Bar SR Ranch

Rodney Starkey Dr. A. Starkey D.V.M. 3485 La Posta Truck Trail Pine Valley, CA 91962 Phone: (619) 478-5108 Fax: (619) 473-8810

August 22, 2008

Letter sent certified with return receipt and faxed

CPUC/BLM c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104 Fax: (866) 711-3106

RE: Questions and comments on the Sunrise Power Link Project Recirculated Draft EIR/Supplemental DEIR

To whom it may concern:

This letter is written in opposition to Aspen's Southern Route proposals. We believe that the southern Alternative routes are infeasible and to costly. We are in favor of the original proposal by SDG&E to place the Sunrise powerlink through Anza Borrego State Park.

The Starkey Family owns the BAR SR Ranch at 3485 La Posta truck Trail. (parcel #527-150-01 and 528-170-01) where we have an intensive agricultural operation. Thing Valley and the area around La Posta Truck Trail has historically been used for agricultural purposes. We were never noticed as property owners regarding the Sunrise Powerlink project yet the maps from January 2008 and July 2008 show the Southwestern routes adjacent to our ranch.

How far from our northwest property boundary is the proposed transmission line? How far from our southwest property boundary is the proposed transmission line? Where does the transmission line cross La Posta Truck Trail? (miles from Old Highway 80)

The UCAN Modified Route (July map) and the BCD route from BCD-10, BCDs-0, BCD-15 (January map) are different. The UCAN Modified Route traverses further north, what is the purpose of this change and diversion? Where will the BCDS-0 be located under the UCAN or the South option north of Interstate 8.

The UCAN Modified Route is the shortest route and therefore would be the least costly of the Southern options. The BCD South option impacts those entering little La Posta Reservation which is west of La Posta Truck Trail and separate from La Posta Reservation (which is further east). Those entering Little La Posta Reservation will need to cross over the transmission line. Has the tribe been notified of this? The UCAN route would completely bypass little La Posta Reservation.

The Proposed Alternative Southern Options need to Undergrounded.

Cleveland National Forest

Both the UCAN and the BCD Southern Alternative routes are being shown on the maps as being routed through The Cleveland National Forest. In a letter from the Forestry to Billie Blanchard of the CPUC and Lynda Kastol dated March 12, 2008, on page 2 it states "It does not appear that the remaining conflicts with the forest plan could be resolved by reroutes or mitigation, unless an underground route was possible for the entire length." This is the only way this project could proceed in this area for many reasons.

We agree with the Cleveland National Forest, that this portion of the transmission line should be undergrounded.

Sunrise Rise Powerlink poses Fire Hazard

San Diego County has experienced Catastrophic fires recently especially in wilderness areas, Cleveland National Forest, and reserves. The Wildlife agencies have not managed this area of the forest for fires, which poses enormous risk to the community.

The power lines present a significant fire hazard which has been acknowledged by the fire agencies. The very thought of a rapid spread of a wildfire is a catastrophic thought to an intensive Agricultural operation such as the Bar SR Ranch where we raise Santa Getrudis cattle. The risk is to great for the sunrise power link transmission line to be adjacent to our ranch unless it is placed underground.

Santa Anna Winds and Dry hot weather

We have had several devastating wildfires in San Diego in recent years (2002, 2003, and 2007) These fires are exacerbated by the hot dry weather and the High Santa Anna Winds. These winds are so strong that Interstate 8 was not helpful as a fire brake. This was shown in the Cedar fire where it jumped Interstate 8 near Alpine.

Emergency Evacuation:

Interstate 8 is the only emergency route for those residents in this area. During the Witch Creek Fire, Interstate 8 was especially used by those that needed to evacuate livestock. They evacuated their animals to Imperial Valley. This is a major Interstate for transportation in and out of San Diego and should not be compromised.

Post 911/Terrorist Attack

The proposed Southern options cross Interstate 8, this would be an ideal place for a terrorist attack to occur. It would shut down the only major east-west interstate transportation corridor into San Diego. One of the proposed crossings is near the new Border Patrol Station which has all above ground fuel tanks making this scenario a serious situation. The thought that this Interstate could be compromised by overhead transmission lines either by fire or a terrorist act post 911 is unacceptable. The cost is to high to take this chance.

