



SAN DIEGO COUNTY SUPERVISOR  
**DIANNE JACOB**  
PUBLIC COMMENTS

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Sunrise Powerlink Scoping Conference  
Second Round  
February 6, 2007

The Second District, which I represent, includes the communities of Ramona, Julian, Santa Ysabel and other communities impacted by the preferred and alternative routes of SDG&E's Sunrise Powerlink proposal.

I appreciate the Commission and the Bureau of Land Management holding scoping meetings in communities most affected by the line. Your willingness to travel to rural areas sends an important message to residents who live here. It says you are willing to listen and you value input.

Last year, when the Commission held its pre-hearing conference on the Sunrise Powerlink, I questioned whether Sunrise was the wisest way to meet future energy demand for our region and our State.

Today, after seeing nearly 100 project alternatives, including the 30 recommended for analysis in the project's Environmental Impact Report (EIR), I still question whether Sunrise is the best use of ratepayer dollars to meet future demand.

Last fall, the County of San Diego submitted formal comments to the CPUC responding to the Sunrise Notice of Preparation (NOP). The County continues to review alternatives and will submit a formal response to the project's Draft EIR when it becomes public this summer.

I too will review the Draft EIR. Today, I would like to focus my comments on the No Project Alternative and the Central Link Alternatives.

Because too many unanswered questions linger over Sunrise, I strongly support the No Project Alternative at this time. I believe, as do others, that SDG&E can keep lights on in its territory and satisfy its renewable energy mandate with measures that are cheaper and safer than this costly line.

SDG&E has offered two major justifications for the Sunrise Powerlink: the need for renewable energy and the need for greater reliability.

SDG&E's claim that Sunrise will carry renewable energy is commendable. But, if we are to invest \$1.3 billion ratepayer dollars in Sunrise, we must be certain that the renewable claim is true. Right now, there are no guarantees.

In October of 2006, SDG&E was asked by a group of local energy stakeholders (SANDAG's Energy Working Group) if the utility would be willing to guarantee that a minimum percentage of the power imported via Sunrise would come from renewables.

SDG&E responded in writing, "The physics of interconnected grid operation are incompatible with the notion of ascribing particular sources of generation to particular transmission lines."

Translated to English: SDG&E will offer no such guarantee. If SDG&E won't say how much renewable power will travel on Sunrise, why is the utility marketing the project as a promise of clean power?

Let's pretend that SDG&E's statement is true: Moving electrons is a complicated process and it's difficult to determine what electrons are coming from which source. Surely, one would think that SDG&E has secured operable or nearly operable renewable generation in and around the east end of the Sunrise Powerlink.

However, the California Energy Commission has not permitted any renewable projects slated to supply Sunrise.

Where will these future projects be located? Public lands? Private lands? Will those projects require lengthy environmental reports that can often take years to complete? Will residents and other stakeholders in those communities embrace the projects or attempt to block them with potentially expensive litigation?

Especially distressing is the still unproven Stirling solar project which has never been commercially tested. Its application hasn't even been filed and energy experts continue to raise serious concerns about its viability.

Ratepayers are being asked to buy the single most expensive energy infrastructure project in the history of the San Diego region. Yet SDG&E can offer few details about the nature of the power that is to travel on the line. Without that information, it is entirely premature to even contemplate this massive project.

SDG&E continues to obfuscate on another key area of justification for Sunrise: the area of reliability. SDG&E says Sunrise is needed to keep the lights on in our region. By its very nature as an *out-of-county* transmission line, Sunrise curiously turns to faraway sources to ensure reliability.

How SDG&E equates greater reliability with a 150 mile line that carries imported power through landscape prone to catastrophic wildfire is simply beyond me. Why not focus on in-basin power?

I believe that Sunrise must be judged in conjunction with the many energy projects currently taking place in San Diego County.

An application to relocate a more efficient South Bay power plant has been filed. Changes to the Encina plant have been announced. A power plant in Otay Mesa is coming on line. Sempra Energy's Palomar plant is operational. Peakers are being planned with possible sites in Escondido, Chula Vista, Kearney Mesa and at several SDG&E substations.

