



California Public Utilities Commission (CPUC)  
and Bureau of Land Management (BLM)



## Comments on the Recirculated Draft EIR/ Supplemental Draft EIS

Proposed Sunrise Powerlink Project

Aug. 4, 2008

Your Name\*: Shannon and William Davis

Affiliation (if any)\*: Property owners - D Route Alternative  
(East Lane)

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EIR for the Proposed Sunrise Powerlink  
by SEMPR Utility San Diego Gas and Electric  
Company.

One area of special concern is McCain Valley,  
because Endangered Pennisular Bighorn Sheep  
have historically passed through areas  
outside and to the south of established  
U.S.F.W. Critical Habitat. Jim and Eddie  
Harmon turned in Rams Horns to the  
El Central Bureau of Land Management  
office found in McCain Valley. Numerous  
sittings of Pennisular Bighorn sheep should  
be noted. Therefore, the fact that the EIR  
has no mitigation outside of established  
critical habitat for sheep is important. Tom  
Dale of BLM is aware of this fact.

\*Please print. Your name, address, and comments become public information and may be released to interested parties if requested.

No mitigatable measures is wrong and should change.  
Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert  
additional sheets if needed. Comments must be received by August 25, 2008. Comments may also be faxed to  
the project hotline at (866) 711-3106 or emailed to sunrise@aspenerg.com.

We have written previously, that we are concerned because migrating birds navigate at night by the stars, that lighting on transmission towers, may cause birds to collide into towers, mistaking lights for stars. We explained that Border Patrol helicopters in areas near the border and from Campo to East Jamul will require fly zone lighting on transmission towers. Although the EIR Draft response is clear that birds "their mortality would be a significant impact that is not mitigable to less than significant levels (class 1).", we are still concerned about protections. In particular that pg. 2-51 and B-10-a in regards to utilizing collision study, the implementation of a biologist reporting system, after the fact that the towers are erected, in order to develop a solution to reduce impacts of collisions with towers and infrastructure, is uncertain. There is no potential mitigation even in using the Avian Protection (A.P.L.I.C.) to ensure protection. Is it too late to take down towers after the fact, if there is mortality?

S.D.G.E. did not do any studies locally for their 500 kv SWPL Powerlink lines. They could have studied their existing lines and provided data. If it's not a problem, then S.D.G.E. should prove it beforehand. This is the habitat for Bald Eagles, Golden Eagles, Least Bells Verios, Southwestern Willow Flycatchers, California Gnatcatchers, Perigrin Falcons, Wild Turkeys, Crested Cararas, Lapland Longspurs, Condors, Vesper Sparrows, Collared Forest Falcons, Northern Saw-whet Owls, Elf Owls, Mountain Pigmy Owls, Red-brested Sapsuckers, Wilson's Snipes (at Barret Lake), Cranes, Ducks, Canadian Geese, Belted Kingfishers and many more. With Barret Lake and Moreno Lake as major stop overs, this area is rich with bird species sightings in this migrating zone and should require more mitigation and more protection. We believe collision mortality is probable to the Alternate D Route with structures day or night, not only specification to class 1 species listed migrating at night, but also class 2 non sensitive species (mortality) during day.

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We (Shannon and Bill Davis) object to the way in which the Aspen Environmental Group conducted the public comment input into the Draft Environmental Impact Report, which is usually read in preparation for the Final Draft by all concerned. We believe that the Aspen Group deliberately condensed comments into brief bullet summaries in the Appendix not on paper in the book.

Our concern is that the California Public Utility Commissions do not read comments at all in length, but read the condensed bullets. Therefore, Commissioners may not give true full consideration. One example is some thirty pages of our comment condensed to four bullets on C. 3-15. This does not accurately acknowledge legal environmental impact positions that could have influenced and resulted in the mitigation assessment preparation in the Draft EIR. These letters should be on paper, not on a CD, attached to the book. Aspen Environmental Group has inconvenienced S.D.C.E. in this way and made it easy to overlook possible significant liabilities. Out of sight - out of mind.