

Comment Set A0003  
Imperial County Department of Public Works



County of Imperial *Building Roads into the Next Century*  
**PUBLIC WORKS DEPARTMENT**

February 19, 2008

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

**SUBJECT:** Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment; San Diego Gas & Electric Company (SDG&E) Sunrise Powerlink Project

This letter is in response to the January 2008 Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment SCH No. 2006091071, DOI Control No. DES-07-58 received January 7, 2008. The project consists of the construction of a new 91-mile, 500 kilovolt electric transmission line from the Imperial Valley Substation in Imperial County, near the City of El Centro, to a new Central East Substation in Central San Diego County, southwest of the intersection of San Diego County Highways S22 and S2. In addition to a new 59-mile 230 kilovolt transmission line from the new Central East Substation to the existing Peñasquitos Substation in the City of San Diego.

A0003-1

Department staff reviewed the document and offers the following comments regarding the Imperial Valley Link of the above-mentioned project:

1. Of concern are the potential impacts that the proposed Imperial Valley Link component of the project and its potential alternatives may have on various segments of the following County roads:
  - Evan Hewes Highway
  - Imler Road
  - Huff Road
  - Vaughn Road
  - Hardy Road
  - Stevens Road
  - Jeffery Road
  - Dunaway Road
  - Reynolds Road
  - Payne Road
  - Wheeler Road

However, the proposed mitigation measures seem to adequately address the project's impacts on County roads, along with a County encroachment permit. Furthermore this department considers the transmission line path named SDG&E West of Dunaway

Comment Set A0003, cont.  
Imperial County Department of Public Works

February 19, 2008

Alternative, to be of lesser impact in the generation of additional construction-related traffic on the County's roadways than the others proposed.

A0003-1 cont.

2. A transportation permit shall be required from this department for any hauls of heavy equipment and large vehicles, due to construction activities, which impose greater than legal loads on County roads and bridges.
3. An Encroachment Permit shall be required from this Department for any proposed access and/or improvement being constructed onto, into or within County road right-of-way(s). This include but is not limited to above and below ground utilities, storm drains, water and sewer lines and appurtenance within road right-of-way(s). All improvement plans will need to be reviewed and approved by this Department as well. Consideration of storm water Best Management Practices (BMPs) and construction warning signage must be addressed.
4. A Grading and Drainage Study/Plan to provide for property grading and erosion control shall be required which shall also include prevention of sedimentation or damage to off-site properties (and storm water retention for a 100-year storm event). The Study/Plan shall be submitted to this Department for review and approval and the applicant shall implement the approved plan. Employment of the appropriate storm water Best Management Practices (BMP's) shall be included. Concern that drainage washes be considered as well as perched groundwater. NOI and SWPPP will be required.
5. Please be advised that this Department reserves the right to add additional comments as the project develops and more detailed information is available.

A0003-2

A0003-3

Should you have any questions, please do not hesitate to contact, Donald Vargas, Administrative Analyst I of this office. Thank you for the opportunity to review and comment on this project

Respectfully,

William S. Brunet, PE  
Director of Public Works

BY:

  
Frank Fiorenza  
Deputy Director of Public Works – Engineering

DV/dm

cc: Jurg Heuberger - Director, Planning & Development Services Dept.

## Responses to Comment Set A0003

### Imperial County Department of Public Works

- A0003-1      The commenter's preference for the West of Dunaway Alternative has been noted. Section H.3.1.1 compares the West of Dunaway Alternative to the Proposed Project and FTHL Eastern Alternative. The West of Dunaway Alternative was not found to be environmentally superior in this segment because the route would be 2.2 miles longer than the proposed route resulting in greater ground disturbance impacts and impacts to biological and cultural resources, and it would create new significant and unmitigable (Class I) visual impacts from the Dunaway OHV Staging Area, south of I-8 and views from Dunaway Road north of I-8.
- A0003-2      The commenter's description of required permits is acknowledged. Section A.6.5 of the Draft EIR/EIS lists the permits that would be required for the Sunrise Powerlink Project, including roadway permits in Imperial County.
- A0003-3      Section D.12 of the Draft EIR/EIS addresses water quality impacts and erosion control. WQ-APM-4 would require use of erosion control best management practices and WQ-APM-14 would require the development of a SWPPP for construction-related erosion control (see Section D.12.3 of the Draft EIR/EIS). Implementation of APMs would reduce Impact H-1 (Construction activity could degrade water quality due to erosion and sedimentation) to a less than significant level (Class III) in the Imperial Valley Link. In addition, Section A.6.5 of the Draft EIR/EIS lists the permits that would be required for the Sunrise Powerlink Project, including permits for the Regional Water Quality Control Boards (Regions 7 and 9).

