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March 18, 2008

Ms. Billie Blanchard  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Ms. Lynda Kastoll  
El Centro Field Office  
Bureau of Land Management  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243

Dear Ms. Blanchard & Ms. Kastoll,

SDG&E appreciates the opportunity to provide the attached comments to the California Public Utilities Commission and Bureau of Land Management (CPUC/BLM) Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). This third comment letter covers comments on Sections A, B, C, D, F, G and Appendix 12 of the Draft EIR/EIS. SDG&E will provide additional specific comments in future letters for the CPUC/BLM to consider in preparation of the Final EIR/EIS and may provide additional subsequent comments on the sections of the Draft EIR/EIS included in this submission as our review of the document continues.

Similar to SDG&E's second comment letter, these comments focus on identifying potential inaccuracies, omissions, inconsistencies and clarifications that can be fully addressed in the Final EIR/EIS. In addition, SDG&E identifies certain impacts that it believes are overstated in their significance. Similarly, certain mitigation measures are excessive because either the impact's significance is overstated or the mitigation is disproportionate to the impact. SDG&E intends to submit more substantive comments with respect to the various alternatives in its next comment letter.

Thank you in advance for your consideration of SDG&E's comments.

Sincerely,

A handwritten signature in cursive script that reads "Jill Larson".

Jill Larson

cc: Mike Niggli  
Greg Barnes

SDG&E's 3<sup>rd</sup> Letter to CPUC: Sunrise Comments on DEIS/EIR

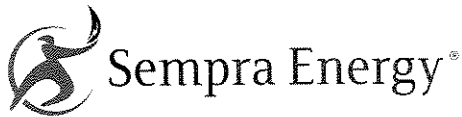
CH#	Pg#	Par#	Comment
A	A-1	1st	Right-of-Way Grant Application was filed with BLM on November 2, 2005 for areas outside of ABDSP. Right-of-Way Grant Application was amended to include areas within ABDSP in 2007.
A.1, A.6.3.1	A-2	7th	Significant portion of transmission corridor in ABDSP is under jurisdiction of BLM, rather than State Parks and Recreation. Federal transmission corridor was reserved from grants of land to State for inclusion within ABDSP.
A.1	A-2	8th	Statement that SDG&E would have to obtain an additional 50 feet of ROW is incorrect. SDG&E has indicated that Proposed Project could be built within existing 100-foot-wide transmission corridor in ABDSP.

SDG&E's 3<sup>rd</sup> Letter to CPUC: Sunrise Comments on DEIS/EIR

CH#	Pg#	Par#	Comment
B	B-10	2 and 3	Analysis regarding BLM jurisdiction of ROW needs to be clarified. In the discussion titled History and Discussion of BLM's 100-Foot ROW Grant, it should be clarified that BLM has asserted its continuing federal interest and jurisdiction in those portions of the ROW for which it granted easements previously. Revise the text to include this information.
B.2	B-14	2	Outside of the ABDSP but still within Grapevine Canyon, the DEIR describes and SDG&E originally proposed to remove the existing 69 kV line and underbuild it on the new 500 kV structures. The existing wood poles carry a 12 kV circuit so these poles would just be topped off. However, SDG&E could alternatively leave the 69 kV structures with the 12 kV underbuild alone and place the 500 kV structures parallel to the existing structures.
B.1	B-6	2	Proposed Project route near MP-50 crosses BLM parcels that are gifted lands. BLM has notified SDG&E that the Proposed Project needs to avoid these parcels. SDG&E has proposed a route modification to avoid the subject parcels. See SDG&E's GIS shape files accompanying this comment submittal. SDG&E requests that the FEIR include this modification.

SDG&E's 3<sup>rd</sup> Letter to CPUC: Sunrise Comments on DEIS/EIR

CH#	Pg#	Par#	Comment
E.3.2	5-6	Table E.3.2-2	The EIR/EIS assumes mitigation ratios from other similar projects will be applicable for the proposed project. Propose mitigation ratios that reflect the implementation of HMP's prior to any ground disturbing activities as proposed in the EIR <u>or</u> retain the proposed mitigation ratios which typically account for temporal losses of habitat and remove the requirement for the implementation of all mitigation and HMP's prior to any ground disturbing activities.
E.3.2	7	1	The EIR/EIS assumes that trimming and removal of native trees constitute Class I impacts and violation of the MBTA. Native tree removal dependent upon age can be significant; however, impacts are based on a preliminary project design and not the final project design. Use the final project design to determine if proposed impacts cannot be mitigated to a less than significant level.
E.3.2	9	5	Contrary to the statement that the rare plant survey for the proposed project conducted by ARCADIS in 2007 yielded poor results, the rare plant survey of the proposed project in 2007 yielded good results with the identification of 492 plant taxa, 25 of which are sensitive.
E.3	E.3.4.-5	4	Future transmission is proposed following the Route D Alternative. The USFS will not issue a special use permit for a route that will impact Back Country Non-motorized Zones. Thus, this alternative is not feasible.
E.3	E.3.5-1	1	The first paragraph states this alternative will not traverse a federal or state designated wilderness and any wilderness study areas. This chapter fails to make mention of the proposed wilderness areas within the CNF along this alternative.
E.4.2.2	10	3	The EIS/EIR states "The Modified Route D Alternative would impact the following listed or highly sensitive wildlife species: least Bell's vireo (Impact B-7D), golden eagle (Impact B-7H), QCB (Impact B-7J), arroyo toad (Impact B-7K), and" Delete ", and" or add and discuss other species if they were accidentally omitted.
E.4.5.2	E.4.5-2 & 3	Various	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives. Based on the land use compatibility matrix of the Forest Service Land Management Plan.
E.4	E.4.7-10 & Table E.4.7-3	bullet 3	Bullet 3 on page E.4.7-10 says that metavolcanic rocks have no paleontological potential; however, Table E.4.7-3 lists the same rocks as having marginal potential. The text and table needs to be consistent.
E		Figure E.1.1-3	The I-8 Alternative figure does not indicate the access road required to reach the public right-of-way (Highway 79). This is in contrast to the depiction of access road grading shown in Figure B-36 for the Central East substation.
E.4	E.4.1-1	4	MRD-10 to MRD-11 overhead span goes across CNF land. SDG&E proposes a route modification to avoid crossing CNF. See GIS shape files.



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April 11, 2008

Ms. Billie Blanchard  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Ms. Lynda Kastoll  
El Centro Field Office  
Bureau of Land Management  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243

Dear Ms. Blanchard and Ms. Kastoll:

SDG&E appreciates the opportunity to provide its final comments to the California Public Utilities Commission and Bureau of Land Management (CPUC/BLM) Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS). Several of the comments pertain to certain mitigation re-routes, infeasibilities of various alternatives, greenhouse gas issues and certain excessive mitigation measures. SDG&E requests that the CPUC/BLM incorporate this information into the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS).

**I. Sunrise Is The Best Option To Meet The Project And State Objectives Within The Time Needed For Reliability**

The Sunrise Powerlink is the best option to meet the project objectives, state mandates and goals and ensure reliable energy for the San Diego region. The need to expand and improve the reliability of the grid is real and imminent. The looming retirement of aging generators on San Diego's coastline combined with the expected load growth in the region is the primary reason why the Sunrise Powerlink must be built.

SDG&E's balanced long-term energy resource plan includes aggressive conservation and demand response programs, more renewable power and local generation. But those resources and programs are not enough. SDG&E still needs to construct another transmission line that links San Diego to the state electric grid.

The San Diego region is severely transmission deficient. Of the 47 500 kilovolt (kV) lines serving California, only one – built nearly 25 years ago - serves SDG&E's 1.4 million electric customers. This lack of high-voltage transmission import capacity puts

the entire region at risk. The grid must be expanded to ensure future reliability for SDG&E customers.

Sunrise is the best option to provide direct access to the clean, renewable resources in the Imperial Valley that California is counting on to meet the state Renewable Portfolio Standard (RPS) and AB 32 greenhouse gas emissions reduction mandates. Unlike the environmentally superior alternative identified in the DEIR/EIS, the Sunrise Powerlink helps implement these aggressive policies and is consistent with California's vision for a cleaner energy future.

The Imperial Valley could become a leader in renewable generation if new transmission capacity that links the vast supplies of solar and geothermal resources to California load centers is built. One look at the California Independent System Operator (CAISO) interconnection queue makes this point obvious. The Imperial Valley region could surpass more well-known renewable resource areas like the Tehachapi area in terms of production. And unlike Tehachapi, the Imperial Valley has a diverse mix of resources that, at times, better matches California's load profile.

The California Energy Commission (CEC) has repeatedly said that the lack of transmission lines to areas like the Imperial Valley is a key impediment to reaching RPS goals. And SDG&E has repeatedly stated that it will not meet its goal of procuring at least 20 percent of SDG&E's retail sales from renewable energy sources by 2010 without the Sunrise Powerlink. (SDG&E will comply with its legal obligation in 2010 through flexible compliance mechanisms).

Sunrise is also the most cost-effective option for customers. SDG&E and CAISO have repeatedly demonstrated that Sunrise provides more energy cost savings than any other alternative under consideration by the CPUC/BLM. In fact, the Sunrise Powerlink will provide CAISO customers over \$100 million in annual energy savings and pay for itself over time.

Improved energy reliability, direct access to clean, renewable resources and lower costs for consumers make the Sunrise Powerlink the right choice for California. SDG&E appreciates that the DEIR/EIS focuses on the environmental impacts associated with Sunrise and various alternatives thereto. But while the DEIR/EIS identifies the "worst case" environmental impacts of the Proposed Route and examines a reasonable range of alternatives, the FEIR/EIS should offer more guidance for critical aspects of the CPUC/BLM's decision on this project. SDG&E's overarching comments on the DEIR/EIS are as follows.