Numerous industry experts now say that Sunrise is NOT economical compared to this in-basin generation. Energy experts believe that with re-powering of South Bay and Encina plants alone, there will be no future energy gap.

And, these traditional fossil fuel sources do not take into account a brave era of renewable generation now taking place inside Diego County right now.

Thanks to the California Solar Initiative, solar projects are more promising than ever. Wind and biomass are emerging too. Demand reduction programs and energy efficiency programs continue to cut use and improve efficiency.

Sunrise puts all of San Diego County's eggs in one \$1.3 billion basket. I believe a multiple set of strategies offers this region a far safer and more practical energy future.

Throughout the course of these scoping meetings, I am certain that you will hear from residents who feel helpless and scared; residents who fear that this growth-inducing project will destroy forever the peaceful rural lifestyle that is so much a part their heritage. I am one of them and I thank you for listening to us.

One particular area that has been treated especially unfair with regard to Sunrise is the Santa Ysabel Valley depicted on the map of Central Link Alternatives. While SDG&E has agreed to underground in more populated areas, it absolutely refuses to consider undergrounding in this gorgeous, remote valley. Sunrise will create significant visual impacts to the unique and pristine viewsheds of the Santa Ysabel Valley. For that reason, the Santa Ysabel State Route 79 underground alternative must be studied.

Thank you again for the opportunity to comment on alternatives. This is future-planning and the Commission must be forward-thinking. I am not at all convinced that the line's benefits outweigh its tremendous consequences. With the Commission's leadership, we can begin to find a better way.



**GARY L. PRYOR**  
DIRECTOR

## County of San Diego

### DEPARTMENT OF PLANNING AND LAND USE

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March 7, 2007

Billie Blanchard, CPUC/ Lynda Kastoll, BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

Dear Ms. Blanchard,

The County of San Diego (the County) would like to thank you for providing additional time to review and comment on the Sunrise Powerlink Project Second Round of Scoping data as requested. We appreciate your fairness in this judgment and your efforts to assist us in our thorough review of this project as the primary jurisdiction potentially impacted.

The attached comments are intended to supplement the general comments provided to you on October 20, 2006. Please note that our comments remain founded upon the basic question of whether there is actually a need for the project as stated in that letter. The current comments are intended to augment and, in some cases, reiterate our general comments as well as to provide input on the specific alternatives provided for review during the Second Round of Scoping beginning January 24, 2007.

We thank you for the opportunity to comment and appreciate your ongoing efforts to communicate with us. Please feel free to contact Dahvia Lynch at (858) 694-3075 with any questions or for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "GARY L. PRYOR".

GARY L. PRYOR, Director  
Department of Planning and Land Use

**County of San Diego**  
**Comments on the Sunrise Powerlink Notice of Second Round of Scoping**  
**Meetings on Alternatives to the Proposed Sunrise Powerlink Project**  
**March 7, 2007**

**GENERAL COMMENTS**

**Environmental Impact Report/ Environmental Impact Statement (EIR/EIS)**

Project Description

The project description and impact analysis should include the proposed energy sources and projected impacts. In addition, the Lakeside Planning Area should be included as a community that the project will traverse.

EIR/EIS Methodology

The EIR/EIS should examine the *whole* of the project per the California Environmental Quality Act (CEQA) [Sec. 15378 (a)] including the potential impacts of the power generating facilities that the project (as currently defined) will be dependent upon and all "future phases" of the project.

The County is particularly concerned about the "future phases" component of the proposed project. Numerous questions are raised about the comprehensiveness of the proposed project by the stated need for "future phases" of the project requiring up to four additional circuits and potentially hundreds of miles of additional powerlines. The County recognizes that these "future phases" will be subject to CEQA/NEPA review at the time that they are formally proposed. However, their broad inclusion in the proposed project leaves many questions unanswered with respect to the magnitude and location(s) of any other future transmission lines and their potential impacts. A thorough analysis of these future phases should be performed in the EIR/EIS.