Comment Set A0004  
California State Assembly of 76th District

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0076  
(916) 319-2076  
FAX (916) 319-2176  
DISTRICT OFFICE  
1557 COLUMBIA STREET  
SAN DIEGO, CA 92101  
(619) 645-3090  
FAX (619) 645-3094

Assembly  
California Legislature



LORI SALDAÑA  
ASSEMBLY MEMBER, SEVENTY-SIXTH DISTRICT  
CHAIR, HOUSING AND COMMUNITY DEVELOPMENT

COMMITTEES:  
CHAIR, HOUSING AND  
COMMUNITY DEVELOPMENT  
ELECTIONS AND REDISTRICTING  
LOCAL GOVERNMENT  
NATURAL RESOURCES  
VETERANS AFFAIRS  
SUBCOMMITTEES:  
CHAIR, BASE CLOSURE AND  
REDEVELOPMENT

February 25, 2008

Commissioner Michael Peevey  
President, Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Commissioner Peevey:

I am writing to express my support for the in-basin generation alternatives in the Draft EIR issued by the California Public Utilities Commission (CPUC) and the Federal Bureau of Land Management (BLM).

Because these alternatives reflect state and the regional energy priorities, I believe they are a better fit for San Diego's energy future than the transmission option offered by SDG&E.


The State of California has shifted its energy policy in the direction of low-emission, renewable, distributed energy generation and increased energy efficiency. To this end, the Legislature has passed a number of measures that require or encourage these approaches, including AB 32 (The Global Warming Solutions Act) and SB 1 (The Solar Roofs Initiative).

I think it should be clear that the Legislature's intent in requiring increased use of renewables would also demand the development environmentally responsible generation proposals before considering the sacrifice of state park land, open space or other natural resources.

Now that viable alternatives have been developed and evaluated by the CPUC and BLM, we should seize this opportunity to explore the preferred options more fully.

I believe that these in-area alternatives offer San Diego a more independent, reliable and environmentally responsible energy future.

I respectfully encourage the Commission to require the utility to pursue alternatives to this proposal with greater regard for conserving the state's natural resources, increasing local renewable energy generation capacity, and assuring ratepayer benefit.

Sincerely,  
  
Lori Saldaña  
Assembly Member, 76<sup>th</sup> District

A0004-1

## Responses to Comment Set A0004 California State Assembly of 76th District

A0004-1      The commenter's support of the in-basin generation alternatives is acknowledged. Please refer to General Response GR-8 for a discussion of greenhouse gas impacts of the Sunrise Powerlink Project and alternatives.

Comment Set A0005  
San Diego County Board of Supervisors



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

*Jennifer Stone - Asst. to Supervisor*  
Sunrise Powerlink Draft Environmental Impact Report  
Public Meeting  
February 26, 2008

Thank you Commissioner Gruenich and Judge Weissman for holding this and other public hearings in communities most impacted by this line.

A0005-1

I represent the people of San Diego County's Second District, which encompasses the eastern portion of San Diego County. My district includes many communities affected by San Diego Gas and Electric's Sunrise Powerlink proposal including Ramona, Julian and Santa Ysabel, as well as many communities along Alternative Route D in the southeastern part of the region.

The County of San Diego is finalizing its formal comments on the Draft Environmental Report (EIR) and will submit those technical comments before the April 11, 2008 deadline. I have reviewed the Draft EIR, in particular its executive summary.

I remain steadfastly opposed to the project in its entirety, including the Preferred Route and Alternative Route D. As the Draft EIR points out, there are cheaper and less destructive ways to meet future energy needs.

If speakers here tonight seem especially upset, it's because this area is still reeling from the massive firestorms of last October, fires likely started by SDG&E power lines.

In addition, the region has endured SDG&E's controversial Sunrise campaign for more than two years. This divisive effort has pitted rural communities against urban communities and tried to turn northern communities against southern communities.

Fortunately, many of us have seen through SDG&E's propaganda. SDG&E has presented the CPUC's decision as a choice: approve Sunrise or suffer rolling blackouts.

Yet, as the Draft EIR thankfully indicates—and as expert after expert has testified—Sunrise is a false choice. The EIR's top two alternatives clearly show that this region—its economy and its landscape—are better served by local, not imported, generation.

Comment Set A0005, cont.  
San Diego County Board of Supervisors

In commercials and glossy brochures, SDG&E's impressive public relations machine has boiled down the pitch for Sunrise into a snappy soundbite. SDG&E says this: "Sunrise will bring us the three Rs: renewables, reliability and reduced costs."

