

Comment Set B0001
Potrero Community Planning Group

Potrero Community Planning Group
P. O. Box 9
Potrero, CA 91963

February 14, 2008

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

Re: Sunrise Powerlink EIR/EIS
and the Modified Route D Alternative

The Potrero Community Planning Group passed a resolution unanimously, on 10/11/07 opposing the Sunrise Powerlink and the Modified Route D Alternative. (see attached) The community of Potrero is opposed for the following reasons:

B0001-1

Community Character - The proposed Modified Route D alternative will be going through the communities of Boulevard, Campo, Potrero and Barrett. These are low income communities and will be unfairly burdened by this alternative's negative impacts. The EIR/EIS states clearly that studies show that property values near high voltage lines are reduced and it takes longer to sell property near them. Any homes or businesses too close to the route will be removed using "Eminent Domain" which changes the composition of the community. This route will certainly interfere with planned future developments. These all go under the heading of Environmental Justice.

Visually Degrading - The 150' tall towers will be visible for 2 miles except on ridges where they will be visible for 4 miles. The metal towers are very commercial and industrial looking and do not fit into our very rural community character where all the other power poles are wooden. Our area has very scenic views of the surrounding hills and valleys and these tall towers and power lines will definitely spoil this view.

B0001-2

Tower Height - The tall towers pose a danger to low flying aircraft and helicopters. Because Potrero is located near the Mexican Border we have a lot of Border Patrol and Drug Enforcement helicopter activity. These extremely tall towers would be a real hazard in our area.

B0001-3

EMF Danger - Electric and Magnetic Fields produced by high voltage power lines have not been proven safe to human health. Many residents with Multiple Chemical Sensitivities and Environmental Illness live here because they have found a "safe haven" in Potrero's clean air, pure water, peaceful and quiet environment. High voltage power lines will negatively affect these people and pose a serious health threat for them.

B0001-4

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Noise - High voltage power lines make a constant "Buzzing" and "Crackling" noise which is obnoxious to anyone near them.

B0001-5

Cost - The original cost estimate has been hotly disputed. The actual costs of the project are probably 3 or 4 times higher than the estimate. This is a ridiculous burden on the ratepayers in order to increase SDG&E profits. Other energy alternatives like solar and improving existing San Diego County power plants, and building the proposed peaker plants would be less expensive, less environmentally damaging and less liable to be disrupted during fires or other events.

B0001-6

Environment - Construction of the power lines will disrupt the wildlife in the area. It will leave permanent roads for maintenance and a wide swath of cleared land under the lines which will be ugly and disrupt wildlife. This will certainly damage the Public's use of the Cleveland National Forest and BLM land because it will no longer be a "natural setting". Because there is currently very little green energy being produced in the Imperial Valley - the power will be coming from the Semptra Plant in Mexicali. This plant burns dirty gas which is imported from Indonesia and does not meet California's Clean Air standards. This air pollution increases the dangers of lung diseases for residents of California's Imperial Valley. A fire caused by high voltage lines damaged by wind, accidents, or earthquakes, etc. would be catastrophic in our high fire danger area.

B0001-7

Need - There is no proven need for this power line to San Diego. There is a need for additional power in Riverside and Orange Counties. The EIR/EIS mentions future expansion of the power line...all heading North. It is unreasonable for San Diego County to suffer the numerous negative impacts of the Sunrise Powerlink when the ultimate goal of the project is to increase sales of cheap, dirty power to the Los Angeles area.

B0001-8

We are very much opposed to the Sunrise Powerlink in it's entirety anywhere in San Diego County and extremely opposed to the Modified Route D alternative in our area.

Thank you for this opportunity to comment on the EIR/EIS.

Sincerely,



Carl Meyer, Chairman
Potrero Community Planning Group
P.O. Box 9
Potrero, CA 91963

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**RESOLUTION OF THE POTRERO PLANNING GROUP
CONCERNING THE MODIFIED ROUTE D ALTERNATIVE OF
THE SUNRISE POWERLINK**

Whereas,

1. SDG & E generates and distributes electricity in San Diego County and is part of Semptra Energy, the gas supplier for area generators, and has the ability to generate electricity where used by the consumer, and
2. The need for the power link is to meet the state mandate for future renewable energy sources at a staggering cost to the consumer, and
3. Public mandated power links are far less expensive when crossing public lands, and
4. Lower capacity power links already exist across these public lands and could be upgraded to meet the demand
5. The South West Power link already comes through our community and has been taken down over 18 times by past fires, and greater separation is needed to prevent natural disasters from taking out more than one power link and
6. The necessity for the Sunrise Power Link has not been proven.