Fire Suppression Aircraft, Military Helicopters; Border Patrol Helicopters and Drug Enforcement helicopters

Powerlines have been shown to cause fires and complicate wildland firefighting. Fire Suppression Helicopters use the water from the Starkey lake (which is east of La Posta Truck Trail and adjacent to The La Posta Indian Reservation) every year to put out fires in the backcountry. Any power lines placed in this area will prohibit the use of fire suppression aircraft from using this lake for putting out fires. Time can be quite critical when fighting a fire. Several fires have been started on the La Posta Indian Reservation by lighting and illegal immigrants through the years. They are always put out quickly by using the Starkey lake. (See photographs of Fire Suppression Helicopters picking up water from our lake). Any transmissions lines & towers will hinder Fire Suppression Aircraft in this Valley. The plumes of smoke witnessed in the 2002, 2003 and 2007 fires were so dense that visibility by any pilot would be impaired and the transmission lines would complicate extinguishing the fire by aircraft.

Military Helicopters routinely use this valley for low altitude flight operations. Most every day and night the Starkey's note military flights over their ranch. These low altitude flights would pose a greater hazard for power line collision. Earlier this month the lawsuit against SDG&E began regarding #3 U.S. Marines that were killed when their UH-1N Huey crashed into the power lines at Camp Pendleton. We do not want the same thing to happen here.

Recently the Border Patrol opened a new station at La Posta. The Border Patrol has a heliport at this facility. This facility employs presently 350 agents and plan to increase the number of agents and enlarge their heliport to provide other agency use in the future. La Posta is a corridor for illegal immigration and drug traffic. The Pines fire of 2002 was caused by a DEA H58 helicopter on an anti-narcotic mission when the chopper blade hit and snapped a line starting the Pines fire.

The Cost of Undergrounding

The Pines fire burned 56,000 acres, burned 37 homes and 116 barns/outbuildings, burned 161 vehicles. This damage was estimated at \$10 million. Fighting the fire took approximately 2,700 firefighters, 17 helicopters, 10 airtankers. Approximately 500-1000 people were evacuated and 24 firefighters were injured. The firefighting cost was estimated to be at \$21 million. These figures do not reflect how many animals (livestock and wildlife) were injured or killed in the fire directly or by smoke inhalation. One must also consider the amount of carbon emitted by these fires. "In 2004, US forest fires emitted more carbon than all the America's internal Combustion engines for that entire year."

The Cedar Fire which started on October 25, 2003 wasn't fully extinguished until December 5. During this time the fire burned 273,000 acres, destroyed 2,275 homes, 22 commercial properties, 576 outbuildings, 148 vehicles. 1 firefighter and 13 people were killed. 104 firefighters were injured. The estimated cost for this fire was listed as \$1.06 billion.

The Witch Creek Fire that occurred in October of 2007 burned approximately 197,000 acres. This fire destroyed approximately 1600 homes and the estimated cost at this time is over 1 billion dollars. According to a representative of the Tulloch ranch it was started by electrical lines snapping in the Santa Winds. There are several pending law suits against San Diego Gas and Electric by Thorsnes Bartolotta McGuire, Packard, Packard & Johnson and Nix, Patterson & Roach law firms representing fire victims.

The Pine, Cedar and Witch Creek fires illustrate that the economic cost in dollars, the damage to the environment and the harm to human and animal life far exceed the cost of placing the transmission line underground.

Recreational use/ Hang Gliding/Aircraft training/Hunting

This area provides a variety of recreational uses. La Posta Truck Trail provides an area for hiking, horseback riding, and camping. There are more people who use this area for these types of recreation than the Pacific Crest Trail.

The Bar SR Ranch is used by tourists for a landing area for hang gliding. After landing on the ranch, we arrange return to their vehicles. This area is also used by flight schools for training as well. The powerlines would interfere with these recreational uses and need to be placed underground.

Another recreational use in this area is hunting. There are many Deer and Quail hunter's who use this valley. A stray bullet could strike the power wire and cause stress failure or cause connections to separate. This could increase the probability of igniting vegetation in this area. Over the years, we have had interrupted phone service due to the wires being shot by hunter's. Also, remember the Cedar Fire was caused by a hunter.

Viewsheds/Scenic Highway

This area is in the viewshed of the Historic Old highway 80 and Interstate 8 and therefore is another reason why undergrounding is the only way this route could be considered.

Summary:

We support the original proposed route by SDG&E through Anza Borrego State Park We are opposed to the proposed Southern route in Cleveland National Forest in the area of Thing Valley and near La Posta Truck Trail unless it is placed underground. We have provided many reasons which include impacts to the Forest, Viewshed, homeland security issues post 911, Fire Hazard, Hinder fire fighting Air Craft, Recreational hazards and the costs associated with any emergency associated with these transmission lines. Thank you for reviewing these issues and concerns. Please place us on any future mailing lists regarding this project.

Sincerely,

Rodney Starkey Dr. A. Starkey DVM

cc: William Pabarcus, Esq.

floring Stady Di Stacky D. V.m.

enclosures: Copies of January Map and July maps showing the Location of our ranch

Photograph of Fire Suppression helicopters using our lake







