April 11, 2008

Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Ave., Room 2103
San Francisco, CA 94102

Miss Susan Lee
Aspen Environmental Group

Subject: Additions to Draft Environmental Impact Report for San Diego Gas & Electric Company (U-902) Transmission Project A0608010

Dear Ms. Blanchard and Ms. Lee,

We are commenting in support environmentally superior alternative one described in the subject report and to vigorously oppose the proposed route through Anza-Boreggo Desert State Park and alternative 4. We are also submitting a list of facts that are not adequately addressed in the draft EIR and should be addressed in greater depth and breadth in the Final EIR.

As you know, alternative 4, also called the Interstate 8 alternative, allows 19 miles of new 500 Kv transmission lines through the Cleveland National Forest along one of the most scenic and popular highways in the country. This area was jointly designated a Scenic Byway by Federal State and County representatives in 1992.

More than 15,300 people travel this route each day. This section of the Cleveland National Forest is designated as Scenic National Forest. Alternative four is not environmentally superior and hinges on de-designation of the Cleveland National Forest as Scenic.

Alternative four is therefore not viable and should be completely removed from the draft EIR.

An alternative not adequately addressed in the draft EIR is to apply the best available technology for power transmission to the existing Southwest Powerlink. Steel cables could be replaced with aluminum composite cable with ceramic cores that resist heat and sagging and can transmit three to four times the power of current steel cable. This alternative is not adequately developed in the draft EIR

The present load on the Southwest powerlink is not well-described. This is central to the need for an alternative power link. Several routes on the existing Southwest Power Link could be refitted with aluminum composite cables to meet transmission needs without the construction of any new transmission towers through Anza Borrego Desert State Park, or elsewhere. This fact needs to be fully developed as an environmentally superior alternative in the final EIR.

I would like to add that solar power is largely unavailable during periods of peak electricity demand from 4 to 8:30 PM, particularly for plants located east of the area of peak demand, such as in Imperial County. This is when the peaker plants described in alternative one can be used to supply peak energy needed and reduce risk of outages. The facts that no commercial solar facilities exist in Imperial Valley and that solar energy is largely unavailable during peak electrical demand periods directly contradict the applicants' often-stated need to transmit solar renewable energy within the state.

Transmission of solar energy is therefore not a rational basis for construction of these new powerlines. All mention of the need to transmit solar energy within the state should be removed from the final EIR.

I would like to add that in my view and the view of many experts including some staff members of the California PUC, construction of long-distance powerlines is not the answer to energy security or reliability for California. Most power failures result from interruptions of long distance transmission and propagated failures of the power grid. Local generation facilities like those described in environmentally superior alternative 1 are well known to be more efficient and economical. These points must be further developed in the final EIR.

The proposed transmission towers are inextricably linked to the environmental burdens created by new power generation stations at their sources. These are two large power plants in Mexico. Sempra's new 600 Megawatt power generation station in Mexicali and the 750 Megawatt InterGen power generation station at the La Rosita power complex. Environmental effects on California from these plants, such as nitrogen oxide air pollution and greenhouse gases that are released by them are fully within scope and should be more completely evaluated in the final EIR.

Since air pollution emissions from these plants will not be regulated under United States federal, state or local clean air standards or agencies is a critical aspect of the environmental impact of the construction of these transmission towers and must be considered in the final EIR. The fact that the 750 Megawatt InterGen power station could at any time bypass their catalytic converter and increase emissions of oxides of nitrogen without legal penalties or recourse by air pollution control districts in California is a fact that must be addressed in the final EIR

The fact that nitric acid rain from these plants will affect Mexico, the Imperial Valley, the Anza Borrego Desert State Park and San Diego County must be considered among the critical environmental impacts of the proposed transmission towers and must be fully addressed in the final EIR.

Meteorological wind-rose studies of pollution plumes from these plants by season and weather conditions, such as inversions, are critical to understanding the environmental

impacts of the proposed transmission towers and must be considered in far more detail the final EIR.

The proposed transmission project will create environmental injustice by allowing contamination air basins distant from the locations where the electricity will be used, and must be fully evaluated and included as a result in the final EIR.

Power for the SDG&E transmission towers will burden the people of Mexicali, Calexico, and El Centro with air pollution that is unregulated under U.S. laws for the benefit of the energy traders in the profitable markets of Riverside and Orange Counties. This environmental injustice issue should be considered within the final EIR.

Environmental injustice issues arising from pollution from these power plants is inextricably linked to the proposal for this project and fully falls within the scope of evaluation of the current proposal. This is inadequately described in the draft EIR.