Data to be Included in EIR/EIS

The County would like to reiterate our request for several changes to the existing project maps for the purposes of any future publications related to the project including the EIR/EIS. The EIR/EIS and other documents should include maps of the proposed alternatives including the following base information: 1) County parks, 2) locally & regionally significant preserve lands, and 3) existing lattice towers. This additional information is important to demonstrate the position of the proposed routes relative to significant land uses. In addition, the EIR/EIS should provide the following information up front in a tabular format: 1) the total acres impacted for the project as a whole including all impacts for roads, construction (temporary impacts), etc., 2) anticipated impacts by vegetation type, 3) number of potentially affected residences, and 4) quantifiable impacts to County Parks and Open Space Preserves. This type of summary information would be useful to allow a meaningful review of the proposed alternatives.

### **General Impacts to County Resources**

Anticipated general impacts to County assets and resources are enumerated below. The County would like to work with the project proponent, California Public Utilities Commission (CPUC), and Bureau of Land Management (BLM) to determine a project that would avoid these impacts. Where this is determined to be impracticable, the County would like to be involved in the selection of appropriate mitigation measures.

### Impacts to Parks and Open Space

All proposed alternatives located within the jurisdiction of the County impact high and very high habitat quality. Many impact County Parks and/ or preserves. If possible, impacts should be limited to developed or low quality habitat and should avoid County Parks and preserve lands. Of particular concern are the following alternatives:

- Black Mountain to Park Village Road Underground Alternative
- Carmel Valley Road Overhead Alternative
- Los Peñasquitos Canyon-Mercy Road Underground Alternative
- Route D Alternative (upon heading north)
- Santa Ysabel Existing ROW Alternative
- Santa Ysabel Underground Alternative
- West of Forest Alternative

All of these alternatives directly or indirectly impact a County Park or Open Space Preserve.

To reiterate the comments made in our prior letter (October 20, 2006), numerous County Open Space Preserves that would be impacted were purchased with grant funding to protect sensitive habitats, species, and cultural resources. Several of the grants may exclude building of roads or structures on County lands purchased with these grants. The grant and deed for each potentially impacted property would need to be reviewed to determine feasibility of infrastructure construction. Also, if the proposed project is approved, the project proponent would need to compensate the County if these lands are lost due to conflicts with grant restrictions.

Barnett Ranch and Santa Ysabel Open Space Preserves have an approved Area Specific Management Directive (ASMD). San Vicente Highlands has a draft ASMD for the preserve. These ASMDs direct the management of the preserve. These documents should be reviewed and referenced in preparation of the EIR/EIS. In addition, the County is currently preparing an ASMD for the Boulder Oaks Open Space Preserve. A final draft is expected in Fall 2008.

The proposed project alternatives could impact many existing and planned recreation trails. Impacts to these trails would be considered significant by the

County. The proposed project alternatives could also impact County projects such as staging areas and future trails. Impacts to these development projects would be considered significant.

Construction of the Powerlink project may impact County Operations in the Parks and Open Space Preserves. If County Operations are interrupted or discontinued, this impact would also be considered significant.

#### Impacts to the Multiple Species Conservation Program (MSCP) Preserves

Many of these Preserves were acquired as habitat to achieve the goals of the Multiple Species Conservation Program (MSCP). These Preserves are considered "hard-lined" into the MSCP. Impacts would be considered significant. MSCP amendments to remove the previously identified preserve lands could be necessary for project approval.

#### Impacts to Roads, Infrastructure and Facilities

The County is limiting comments regarding the proposed project's impacts to roads and infrastructure to the locations where the proposed routes and acceptable alternatives intersect with County maintained roads. For any overhead crossings SDG&E must obtain the proper traffic control permits and encroachment permits such that public health and safety along County maintained roads is not compromised. Also, for any underground alternatives, there will need to be thorough traffic control plans tied to encroachment permits that detail how these roads will stay in operation simultaneously with the installation of the undergrounding work. This applies to one or more alternatives, including, at a minimum, Partial Underground 230 kV ABDSP SR 78 to S 2 Alternative.

The County also expects that all Regional Standards would be followed regarding construction within County road right of way and that the DPW road cut policy would be observed. The permitting language found within the encroachment permit and traffic control permit should include all specifications (or references thereto).