B0001-8 cont.

Now therefore,

The Potrero Planning Group resolves that the:

1. We oppose the Modified Route D Alternative of the Sunrise Power link.
2. We oppose the Sunrise Power link until the necessity for this link is proven.

On motion made by Jan Hedlun, seconded by Jerry Johnson and carried the 11th day of October, 2007 by the following roll call vote:

	Yes	No	Abstain	Absent
Jerry Johnson	X			
Thell Fowler	X			
Mary Johnson	X			
Jan Hedlun	X			
Gordon Hammers	X			
Janet Wright	X			

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Sunrise Powerlink Negative Impacts on Potrero:

- | | |
|--|----------|
| 1. Visually degrading a pristine view corridor- these tall towers will be seen from all over Potrero. | B0001-9 |
| 2. Fire Danger - High voltage power lines can certainly start fires if they fall. Potrero is a high fire danger area and this could be catastrophic. | B0001-10 |
| 3. Height of towers - Pose a threat to helicopter traffic and low flying aircraft, and because we have so much Border Patrol activity and the proposed Blackwater facility with helicopters - this is extra dangerous in our area. | B0001-11 |
| 4. In case of a big fire in our area there is a real possibility that both large transmission lines could be affected and cause a major power outage in San Diego. | B0001-12 |
| 5. During a large earthquake both lines, because they are so close together, could be damaged and cause a critical outage in San Diego. | B0001-13 |
| 6. There is still a big question about the safety of high power lines on human health - this line is too close to too many homes in Boulevard, Campo, Potrero, Barrett, etc. | |
| 7. The Sempra Power Plant in Mexicali will be burning dirty gas from Asia and will produce a large amount of air pollution. | B0001-14 |
| 8. There is no proven need for this Powerlink - experts have said that San Diego's future power needs could be met by using more renewable green energy such as solar, wind, geothermal, etc. - along with improving the existing South Bay Power Plant and the Encina Power Plant as well as the Otay Mesa Plant. | B0001-15 |
| 9. SDG&E claims that the Powerlink is needed to bring "green" energy from the Imperial Valley to San Diego - in fact there is no "green" energy currently being produced there. | B0001-16 |
| 10. The actual cost of the Sunrise Powerlink is estimated to be close to \$4 Billion dollars...a cost we, the already overburdened ratepayers will have to pay. | B0001-17 |

Hand carried to the Potrero Community Planning Group meeting on 10-11-07. PCPG agreed to include it with Resolution. 10-12-07

Jan M. Hedlund
PCPG Sunrise Powerlink Liaison

Responses to Comment Set B0001 Potrero Community Planning Group

B0001-1 The commenter's opposition to the Proposed Project and to the Modified Route D Alternative and concern regarding environmental justice impacts of the Modified Route D are acknowledged. Environmental justice was analyzed in Section F.1 in Volume 5 of the Draft EIR/EIS. In the screening analysis, the percentages of minority and low-income populations were examined for each jurisdiction. For purposes of consistency and in compliance with U.S. BLM guidelines, U.S. Census data is used to determine minority and low-income population percentages along the entire ROW. The unit of analysis in the Environmental Justice Section of potential impact on minority populations and low-income populations is the block census tract. After an initial screening level analysis of the project area to determine low-income and minority percentage areas, a jurisdictional screening level analysis is conducted. If the jurisdiction has a population of 50 percent or greater for either the low-income or minority categories, it is identified for more detailed analysis. If a jurisdiction's minority and low-income populations are less than 50 percent for any of these categories, no further environmental justice analysis was performed on the jurisdiction.

