

Comment Set B0013 Community Alliance for Sensible Energy (CASE)

To the CPUC
For the Julian Hearing
RE: Draft Environmental Impact Report, A:06-08-010
SDG&E's Sunrise Powerlink Proposal
February 27, 2008, 10:30am

From: Mary Aldern
Community Alliance for Sensible Energy (CASE)
(a group of citizens residing or owning property in communities throughout San Diego County, including but not limited to Ranchita, San Felipe, Warner Springs, Santa Ysabel, Lake Henshaw, Mesa Grande, Sunshine Summit, Julian, Borrego Springs, and Chihuahua Valley.)

My contact: (559)323-6750

Dear Judge Weissman + AC Dian Greunich,
Honorable Commissioners, Aspen Enviro. Group, BLM:

historic

Thank you for coming to Julian today to discuss the Sunrise Powerlink proposal. It is evident that those who have worked on the many thick volumes have put much time and effort into it, and I appreciate that. However, I found that the description of the environmental impacts of the proposal in CASE's area of concern has been severely understated.

B0013-1

I could find only 10 pages of writing about the environmental impacts of the six mysterious surplus 230kV links to come out of the proposed Central Substation.

I believe that the environmental impacts of the proposed Central Substation should include a thorough investigation into its designed potential, including all 6 of the extra 230V hardware outlets. Only two of the future transmission lines are briefly outlined in the DEIR.

In particular, I would like to focus on one of these, the Henshaw-Valley Center-Valley Substation link, which would tie the SDG&E grid to that of the Southern California Edison grid of Riverside and the North.

The little pink line given to this "future expansion", nearly camouflaged as it meanders off the page of the main map, is indeed the extremely high voltage bridge between two massive systems. Together, they would create a super-system which would itself have an impact on the energy supply of Southern California like no other before.

I believe that the inter-connective purpose of this link cannot be overlooked or dismissed as simply a future hypothetical possibility.

This special link is like the strong trunk of an electrical tree, the only connection between the roots and the upper branches and far-reaching canopy. What at first seems like a electrical version of the Winchester Mystery House becomes all clear when one looks at

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this complete picture. The inordinate cost becomes appropriate. It is, in fact, the next phase of the same system. It should, therefore, be fully described at this point.

B0013-1 cont.

It is the environmental impact of the “potential” Phase two of a super-system that I find missing in the voluminous Sunrise Powerlink DEIR.

The DEIR includes SDG&E’s casual allusions to their desire to build this vital part of their grand “full loop” scheme, saying that it will “probably” be necessary to build this link within 10 years. They have also admitted its importance in other meetings. The DEIR accurately describes how this critical component is blatantly absent from the mis-named SRPL proposal. SDG&E’s persistent, quiet, predator-like, almost lustful desire to continue to pursue this unpopular proposal in the face of this omission is perhaps the most disturbing of this whole business to me.

Without the proper environmental recognition, we here would be allowing the San Luis Rey watershed to be victimized even more-so that the many residents along the documented proposed routes, whose purposes are not served by the proposed Sunrise Powerlink.

B0013-2

I think that at the very least, it would be just to say that the proposal brings with it the immediate depression in property values in and about the whole Central Substation Region, particularly along the future transmission routes stated, with the more than likely eventuality of a future transmission upgrade through the Henshaw-Valley Center corridor of the San Luis Rey Watershed. I believe that the proposal’s EIR should include a description of this beautiful river corridor, because of its unique position as the critical SDG&E/So Cal Edison connector.

B0013-3

B0013-4

For instance, there is an endangered bird, the Southwestern Willow Flycatcher, that lives along the river there, I think within or within close proximity to the ROW. Like the Bighorn of Anza Borrego, this species has a special place on Earth, and that place is there. You can hear it by going to the Center for Biological Diversity’s ringtone download page:

<http://www.biologicaldiversity.org/swcbd/species/ringtones/sounds/SouthwesternWillowFlycatcher-Naturesongs.mp3>

or, like residents and tourists around here, and the thousands of San Diego County school kids annually that come to the science camp located within that transmission ROW, you could go to the river yourself to experience that piece of rural San Diego. It is part of our American heritage! A 500kV line there would certainly have a grave effect on this area.