Visual pollution and visual impacts of the 150 miles of 160 foot-tall and 65 foot-wide transmission towers covering some of San Diego county's formerly most scenic parks and neighborhoods is inadequately described in the draft EIR. The vast visual impacts amount to a *de facto* expansion of the SDG&E right of way. This causes an added economic burden to adjacent communities that is not recognized or acknowledged in the draft EIR.

Underground alternatives also fall within scope. San Francisco peninsula residents insisted that Pacific Gas and Electric put its 230 Kilovolt lines across the peninsula underground and PG&E complied. This type of precedent should be added to the final EIR and fully considered when weighing new underground alternatives in the final EIR.

The impact of air pollution emissions from power plants in Mexico on visibility in the Imperial and San Diego County air basins are critical to understanding the environmental impacts of the proposed transmission project. Visibility studies must be conducted and requirements for these considered in the final EIR.

The fact that acid rain pollution will occur when moist air from Mexico carries oxides of nitrogen and sulfur dioxide from the power plants that are not subject to Federal or State clean air standards needs to be explicitly stated in final EIR and considered in the context of evaluating alternatives.

Projections of the impact on Imperial County residents of the release of more than 400 tons per year of oxides of nitrogen from the combined-cycle power plants in Mexico assuming they are equipped with catalytic converters needs to be considered in the final EIR.

The facts that catalytic converters to remove oxides of nitrogen and reduce the potential for acid rain are not required for the two power plants in Mexico, and requirements for catalytic converters are not easily enforceable needs to be explicitly stated in final EIR

and considered when evaluating alternatives including local generation by peaker plants which can be regulated.
Emission of substantial quantities of other harmful air pollutants from these power plants in Mexico into a troubled air basin that currently is in violation of Federal and State clean air standards for healthy air several days a year needs to be addressed in the final EIR.

The fact that the transmission towers will damage a National Historic Trail and State and County parks needs to be more heavily weighted in the determination of alternatives in the Final EIR.

The fact that Southern California will not gain energy security from these power lines and that these lines won't help prevent power reduction (brownout) or interruption (blackout) needs to be explicitly stated in the final EIR.

The fact that long-distance power grid systems are subject to market manipulation that can result in power interruptions needs to be considered in the final EIR. Since these transmission towers will add to that grid and enhance opportunities for market manipulation they have a potential to increase the frequency of brownouts and blackouts.

The fact that costs for electrical power will not be reduced if these lines are constructed needs to be considered in the final EIR. Although the rate charged per kilowatt hour of power is regulated by the State Public Utilities Commission (PUC), the costs of power transmission are passed directly to the customer and are difficult to verify. The facts that transmission costs are difficult for PUC to verify and long distance transmission practices facilitate energy trading need to be fully addressed in the final EIR.

The fact that these transmission towers will block aerial fire control efforts because aircraft must avoid them needs to be considered in the final EIR with respect to alternative 4 along I8.

The fact that long transmission towers block access to roads by emergency medical helicopter services needs to be considered in the final EIR with respect to alternative 4 along I8.

The claim that these transmission towers would provide access to transmit "renewable" energy must be demonstrated and the factual basis for the need for these transmission towers for transmission of "renewable" energy should either be developed or completely rejected in the final EIR.

The transmission tower project defeats the intent of the Western States Energy Corridor to group power transmission thorough designated Federal corridors. Its routing specifically avoids Federal lands. This fact should be explicitly stated and used to weigh alternatives in the final EIR.

Alternatives routes along existing corridors including the South West Power Link in conjunction with use of composite aluminum cable with three to four times greater

transmission capacity, and other equipment that could substantially increase the power transmission of the existing Southwest Power Link needs to be considered and fully developed as an alternative in the final EIR.

Use of the federally-designated new Western States Energy Corridor near the Mexican border for westbound transmission of electricity from the Imperial substation to the coast must be considered in the final EIR.

Relevant laws that need to be considered in greater depth in weighing alternatives in the final EIR include: San Diego and Imperial County Air Quality Regulations and standards for fixed sources; California Air Resources Board standards, regulations and practices; California Historical Preservation Act - Includes sites of anthropological importance such as Native American Sites; National Historical Preservation Act; US Clean Air Act; California Global Warming Solutions Act of 2006 (AB 32) and the Federal Clear Skies Initiative.

Thank you.

Visual Pollution and Scenic Preservation Task Force
San Diego Sierra Club