First, the DEIR/EIS's top-ranking alternatives give short shrift to the project objectives. The DEIR/EIS only offers a conclusory assertion as to whether a particular alternative satisfies the project objectives. The DEIR/EIS admits that the non-Sunrise alternatives simply fail to meet the project objective of obtaining access to renewables in Imperial Valley altogether. Moreover, the DEIR/EIS omits some objectives entirely, even though they were included in SDG&E's Proponent's Environmental Assessment

(PEA) and identified in the CPUC/BLM's Notice of Preparation/Notice of Public Scoping Meetings dated September 11, 2006 at pages 3-4. One critical project objective is expandability. Expandability is an important planning consideration, is part of a long standing and accepted practice in the electric utility industry, and is consistent with various infrastructure siting principles. Several of the routing options limit future expandability.

Second, the DEIR/EIS does not thoroughly consider how the alternatives meet or advance the state energy and environmental mandates, laws and policies that guide utility operations and investments, in particular, renewable development, greenhouse gas (GHG) emission reductions and resource procurement. In this letter, SDG&E provides more information on these issues for the CPUC/BLM to include in the FEIR/EIS.

Third, the DEIR/EIS identifies various purportedly "environmentally superior" alternatives to Sunrise despite evidence that shows that such alternatives are, at best, speculative, hypothetical and/or infeasible. The DEIR/EIS admittedly did not evaluate the feasibility of the alternatives after selecting which proposed options should be given full evaluation. The FEIR/EIS should recognize these infeasibilities.

Fourth, the DEIR/EIS overstates Sunrise impacts and costs thereby affecting the comparison, screening and "ranking" of some alternatives against the Proposed Route. These specific weaknesses must be seen in light of the DEIR/EIS's limited focus on environmental effects. All electricity users, generation suppliers and citizens in the San Diego area have high and enduring social and economic stakes in the Sunrise decision. Additionally, 37 million Californians have a stake in the potential consequences of the Sunrise decision on California's renewable energy and greenhouse gas emission goals.

As described in more detail below, this letter discusses some of the infeasibilities and impacts not addressed by the DEIR/EIS's "superior" routing alternatives as well as the critical shortcomings of generation alternatives that the DEIR/EIS ranks higher than Sunrise. With respect to routing in particular, the DEIR/EIS identifies three potential routes for Sunrise:

- (1) the Proposed Project Route (the route originally proposed by SDG&E)
- (2) an "Environmentally Superior Southern Route (SWPL) Alternative" (Aspen's Southern Route) and
- (3) an "Environmentally Superior Northern Route Alternative" (Aspen's Northern Route).

Neither Aspen's Northern Route nor Aspen's Southern Route is feasible. In order to make a southern route feasible, SDG&E developed slight mitigation re-routes and identifies it as the "Modified Southern Route." SDG&E also identifies an "Enhanced Northern Route," using route alternatives evaluated in the DEIR/EIS to address some concerns identified in the DEIR/EIS regarding the Proposed Project Route. These mitigation re-routes are discussed in depth below. SDG&E's Enhanced Northern Route

and the Proposed Route are feasible, meet all of the project objectives<sup>1</sup> and should be included in the FEIR/EIS in response to these comments.

## **II. SDG&E's Enhanced Northern Route Is The Best Alternative - It Is Feasible, Meets Project And State Objectives And Has Limited Environmental Impacts**

To mitigate certain environmental impacts associated with the Proposed Route, SDG&E has identified an "Enhanced Northern Route" that consists of the Proposed Route with some segments replaced by the following alternative segments analyzed in the DEIR/EIS.<sup>2</sup> The end result is a complete and feasible proposed northern route with reduced environmental impacts. SDG&E's Enhanced Northern Route includes the following modifications to the Proposed Route:

- Flat Tailed Horned Lizard (FTHL) Eastern Alternative (Imperial Valley Link);
- West Main Canal-Huff Road Modification Alternative (Imperial Valley Link);
- Overhead 500 kV ABDSP Within Existing 100-foot Corridor Alternative (Anza-Borrego Link);
- CNF Existing 69 kV Route Alternative (Inland Valley Link); and
- Oak Hollow Road Underground Alternative (Inland Valley Link).

### **FTHL Eastern Alternative**

The Proposed Route parallels the existing Southwest Powerlink (SWPL) for four miles and turned north before heading in a northeasterly direction towards the West Main Canal. The FTHL Eastern Alternative also parallels SWPL, but only for three miles, turning north sooner and taking a more direct route to the West Main Canal. The FTHL Alternative is shorter by 1.4 miles than the Proposed Route. This alternative was proposed to avoid a route through a FTHL Management Area, and thus avoid impacts to this sensitive species. (DEIR/EIS at Ap.1-27.)

This alternative will result in some additional impacts to agricultural areas, but these impacts are minimal compared to the potential impacts to the FTHL. By locating the transmission line adjacent to agricultural access roads, canals and property lines, interference with agricultural operations would be nominal, and any interference would be compensated by SDG&E to those affected farmers and property owners, as appropriate. By avoiding FTHL areas, recovery of this species could be assisted. By avoiding these impacts, and locating the transmission line in a way which substantially

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<sup>1</sup> The DEIR/EIS acknowledged that in its PEA, SDG&E identified eight objectives for the Sunrise Project, including expandability. (DEIR/EIS at ES-19 and ES-20.) Nevertheless, the DEIR/EIS reduced the eight project objectives to three broad objectives: (1) maintain reliability in the delivery of power to the San Diego region; (2) reduce the cost of energy in the region; and (3) accommodate the delivery of renewable energy to meet State and federal renewable energy goals from geothermal and solar resources in the Imperial Valley and wind and other sources in San Diego County. (DEIR/EIS at ES-20.)

<sup>2</sup> A map depicting SDG&E's Enhanced Northern Route is attached as Attachment 1.

minimizes farming impacts, it is expected that there may be a net reduction in impacts to FTHL by this option.

### **West Main Canal – Huff Road Alternative**

This suggested modification would diverge from the Proposed Route at MP11, follow the Imperial Irrigation District's (IID) West Main Canal to the east-northeast and turn north on Huff Road. It would go north on the east side of Huff Road for 1.5 miles before joining the Proposed Route at MP 15.9. This alternative segment would avoid direct impacts to the Bull Frog Farms dairy structures and to the Raceway development. This alternative segment does not change the route length of the Proposed Route. (DEIR/EIS at Ap.1-34.)

### **Overhead 500 kV ABDSP Within Existing 100-foot Corridor Alternative**

This segment option keeps the route within the existing 100-foot transmission corridor in Anza Borrego Desert State Park (ABDSP), eliminating the additional 50 feet of right-of-way needed for the Proposed Route and eliminating impacts to administratively designated wilderness in ABDSP. Delta lattice towers carrying both the 500 kV transmission line and the existing 69 kV and 92 kV circuits would be used for this area, and those structures would have an average height of 160 feet compared to an average of 130 feet for the structures in this segment of the Proposed Route. (DEIR/EIS at Ap.1-68.)

Even though the Sunrise line would remain within the existing transmission corridor through ABDSP under this alternative, SDG&E would continue its efforts to work with California Department of Parks and Recreation (State Parks) officials in making adjustments to minimize impacts to biological, cultural and recreational resources. To the extent that State Parks would prefer to mitigate certain cultural impacts by routing the overhead 500 kV line around a sensitive cultural resource known as Grapevine Canyon and/or mitigate certain recreational impacts at Tamarisk Grove Campground by routing the overhead 500 kV line east of the campground, SDG&E would continue its efforts to work with State Parks to implement those mitigation re-routes in a timely way.

### **Cleveland National Forest (CNF) Existing 69 kV Route Alternative**

This segment option was suggested during scoping to reduce property and visual impacts to single-family residences on State Route (SR)78 and Deer Canyon Drive in unincorporated San Diego County. At MP 111.5, where the Proposed Route includes locating the 230 kV and existing 69 kV transmission lines west of CNF, the CNF Existing 69 kV Route Alternative would site the new 230 kV line adjacent to the existing 69 kV transmission line, traveling southwest through CNF for approximately 0.5 miles and rejoining the Proposed Route at MP 112.5. It would be 0.5 miles shorter than the Proposed Route and the existing 69 kV transmission line would not need to be relocated. (DEIR/EIS at Ap.1-129.) This option would be contingent upon Forest Service approval,

but SDG&E believes that this could be achieved with a project specific non-significant Forest Plan amendment in a time frame consistent with SDG&E's project objectives.

### **Oak Hollow Road Underground Alternative**

This alternative was developed to reduce property and visual impacts to Starlight Mountain Estates. The double circuit overhead 230 kV line would transition underground as a 230 kV double circuit line in parallel duct banks at approximately MP 116.7 at transition poles within Mount Gower Open Space Preserve on a hill approximately 100 feet north of an existing dirt access road. The route would enter private property and would travel underground in the dirt road for approximately 1,400 feet before passing between a residence and a fenced pasture to join the residence's paved driveway at its intersection with Oak Hollow Road. The route would turn west and would travel underground in paved Oak Hollow Road for approximately 1,300 feet. When Oak Hollow Road turns into a dirt road, just west of the most western driveway in the Starlight Mountain Estate Owners (SMEO) area, the line would continue west-southwest in a maintained dirt and gravel access road (Oak Hollow Road) to exit SMEO private property, traveling under a fenced gate into Mt. Gower Open Space Preserve for approximately 600 feet to west of Structure I125. It would continue into Gunn Stage Road and would rejoin the underground segment of the Proposed Route at MP 117.3 along Gunn Stage Road. (DEIR/EIS at Ap.1-133.)

The mitigation re-routes proposed by SDG&E in its Enhanced Northern Route reduce impacts and render the route more feasible, by potentially reducing the regulatory obstacles associated with State Parks,<sup>3</sup> while still meeting the project objectives – including access to Imperial Valley renewable energy resources and ensuring system reliability and expandability.

