

March 20, 2008

Mr. Jeff Martin
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Billie Blanchard, CPUC / Lynda Kastoll, BLM
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Dear Ms. Billie Blanchard:

Subject: *Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH #2006091071, DOI Control No. DES-07-58, January 2008 (Draft EIR/EIS)*

SDG&E's Proposed Project Alternative and the Environmentally Superior Northern Route Alternative in the California Public Utilities Commission's (CPUC) Draft EIR/EIS both are routed through existing Imperial County dairy property along the segment, West Main Canal-Huff Road Modification Alternative. The proposed 500 kV transmission line (Line) needs to be located five miles away from dairy facilities such as milking barns and cow/calf operational facilities. Dairy cows stay in the same area for years and are negatively impacted from the electrical fields. SDG&E says they modified this route segment to eliminate dairy operational impacts and avoid Bullfrog Farms but that is not true. SDG&E moved the Line from across the milking barn to across the dairy's cow/calf operational facilities. These alternative routes continue to be located on Bullfrog Farms property and negatively impact dairy operational facilities.

SDG&E's map overviews are from the early 1990s and do not show current structures along the routes: (1) Proposed Project Alternative, (2) Environmentally Superior Northern Route Alternative, and (3) West Main Canal-Huff Road Modification Alternative. The 1990s aerial base used for the Imperial Valley Link along the proposed Line does not show current site conditions such as dairies, agricultural businesses, Centinela State Prison, and newer residential structures along the route. Using a map overview from the early 1990s makes it appear that the proposed route for the 500kV transmission line goes through vacant lands when that is not the case.

Distance setback requirements for 500kV lines could be greater for state prisons than for the general population. It may be the same as the five-mile setback distance needed for dairies. This needs to be verified in the CPUC process because lawsuits, filed by prisoners, could cost the state, Imperial County, and other agencies loss of funding in coming years with a 500kV transmission line located so close.

Two additional Bullfrog Farms dairies are planned for construction on the east side of Huff Road. The proposed 500kV transmission line segment, going north along Huff Road from the Westside Main Canal, will cause severe negative impacts to these dairy expansions. Another

smaller dairy, proposed to be developed along the Westside Main Canal, has withdrawn from escrow due to SDG&E's proposed 500kV transmission line. Proposing to location a 500 kV transmission line in this area is negatively impacting new dairy development in Imperial County. Loss of existing and additional proposed dairies will negatively impact Imperial County's economy by millions of dollars.

I request that the State of California and the CPUC support Imperial County's dairy industry and dairy development process by locating SDG&E's proposed 500kV transmission line away from the western edge of Imperial County's agricultural lands. The two route alternatives that are located along the western edge of Imperial County's agricultural lands are 1) Environmentally Superior Northern Route Alternative and 2) SDG&E's Proposed Project.

Several rural residences in Imperial County, located along the proposed Line and the Westside Main Canal, have children living in them. Additional existing cattle operational facilities located along the Westside Main Canal are less than 500 yards from the proposed Line and will experience severe negative impacts. Along the West Main Canal-Huff Road Modification Alternative route there are: (1) two residences located directly underneath the proposed Line on a single parcel, (2) four residences along the Westside Main Canal are located less than 1,800 feet from the proposed Line, and (3) three or more additional residences are located near the proposed Line.

One of the residences to be removed, due to Line placement along the Westside Main Canal, currently produces energy with solar panels and plans to add wind generation facilities. Placement of the proposed 500kV transmission line, along the West Main Canal-Huff Road Modification Alternative, will destroy an existing solar renewable energy resource facility located in Imperial County. Why would SDG&E be allowed to destroy an existing facility that produces renewable energy in an adjacent county? I request that the CPUC not allow SDG&E to destroy existing renewable energy resources located in Imperial County along the Environmentally Superior Northern Route Alternative and SDG&E's Proposed Project.

Thank you for the opportunity to share and express issues of concern that negatively impact Imperial County's: (1) economy, (2) agricultural and dairy industries, and (3) residents due to the proposed 500kV transmission line to be located along the Environmentally Superior Northern Route Alternative, SDG&E's Proposed Project Route Alternative, and the West Main Canal-Huff Road Modification Alternative as currently described in the January 2008 *Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH #2006091071, DOI Control No. DES-07-58*. If you have any questions, please contact me at (760) 791-0549.

Sincerely,



Jeff Martin