within the Central Link portion of the project. The enclosed map illustrates the property ownership within the area of concern. The San Dieguito River Park is a 55-mile long open space and recreational river corridor from the beach in Del Mar to Volcan Mountain near Julian. The JPA was established in 1989 to assemble, protect, and manage this regional river park. The Sunrise Powerlink route would traverse through a pristine and publicly protected segment of the River Park between Lake Sutherland and Highway 79. This area was added to the heart of the River Park through property acquisitions made in the past five years by the JPA and County of San Diego: an investment of over \$15 million in state grants. The proposed preferred Powerlink route would cut through the middle of this scenic open space corridor and significantly impact its pristine setting. The JPA strongly encourages SDG&E to reconsider their preference for this route for the following reasons:

- The area east of Lake Sutherland and west of Highway 79 is an established open space preserve created using \$15 million dollars of State bond act money representing a major public investment.
- The area represents pristine back country at near-wilderness quality of major ecological significance. The transmission towers themselves (up to 150 feet high) would result in a significant visual impact to this pristine landscape. The project would also require a network of access roads through difficult terrain to provide vehicular access to each tower.
- The 55-mile long Coast to Crest Trail is planned through this area, which will attract many recreational users who want a unique recreational and aesthetic experience.
- The Coast to Crest Trail is also both a State (California Recreational Trails Plan) and County (County General Plan) recognized regional public trail corridor.
- The area has unique recreational, biological, and visual significance that was not considered.

The JPA urges SDG&E to reconsider a route within or near Highway 79 as the preferred route, in an area that is relatively level, is more accessible from existing roads, and is biologically less sensitive. The lines should be placed underground. Although a corridor along Highway 79 has been selected by SDG&E as an alternative, no evidence has been made available to justify why that route was not selected as the preferred route. Although the area just west of Highway 79 is also within the San Dieguito River Park's focused planning area and is scenic, more opportunities exist in this area to site a transmission route that can be undergrounded.

We hope to continue working with your project staff in routing the lines outside of such an important and sensitive area. We would appreciate your serious consideration in this matter. Thank you.

Sincerely,

Jerry Finnell
JPA Board Chair

Cc: California Public Utilities Commission
Chris Terzich, SDG&E
Scott Crider, SDG&E

RESOLUTION NO. RO7-01

**RESOLUTION OF THE SAN DIEGUITO RIVER VALLEY REGIONAL OPEN SPACE
PARK JOINT POWERS AUTHORITY BOARD OF DIRECTORS REGARDING THE
PROPOSED SUNRISE POWERLINK PROJECT**

WHEREAS, the Santa Ysabel Valley is a scenic viewshed with visual resources that should be protected, and a long-history of established pioneer ranches some of which have been family-owned for over a century over several generations, and

WHEREAS, the Santa Ysabel Valley is a treasured landmark with regionwide public significance, and

WHEREAS, the Sunrise Powerlink transmission towers (up to 150 feet high) would cause visual blight to this scenic landscape and along a scenic drive of Highway 78/79, and

WHEREAS, the proposed transmission towers would cause a potential fire danger in an area susceptible to wildland fires, and

WHEREAS, SDG&E has already proposed undergrounding lines in Ramona and Penasquitos as part of the Powerlink project, and

WHEREAS, the 55-mile long Coast to Crest Trail is planned through this area, which will attract many recreational users who want a unique recreational and aesthetic experience, and the Coast to Crest Trail is both a State (California Recreational Trails Plan) and County (County General Plan) recognized regional public trail corridor, and

WHEREAS, adoption of this resolution shall not be inferred as support for the Sunrise Powerlink Project; and

WHEREAS, the Board of Directors of the San Dieguito River Park Joint Powers Authority (“Board”) does not believe adequate information to justify the Project has been provided to date,

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

- 1) The Board opposes placement of transmission lines for the Powerlink Project within the River Park’s Focused Planning Area; and
- 2) The Board urges that SDG&E underground the proposed transmission lines in the Highway 79 utility corridor through Santa Ysabel.

PASSED AND ADOPTED THIS 19th DAY OF January, 2007
BY THE FOLLOWING VOTE:

AYES:	8
NOES:	0
ABSENT:	1
ABSTAIN:	0

Ed Gallo, Chair

ATTEST:

Dick Bobertz, Executive Director