#### **A. SDG&E Believes That It Will Be Able To Obtain Any Necessary Approvals To Construct Sunrise Through ABDSP**

SDG&E developed its Enhanced Northern Route, in part, to directly address concerns raised by State Parks regarding the Proposed Route's impacts to administratively designated state wilderness through ABDSP. Although SDG&E does not agree with State Parks' conclusions regarding the scope, severity or implications of the Proposed Route's impacts, to avoid a potentially lengthy dispute regarding these issues, SDG&E sought to develop a transmission line route through ABDSP that would entirely avoid crossing any designated wilderness areas and would obviate the need for State Parks to amend the General Plan for ABDSP.<sup>4</sup>

The existing transmission line, which was built close to a decade before the Park

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<sup>3</sup> SDG&E notes that State Parks has recently asserted that a General Plan amendment will be necessary even if Sunrise remains within SDG&E's existing transmission corridor. SDG&E does not agree with that assessment as discussed *infra*. In all events, SDG&E believes that many of State Parks' concerns may be addressed by keeping Sunrise in the existing transmission corridor.

<sup>4</sup> ABDSP General Plan website link: [http://www.parks.ca.gov/default.asp?page\\_id=21314](http://www.parks.ca.gov/default.asp?page_id=21314)

itself was established, is located within an existing 100 foot corridor that State Parks has acknowledged in its own records and designated in the ABDSP General Plan as part of the Backcountry Zone.<sup>5</sup> Both the management standards for Backcountry Zone areas and the ABDSP General Plan expressly allow for the expansion of the existing transmission line within (and outside) the existing corridor.<sup>6</sup>

Finalized in 2005, the ABDSP General Plan provides the broad framework that guides State Parks staff in managing and operating ABDSP. (*See* CAL. PUB. RES. CODE § 5002.2(a) (General Plans serve as “guides for the future development, management, and operation” of state park units); CAL. STATE PARKS PLANNING DIVISION, PLANNING MILESTONES FOR THE PARK UNITS AND MAJOR PROPERTIES ASSOCIATED WITH THE CAL. STATE PARKS SYSTEM 95 (July 1, 2007)<sup>7</sup> [“Planning Milestones”] (noting that a General Plan should be more of a “vision” document than a “specific, detailed directive”)); (ABDSP General Plan at XI (plan “does not provide detailed management

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<sup>5</sup> The plan designated six management zones within the Park, and these zones “describe the overall management purpose and intent of specific regions within the Park as well as depict their intended uses.” (General Plan at XII); *see also id.* at 3-8 (“Each zone provides direction for the general level and type of development and use within the Park.”). (General Plan at Table 5.6).

<sup>6</sup>SDG&E believes that in several places the DEIR/EIS inaccurately states the nature and scope of the property rights and interests within the existing 100-foot transmission corridor in the Park. (*See, e.g.*, DEIR/EIS at B-9 to B-13.) SDG&E refers the CPUC/BLM to SDG&E’s data request responses on these topics, which are incorporated herein by reference. (*See* SDG&E’s Response to California Public Utilities Commission Data Request No. 1 dated January 11, 2007; SDG&E’s Supplemental Response to California Public Utilities Commission Data Request No. 1 dated July 25, 2007; SDG&E’s Response to California Public Utilities Commission Data Response No. #8, ALT-74 (initial and supplemental responses).) The existing 100-foot corridor follows the existing transmission line which was built a decade before ABDSP was created; historical evidence demonstrates that many affirmative and intentional steps have been taken to protect and grandfather the existing 100-foot transmission corridor. (*See, e.g.*, Letter from Mike Pool, State Director, BLM to Bret Lane, SDG&E dated July 5, 2007 attached as Attachment 2. ) While SDG&E agrees with the DEIR/EIS that it is outside the scope of the CEQA and NEPA processes to verify the legal status of the existing transmission line corridor, the DEIR/EIS contains inconsistencies and other inaccurate information about these issues that should be deleted or, in the alternative, corrected in the FEIR/EIS. For example, on page B-10, n. 3 the DEIR/EIS states that Section 16 lands are held in trust by the State. Historical evidence demonstrating the sale of these lands to private individuals at the time the transmission line was built indicates that these lands were proprietary in nature, and not held in trust. SDG&E provided the CPUC with this documentary evidence in data request responses. Similarly, on page B-10, the DEIR/EIS states that “State Parks contends that ROW for transmission infrastructure is excluded from these lands.” Again, SDG&E disagrees with State Parks’ contention. As the DEIR/EIS correctly reports in the text on the same page, the BLM is still reviewing the status of the federal interests in the Section 16 lands. Likewise, on page B-13, the DEIR/EIS states that there is no documented width of certain segments of the transmission corridor, and argues that this allows for “an interpretation of minimal width equal to what the existing transmission line occupies.” SDG&E disagrees with this inaccurate assertion, particularly given that the undisputed width of the rights-of-way abutting each of these private parcels is 100-feet, as expressly reserved in federal patents and legislation. In any event, State Parks may grant a ROW for Sunrise across all of these lands under its authorizing statutes. (CAL. PUB. RES. CODE § 5012 (State Parks authority to grant permits and easements for “electric, gas, water, sewer, telephone, telegraph and utility lines, and pipelines and structures incidental thereto . . .”).) These conclusions should be deleted from the DEIR/EIS. In the alternative, the corrections here noted, and other clarifications consistent with SDG&E’s data request responses, should be corrected in the FEIR/EIS.

<sup>7</sup> <http://www.parks.ca.gov/planning>

recommendations, but rather provides conceptual parameters for future management actions.”).) The plan “provides goals and guidelines for the appropriate types, locations, and designs of [facilities] that may be proposed in the future.” (General Plan at XIII; *id.* at XII (General Plan established “management goals and guidelines and management zones for resource management, facility operations, and accessible interpretive and recreational programs for the public within ABDSP”); CAL. STATE PARKS, PLANNING HANDBOOK 69 (Feb. 2002) [“Planning Handbook”] (noting that the General Plan may be referred to by subsequent environmental documents prepared for specific proposed projects)).<sup>8</sup>

As a broad framework document, a general plan is meant to be enduring and should “only be reconsidered for amendments or revisions when circumstances and needs dictate.” (Planning Handbook at 21.) The circumstances requiring a plan amendment might include “major and unforeseen changes in the unit and its surroundings.” (Planning Milestones at 121.)

Upgrading SDG&E’s existing transmission line through the Park is not a “major and unforeseen circumstance” and, instead, is explicitly contemplated within ABDSP’s General Plan. Specifically, the plan states:

Utility companies such as San Diego Gas & Electric and the Imperial Irrigation District have existing transmission lines through the Park. These companies have responsibility to address California’s future need for additional electrical power, which is critical to the continued economic viability of the State. Anticipated electrical needs in Southern California will require the utility companies to evaluate proposals to *expand the existing level of service*. . . . Reconciling the inherent conflicts between the future electrical needs of the State and the protection of the Parks’ resources *will require the utility companies and the Department to work closely together in planning for the size and location of these future facilities.*

(General Plan at 2-96)(emphasis added). Additionally, under the Goals and Guidelines section for Infrastructure and Operations, Goal-Operations 4/Guideline-Operations 4a states that “[s]hould Caltrans or *utility companies propose to improve or expand existing facilities (within existing easements); the department will work in collaboration with them to minimize adverse impacts to Park resources and the visitor experience.*” (General Plan at 3-52 (emphasis added); *see also id.* (“The department shall work with local agencies, Caltrans, and utility companies to minimize the adverse impacts associated with developments.”).)

That the improvement of the existing line would take place within an area now

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<sup>8</sup> Pursuant to CEQA requirements, the ABDSP General Plan serves as a first-tier EIR. *See* CAL. CODE REGS. tit. 14, § 15166 (noting that EIR requirement can be satisfied by using the General Plan). As is the case here in considering the Sunrise Project, “[i]ndividual and/or site-specific projects and appropriate CEQA compliance will follow the General Plan/EIR.” (General Plan at XVII.)

designated as Backcountry Zone does not alter the conclusion that no General Plan amendment is required for SDG&E's Enhanced Northern Route. When State Parks first proposed that the area surrounding the existing transmission corridor be designated Backcountry Zone, SDG&E questioned State Parks to ensure that this zone designation was appropriate given the presence of the existing transmission line and the fact that SDG&E likely would seek to upgrade the line in the future. In a series of communications and then in writing, State Parks explicitly acknowledged that expansion of the existing line was possible within the Backcountry Zone, noting that the Backcountry Zone goals and guidelines *allow flexibility* for utilities, such as SDG&E, to expand existing utility lines. See Attachment 3, (California State Parks Response to SDG&E Comment Letter, Response #5-5 (noting that new language would be added in the goals and guidelines section of the General Plan to allow for greater flexibility within the Backcountry Zone)). State Parks altered the language in the final plan subsequently approved by the California Park and Recreation Commission (Park Commission) to include, among other things, Goal-Operations 4/Guideline-Operations 4a in response to SDG&E's request, and which allows utilities to improve or expand existing facilities within existing easements. See also Attachment 4 (Transcript In the Matter of: Informational Proceeding and Preparation of the 2004 Integrated Energy Policy Report (IEPR) Update, Docket No. 03-IEP-01, August 23, 2004 (State Parks Director of Planning reporting on ABDSP position that "we have met with SDG&E . . . and driven the corridor which would most likely serve the needs of a future 500kV power line. . . . Currently there is a 69 kV line which basically traverse the middle of the park in an east-west direction along highway 78. . . . We discussed the concept, **which the Park can agree with**, of increasing the 500 kV using taller steel poles with longer spans than the current wooden poles. . . . The taller poles with spans two to three times the current span would actually have less physical impacts on the ground, on archeological sites, riparian areas, wildlife habitat, plan disturbance, et cetera. . . . Thus the idea of putting any new power lines in the park centers on placement along already disturbed routes, i.e., paved highways, as discussed in the energy briefing paper. **We can and will work with SDG&E.**") (emphasis added).)