There are many incredible diverse places like that around here, and they deserve some attention before it is too late.

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Incidentally, the other future link named would impact Mission Trail Regional Park, which I think the public has spent money to preserve. We deserve to know all about the thoughts SDG&E used to design this Central Substation at this time to justify its size.

B0013-5

Other natural areas impacted in Future Expansions include the the San Dieguito River Park, Camp Pendelton, and the Trabuco area of the Cleveland National Forest, all fire-prone areas. I also believe that Trabuco is where California's last or largest Grizzly Bear was shot. It's skull is in a museum somewhere. Will that be the same fate for the actual forest in which it lived?

The mysterious nature of the proposed massive Central Substation in San Felipe needs to be revealed to the public as part of the EIR. I believe it is **socially and legally unjust** to leave the computer-virus-like impacts of this design to the reader's imagination.

B0013-6

By acknowledging the impacts of the full loop, I suspect that at this point, the argument for reliability would come in to play. However, creating a system that can be used to import energy, only increases reliability if that energy itself is reliable, and cost effective. For this reason, I believe that a full cost analysis over the lifetime of the transmission system of the future import supply and price projections of potential energy coming over that line should be considered. Therefore, the environmental impacts and stamina of those supply systems, in particular, their peak point, and their impact on Global Warming and world wide pollution, should be included in the EIR, along with any security or military costs, fines and disposal fees we or the utilities would be responsible for. I for one would like to know if it is true that LNG production has peaked in America,

In addition, the health and environmental impacts arising from the creation of the energy we choose to import over any particular route is directly related to how much we would pay and where we would build transmission to bring it here.

In addition, and most importantly...we need to examine just how much middle class Americans can pay for such a proposal. I would like to know if it is just to ask us to pay for something that is obviously not needed, is expensive, and destructive, especially now, when property owners in Southern California, and everywhere, now, are all struggling with the sub-prime mortgage crisis. How many of us have lost our homes, since November of 2005, or know someone who has? What if the cost cannot be recovered and the whole thing goes bankrupt? Then, if began, it would stand like a giant bridge to nowhere.

SRP's public appearance in San Diego

As for the SANDAG projections of what is best for our region, justice spoken does not equal justice done, if those in office do not uphold the work of those done before them.

In fact, the Sunrise Super-system is not what San Diegans have in mind. Nor is it what is recommended in the DEIR's Executive Summary. Not an import system. Not just an energy port. We, like many other modern Americans, have faith that an American-made Energy can be produced to build our All-American products... we have the knowledge, and we are challenged now to secure this opportunity to turn down non-sustainable

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choices, and to choose the right path for our future, for our heritage and that of the planet. Please act locally in the name of all of San Diego's little ones so they may have their own day in the sun. We want a brilliant, sustainable, thriving, awesome overall plan for us and them.

B0013-6 cont.

I will leave you with a Chinese proverb "Give a man a fish, he has one meal. Teach a man to fish, he will eat for the rest of his life."

