



# BOULEVARD SPONSOR GROUP



Billie Blanchard, Sunrise Powerlink Project Manager  
California Public Utilities Commission  
Lynda Kastoll, Project Manager, BLM  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

October 6, 2007

VIA CERTIFIED & ELECTRONIC MAIL & FAX

**RE: Sunrise Powerlink and Modified Route D Alternative**

Dear Ms. Blanchard and Ms. Kastoll,

It is our understanding that the public comment deadline has been extended to accept comments received by October 8, 2007. At our regular meeting, held on October 4, 2007, our Boulevard Planning Group voted to submit this letter and to adopt and attach the June 11, 2007 public comments I sent in as an individual on the Modified Route D Alternative. Please include our comments in the official record for the Sunrise Powerlink project and include our group on the list to receive notification when the Draft EIR/EIS is released for public comment, and any other project related correspondence and/or updates.

Modified Route D Alternative, which may interconnect with either the I-8 route, or the previously eliminated B-C route along the existing 69 kV powerline (as suggested by SDG&E's June 14, 2007 comments on Modified Route D Alternative), both of which impact our rural community of Boulevard and many others, appears to have as many negative impacts to private properties, public lands and sensitive lands as the other ill-advised routes for this unneeded and unwanted project. We strongly oppose Modified Route D and all the other proposed routes, including the preferred and all the alternate routes. Please refer to my attached June 11<sup>th</sup> comments and SDG&E's own comments submitted to the CPUC on Modified Route D Alternative (6-14-07) for a list of some of Modified Rt. D's negative impacts. We agree with SDG&E on those impacts. The potential for new high power transmission lines, on this and other routes, to trigger fires is a also a major concern for our high-risk area. It is our understanding that the US Border Patrol station under construction at La Posta on Modified Route D Alternative, just installed a very large above ground fuel storage tank. This raises further fire concerns, especially since the California Department of Forestry complained at a public meeting in Campo that the Border Patrol had not been required to comply with the usual fire mitigation requirements.

For the record, we strongly disagree with SDG&E on the need for the Sunrise Powerlink project itself. Sunrise will compromise San Diego's Regional Energy Strategy to increase local renewables, and to increase the in-basin power generation to 75% in 2020. We support alternative goals of energy conservation, through education and the use of more efficient insulation and equipment, upgrading the existing grid to eliminate bottlenecks and to move more energy over existing footprint, using energy generated at an upgraded and more efficient Encina Power Plant and a replacement for the SouthBay Facility, implementing an aggressive solar roof campaign, including commercial projects like Kyocera's solar tree parking lot and UCSD's solar roofing projects, and moving energy from appropriately located renewable projects on the existing South West Powerlink when the current long-term energy contract runs out in several years.

Currently, renewable energy from Imperial Valley is being transmitted to SCE and PGE via the IID transmission grid. Ormatt just signed a deal to move new geothermal energy, sold to SCE, via the IID grid. IID has stated they have up to 1,000 MW of capacity to move more renewable energy north with just a few minor and affordable upgrades to their existing infrastructure. Overall, this would provide a more diversified distribution of energy, without having to invest in hundreds of miles of obnoxious and vulnerable powerlines through rural communities and sensitive lands. It would also save the ratepayers from bearing the burden of a \$1.5 billion boondoggle. We also strongly resent having our rural communities bulldozed, and our property values slashed, to accommodate an old school energy highway that connects to urban users in LA and which, according to the Utilities Consumer Action Network, represents almost \$800 million in profits to SDG&E and their shareholders—at our expense.

Sincerely,



Donna Tisdale, Chair

at groundsurface in many of the low-lying areas along proposed routes during El Nino years. It would appear that the rest of Modified Route D is as ill-advised and environmentally threatening as the rest of the project and should be denied.

Attached is an article from the Imperial Valley Press (6-2-07) regarding the potential for renewable energy from Imperial Valley (which is still in questionable planning stages) being directed through the Green Path North through a pact being considered between the Imperial Irrigation District (IID) and the powerful Los Angeles Department of Power and Water, rather than through Green Path Southwest with SDG&E. IID Director Sanchez was quoted as saying they want to do what is best for their ratepayers. After reviewing recent testimony and articles on the Sunrise Powerlink, it does not appear to be in the best interest of either SDG&E's ratepayers or the IID's ratepayers.