State Parks would not be required to change the current Backcountry Zone designation in the area of the existing transmission corridor should the CPUC/BLM approve SDG&E's Enhanced Northern Route through the Park. This zone designation already allows for expansion of infrastructure such as roads and utility lines. The language of the General Plan explicitly states: "In ABDSP, Backcountry has the potential to allow new roads and utility lines through the Park." (See General Plan, Environmental Analysis at 4-7.) Moreover, the construction of Sunrise will not preclude State Parks from continuing to manage the area in the vicinity of the already existing transmission line and public highway in a manner that provides a "predominantly natural environment with moderate evidence of human existence."

In short, the General Plan acknowledges that SDG&E might seek to expand its existing transmission line through the Park, the plan approved by the Park Commission directs State Parks staff to work with SDG&E to resolve any potential resource conflicts implicated by any transmission line expansion within the existing 100 foot corridor, and

the plan defined a land use designation for that existing corridor that allows for expansion. As a result, there is no requirement to amend the ABDSP General Plan to allow for the construction of Sunrise along SDG&E's Enhanced Northern Route.

The DEIR/EIS suggests that a General Plan amendment "may" be required as a result of "inconsistencies" between the Sunrise Powerlink and certain broadly stated Goals and Guidelines of the ABDSP General Plan. Similarly, SDG&E understands that certain State Parks representatives have very recently asserted the position at the February 25, 2008 all parties meeting in San Diego that *any* route through ABDSP (including one that stays within the existing 100 foot corridor) would require a General Plan amendment given these and other newly found so-called inconsistencies. In other words, it now appears that State Parks is taking the position that the Park Commission must expressly approve Sunrise. This approach, however, ignores the more specific management zones and express operational goals and guidelines for utility facilities adopted by the General Plan and the fact that general plans are not intended to describe in detail the location and design of specific facilities.

There is no statutory, regulatory or guidance provision requiring State Parks to amend the General Plan under these circumstances. Just as the construction of the Sunrise Powerlink along SDG&E's Enhanced Northern Route will not require State Parks to change the Backcountry Zone designation in the vicinity of the existing transmission corridor, neither State Parks nor the DEIR/EIS identifies how any of the Goals and Guidelines of the General Plan that are alleged to be inconsistent with Sunrise must be changed to accommodate upgrading and improving the existing line through the Park. For example, the DEIR/EIS alleges that Sunrise would be inconsistent with the General Plan's Significant and Sensitive Biota Element Goal 1/Guideline 1a, which directs State Parks staff to preserve sensitive species and habitats and encourage their recovery. (DEIR/EIS at D.16-39.) Neither the DEIR/EIS nor State Parks has identified how this guideline would have to be changed. Indeed, Sunrise, which will be constructed in an already disturbed corridor, will not preclude State Parks from continuing to preserve sensitive species and habitats and encourage their recovery.

Similarly, the DEIR/EIS finds an alleged inconsistency between Landscape Linkages Goal 1/Guideline 1a, which mandates that State Parks "actively work with local, federal transportation, and regulatory agencies in the planning of future regional transportation and infrastructure projects." (DEIR/EIS at D.16-41.) The guideline further directs State Parks to "discourage the fragmentation and isolation of habitat by such projects and ensure that adequate mitigation measures are incorporated into all road and infrastructure improvement and construction projects." (DEIR/EIS at D.16-41.) State Parks is in fact doing exactly as the guideline directs and is advocating mitigation measures that will address the potential impacts of Sunrise, and indeed, the Northern Enhanced Route would stay entirely within the existing 100-foot transmission corridor, consistent with this requirement. The DEIR/EIS finds an "inconsistency" by concluding that these mitigation measures will not entirely eliminate the potential impacts to habitat areas within the Park. However, there is no direction in the General Plan that State Parks must eliminate all potential impacts from any proposed infrastructure project, and there is

no requirement that this guideline must be changed as a result of Sunrise. Rather, one would assume that this guideline should remain the same as future infrastructure projects are proposed so that State Parks staff continue to be obligated to work with relevant agencies in the planning of those projects and to advocate mitigation measures to offset any potential impacts of those projects.

By way of comparison, the DEIR/EIS makes similar conclusions about alleged inconsistencies between Sunrise and broad goals stated in the resource management plan applicable to the CNF. For example, the DEIR/EIS alleges that the Sunrise Powerlink is inconsistent with Goal 1/Objective 2 of Part 1 of the Land Management Plan for Southern California National Forests Vision, which directs that wildland fires should be suppressed at a minimum cost. (DEIR/EIS at D.16-20.) The DEIR/EIS also finds a so-called inconsistency between Sunrise and Goal 6/Objective 3 of the same plan, which directs that the Forest Service maintain the environmental, social and economic benefits of forests by reducing their conversion to other uses. (DEIR/EIS at D.16-21.) The DEIR/EIS erroneously concludes that as a result of these so-called inconsistencies with broadly stated goals, the Forest Plan must be amended as a result of the Sunrise Powerlink project. (DEIR/EIS at D.16-3.)

Plan amendments are not required under these circumstances, however, and instead as both the Forest Service has stated and the DEIR/EIS subsequently acknowledges, there are only three circumstances applicable to Sunrise that actually might require an amendment to the Cleveland National Forest Plan: (1) if a route traverses the Back Country Non-Motorized Zone; (2) if a route conflicts with specific scenic integrity objectives designated for a particular area; or (3) if a route crosses the Pacific Crest National Trail. (DEIR/EIS at D.17-9.) Amendments may be required under these circumstances because these three instances reflect specific standards designations contained in CNF's management plan, and these designations must be changed to allow Sunrise to be located within certain areas of the Forest.

By contrast, the DEIR/EIS's generic and often overstated conclusions about alleged inconsistencies between other Forest plan guidelines and Sunrise do not require a plan amendment because the plan guidelines would continue to remain the same, and the Sunrise Project (with associated mitigation) would be built in a manner contemplated by these broad guidelines. For example, the Forest Service will continue to fight fires at minimum costs and will continue to manage the Forest in a manner that reduces land use conversion.

The same holds true for the ABDSP General Plan. The DEIR/EIS's conclusions about alleged inconsistencies between a number of broadly stated guidelines in the ABDSP General Plan and Sunrise do not require that the ABDSP General Plan be amended in order for the project to be located within the Park, given that those guidelines would continue to remain exactly the same, and the project would be built in a manner that would not preclude application of these policies. General Plans must be read as a whole document, including the language adopted by the Park Commission in Operations Goal and Guideline 4. Indeed, the Plan expressly acknowledges that “[i]n ABDSP,

Backcountry has the potential to allow new roads and utility lines through the Park.” (See General Plan, Environmental Analysis at 4-7). The CPUC/BLM recognized as much when it noted that no General Plan amendment would be required for any route through ABDSP that used the existing transmission corridor. (See CPUC/BLM Notice Regarding Conclusions on EIR/EIS Alternatives to the Proposed Sunrise Powerlink Project: Results of the Second Scoping Process at 7 (noting that the Overhead 500 kV ABDSP Within Existing 100 Foot ROW was retained as an alternative northern route segment because it would stay within SDG&E’s existing corridor and therefore “would not result in direct effects on State-designated wilderness and would not require a State Park Plan Amendment.”); see also Park Commission, Minutes of the Meeting-Thursday, February 8, 2007<sup>9</sup> (noting State Parks General Counsel’s opinion that if the transmission line stayed within the existing transmission corridor, it would decrease the likelihood of needing an amendment to the Park’s General Plan).)

Consistent with that finding, SDG&E compiled the Enhanced Northern Route as the optimum route for Sunrise, given that it avoids administratively designated wilderness and any need for a General Plan amendment.

#### **B. SDG&E’s Enhanced Northern Route Should Allow For 2011 In-Service Date**

Because SDG&E’s Enhanced Northern Route is similar to the Proposed Route and does not require significant lengths of underground construction, which would add greatly to the schedule, SDG&E expects that Sunrise can be constructed along the Enhanced Northern Route to meet the same in-service date as is expected for the Proposed Route. If the Enhanced Northern Route is constructed, the expected in-service date would be June 2011. This estimated in-service date takes into account mitigation and reasonably expected permit requirements, land acquisition activities and the varied construction methods proposed for this alternative.

In the event that a statutory exception to General Plan amendment requirements does not apply,<sup>10</sup> SDG&E believes that the amendment can be achieved within the timeframe of obtaining the other permits. A Forest Plan Amendment required for any southern routes is expected to take longer to complete since it may require additional subsequent environmental review, as discussed below. It is estimated this would delay the in-service date of the southern routes.

#### **C. The Enhanced Northern Route Provides Expandability For Future Needs**

SDG&E’s proposed Central East Substation is designed to allow for a potential buildout, if needed, of two 500 kV circuits and six 230 kV circuits of which initially there will be one 500 kV circuit and two 230 kV circuits. It is prudent planning for large infrastructure projects such as transmission lines to design for potential future needs, even where the certainty of such needs and the precise timing of such needs is not known.

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<sup>9</sup> <http://www.parks.ca.gov/pages/843/files/minutes2-8-07.pdf>

<sup>10</sup> These statutory exemptions are discussed in more detail herein and are equally applicable to the Enhanced Northern Route.

SDG&E does not know the routes of any potential future transmission lines. However, if needed, it is reasonable to assume the future 500 kV or 230 kV lines would go to existing substations. Thus, future 230 kV circuits out of Central East Substation would probably terminate at existing substations such as Escondido and Sycamore Canyon. (DEIR/EIS at B.2.7.) From a planning perspective, SDG&E would, to the extent possible, site additional lines in already disturbed corridors using existing rights-of-way. A possible 500 kV future route is to connect to the Valley – Serrano 500 kV line, as shown in the DEIR/EIS in Figure B.12-b.