Replacement of affected and/or damaged culverts within County maintained road rights of way as well as striping, signs and other traffic control devices shall be the responsibility of SDG&E and/or its agents. Utility coordination plans should be sent to the County's DPW Utility Coordinator.

The County has not identified any adverse impact to County Airports. All the proposed lines would be outside flight path approaches of our County Airports. However, the proposed lines do impact some of the agricultural and sport aircraft flying areas and may cause adverse impacts to these operators. The Warner Springs Glider Port and other private airstrips may suffer negative impacts. We understand these other airport/aircraft operators would have to comment independently.

## **ALTERNATIVES RECOMMENDED FOR FURTHER STUDY**

The County has identified several alternatives which it recommends for analysis because they appear to be less impactful than others offered at this time. This should not be misconstrued as support for these alternatives. It merely means that they are not as bad as other alternatives that have been offered for consideration. *The County retains the right to present a different position on any and all of the following alternatives upon more thorough reconsideration of these alternatives as analyzed in the project EIR/EIS.*

### **Non-Wires Alternatives**

The County recommends thorough analysis of *all* retained non-wire alternatives. This includes serious consideration of energy efficiency measures as a component of the Resource Bundles or other alternatives. Energy efficiency measures have been demonstrated to substantially reduce energy demands in other regions and should be analyzed in-depth in the EIR/EIS for this project.

In general, a thorough and good-faith consideration of the ability of non-wire alternatives to meet regional energy demand growth has not been undertaken. Instead, numerous non-wire alternatives are recommended by the EIR/EIS team for elimination based on their inability to meet regional demand growth as stand alone alternatives (page 22 of scoping report). Clearly, the ability of non-wire alternatives to meet regional growth would be dependent on a combination of strategies including improvements in consumer and distribution energy efficiency and development of renewable generating technologies. Other factors would also affect the feasibility of non-wire alternatives. For example, the ability of existing, centralized power plants such as the South Bay and Encina plants to be re-powered and upgraded as a means to provide for anticipated future energy demand should be included in the comprehensive analysis of non-wire alternatives.

Elimination of a non-wire alternative leaves a significant gap in the reasonable range of alternatives that the EIR/EIS is required to consider. The huge scale of the proposed Sunrise Powerlink project and the wide ranging impacts to County residents and to its scenic and biological resources requires that a detailed non-wire alternative be considered in the EIR/EIS. In particular, the EIR/EIS should legitimately consider the potential of solar roof panels to be utilized on a widespread basis through the implementation of economic incentives and other mechanisms. These options should also be considered in the context of the No Project Alternative as potential sources of new generation in San Diego.

### **Imperial Valley and Anza-Borrego Link Alternatives Eliminated**

HVDC Light Alternative- The Scoping Notice indicates that this alternative is recommended for elimination on the basis that "...the higher costs of this alternative make it infeasible using CEQA guidelines...". The Notice also



includes language acknowledging that, according to CEQA, "...[t]he fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible...". The County recommends further analysis of this alternative in light of the various other benefits that it may produce that may outweigh additional costs. The County also suggests that the costs of this alternative be compared to the more recent projections of the actual cost for the Sunrise Powerlink proposed project. These costs are significantly higher than the original estimates for the project.

## **DETAILED ANALYSIS OF OTHER ALTERNATIVES**

### Undergrounding of All Transmission Routes

If the project is determined to be necessary, the County would recommend undergrounding of the entire transmission line. While the County does not have extensive technical expertise in this area, we recommend further investigation into the economic feasibility of this option due to anecdotal information that undergrounding the entire transmission line (versus limited segments) may be more cost-effective than stated in the information provided by the proponent and by the EIR/EIS Team to date. In addition, placement of overhead lines in many of the proposed locations would involve presumably costly measures due to the rugged terrain, rocky soils, limited access and other constraints within these locations.

If undergrounding is ultimately determined to be economically infeasible, the County would still have serious concerns about proposed alternatives by which the size of the transmission line is proposed to be reduced from the original 500 kV line to a 230 kV line. The County would typically be less likely to have significant concerns about a 230 kV transmission line as opposed to a 500 kV line in the case of any of the proposed alternatives, particularly in the vicinities where transmission lines are currently located. However, this is not the case with the proposed Sunrise Powerlink and its alternatives due to the proposed use of stainless steel towers to support the 230 kV lines.

