

From: Bill Bretz <wlbretz@uci.edu>
To: sunrise@aspenerg.com
Sent: Fri Apr 11 14:23
Subject: Fwd: Sunrise Powerlink

Comments to: CPUC/BLM, c/o sunrise@aspenerg.com

From: Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Planning Group

Re: Sunrise Powerlink Project

At its regular monthly meeting on 11 February 2008 the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Planning Group considered the subject of the Sunrise Powerlink and its Draft EIR/EIS. Following discussion of the project and its potential impacts, the Planning Group approved (8 yes; 1 no) sending a letter of comment concerning the San Diego Gas and Electric proposed Sunrise Powerlink Project and its Draft EIR/EIS, stating that: 1) the Planning Group finds that any preferred or alternative route of the Sunrise Powerlink with above ground transmission lines will create unacceptable additional fire causing and fire fighting risks for the wildfire prone East County region; and 2) the Planning Group recommends that the California Public Utilities Commission, the Bureau of Land Management, and all other permitting agencies consider approving only the No Project/No Action alternative, or the New In-Area All-Source Generation alternative, or the New In-Area Renewable Generation alternative.

Planning Group Secretary William Bretz orally presented this action of the Group at the Pine Valley Public Participation Hearing on 25 February 2008.

This email is intended to serve as a written letter of comment for the record of the Sunrise Powerlink Draft EIR/EIS from the Crest-Dehesa-Granite Hills-Harbison Canyon Planning Group.

Sincerely yours, William L. Bretz, Planning Group Secretary

11 April 2008

To: CPUC/BLM, c/o sunrise@aspenerg.com

Comments on the Sunrise Powerlink Project and its Draft EIS/EIR

We support the findings reported in the Draft EIR/EIS for the Sunrise Powerlink project that the “no wires” alternatives are the most environmentally preferable solutions for meeting the future energy needs of the San Diego Region.

We urge the California Public Utilities Commission and the Bureau of Land Management to decide that the public interest is best served by denying San Diego Gas and Electric’s Proposed Project in its Sunrise Powerlink application.

We favor approval of the No Project/No Action Alternative, or the New In-Area All-Source Generation Alternative, or the New In-Area Renewable Generation Alternative. All of these are “no wire” alternatives that do not have the serious, significant fire-causing and fire-fighting interference impacts (that can not be fully mitigated) that are unavoidable with above ground transmission lines.

None of the above ground alternatives are desirable, and some are more undesirable than others. The LEAPS Transmission-Only Alternative is the shortest transmission line alternative, and it is the farthest removed from the existing 500 kV Southwest Powerlink (SWPL) location along the international border. It would produce the least environmental impacts to on the ground habitat and would create the least additional wildfire-related risks to the region.

The Environmentally Superior Southern Route (SWPL) Alternative is seriously flawed by reliance on the Modified Route D Alternative. The Modified Route D Alternative is not adequately described and analyzed as an alternate route for the Sunrise Powerlink project in the Draft EIR/EIS. A rationale for this alternate seems to be utilization of an alignment along a proposed Section 368 utility corridor planned for the Federal West-wide Energy Corridor project (Figure E.4.1-1a). Federal corridor planning exists to enable interstate transmission supplies of energy and fuels. This Sunrise Powerlink project is within California, mostly within San Diego County. It would seem that local California planning and analysis should look at local California conditions that determine where a route would be least environmentally damaging

Constructing the Sunrise Powerlink along the Modified Route D Alternative would, by becoming the first utilization of the federal utility corridor plan in this region, confer validation on it. In contrast to this Powerlink approval process, the federal West-wide plan has not been widely publicized to individual residents and landowners (along this portion in San Diego county let alone in California) to seek and encourage public inputs and comments. Thus, a significant impact of selecting the Modified Route D Alternative would be to help create the actual, on-the-ground route of a federal utility corridor that

could ultimately become a 3000' wide zone which could include other transmission lines, buried liquid and gas pipelines and infrastructure, all in cumulative addition to the original 500 kV Sunrise Powerlink transmission line.

The Sunrise Powerlink Draft EIR/EIS does not provide any information about the federal utility corridor planning which resulted from the Energy Policy Act of 2005, Section 368, and which has independently selected the route for a Section 368 utility corridor. This route now is being used to promote the superiority of the Modified Route D Alternative. The Sunrise Powerlink Draft EIR/EIS analyzes the impacts of a 500KV transmission line on a 200' right-of-way, but once installed, the Modified Route D Alternative has the potential to morph into a 3000' multi-use federal utility corridor.

Additional unanalyzed impacts of the Modified Route D Alternative result from the planned location of elements of future transmission system expansion linked to this alternative. Many references throughout the DEIR (as on Pages E.1.1-7 through E.1.1-8) include a description of "Future Transmission System Expansion" which is illustrated in Figure E.1.1-6, "SWPL Alternatives 500kV Future Expansion." The third option described in the text and illustrated in the figure is a resurrection of the West of Forest Alternative that was eliminated from analysis in the Draft EIR/EIS.

We submitted a detailed 13 page letter of comments during the project scoping process largely critical of the West of Forest Alternative, and we approved of the decision to eliminate it as an alternative to be further considered in the Draft EIR/EIS. It is dismaying to see that this route has risen again, like a vampire, to exist on a map in the Sunrise Powerlink documents as the future Son of Modified Route D. It is portrayed as a future option and possible consequence if Modified Route D is selected yet it has not undergone environmental analysis and review.