The Enhanced Northern Route provides better opportunity for future transmission routes. Central East Substation is better placed to serve future needs in the northern service territory or the southern part of the service territory. Future routes out of the southern route substation sites like the Modified Route D Alternative (MRDA) Substation Alternative would have to traverse longer distances to get to the Valley – Serrano interconnection point. A southern substation site would also have a longer route to get to Escondido and other northern substations. Whereas, a location like Central East Substation would be able to get to the northern substation and the southern substations like Sycamore Canyon Substation.

Future transmission routes from the MRDA Substation Alternative compared to the Central East Substation reveals there are more constraints with the former. The future transmission route (as shown in DEIR/EIS at Fig. E.1.1-6) following the Route D Alternative goes through CNF proposed wilderness areas and Back Country Non-motorized Zones. The second future transmission route shown in the DEIR/EIS proposes to go in existing transmission corridors through developed areas and will impact businesses and residences. Therefore, the feasibility of the future expansion routes is at best questionable if a southern alternative for Sunrise is chosen. Because any such future line would be longer from a southern route than a northern route, it almost certainly would be more expensive (with the ultimate cost dependent on routing and construction methods).

If future 500 kV and 230 kV circuits cannot not be built due to the location of the substation and route constraints, then one of the critical objectives of the Sunrise Powerlink, “expandability” would not be met.

#### **D. The Enhanced Northern Route Follows Linear Features**

SDG&E’s Enhanced Northern Route uses more existing transmission line corridor than Aspen’s Southern Route – the former uses 49 miles out of a total length of 147.7 miles, while the latter uses only 9 miles of existing corridor – and SDG&E’s Enhanced Northern Route follows more existing linear features. (See SDG&E Direct Testimony at 6.31<sup>11</sup> and Attach 5 - maps depicting proposed miles located within or parallel to existing facilities.) By following existing disturbed transmission corridors and

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<sup>11</sup> SDG&E’s Phase 2 Direct Testimony and Rebuttal Testimony referenced in this letter are hereby incorporated by reference and may be accessed at <http://www.sdge.com/sunrisepowerlink/CPUC.html>.

existing linear features such as highways, the Enhanced Northern Route limits overall and site-specific effects and avoids the introduction of new facilities onto previously undisturbed landscapes, as would occur with the southern routes. Additionally, when following existing linear features, this route would reduce the need for new access roads, thus minimizing impacts to upland vegetation communities wetlands, and stream crossings. (*Id.*) These accepted guidelines are both incorporated into State policy known as the Garamendi Principles and many multiple species conservation plans (MSCP) in San Diego County. (*See, e.g.,* City of San Diego MSPC Subarea Plan at 44 (noting that utility lines “should follow previously-existing roads, easements, rights of way, and disturbed areas, minimizing habitat fragmentation”) at Attachment 6.)

### **III. SDG&E’s Proposed Route Is The Second Best Alternative—It Is Feasible, Meets Project Objectives And Has Limited Environmental Impacts**

SDG&E’s Proposed Route is the second best option available to meet the needs of SDG&E ratepayers and achieve the State of California’s energy goals. Because the Proposed Route deviates from the existing transmission corridor through ABDSP, it may take longer to secure all necessary permits and approvals before SDG&E can commence construction on Sunrise. Accordingly, the in-service date could be slightly delayed compared to SDG&E’s Enhanced Northern Route. Nevertheless, the Proposed Route still achieves all of the project objectives and has limited environmental effects compared to the southern routes.

#### **A. SDG&E Believes That It Can Continue Working With State Parks To Obtain Any Necessary State Parks Approvals, Though It May Take More Time Than On SDG&E’s Enhanced Northern Route**

If the CPUC/BLM determines that SDG&E’s Enhanced Northern Route should not be selected, SDG&E’s Proposed Route continues to be the ideal route choice for the Sunrise Powerlink. The Proposed Route is legally and technically feasible and can be implemented with fewer delays and without the uncertainty associated with southern routes. Moreover, the Proposed Route was selected by SDG&E because of its potential to limit certain environmental effects within ABDSP.

The Proposed Route generally follows the existing transmission corridor through ABDSP, just as SDG&E’s Enhanced Northern Route does and in accordance with the Garamendi Principles, discussed at length in SDG&E’s PEA and in Phase 2 testimony.<sup>12</sup> SDG&E proposed certain deviations from that existing corridor, however, to lessen the potential environmental impacts of the existing transmission corridor through ABDSP. SDG&E acknowledges that as a result of these proposed deviations, the Proposed Route would traverse some administratively designated wilderness areas in ABDSP. (DEIR/EIS at D.5-22.) But SDG&E believes that the slight boundary adjustment that would be required to accommodate these deviations from the existing transmission corridor is outweighed by the benefits to ABDSP of relocating the transmission line outside of certain sensitive areas, reducing the number of structures required in the Park, and

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<sup>12</sup> SDG&E Phase 2 Direct Testimony at Ch. 6, p. 6.30.

reducing the number of instances of transmission line crossings across certain roadways, especially in light of the extensive environmental review and analysis that has already been performed.

The DEIR/EIS states that an amendment to ABDSP's General Plan is required for the Proposed Route because the route will cross administratively designated wilderness. SDG&E respectfully disagrees with this conclusion. California law holds that no general plan revision is required if the undertaking is "necessary for the protection of public health and safety." (CAL. PUB. RES. CODE § 5002.2(c).) Ensuring reliable power and preventing blackouts with the implementation of the Sunrise Powerlink is unquestionably a matter of public health and safety. (*See also* CAL. PUB. UTIL. CODE § 334 (recognizing that the importance of electrical system reliability is "of paramount importance to the safety, health, and comfort of the people of California").<sup>13</sup>)

Even if a General Plan amendment was required to implement the Proposed Route, it should be a minor amendment consisting of adjusting the boundaries of administratively designated wilderness within the Park to reflect a slightly wider right-of-way corridor. Minor boundary adjustments of federal wilderness areas have occurred to accommodate needed power infrastructure, particularly if there is no net loss of wilderness through mitigation measures.<sup>14</sup> In those areas where the Proposed Route deviates from the existing transmission corridor altogether, as mentioned above, these deviations were specifically designed to provide the Park with a net environmental benefit as a result of the project by moving the existing line outside of sensitive areas and reducing the overall number of structures and road crossings within the Park. In this way, instead of being inconsistent with the ABDSP General Plan, SDG&E followed the dictates of that plan, which directs that if facilities are proposed in areas not designated for such use, State Parks shall work with the project proponent to evaluate alternatives that will result in a net improvement to the environment. (General Plan at 3-52, Guideline - Operation 4b.)

Despite some suggestions in the DEIR/EIS to the contrary, the Proposed Project would be constructed in a manner that would be consistent with the broad policies contained in the ABDSP General Plan, and thus SDG&E does not believe an amendment to the plan on that basis is necessary to authorize Sunrise. Rather, the only requirement related to a plan amendment that appears to apply given the text of the existing General Plan is the California Code provision directing that General Plans be revised in the event of any reclassification of the state park unit, absent an applicable exception. (CAL. PUB. RES. CODE § 5002.2.) In the event that a statutory exception to General Plan amendment requirements does not apply, however, SDG&E believes that an amendment to the plan to reflect new wilderness boundaries could be processed expeditiously, because both

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<sup>13</sup> *See also* CAL. PUB. RES. CODE § 5002.2(c) (no general plan amendment is required "if the only development contemplated by the department consists of the repair, replacement, or rehabilitation of an existing facility").

<sup>14</sup> Boundary adjustments to federal wilderness (which unlike here require legislative action under federal law) are not unprecedented. (*See, e.g.*, Glacier Bay National Park Boundary Adjustment Act of 1998, Pub. L. No. 105-317 (1998).)

State Parks and the Park Commission already have at their disposal the thorough environmental analysis that has been performed to date and is currently reflected in the DEIR/EIS and the soon-to-be-issued FEIR/EIS.

In order to amend the General Plan, State Parks would prepare an inventory of the unit's scenic, natural and cultural features – information readily at the agency's disposal from its recent development of the General Plan and easily supplemented by the information gathered during the Sunrise Powerlink environmental review process. (*See CAL. PUB. RES. CODE § 5002.1* (requiring inventory prior to reclassification).) In sum, SDG&E believes that, in the event that an amendment to the General Plan is required, such amendment could be processed in a manner that prevents delay of the implementation of the Sunrise Powerlink.

## **B. The Proposed Route Potentially Minimizes Cultural Impacts**

Any route for the Sunrise Powerlink is likely to have some cultural impacts given the rich cultural history of Southern California generally and the greater San Diego area specifically. In selecting its Proposed Route, SDG&E followed already-disturbed corridors containing existing rights-of-way and linear features and minimized undergrounding, whenever possible in order to minimize the potential impact to culturally significant areas. Additionally, SDG&E identified a range of proven measures aimed at minimizing any of the impacts that might occur and incorporated those Applicant Proposed Measures into the project design itself. Aspen's Southern Route does not minimize the cultural impacts associated with SDG&E's Proposed Route; instead, going south merely moves those impacts from one area to another. Moreover, in evaluating SDG&E's Proposed Route, the DEIR/EIS appears to have overstated the impacts that would be likely to occur and disregarded the effectiveness of SDG&E's proposed mitigation measures.<sup>15</sup>

The substantial undergrounding associated with Aspen's Northern Route will result in a far greater likelihood that the route will encounter subsurface cultural resources, given that the route passes through two culturally sensitive areas – ABDSP and the Santa Ysabel Valley.

Additionally, not only does Aspen's Southern Route also propose potentially destructive undergrounding through culturally important areas – an Early Period habitation site (CA-SDI-4798) in the vicinity of Alpine – overhead portions of this route will span the potentially large cultural area in the vicinity of the National Register listed Table Mountain Archaeological District. In short, neither Aspen's Northern route nor Aspen's Southern Route demonstrably improves the cultural impacts that may be associated with Sunrise. In addition, the amount of culturally sensitive areas on the Proposed Route are known because the Proposed Route has been subjected to a 100% Class III pedestrian survey, while a lesser amount has been surveyed with Aspen's Southern Route. In fact, there is more of a likelihood of encountering additional

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<sup>15</sup> SDG&E has previously identified concerns on these issues in its prior comment letters on the DEIR/EIS.