A0005-1 cont.

Unfortunately, SDG&E overlooked a forth and more important R: reality.

**Here's the reality about renewables:** There is enough capacity on the existing Southwest Powerlink to bring wind, solar and geothermal energy from the Imperial Valley into this region without building Sunrise.

SDG&E's own testimony reveals that the utility can meet California's renewable mandate without building Sunrise.

The unproven Stirling Solar Dish project—the cornerstone of SDG&E's renewable claims—has been delayed again. The company has not filed an application for construction with the California Energy Commission. Worse yet, Stirling officials have testified they will move forward with a type of technology that has long suffered from hydrogen and engine-seal leaks.

Finally, if SDG&E is as committed to renewable energy as it claims, why—last summer—did the company lobby against increasing the State's renewable mandate?

**Here's the reality about reliability:** A massive extension chord through our fire-prone Backcountry does not equal greater reliability. It equals perilous danger.

A0005-2

In my discussions with SDG&E, the utility used the 2003 Cedar Fire as an interesting argument for Sunrise. SDG&E said that Sunrise was needed because if the existing Southwest Powerlink were to go down in a fire, Sunrise could ensure reliability.

SDG&E officials downplayed the likelihood of the region having two massive fires at the same time. That argument was debatable until October 2007. It turned out SDG&E was right. We didn't have two massive fires at the same time. We had seven!

The Southwest Powerlink went down in the Harris fire. And, had Sunrise been built, it would have been out of service too because of the path of the Witch Fire.

**Here's the reality about reduced cost:** Repeatedly, we have seen the alleged financial benefits of Sunrise drop dramatically because of SDG&E's own miscalculations, math errors and faulty assumptions about power plants. First it was \$447 million, then \$204 million, then \$129 million—less than one quarter of the line's original cost savings estimates.

A0005-3

## Comment Set A0005, cont. San Diego County Board of Supervisors

The Utility Consumers Action Network and other energy stakeholder groups have done some remarkable research into the cost-effectiveness of upgrading existing infrastructure and investing in solar— proposals that have largely been ignored by SDG&E.

A0005-4

It's time for SDG&E to retire claims about the three Rs. The facts don't support them. The region needs to turn its focus to the three Es— existing infrastructure, emerging technologies and efficiency measures.

The State of California is standing at the threshold of a whole new era in energy development. In my mind, Sunrise is really a battle between the dying past and the promising future.

California, with its Million Solar Roofs campaign and its investments in energy research, is blazing trails when it comes to renewables. The State and its Governor have put its money where its mouth is. That investment is paying off.

This month, a story in *NY Times*, describes California as the world's "next big solar market and its entrepreneurial center." An economist said of California: "We're at the dawn of a revolution that could be as powerful as the Internet revolution." A venture capitalist said companies are just starting to blossom from venture funding and, "through innovation and volume, prices are coming down."

Change is scary and SDG&E is likely protecting an old way of doing business.

Yet the financial sector and the energy sector are all saying the same thing: hulking lines and massive steel are antiquated concepts. Distributed generation, self-reliance and new green technologies are here to stay, whether SDG&E likes it or not. Imported power— in Sunrise's case, much of it from fossil-fueled plants— is a thing of the past.

By approving Sunrise, California would be building a billion dollar monument to the past. It will be outdated before it's even finished.

By turning down this line, the Commission sends an important message to the San Diego region: San Diegans need to create in-basin generation and become self-sufficient and safer from fire.

With your help, we can force our utility to do the right thing.

Thank you again for the opportunity to speak this evening.

## Responses to Comment Set A0005 San Diego County Board of Supervisors

- A0005-1      The commenter's opposition to the Proposed Project and the Route D Alternative and support for local generation is acknowledged. Please refer to General Response GR-9 for a discussion of fire risk and the comparison of alternatives and General Response GR-5 for a discussion of the status of renewable generation projects in the Imperial Valley, including Stirling Energy Systems.
- A0005-2      Please refer to General Response GR-9 for a discussion of fire risk and the comparison of alternatives and General Response GR-3 for a discussion of reliability between the northern and southern transmission line routes.
- A0005-3      Please refer to General Response GR-12 for a discussion of project costs and the CEQA/NEPA processes.
- A0005-4      Please refer to General Response GR-6 for a discussion of Smart Energy 2020 and All-Solar Alternatives. The commenters' opposition to the Proposed Project and support for local renewable generation are acknowledged.