Worse, by being documented in this DEIR/DEIS, in text and in maps, it is granted an existence now which will be used in the future to help present it and validate it, in fact, as a prime expansion route alternative, should the Modified D route be approved for Sunrise Powerlink corridor. And, far worse, residents who regarded it as deleted turned back to their rural lives not seeing any further need to comment. If they had realized this was still lurking, we're sure there would have been many more comments against any consideration of the West of Forest route whether for this project or future use. The various D routes and West of Forest route were originally rejected from further consideration and environmental analysis for many valid reasons, none of which have vanished in spite of the reversals that have brought Modified Route D and future West of Forest back on the table. All criticisms of these routes from the Scoping process still apply.

The Executive Summary of the Draft EIR/EIS concludes on page ES-61 that "The Modified Route D Alternative is environmentally superior to the corresponding segment of the Interstate 8 Alternative with the West Buckman Springs Option it would replace." After review of the information presented in the Draft EIR/EIS, and our knowledge of the area, we do not believe this conclusion is valid.

If the Modified Route D alternative is 25 miles shorter than the original Proposed Project it would replace, then the “Environmentally Superior I-8 Alternative” is 38 miles shorter than the original Proposed Project it would replace. Since it is 13 miles shorter than the Modified Route D Alternative, therefore it has 13 fewer miles of significant visual impacts and of significant impacts to sensitive native vegetation. It also has fewer impacts to golden eagle nesting sites and to the Least Bell’s Vireo. While both of these alternatives are not consistent with the Cleveland National Forest High Scenic Integrity Objective (SIO), the Modified Route D has only 4 miles less of the SIO impacts than the Environmentally Superior I-8 Alternative, which hardly seems a difference significant enough to pick Modified-D over I-8, when compared to the 13 miles of extra impacts Modified-D would create.

Corona noise levels from the high voltage powerline would be approximately 50dBA (mentioned in I-8 Alternative on page E.1.8-1 but not in the Modified Route D Alternative on page E.4.8-1), very noticeable in an area with ambient levels usually less than 50dBA down to 35 dBA. Ambient noise levels along the I-8 Alternative would be greater than 80dBA, against which corona noise would be un-noticeable.

Basically, Modified Route D Alternative forces a major transmission corridor into remote very rural communities typified by limited rural road access and very rugged terrain. As was seen in the October 2007 Harris Fire these very elements helped stymie fire-fighting on the ground very effectively without adding in the difficulties of a 500 kV transmission line. Both the Modified Route D Alternative and the I-8 Alternative are within areas of very high wildfire risk as described in the Draft EIR/EIS, but we do not agree with the argument that the Modified Route D Alternative is significantly less so: Refer to information for Burn Probability, Wildfire Containment Conflict, and Fire Behavior Trend. Looking at the firesheds that contain the relevant respective portions of I-8 (La Posta, Guatay) that Modified-D (Campo, Dulzura, Guatay) would replace, we see higher numbers in all the model categories for Modified-D (M-D):

CONTAINMENT CONFLICT: Very High + High: (I-8) 77 v. (M-D) 181
Very High + High + Moderate: (I-8) 144 v. (M-D) 263

BURN PROBABILITY: Very High + High: (I-8) 27 v. (M-D) 99
Very High + High + Moderate: (I-8) 63 v. (M-D) 227

FIRE BEHAVIOR: all numbers of houses and of acreage at risk under both scenarios are far greater for Modified-D than for I-8

Furthermore, while Modified Route D alternative does not share the same corridor with the SWPL as it comes west into the region of greater fire risk, its route does share the same very high wildfire risk environment. At least 15-20 miles of the Modified-D route running mostly parallel to the SWPL, is located less than 5 miles north of it. As seen in the October 2007 Harris Fire, and as observed in the DEIR, wildfires in this region can spread rapidly over such a distance, and in fact leap miles creating spot fires which spread. Rough topography, local created fire-driven winds, and smoke layers present

difficulties for firefighting and threats to the safe effective, reliable functioning of the Sunrise Powerlink. The 2007 Firestorm was eye-opening in its widespread overall impacts on the system reliability for San Diego County, and its imminent failure in the face of so many multi-front threats.

The Environmentally Superior I-8 Alternative is better than the Modified Route D Alternative in most of the issues mentioned above, and where it is not, it seems the differences are so slight as to be negated by all the attributes the I-8 Alternative has as an already highly disturbed zone. As opposed to small and few rural roads for access in difficult topography as in the Modified Route D Alternative, the I-8 Alternative is a flat, wide, multilane pavement with multiple access points and could readily be adapted for access and staging by fire-fighting equipment and personnel. Not to mention access for construction and maintenance equipment also. The I-8 highway is an existing intrusion across the area. It makes more sense to add the 500 kV transmission lined powerlink corridor to it rather than enter the relatively unblemished and still rural area where Modified Route D Alternative would be located. Cleveland National Forest exists in several counties as a patchwork. It is already bisected by Interstate 8. Just add the extra disturbance of the powerlink there. Amend the Forest Plan as must have been done for I-8 to go through.

In conclusion, we urge you to deny the proposed Project and all of its transmission line alternatives, and to approve one of the three no wire alternatives. The analysis in the DEIR of the Modified Route D Alternative is not adequate, is flawed and does not justify ranking it superior environmentally to the “Environmentally Superior I-8 Alternative” which it would replace.

Sincerely yours,

William L. Bretz, Ph.D. and Lesley A. Barling, M.S.

POB 20543
El Cajon, CA 92021