## **VI. SDG&E's Modified Southern Route Attempts To Mitigate The Impacts Of Aspen's Southern Route**

SDG&E is proposing a segment re-route for Aspen's Southern Route that would mitigate direct impacts to CNF lands currently designated as Back Country Non-Motorized Zone and that would avoid all Indian Reservations located along Aspen's Southern Route. The FEIR/EIS should include this mitigation re-route as "SDG&E's Modified Southern Route."<sup>25</sup> This re-route would mitigate the feasibility concerns arising from those impacts, but still would require contingent Forest Service approvals. Other route constraints still remain, such as potential impacts to a very large archaeological district, the significant difficulties associated with undergrounding a 230 kV transmission line in Alpine Boulevard, and the infeasibility of locating any future 230 kV underground through Alpine Boulevard.

SDG&E's Modified Southern Route would follow Aspen's Southern Alternative from the Imperial Valley Substation, using the I-8 Alternative, until the intersection of the I-8 Alternative and the BCD Alternative (DEIR/EIS at Fig. E.1.1-1) located southeast of the town of Boulevard. SDG&E's Modified Southern Route would follow the BCD Alternative, which crosses I-8 as it travels in a north-northwest direction, passing one mile east of Boulevard and generally paralleling McCain Valley Road. The route would pass directly adjacent to the Carrizo Gorge Wilderness Area, crossing both BLM and private lands.

Then, the route would pass within one mile and east of the Lark Canyon Campground and Off-Highway Vehicle Area at the BCD Alternative MP 4. At BCD Alternative MP 6.5, the route would turn northwest for 2.5 miles on BLM land, crossing Lost Valley Road and McCain Valley Road, and passing approximately three miles southwest of the Carrizo Overlook at BCD Alternative MP 8 before heading west through BLM land for approximately five miles. The route would pass within two miles for the Cottonwood Campground at BCD Alternative MP 10 and cross Lost Valley Road, Manzanita Cottonwood Road, Canebrake Road, and Old Mile Road.

SDG&E's Modified Southern Route would deviate from BCD Alternative MP 12 to go north through BLM lands and around CNF Back Country Non-Motorized Zones before rejoining the BCD Alternative at BCD Alternative MP 13.7, located at the crossing of La Posta Truck Trail. SDG&E's Modified Southern Route would then turn south, primarily following the BCD South Alternative, although, as noted below, the line may need to be located slightly to the west to avoid placing a structure in the middle of the I-8 ROW. After crossing I-8 and the La Posta Valley, the Modified Southern Route would rejoin Aspen's Southern Route along the Modified Route D Alternative near Modified Route D Alternative MP 2.5. After joining the Modified Route D Alternative, SDG&E's Modified Southern Route would follow Aspen's Southern Route until reaching Sycamore Canyon Substation. After this point, this alternative would be the same as the

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<sup>25</sup> The Modified Southern Route is depicted on Attachment 1.

Coastal Link of the Proposed Route. SDG&E requests that this mitigation re-route be incorporated into the FEIR/EIS.

**A. No American Indian Lands Or Backcountry Non-Motorized Zones Would Be Crossed By The Modified Southern Route**

SDG&E developed the Modified Southern Route to respond the Campo Indian Tribe's letter stating it will not allow any route across its Reservation, rendering Aspen's Southern Route infeasible. The BCD Alternative and the Backcountry Non-Motorized Zone work-around proposed by SDG&E is a necessary mitigation re-route to avoid these Indian Reservations and land use conflicts in CNF. (*See also* March 12, 2008 letter from Forest Service (requiring reroute of BCD Alternative "between milepost 12 and 14 to avoid the conflict with the Forest Plan".))

SDG&E has also recently learned that this route (which is a portion of the BCD Alternative) would cross a Section 16 parcel of land, located in Township 16 South, Range 6 East, currently under California State Lands Commission (SLC) jurisdiction, raising some uncertainty with the feasibility of crossing this Section 16. SDG&E understands that SLC has received an application from a developer, PPM Energy, Inc., to use the entirety of the land for a wind energy project and, at this time, it is unclear whether Sunrise could be constructed over that land should the wind energy project be pursued. While SDG&E believes that an appropriate work-around could be achieved to minimize any potential impacts and conflicts, this situation represents another example of the delays and uncertainty applicable to any of the southern routes proposed for Sunrise and would involve yet another permitting agency (SLC).

In any event, assuming SDG&E's proposed mitigation re-route is feasible, after avoiding the Back Country Non-Motorized Zone area in the vicinity of the BCD Alternative, SDG&E's Modified Southern Route would then, for the most part, follow the BCD South Option to the Modified Route D Alternative and then rejoin Aspen's Southern Route. However, SDG&E has proposed another necessary mitigation re-route in this area – siting the BCD South Option further west at a location crossing I-8 to avoid impacts to the highway ROW by eliminating the need to put a structure in the middle of that ROW.

To avoid the Campo, Manzanita and La Posta Reservations and to locate Sunrise a safe distance from the Southwest Powerlink, SDG&E's Modified Southern Route, like Aspen's Southern Route, must cross many miles of the CNF. As such, any southern route implicates Forest Service requirements, which could delay construction and the projected in-service date for Sunrise. For these reasons, SDG&E continues to believe that either its Enhanced Northern Route or the Proposed Route are superior to any southern route.

**B. Forest Service Approvals Would Still Be Required But Impacts Would Be Reduced By Avoiding Backcountry Non-Motorized Zones**

Both SDG&E's Modified Southern Route and Aspen's Southern Route include route segments that will cross extensive portions of the CNF designated as having a high scenic integrity objective. (DEIR/EIS at Fig. D.17-3.) As a result, plan amendments are likely required to allow these segments to be implemented.

Assuming the Forest Service proceeds with fully evaluating the Sunrise route segments that cross CNF lands, the agency has informed SDG&E that it may need to conduct its own environmental review of the project, separate and apart from the review performed by the CPUC and BLM, as discussed above. Although SDG&E supports the use of the existing environmental review documents by the Forest Service, given that SDG&E believes it provides adequate analysis of the project's environmental impacts, the Forest Service still retains the discretion to conduct a separate environmental review. This is in contrast to the situation presented by any route through ABDSP and CEQA's mandate to State Parks to combine its EIR process with the "existing planning, review, and project approval process used by each public agency" – in this case that of the CPUC. (See CAL. CODE REGS. tit. 14, § 15080; see also CAL. PUB. RES. CODE § 21166 (mandating that a responsible agency (such as State Parks here) cannot undertake a subsequent or supplemental EIR unless certain circumstances not present here occur).) Thus, unlike state law, federal law would not preclude the Forest Service from conducting its own potentially lengthy environmental review process (typically anywhere from six months to two years) – a decision that could substantially delay the in-service date for Sunrise.

### **C. SDG&E's Modified Southern Route Still Has Feasibility Constraints And Could Delay The In-service Date**

Even with SDG&E's modifications to Aspen's Southern Route, there remain additional obstacles and constraints that render SDG&E's Modified Southern Route less preferable to either SDG&E's Enhanced Northern Route or the Proposed Route. Among other issues, SDG&E's Modified Southern Route includes the undergrounding through Alpine Boulevard that is proposed as part of Aspen's Southern Route. This undergrounding presents a number of technical and scheduling challenges associated with installing two 230 kV circuits in the same area as fiber optic cables and other existing underground utility lines in this area.

Also, the expected in-service date is still predicted to be later than either the Proposed Route or SDG&E's Enhanced Northern Route. Optimistically, it is possible that SDG&E's Modified Southern Route could be in service by June 2012, at the very earliest. This delay is attributable to a number of factors, including the likelihood of a Forest Plan amendment, the potential delays associated with required mitigation measures and the extensive underground construction along Alpine Boulevard. The latter obstacle, in particular, may cause substantial delays, given the need to avoid impacts to cultural sites, work with area businesses potentially affected by construction, and avoid conflicts with existing facilities in the ground. Additionally, Aspen's Southern Route will require a number of I-8 crossings, which will pose timing challenges in coordinating with Caltrans to install the conductor across a busy highway. Other potential schedule delays exist as well, including those associated with navigating the challenging terrain of

areas such as the steep rocky grades of Mountain Springs Grade, the McCain Valley area where the BCD Alternative is proposed, and the Chocolate Canyon to Highway 67 segment. All these constraints will add to the delay of the in-service date. These issues should be included in the FEIR/EIS.

#### **D. Choosing Any Southern Route Will Impede Future Expandability**

The Modified Southern Route also fails to meet the future expansion project objective. Although the timing for the need for future transmission lines out of the proposed Modified Route D Substation has not yet been determined, prudent planning suggests that this alternative be sited where future transmission expansion is possible. The potential routes for future transmission expansion associated with the southern routes have questionable feasibility. (DEIR/EIS at E.1.1-22 (Fig. E.1.1-6).) As mentioned previously for Aspen's Southern Route, the ability to add additional underground 230 kV circuits within Alpine Boulevard may not be possible resulting in limited future ability to meet transmission expansion needs.

For instance, one of the DEIR/EIS's potential future expansion routes for this option proposes to follow the Route D Alternative. As proposed, it traverses through CNF Back Country Non-Motorized Zones, through inventoried roadless areas and through proposed wilderness areas. (DEIR/EIS at Table E.3.4-3.) The Forest Service has already indicated that a special use authorization will not be approved for any route that follows the Route D Alternative. (*See* Forest Service's March 12, 2008 letter.)