Many of the relevant transmission lines currently located within the County are supported by wooden towers that have a *relatively* minimal visual impact and blend comparatively well with other building materials utilized within those communities. The County's general position is that any anticipated reduction in visual and physical impacts resulting from a reduced transmission line capacity and size, and/ or the use of existing transmission line routes, would be negated in the case of the proposed project due to the visual and community character impacts that would result from the use of highly visible urban construction material such as stainless steel.

### **Other Transmission Route Alternatives**

The County questions the need for and the appropriateness of the proposed project (or any transmission route alternatives) from the perspective of achieving the project objectives and enhancing the general sustainability and welfare of the region. The County recommends a thorough analysis of the No-Project Alternative that includes re-evaluation of the anticipated long-term energy needs of the region and considers multiple options for addressing these needs.

In light of the potential for this project to be deemed necessary, the County offers detailed comments on specific transmission route alternatives in the following section. All statements of concurrence with the intent of individual alternatives or components thereof are intended solely in a relative context as compared to other proposed Sunrise Powerlink transmission route alternatives. *The County does not fundamentally support any component of the proposed project or transmission route alternatives at this time.* County recommendations to eliminate particular alternatives from consideration are also noted. All statements provided in the alternative descriptions regarding regulatory and legal feasibility are assumed to be accurate and have not been verified by the County.

### Imperial Valley and Anza-Borrego Link Alternatives Retained

- SDG&E Desert Western Alternative
  - Eliminate due to impacts to wilderness areas and wildlife habitat that may provide important linkages for the future East County Multiple Species Conservation Plan.
- Imperial Valley FTHL Alternative
  - Concur with efforts to avoid the Bureau of Land Management Flat-Tailed Horned Lizard Management Area.
- Partial Underground 230kV ABDSP SR78 to S2 Alternative
  - This route crosses wilderness areas with high biological value and sensitive resources. In addition, the current Wilderness Area and State Park Plan are being considered in the development of the East County Multiple Species Conservation Plan preserve design. Changes to these plans and associated resource management practices as a result of the proposed project could have negative impacts on the East County Multiple Species Conservation Plan preserve. Impacts could include elimination of core habitat areas and/ or disruption of important wildlife corridors between private and public lands. The County does concur with efforts to underground this alternative to reduce visual impacts wherever possible.
- Overhead 500 kV ABDSP Within Existing 10 Foot ROW
  - Eliminate due to stated impacts.
- SDG&E Bullfrog Farms Alternative
  - Entirely outside of County jurisdiction. No comments.
- Huff Road Bullfrog Farms Alternative

- Entirely outside of County jurisdiction. No comments.

#### Imperial Valley and Anza-Borrego Link Alternatives Eliminated

- SDG&E Alternative Segments 3,3B, 3D
  - Eliminate due to stated impacts.
- SDG&E Segment A/Northern Borrego Springs via S22 Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 1/Imperial Valley via 92 kV Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 4/ABDSP via S2 Alternative
  - Eliminate due to stated impacts.
- SDG&E ABDSP North Side of SR78 Alternative
  - Eliminate due to stated impacts.
- SDG&E Borrego Valley Alternative
  - Eliminate due to stated impacts.
- SDG&E SR78 Julian Alternative
  - Eliminate due to stated impacts.
- SDG&E Overhead ABDSP SR78 to S2 Central Alternative
  - Eliminate due to stated impacts.
- Overhead 230kV ABDSP Alternative
  - Eliminate due to stated impacts and potential impacts to roads, infrastructure and facilities.
- HVDC Light underground Alternative
  - The County supports efforts to underground any transmission line and to utilize existing disturbed areas such as road right of ways and existing transmission line routes. The County also concurs with efforts to avoid significant cultural resources.

