

Del Mar Mesa Community Planning Board

3525 Del Mar Heights Rd, # 246
San Diego, CA 92130

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

April 11, 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 Del Mar Mesa Community Planning Board represents the nearly 500 homes east of Del Mar Mesa and south of SR56. The views from many of our homes and our dedicated Open Space are directly impacted by the Sunrise Powerlink. 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.

San Diego Gas & Electric proposes to construct the western portion of the Sunrise Powerlink along the border of Del Mar Mesa and the Los Penasquitos Canyon Preserve. There are two existing overhead facilities along the boarder 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 Del Mar Mesa Planning Board wishes to make the following comments with respect to the Draft Environmental Impact Report for this project:

Fire and Fuels:

According to the DEIR, Los Penasquitos Canyon Preserve is the most heavily developed and urbanized fire shed 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.

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. Many homeowners in our neighborhood are put at significant additional risk as a result of this proposed project.

Del Mar Mesa Community Plan

The study fails to demonstrate or even discuss conformance with the Del Mar Mesa Community Plan in this area at all. Our whole Community Plan was developed to enhance and preserve huge amounts of Open Space and consolidate development in clusters to minimize impacts. Much of the open space area represents '*sensitive lands*' as defined by the City's Resource Protection Ordinance." This wonderful natural 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.

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 Del Mar Mesa and Penasquitos Preserve.

EMF Mitigation Concerns

In addition to visual and construction impacts, Del Mar Mesa is concerned about potential health and safety affects 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 frequencies 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 frequency to human health, and we are not accepting of even a slight potential risk. We feel that the cumulative affects of additional transmission lines on Electromagnetic Fields and the proximity of homes to these power lines should be studied further

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

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

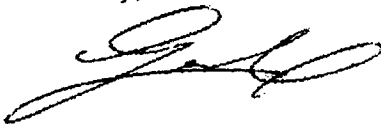
case testimony show that the Sunrise Powerlink project does not fulfill these goals. We feel that a massive transmission project such as this will undermine our ability to achieve many of the goals of the San Diego Regional Energy Strategy and the State's Energy Action Plan like maximizing local renewable and distributed generation and increasing energy efficiency and conservation.

With this in mind the DMMCPB 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 DMMCPG understands the need for additional energy sources in order to sustain the energy needs of a strong and vibrant economy created by the additional population growth we all pay a part in creating. Yet at the same time we are convinced that with the investment dollars being proposed to be made in the Sunrise Powerlink, should they be redirected to take advantage of our climate and location and be invested in local generation, and in particular in local renewable generation sources, the energy needs of our growing region can be met, and met in a way which will help us grow even more vibrant, in a way which will make us all proud of the energy solutions we thereby become part of, and grow in a way which will lead other communities in our country. In this way we all play a part in fighting Global Warming while changing the business model for utility company income generation, creating a new paradigm for how the business interests of utility companies and growing communities can be met in a much more environmentally sensitive way.

Sincerely,



Gary Levitt
Chair, Del Mar Mesa Community Planning Board