A second route identified would follow Modified Route D south of the Modified Route D Substation Alternative, turn north through the community of Alpine, and then continue on to the Chicarita Substation then to the Talega-Escondido line. (DEIR/EIS at E.1.7-21.) This future transmission route follows heavily congested transmission corridors, with developed areas right up to the edge of those corridors. As a result, any future transmission at the 230 kV or 500 kV level will require expansion of existing rights-of-way, which in turn will require relocation of businesses or residences. In general, the ability of SDG&E to expand along this route is therefore questionable and renders any southern route less reliable than the Proposed Route or SDG&E's Enhanced Northern Route.

### **VII. The Other "Top-Ranked" Alternatives Are Infeasible**

The DEIR/EIS identifies three alternatives as "environmentally superior" to any permutation of Sunrise: (1) the "New In-Area, All-Source Generation Alternative"; (2) the "New In-Area Renewable Generation Alternative"; and (3) the "LEAPS Transmission-Only Alternative."<sup>26</sup> The DEIR/EIS states these options are "reasonably expected to occur in the future" if Sunrise is not approved.<sup>27</sup>

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<sup>26</sup> The "LEAPS Transmission-Only Alternative" is called the TE/VS Interconnect.

<sup>27</sup> DEIR/EIS at ES-4.

SDG&E's 4<sup>th</sup> Comment Letter on the Sunrise DEIR/EIS  
Mitigation Re-Routes Corresponding to the Project Description

Reroute No.	Chapter #	Page #	Para. #	Comment
1	B	B-13		<b>Around Narrows Substation:</b> This re-route is to improve the previous submittal where the 500kV passes over the top of Narrows Substation on the south side which would have resulted in maintenance and safety concerns. This re-work remains within the SDG&E easement and routes the 500kV to the north side of the substation and results in an aerial encroachment over the Caltrans ROW but not over the 69/92kV equipment inside the substation. New structures will remain within the SDG&E easement in addition to the 500kV wire setup.
2	B	B-14	2	<b>Grapevine Canyon - North End (avoid 69 kV lines):</b> The Grapevine Canyon Alternative is an alternative to leave the existing 69 kV circuit as is once outside the State Park. This alternative provides for increased separation from the existing 69kV line and increases the distances to homes.
3	B	B-51	1	<b>100-Ft ROW in ABDSP:</b> The ABDSP 100-foot corridor design is intended locate the 500kV transmission line entirely within SDG&E's existing 100-foot wide corridor through the State Park. This revision relocates access roads, pull sites, etc. out of designated wilderness areas.
4	B	B-14	2	<b>Central East Substation ingress / egress:</b> The Central East Substation 500kV ingress and 230kV egress have been modified to fit updated substation civil and electrical engineering and to provide for increased separation between the incoming 500kV line and the outgoing 230kV line to accommodate future transmission expansion.
5	B	B-6	1	<b>N6 Private Land Revision:</b> The N6 Private Land Revision relocates the Preferred Alternative to BLM parcels to avoid bi-secting a private land parcel and cultural resources.
6	C	C-50		<b>For the Coastal Link System Upgrade Alternative,</b> the following transmission upgrades need to be included in the FEIR/EIS: the upgrade of Sycamore - Pomerado 69 kV Circuits 1 and 2 and the upgrade of Sycamore - Scripps 69 kV line.
7	E	Figure E.1.1-2a		<b>SWPPL Archaeological Site (Plaster City):</b> The SWPPL Archaeological Site (Plaster City) avoids a large archaeological site.
8	E	E.1.1-2		<b>Jacumba SWPPL Breakaway Point Revision:</b> The Jacumba SWPPL Breakaway Point Revision eliminates the need for one large angle structure by spanning directly between two smaller angle structures without impacting additional parcels.
9	E	E.1.4-8		<b>Pine Valley I8 Non-motorized Avoidance Revision:</b> The Pine Valley I8 Non-motorized Avoidance Revision avoids Forest Service parcels with the back-country, non-motorized designation and avoids crossing the Viejas Indian Reservation.
10	E	E.1.4-13		<b>High Meadows Revision:</b> The High Meadows Revision relocates the I8 centerline downhill to the west to reduce visual and land use impacts to the High Meadows Ranch Subdivision.

SDG&E's 4<sup>th</sup> Comment Letter on the Sunrise DEIR/EIS  
 Mitigation Re-Routes Corresponding to the Project Description

Reroute No.	Chapter #	Page #	Para. #	Comment
11	E	E.1.4-13		<b>Highway 67 Hansen Quarry:</b> The Highway 67 Hansen Quarry Revision relocates the I8 centerline downhill to the east to eliminate land use impacts to the Hansen Aggregates Quarry.
12	E	E.4.1-8		<b>Lightner Substation Ingress/Egress:</b> The Lightner Substation 500kV ingress and 230kV egress have been modified to fit updated substation civil and electrical engineering and to provide for increased separation between the incoming 500kV line and the outgoing 230kV line to accommodate future transmission expansion.
13	Ap.1	Ap.1-4		<b>Coastal Link Alternative - Chicarita Cable Pole:</b> The relocation of the Chicarita Cable Pole provides an alternative that avoids construction within close proximity to an apartment complex and avoids crossing over two 138 kV existing lines originating at Chicarita Substation and going under a 230 kV structure that has a 69 kV circuit on it.
14	Ap.1	Ap.1-114		<b>Santa Ysabel Partial UG Avoiding Cultural Sites:</b> This is an alternative to the Santa Ysabel Full Underground Alternative that utilizes the Proposed Project overhead route and is routed underground along Mesa Grande Road and adjacent to property lines to avoid impacts to cultural resources and reduce visual and property impacts.

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
1	D	D.4-23, 24	Bottom 2 paragraphs, 23, second bullet, 24, second full paragraph 24	<p><b>Around Narrows Substation.</b> This re-route around the Narrows Substation is to improve the previous submittal where the 500kV passes over the top of Narrows Substation on the south side which would have resulted in maintenance and safety concerns. This re-work remains within the SDG&amp;E easement and routes the 500kV to the north side of the substation and results in an aerial encroachment over the Caltrans ROW but not over the 69/92kV equipment inside the substation. New structures will remain within the SDG&amp;E easement in addition to the 500kV wire setup. This revision relocates access roads, pull sites, etc. out of designated wilderness areas to specifically address Impact WR-4: <i>Presence of a transmission line in a designated wilderness or wilderness study area would result in loss of wilderness land (Class I). The proposed SRPL Project would require a 50-foot expansion of SDG&amp;E's existing easement throughout ABDSP, and in some locations in Grapevine Canyon, a larger portion of the ROW would be located within wilderness areas. The additional ROW width through Grapevine Canyon would require the use of approximately 50.2 acres of State Wilderness within the Pinyon Ridge Wilderness Area (48.1 acres) and Grapevine Mountain Wilderness Area (1.3 acres) (see Table D.5-3 and Appendix 11B for detailed maps). Proposed SRPL ROW would not be located within Vallecito Mountains Wilderness Area; however, portions of three temporary pull sites for stringing the 500 kV conductor would be located within the Wilderness Area, resulting in 0.8 acres of impact to wilderness. Note that the distinction between temporary and permanent impacts to wilderness is not made because both are prohibited.</i> This alternative incorporates full wilderness avoidance to supplant mitigation WR-4a and WR-4b.</p>
2	D	D.4-23, 24	Bottom 2 paragraphs, 23, second bullet, 24, second full paragraph 24	<p><b>Grapevine Canyon - North End (avoid 69 kV lines):</b> The Grapevine Canyon Alternative is an alternative to leave the existing 69 kV circuit as is once outside the State Park. This alternative provides for increased separation from the existing 69kV line and increases the distances to homes, specifically to address Impact L-1: <i>Construction would temporarily disturb land uses at or near the alignment, from MP 83 to MP 88 (See Figure Ap.LU-10 for Grapevine Canyon, west of ABDSP): There are four structures that appear to be residences within 1,000 feet of the proposed ROW in this segment of the project. They are located between 200 and 800 feet from the corridor.</i> This relocation augments and partially supplants APMs LU-1, LU-4, and LU-6 and Mitigation Measure L-1a, Prepare Construction Notification Plan.</p>