The Modified Route D Alternative has a total of five census block groups from three jurisdictions with either low-income or minority that lie within 0.5 miles of the alternative route, the Viejas Reservation, Campo Reservation and La Posta Reservation. Of these three jurisdictions, there would be a disproportionate impact to low-income populations on the La Posta Reservation resulting in a significant environmental justice impact because there is a corresponding Class I impact in Section D. Two significant and unmitigable impacts would occur within the La Posta Reservation. Significant and unmitigable impacts were identified in Section D.8 (Noise) and Section D.11 (Air Quality). The communities mentioned by the commenter were not found to have environmental justice impacts.

The Draft EIR/EIS does not state that there is a clear correlation between high voltage lines and a loss of property values. The significance criteria listed in Section D.14.4.1 state that the impact would be significant if the project would "cause a substantial decrease in property values." Where Proposed Project impacts in other issue areas that can contribute to reduction in property values are less than significant or have been mitigated to less than significant levels, then they would not cause considerable property value changes. Therefore, any associated property value impacts would also be less than significant and no mitigation measure is recommended (Class III). It is concluded, then, that the project would not generate effects that would significantly impact property values in these circumstances. Please see General Response GR-11 regarding property values.

The commenter suggests that SDG&E would use eminent domain to remove homes or businesses within the project ROW. This is true. If the project is approved by the CPUC, SDG&E would have eminent domain rights in California. Therefore, if a parcel is required for the Proposed Project or for an alternative route that is approved, SDG&E would initiate negotiations with landowners and attempt to reach a mutually agreeable settlement. If an agreement cannot be reached, then SDG&E would be forced to initiate a condemnation action in which fair market value of the property required for the project would be determined by the court. It should be noted that landowners of any private parcels that would be crossed by the Proposed Project would be compensated by SDG&E for use of its easement across the property based on the fair market value of the property taken.¹

B0001-2 The commenter suggests the Proposed Project would impact the scenic views of the region. This conclusion is consistent with the findings of the Draft EIR/EIS.

As stated in Section E.4.3.1 in Volume 4 of the Draft EIR/EIS the landscape along this alternative is predominantly natural in appearance though there are rural residences in proximity to the route in the east (Cameron Valley) and west (Deerhorn, Lyons, and Japatul Valleys). The southern east-west segment is more remote. There are existing utility lines along this alternative route, though they tend to be of simple wood-pole construction, which is not uncharacteristic of the typical rural landscape. However, there are minimal built features exhibiting industrial character. The valleys are shallow and narrow and the bordering angular ridges are steep and rocky. Views of the Modified Route D Alternative would be very limited east of Cameron Valley but available from I-8, I-8 Ellis Wayside Vista Point, Old Highway 80, local paved roads (Buckman Springs Road, Lyons Valley Road, Japatul Valley Road, Japatul Road), local graded roads (Cameron Truck Trail, Big Potrero Truck Trail, Cottonwood Road, Barrett Lake Road, Cinnamon Drive, Skye Valley Road), and nearby residences. The key viewpoints chosen for the Modified Route D Alternative were selected as representative of the type and extent of visual impacts along this alternative. Impact V-82, Impact V-83, and Impact V-84 all analyze the impact of the project on key viewpoints and conclude they would be significant and unmitigable.

B0001-3 The commenter suggests the tower height would pose a significant risk to Border Patrol and Drug Enforcement aircraft and helicopters. There have been two incidents on the Southwest Powerlink (SWPL) between the Imperial Valley and Miguel Substations that involved an aircraft flying into the lines. These incidents occurred soon after the SWPL was built (over 20 years ago). Since

¹ "Fair market value" is a term in both law and accounting to describe an appraisal based on an estimate of what a buyer would pay a seller for any piece of property. It is a common way of evaluating the value of property when assessing damages to be awarded for the loss of or damage to the property, generally in a claim under tort or a contract of insurance.

that time SDG&E has worked to ensure additional incidents do not occur by placing aerial marker balls on portions of the line which serve as line detectors to warn pilots of the transmission lines.² This practice would be also be implemented along portions of any approved transmission line route where aircraft risk is identified. Please see Response to Comment D0019-6 for additional discussion, including new recommended Mitigation Measure T-11b (Consult with and inform U.S. Customs and Border Protection).