#### Central Link Alternatives Retained

- Santa Ysabel Existing ROW Alternative
  - The County recommends elimination of this alternative due to insufficient reduction of visual impacts to the community of Santa Ysabel as well as visual and physical impacts to Santa Ysabel Open Space Preserve.
- Santa Ysabel Partial Underground Alternative
  - The County recommends elimination of this alternative due to insufficient reduction of visual impacts to the community of Santa Ysabel and the surrounding Santa Ysabel Valley.

#### Central Link Alternatives Eliminated

- SDG&E Central East Substation to SR-79 Alternative
  - Eliminate due to stated impacts.
- SDG&E Warners S2 to SR79 Alternative
  - Eliminate due to stated impacts.
- Santa Ysabel SR79 All Underground Alternative

- In our previous letter, the County recommended the consideration of an alignment that follows the existing right of way alignment through Santa Ysabel if the Powerlink is determined to be necessary. We appreciate the EIR/EIS team's analysis of such an alternative. However, the undergrounded alternative is recommended for elimination by the EIR/EIS team, due to interfaces with the Lake Elsinore fault.

The County recommends the retention of this alternative for further study for its potential to protect the community character of this community by eliminating visual impacts for residents of Santa Ysabel and the surrounding community. This includes further study of the economics of a transmission line design that potentially incorporates flexible lines and conduit and may require a larger trench area so that the power line has more room to flex to preventing breakage in the case of fault slippage, or fault rupture.

The County would also request that the alignment that traverses Mt. Gower Preserve be examined for undergrounding for the entirety of that segment, along with all associated equipment. Under this scenario, the potential negative impacts of this alternative to natural and rural lands west of State Route 79 should be fully examined.

- SDG&E San Dieguito Park Alternative
  - Eliminate due to stated impacts.
- Volcan Mountain Alternative
  - Eliminate due to stated impacts.

#### Inland Valley Link Alternatives Retained

- CNF Existing 69kV Route Alternative
  - Concur with efforts to reduce visibility of the transmission route in this location. The County's most recent data obtained from the Cleveland National Forest illustrates that the impacted area of the Cleveland National Forest is not managed for a high level of preservation of biological resources. Thus, impacts to biology and the East County Multiple Species Conservation Plan preserve design would likely be insignificant.
- Oak Hollow Road Underground Alternative
  - The County supports undergrounding of the transmission line in areas within and visible to Oak Hollow Road residents and the surrounding community. The County recommends further study of alternatives to protect the community character of this community.

#### Inland Valley Link Alternatives Eliminated

- SDG&E Segment 10/Inland Valley SR78 Alternative

- Eliminate due to stated impacts.
- SDG&E Creelman Alternative
  - Eliminate due to stated impacts.
- West of San Vicente Road Underground Alternative
  - Eliminate due to stated impacts.

#### Coastal Link Alternatives Retained

- Pomerado Road to Miramar Area North- Combined Underground Alternative and Underground/Overhead Alternative
  - Concur with intent to eliminate visual impacts to residents and impacts to Los Penasquitos Canyon Preserve.
- MCAS Miramar- All Underground and Underground/ Overhead Alternative
  - Consider undergrounding along the entire route in further analysis.
- Rancho Penasquitos Boulevard Bike Path Alternative
  - Consider undergrounding along this route in further analysis.
- Carmel Valley Road Alternative
  - Concur with intent to eliminate visual impacts to residents and impacts to Los Penasquitos Canyon Preserve.
- Los Penasquitos Canyon Preserve and Mercy Road Alternative
  - Concur with intent to reduce visual impacts. Show existing powerlines (including capacity) on maps in the EIR/EIS in order to assist in the analysis of relative benefits considering retention of existing lines.
- Black Mountain to Park Village Road Underground Alternative
  - Concur with intent to move powerline away from residences and to eliminate visual impacts by locating underground.
- Coastal Link System Upgrade Alternative
  - Provide further information and analysis in order to facilitate the County and the public consideration of this alternative.