I would also like to incorporate the following list of concerns which was previously sent in as part of Boulevard Planning Group's official comments on 10-9-06. They all apply to the Modified D route, all the alternate routes, as well as SDG&E's preferred route:

The major concerns with the Sunrise Powerlink include but are not limited to the following :

- a. Need for the Sunrise Powerlink appears to have been misrepresented. Several in-basin generation projects were reportedly left out of the Sunrise application (South Bay & Encina Powerplant rebuilds, permitted facility in Otay Mesa).
- b. Massive impacts to sensitive habitat, scenic viewsheds, wilderness areas, the national forest, state parks, rural communities, private properties and agriculture lands-regardless of which route is used.
- c. Industrialization of rural areas violating community character and community plans.
- d. Growth inducing. Encourages and enables growth along route and elsewhere.
- e. There are serious questions regarding legitimacy of renewable energy projects proposed for fragile public lands in Eastern San Diego County and the Imperial Valley, and prospects for approval. Many don't even have applications in place, according to the BLM, and some use unproven technology.
- f. Concerns that BLM does not have adequate staffing to address these many projects properly.
- g. Groundwater flow impacts may result from blasting and setting extensive tower footings into fractured rock aquifers, resulting in negative impacts on private and public wells, our only source of water east of Alpine. There is a federal designation for the Campo/Cottonwood Creek Sole Source Aquifer which all current alternate routes transect.
- h. The highly controversial Campo Landfill is proposed for the Campo Reservation, near the Southwest Powerlink. Close to 100 investigative wells have been drilled resulting in more questions than answers regarding the complex workings of the intensely fractured bedrock groundwater system. The Army Corps of Engineers asked for more in-depth investigation. A federal SEIS is due out soon. Most of the alternate routes in eastern San Diego County cover equally complex geologic/hydrogeologic areas.
- i. Environmental Justice issues. Some impacted communities qualify as low-income and/or minority where obnoxious projects such as this are frequently dumped.

From: donnatisdale [mailto:donnatisdale@hughes.net]  
Sent: Monday, June 11, 2007 06:29 PM  
To: sunrise@aspeneq.com  
Subject: Sunrise Powerlink routes

June 11,2007

Billie Blanchard, CPUC

Lynda Kastoll, BLM

c/o Aspen Environmental Group

RE: SUNRISE: MODIFIED ROUTE D ALTERNATIVE

Ms. Blanchard and Ms. Kastoll,

At our regular meeting held on June 7, 2007, the Boulevard Planning Group discussed the Sunrise Powerlink and the alternate routes, including Modified Route D, which run through our community planning area. There was no support for the new Modified D route or any of the other routes. Strong opposition remains against the entire project with many comments being made to that point. Don Parent, representing SDG&E, in response to a direct question, did reconfirm that SDG&E does not want to pursue any of the alternate routes under consideration. When asked if SDG&E was having to pay for studies of numerous routes they oppose, Mr. Parent responding that the ratepayers ultimately pay the price.

The more detailed Index Maps of the alternate routes, provided by Aspen at my request, were made available to the group members and the public. Unfortunately, our agenda was packed and another SDG&E issue was being addressed. As a result, our group failed to take an official action on Modified Route D. I take the blame for that oversight. Therefore, these comments are my own based on my personal observations, conversations, and remarks made at our Planning Group's public meeting.

Index Map MD-01 of 41 shows the Modified D crossing through and near sensitive riparian areas and through or near the historic overland stage coach route. The retention pond shown in MD-02 of 41 is reportedly where the stage horses were watered. The Spring Mountain Ranch property (AKA Rancho Finis Tierra, previously known as Stagecoach Springs Ranch) is an 87-lot subdivision that recently started selling individual lots. The area, located across several hills, is one with low-performing wells and some that went dry after the Golden Acorn Casino went into operation. New domestic wells are reportedly being drilled 800'-1,400' to find water. At \$20 per foot that represents an investment of \$16,000-\$28,000 just for the drilling, not including the pump and well piping. In this area of highly-fractured bedrock, fragile wells are susceptible to interference or collapse with adjacent drilling or blasting. MD-06 of 41 shows the route crossing an area of wetlands and riparian habitat. The wetlands lie the south and west of the La Posta Cafe, evident in the photo, and the new Border Patrol Station which does not show in the photo. With the new construction there would be more cumulative impacts on this area. Our area is also in the midst of an extended drought with groundwater tables at a lower than usual level. Historic groundwater levels are

j. Potential this is a bait and switch project to ultimately provide power from Mexico to LA (full-loop).