- B0001-4 The commenter suggests electric and magnetic fields (EMF) may pose a threat to the residents of Potrero, including residents with Multiple Chemical Sensitivity (MCS). While the CPUC and BLM are sensitive to the residents of Potrero and elsewhere with MCS, the scientific field has yet to reach a consensus regarding MCS, including what causes MCS.³ Until more information is known about MCS and its relation, if any, to EMF, the CPUC will rely on leading scientific data regarding EMF. Please see General Response GR-10 regarding EMF.
- B0001-5 The commenter's concern regarding corona noise caused by the transmission line is acknowledged. Impact N-3 in Section E.4.8.2 analyzed if permanent noise levels would increase due to corona noise from operation of the transmission lines and noise from other project components and concluded this would be a significant and unmitigable impact.
- B0001-6 The commenter suggests the cost of the Proposed Project is still being debated and should not be the responsibility of the ratepayers. Please see General Response GR-12 regarding the costs and benefits of the Proposed Project. The commenter's support for solar energy, improving power plants within San Diego County, and peaker plants is acknowledged. The New In-Area All-Source Alternative includes solar PV and conventional power plants within San Diego County. Please see GR-1 and GR-2 regarding the non-wires alternatives
- B0001-7 The commenter suggests the Proposed Project would impact wildlife and that the access roads will be aesthetically displeasing and would impact the public's use of the Cleveland National Forest and BLM land. Impacts to wildlife along the Proposed Project route are analyzed in Section D.2 in Volume 1 of the Draft EIR/EIS. Impacts to wildlife along the Modified Route D Alternative are analyzed in Section E.4.2.2 in Volume 4 of the Draft EIR/EIS. A new mitigation measure has been included in the wilderness and recreation sectors to address impacts caused by access roads on federal, State, or local lands. Mitigation Measure WR-2a would require that SDG&E coordinate with the authorized officer before construction in order to determine if gates shall be installed on access roads, especially trails that would be dually used as access

² SDG&E *Performance Category Upgrade Request for Imperial Valley-Miguel 500 kV and Imperial Valley-Central 500 kV*. December 19, 2007.

³ U.S. Department of Labor, Occupational Safety & Health Administration. *Multiple Chemical Sensitivities*. <http://www.osha.gov/SLTC/multiplechemicalsensitivities/index.html> May 2008.

roads, to prevent unauthorized vehicular access to the ROW. Gate installation shall be required at the discretion of the land management agency. Please see Response to Comment A0018-39 for further discussion and the full text of the mitigation measure.

The commenter suggests the energy for the Proposed Project would not come from renewable energy in Imperial Valley but rather from LNG fired power plants in Mexicali. Please see General Response GR-5 regarding the status of renewable energy in Imperial Valley and General Response GR-7 regarding the Sunrise Powerlink Project connection to Mexican generation.

The commenter's concern regarding an increase in fire risk is acknowledged. Please see General Response GR-9 regarding fire risk and the comparison of alternatives.

B0001-8 The commenter suggests need for the Proposed Project has not yet been established. Please see General Response GR-12 regarding the purpose and need of the project. The Potrero Planning Group opposition to the Proposed Project and the Modified Route D is acknowledged.

B0001-9 Please see Response to Comment B0001-2 regarding visual impacts.

B0001-10 Please see General Response GR-9 regarding fire risk and the comparison of alternatives.

B0001-11 Please see Response to Comment B0001-3 regarding the risk of the Proposed Project to low flying aircraft.

B0001-12 Please see General Response GR-3 regarding the reliability of the southern route alternatives versus the northern route alternatives including fire issues. Also please see General Response GR-9 regarding fire risk.

B0001-13 Impact G-4 in Section E.4.13.2 in Volume 4 of the Draft EIR/EIS analyzes whether the project would expose people or structures to potential substantial adverse effects as a result of seismically induced groundshaking and/or ground failure. The analysis concludes that this would be a less than significant impact with the implementation of mitigation that would require geotechnical investigations for liquefaction, geotechnical surveys for landslides, and protect against slope stability. Additionally please see General Response GR-3 regarding the reliability comparison of the northern and southern routes.

B0001-14 Please see General Response GR-7 regarding the Sunrise Powerlink Project connection to Mexican generation.

B0001-15 Please see General Response GR-12 regarding the purpose and need for the Proposed Project.

- B0001-16 Please see General Response GR-5 regarding the status of renewable energy in Imperial Valley.
- B0001-17 Please see General Response GR-12 regarding the cost-benefit of the Proposed Project.