#### Coastal Link Alternatives Eliminated

- SDG&E Northwest Corner Alternative
  - Eliminate due to stated impacts.
- SDG&E Mannix-Dormouse Road Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 12 Poway Substation to Penasquitos Substation Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 13 Scripps Ranch Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 14 Poway Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 15 Warren Canon Alternative
  - Eliminate due to stated impacts.
- SDG&E Segment 16 North of Penasquitos Alternative

- Eliminate due to stated impacts.
- Pomerado Road to Miramar Area North- Combination Underground/Overhead Alternative
  - Provide further information and analysis on potential land use incompatibilities with sand and gravel operation as compared to the impact of other routes on residential and commercial land uses and habitat.
- MCAS Mirarmar-Combination Underground/Overhead Alternative
  - Eliminate due to stated impacts.
- MP 146.5 to Penasquitos Substation Underground and Consolidation Alternative
  - Eliminate due to stated impacts.
- Scripps-Poway Parkway to State Route 56 Alternative
  - Eliminate due to stated impacts.
- Scripps Poway Parkway- Pomerado Road Underground Alternative
  - Eliminate due to stated impacts.
- State Route 56 Alternative
  - Eliminate due to stated impacts.

#### SWPL Alternatives Retained

- Route D Alternative
- Interstate 8 Alternative
- BCD Alternative
- West of Forest Alternative
  - In recognition of the EIR/EIS Team's effort to avoid County parks and open space with this alternative, the County has performed a more in-depth analysis of this alternative than several others. The County recommends elimination of this alternative for further study due to concerns regarding the potential impacts described below.
    - Potential visual impacts to the existing unincorporated communities of Alpine, Crest, Harbison Canyon, Flinn Springs, and northern Lakeside.
    - The route is directly Adjacent to County of San Diego Sycamore Canyon Preserve northern boundary.
    - Alternative 17 bisects Sycamore Canyon Preserve and Goodan Ranch Preserve through the Multiple Species Conservation Program (MSCP) Pre-approved mitigation area (PAMA) (Metro-Lakeside-Jamul Segment).
    - Alternative 17 continues south through the MSCP PAMA and then bisects the 35-acre Berkley Herring Open Space Preserve acquired by the County for MSCP purposes in 2003.
    - Alternative 17 continues in a southeasterly direction through City of San Diego land surrounding San Vicente Reservoir bisecting County MSCP Hard-line Preserve (Lambron ownership).

- Alternative 17 continues east directly north of Stelzer County Park and adjacent to El Capitan Preserve managed by the County of San Diego Department of Parks and Recreation and owned by the Bureau of Land Management (BLM). The County is currently processing a patent with the BLM to obtain ownership of El Capitan Preserve.
- Alternative 17 continues South through U.S. Forest Service land then southwest adjacent to State of California's Crestridge Preserve and through County MSCP PAMA within the Metro-Lakeside-Jamul Segment.
- As Alternative 17 continues in a southeasterly direction, the alignment directly impacts (bisects) the State of California's Sycuan Peak open space as well as land dedicated to the County for open space as part of the MSCP.

#### SWPL Alternatives Eliminated

- SDG&E Route B Alternative
  - Eliminate due to stated impacts.
- SDG&E Route Segment C
  - Eliminate due to stated impacts.
- SDG&E Route Segment BC
  - Eliminate due to stated impacts.
- West of Forest/ Route D Western Origination Segments
  - Eliminate due to stated impacts.

#### **Substation Alternatives**

##### Substation Alternatives Retained

- SDG&E Central South Substation Alternative
  - Provide further information and analysis in order to facilitate the County and the public examination of potential visual impacts to local residents and to visitors of Santa Ysabel Open Space Preserve. Further define "visual resource advantages" anticipated by this option.
- Mataguay Substation Alternative
  - Concur with intent to reduce impacts to habitat and cultural resources. Provide further information and analysis in order to facilitate the County and the public examination of potential visual impacts to local residents and to visitors of natural areas such as those near the Mataguay Boy Scout Camp.

##### Substation Alternatives Eliminated

- SDG&E Warner West Substation Alternative
  - Eliminate due to stated impacts.
- Warners Substation Alternative
  - Eliminate due to stated impacts.

**System Alternatives**

The County recommends that the analysis of alternatives focus on non-wire alternatives and those alternatives that do not negatively impact County of San Diego residents or resources.