Sincerely,

Mary Aldern

MARY ALDERN

Feb. 27, 2008

Responses to Comment Set B0013

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- B0013-1 Future transmission system expansion was evaluated at an appropriate programmatic level in the Draft EIR/EIS. The CEQA Guidelines explain that the “degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” (CEQA Guidelines § 15146.) When the general impacts of a project are reasonably foreseeable, but the specific details have not yet been defined, “the EIR need not be as detailed as an EIR on the specific construction projects that might follow.” (Id., sub. (b).) The Draft EIR/EIS considers the impacts of the future transmission system expansion for each of the 13 issue areas discussed in the document. Because the routes are not well defined, and any future transmission project would require an independent permitting and environmental compliance process, the level of detail in the analysis of the future transmission system expansions as carried out in the Draft EIR/EIS is appropriate. No changes to the level of analysis have been made. Please also refer to Comment Set B0012 for additional discussion of the 500 kV future transmission system expansion.
- B0013-2 The San Luis Rey watershed is included in the Environmental Setting of the 230 kV Future Transmission System Expansion in Section D.12.11.1 in Volume 3 of the Draft EIR/EIS. Impacts to this watershed and others along the 230 kV Future Transmission System Expansions are analyzed in Section D.12.11.2 in Volume 3 of the Draft EIR/EIS. In addition, any future transmission project would require an independent permitting and environmental compliance process including watershed impact analysis.
- B0013-3 Please see General Response GR-11 regarding impacts to property values.
- B0013-4 The commenter states that the EIR/EIS should provide a description of the San Luis Rey Watershed river corridor. A description of the San Luis Rey river corridor was not provided on page D.2-158 (Section D.2.18.1) or on page D.2-179 (Section D.2.18.3) of the Draft EIR/EIS because the river corridor is not considered a Special Habitat Management Area. Impacts to wildlife and specifically the southwestern willow flycatcher are addressed in Section D.2.18.2.
- The commenter states the southwestern willow flycatcher is found in close proximity to the ROW. The generalized location of the Future Transmission System Expansion is parallel to the portion of the San Luis Rey River that supports a population of approximately 25 breeding pairs of southwestern willow flycatchers, as discussed on page D.2-189 of the Draft EIR/EIS. Impacts to southwestern willow flycatchers were also addressed on page D.2-170 of the Draft EIR/EIS. No changes to the Draft EIR/EIS were made based on these comments.
- B0013-5 The commenter requests information on SDG&E’s rationale for the design of the proposed Central East Substation, including the relationship to Future Transmission System Expansion. As described in Section B.2.7 in Volume 1 of the Draft EIR/EIS, SDG&E has stated that a system goal for the Sunrise Powerlink Project is to bring a single 500 kV line as close to the SDG&E load center as is reasonably practicable, then use 230 kV lines to distribute the power to major 230 kV load-serving substations within the San Diego load center. Refer to Section B.2.7 in Volume 1 of the Draft EIR/EIS for additional information regarding Future Transmission System Expansion and the Central East Substation.

Additionally, the commenter expresses concern regarding the potential for fire in the San Dieguito River Park, Camp Pendleton, and the Trabuco area of the CNF. Please refer to General Response GR-9 for a discussion of fire risk.

B0013-6

The commenter requests information on SDG&E's rationale for the design of the proposed Central East Substation, including the relationship to Future Transmission System Expansion. As described in Section B.2.7 in Volume 1 of the Draft EIR/EIS, SDG&E has stated that a system goal for the Sunrise Powerlink Project is to bring a single 500 kV line as close to the SDG&E load center as is reasonably practicable, then use 230 kV lines to distribute the power to major 230 kV load-serving substations within the San Diego load center. Refer to Section B.2.7 in Volume 1 of the Draft EIR/EIS for additional information regarding Future Transmission System Expansion and the Central East Substation.

Additionally, the commenter expresses concern regarding the potential for fire in the San Dieguito River Park, Camp Pendleton, and the Trabuco area of the CNF. Additionally, the commenter expresses concern regarding the potential for fire in the San Dieguito River Park, Camp Pendleton, and the Trabuco area of the CNF. Section D.15.13.3 of the Draft EIR/EIS discusses fire impacts associated with the 500 kV Future Transmission System Expansion. Please also refer to Section E.7.1.15 of the Draft EIR/EIS for a discussion of fire in the Trabuco area of CNF under the LEAPS Alternatives. Finally, impacts to the San Dieguito River Park are discussed in Section D.15.2.5 (PFS-2 San Felipe Fireshed) of the Draft EIR/EIS.