k. Conservation, co-generation, solar roofs, and new technology to reconductor existing transmission lines to carry much more energy should come first before destroying parks and rural communities.

l. SDG& E's overkill advertising campaign to brainwash a naive public of the need for Sunrise Powerlink would have been more cost effective and commendable if those millions had been used to help home and business owners retrofit with dual-pane windows, insulation, solar roofs, and to replace old light fixtures and appliances with newer energy efficient versions to conserve energy.

Sincerely,

Donna Tisdale, Chair

Boulevard Planning Group

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## **Imperial Valley Press**

### **What if Southwest line fails?**

By DARREN SIMON <<mailto:dsimon@ivpressonline.com>>, Staff Writer

Saturday, June 2, 2007 10:25 PM PDT

San Diego Gas & Electric officials said Friday if Imperial Irrigation District chooses not to partner on a massive 150-mile energy transmission line, San Diego stands ready to go it alone. That's not a new message. SDG&E officials have said that all along. But it is a message that comes on the eve of what could be the final round of talks on the proposed Green Path Southwest pact. It's also a message that comes as the state and federal governments could be paying close attention to the IID and SDG&E talks. "This is a statewide and national issue," said Laura McDonald, project manager for SDG&E's Sunrise Powerlink project — which is at the heart of the proposed Green Path Southwest pact. The state will be watching as it has mandated that all private power agencies like SDG&E have 20 percent of their power come from renewable energy resources as early as 2010. The Imperial Valley may prove the source of that renewable energy as it already is home to much of the nation's geothermal energy production, and more renewable energy construction is expected to occur in the Valley. The federal government could also be watching as it has declared a need to open more energy corridors in areas nationwide to alleviate congested transmission corridors, including in California. IID spokesman Kevin Kelley said the district board and its Green Path negotiating team are aware of the statewide and national implications. At the same time, he said the district is looking toward a new round of Green Path negotiations with the idea of protecting district ratepayers. "Our board is driven by the need to get back to what started out as a win-win situation," Kelley said. McDonald said she is hopeful SDG&E and IID will be able to reach an agreement on the Green Path Southwest pact. She did not speculate on what would occur if an agreement was not reached other than to say SDG&E would move forward with its own Sunrise Powerlink project. IID Director John Pierre Menvielle acknowledged if talks fail, SDG&E will still build a massive energy line into the Valley. But, Menvielle said, instead of building the Sunrise Powerlink, which is designed to connect with geothermal fields in the Valley's north county, SDG&E would build a line along Interstate 8 and tap into Mexican energy. But one other possible conclusion is that the two powerful energy companies could become rivals fueled, in part, by IID's desire to protect its energy control area. The two also could be rivals over who will control the movement of renewable energy from the Valley to the rest of Southern California. IID officials say along with Green Path Southwest, they are considering a second project called Green Path North, which would involve a pact with the Los Angeles Department of Water and Power. IID officials said the pact with DWP would place IID in a position of moving green energy to the rest of Southern California, even if Green Path Southwest fails. Still, IID officials, like McDonald, remain hopeful a pact can be reached on Green Path Southwest. IID Director Anthony Sanchez said it is understandable SDG&E wants to reach a deal that will be best for its ratepayers. "They should understand we are going to do the same thing and do what is best for our ratepayers," Sanchez said. >> Staff Writer Darren Simon <<mailto:dsimon@ivpressonline.com>> can be contacted at [dsimon@ivpressonline.com](mailto:dsimon@ivpressonline.com) <<mailto:dsimon@ivpressonline.com>> or at 337-3445.

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