SDG&E's 4<sup>th</sup> Comment Letter on the Sunrise DEIR/EIS

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
3	D	D.5-36, D.5-45	2, page 36 2, page 45	<p><b>100-Ft ROW in ABDSP:</b> The ABDSP 100-foot corridor design is intended locate the 500kV transmission line entirely within SDG&amp;E's existing 100-foot wide corridor through the State Park. This revision relocates access roads, pull sites, etc. out of designated wilderness areas to specifically address Impact WR-4: <i>Presence of a transmission line in a designated wilderness or wilderness study area would result in loss of wilderness land (Class I). The proposed SRPL Project would require a 50-foot expansion of SDG&amp;E's existing easement throughout ABDSP, and in some locations in Grapevine Canyon, a larger portion of the ROW would be located within wilderness areas. The additional ROW width through Grapevine Canyon would require the use of approximately 50.2 acres of State Wilderness within the Pinyon Ridge Wilderness Area (48.1 acres) and Grapevine Mountain Wilderness Area (1.3 acres) (see Table D.5-3 and Appendix 11B for detailed maps). Proposed SRPL ROW would not be located within Vallecito Mountains Wilderness Area; however, portions of three temporary pull sites for stringing the 500 kV conductor would be located within the Wilderness Area, resulting in 0.8 acres of impact to wilderness. Note that the distinction between temporary and permanent impacts to wilderness is not made because both are prohibited.</i> This alternative incorporates full wilderness avoidance to supplant mitigation WR-4a and WR-4b and because 50-feet of wilderness expansion is not required under this alternative would avoid the Class I impact of loss of wilderness land.</p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
4	D	D.3-178 D.3-179	4 2	<p><b>Central East Substation ingress / egress:</b> The Central East Substation 500kV ingress and 230kV egress have been modified to fit updated substation civil and electrical engineering and to provide for increased separation between the incoming 500kV line and the outgoing 230kV line to accommodate future transmission expansion. This modification is proposed to address <b>Cumulative Impact V-2FT:</b> <i>Increased structure contrast, industrial character, view blockage, and skylining resulting in cumulative visual impacts (Class I). The visual sensitivity of the existing landscape and viewing conditions, structure design, site-specific siting locations of future transmission structures, and the resulting cumulative visual impacts of the future 230 kV lines vary along the length of the potential future routes. Where two transmission lines are lined up, viewers would be able to see a doubling of the built features (structures and conductors) with increased visual contrast and view blockage. Assuming that the new transmission line is of identical design and is effectively matched up with an existing 230 kV line, tower for tower with synchronized conductor spans, the cumulative impact would be less than significant. However, with three or more transmission lines in a corridor, even with identical designs, it would be very unlikely that natural terrain variations would allow for a consistent matching of structures. As a result, structures would likely be offset in terms of both location and elevation. This would cause asynchronous structure positioning and conductor spans. The corridor would appear more structurally complex with substantially greater industrial character. View blockage of higher valued landscape features (hills, ridgelines, mountains, and sky) would also be more substantial. The resulting cumulative visual impact would be significant and unmitigable (Class I). The future 230 kV lines that would be located along existing 69 kV routes, could also cause substantial cumulative impacts on visual resources due to the larger, taller pole sizes needed to support the weight of the new lines. The new towers would be structurally more prominent with increased industrial character compared to the existing transmission line facilities and would likely result in more instances of structure skylining (extending above the horizon). View blockage of higher valued landscape features would increase. Such substantial cumulative visual impacts would be significant and unavoidable (Class I).</i></p> <p>This modification is a specific implementation of Mitigation Measure V-25a. Structure design and placement guidance.</p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
5	D	D.7-29 D.7-30	4 5	<b>N6 Private Land Revision:</b> The N6 Private Land Revision relocates the Preferred Alternative to BLM parcels to avoid bisecting a private land parcel and cultural resources. This segment option specifically mitigates for <b>Impact C-1: <i>Construction of the project would cause an adverse change to known historic properties (Class I or II)</i></b> "Historic properties", as used herein, are those resources (including historical built environment resources, prehistoric archaeological sites, historical archaeological sites, unique archaeological sites, and traditional cultural properties — regardless of their age) that are determined by a federal, State, or local agency to be eligible for listing on a historic register. The Proposed Project would impact historic properties directly during construction activities such as excavating and grading, as well as indirectly through increased access to cultural resources that could result in vandalism or inadvertent impacts. This segment relocation implements Mitigation Measure C-1b, Avoid and protect potentially significant resources.
7	E	E.1.7-4	2, 4	<b>SWPPL Archaeological Site (Plaster City):</b> The SWPPL Archaeological Site (Plaster City) avoids a large archaeological site. This segment option specifically mitigates for <b>Impact C-1: <i>Construction of the project would cause an adverse change to known historic properties (Class I or II)</i></b> "Historic properties", as used herein, are those resources (including historical built environment resources, prehistoric archaeological sites, historical archaeological sites, unique archaeological sites, and traditional cultural properties — regardless of their age) that are determined by a federal, State, or local agency to be eligible for listing on a historic register. The Proposed Project would impact historic properties directly during construction activities such as excavating and grading, as well as indirectly through increased access to cultural resources that could result in vandalism or inadvertent impacts. This segment relocation implements Mitigation Measure C-1b, Avoid and protect potentially significant resources.

## Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
8	E	E.1.3-79 E.1.3-80	5 1,2	<p><b>Jacumba SWPPL Breakaway Point Revision:</b> The Jacumba SWPPL Breakaway Point Revision eliminates the need for one large angle structure by spanning directly between two smaller angle structures without impacting additional parcels. This modification directly mitigated for <b>Impact L-2: <i>Presence of a project component would divide an established community or disrupt land uses at or near the alignment (No Impact for division of community; Class I or Class II for Pending/Future Development) Pending and Future Development.</i></b> <i>If a transmission route is approved by CPUC and BLM decision-makers, ROW acquisition and detailed design would begin soon after approval. Prior to this process, new land development projects may have been proposed or constructed by landowners on land parcels across which the route would pass. When Proposed Project was defined, an effort was made to avoid properties where the alignment would affect existing or newly planned land developments. However, development is occurring rapidly in southern California, and there are new development projects entering local development approval processes continually. In order for the final engineering of the transmission line to accommodate land use changes that may have occurred after the route was originally defined, Mitigation Measure L-1b is recommended. This measure requires SDG&amp;E to coordinate with landowners to revise the route, where feasible, to minimize land use conflicts between the transmission line and existing/planned development. To reduce impacts to planned new land uses identified subsequent to project approval by CPUC and BLM, it may be feasible to make minor adjustments to alignment location or tower design that would accommodate the proposed development without compromising the transmission line or creating new impacts to adjacent land uses that would be more adverse than the approved alignment. Preparation and implementation of a construction notification plan (Mitigation Measure L-1a) would serve to notify landowners and tenants of pending construction. However, this notification would not provide sufficient time to investigate mitigation rerouting of the transmission line at specific parcels. There would be no impact if no developments are affected, but impacts to these developments would be significant if the mitigation cannot be effectively implemented. It is expected that minor route revisions will reduce impacts to less than significant levels (Class II) but that there may also be situations where the alignment or facility components cannot be relocated, and the impact would remain significant (Class I).</i> This modification implements <b>Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.</b></p>

SDG&E's 4<sup>th</sup> Comment Letter on the Sunrise DEIR/EIS

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
9	E	E.2.5-3, 4	2, 2	<p><b>Pine Valley I8 Non-motorized Avoidance Revision:</b> The Pine Valley I8 Non-motorized Avoidance Revision avoids Forest Service parcels with the back-country, non-motorized designation and avoids crossing the Viejas Indian Reservation. This option mitigation Impact WR-2: <i>Presence of a transmission line or substation would permanently change the character of a recreation area, diminishing its recreational value (Class I). The BCD Alternative would not be collocated with other overhead utilities, and would therefore introduce new structurally complex, industrial type features to a predominantly natural landscape. As described in Section E.2.3, Visual Resources, long-term, operational visual impacts would be experienced by viewers throughout the length of this alternative.</i> This option implements <b>Mitigation Measure WR-2a, Coordinate tower and road locations with the authorized officer for the recreation area, based on input from the USFS March 2008 comment letter on the DEIR/EIS.</b></p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
10	E	E.1.4-12, 13	12, last 13, 2, second bullet	<p><b>High Meadows Revision:</b> The High Meadows Revision relocates the I8 centerline downhill to the west to reduce visual and land use impacts to the High Meadows Ranch Subdivision. This modification directly mitigates for <b>Impact L-2:</b> <i>When the Interstate 8 Alternative was defined, an effort was made to avoid properties where the alignment would affect existing or newly planned land developments. Development is occurring rapidly in southern California, and there are new development projects entering local development approval processes continually. Mitigation Measure L-1b requires SDG&amp;E to coordinate with landowners to revise the route, where feasible, to minimize land use conflicts between the transmission line and existing/planned development. Several new projects have been identified as having potential conflicts with the Interstate 8 Alternative. Potential solutions for these specific projects are presented in the mitigation measure. It is likely that there will be other projects that will be in the land use approval process prior to final design and construction of the approved route. To reduce impacts to planned new land uses identified subsequent to project approval by CPUC and BLM, it may be feasible to make minor adjustments to alignment location or tower design that would accommodate the proposed development without compromising the transmission line or creating new impacts to adjacent land uses that would be more adverse than the approved alignment. Preparation and implementation of a construction notification plan (Mitigation Measure L-1a) would serve to notify landowners and tenants of pending construction. However, this notification would not provide sufficient time to investigate mitigation rerouting of the transmission line at specific parcels. The impact to these developments would be significant if the mitigation cannot be effectively implemented. It is expected that minor route revisions will reduce impacts to less than significant levels (Class II) but that there may also be situations where the alignment or facility components cannot be relocated, and the impact would remain significant (Class I).</i></p> <p>This segment alternative implements Mitigation Measure L-2b, Interstate 8 Alternative: <i>MP I8-87 through I8-89.5, High Meadow Ranch. The initial alignment shall be shifted approximately 200 feet to the west, down slope, in order to minimize visual effects of the towers on the development. See Figure Ap.11C-56 for map of this area.</i></p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
11	E	E.1.4-12, 13	12, last 13, 2, second bullet	<p><b>Highway 67 Hansen Quarry:</b> The Highway 67 Hansen Quarry Revision relocates the l8 centerline downhill to the east to eliminate land use impacts to the Hansen Aggregates Quarry. This modification directly mitigated for <b>Impact L-2: <i>Presence of a project component would divide an established community or disrupt land uses at or near the alignment (No Impact for division of community; Class I or Class II for Pending/Future Development) Pending and Future Development.</i></b> <i>If a transmission route is approved by CPUC and BLM decision-makers, ROW acquisition and detailed design would begin soon after approval. Prior to this process, new land development projects may have been proposed or constructed by landowners on land parcels across which the route would pass. When Proposed Project was defined, an effort was made to avoid properties where the alignment would affect existing or newly planned land developments. However, development is occurring rapidly in southern California, and there are new development projects entering local development approval processes continually. In order for the final engineering of the transmission line to accommodate land use changes that may have occurred after the route was originally defined, Mitigation Measure L-1b is recommended. This measure requires SDG&amp;E to coordinate with landowners to revise the route, where feasible, to minimize land use conflicts between the transmission line and existing/planned development. To reduce impacts to planned new land uses identified subsequent to project approval by CPUC and BLM, it may be feasible to make minor adjustments to alignment location or tower design that would accommodate the proposed development without compromising the transmission line or creating new impacts to adjacent land uses that would be more adverse than the approved alignment. Preparation and implementation of a construction notification plan (Mitigation Measure L-1a) would serve to notify landowners and tenants of pending construction. However, this notification would not provide sufficient time to investigate mitigation rerouting of the transmission line at specific parcels. There would be no impact if no developments are affected, but impacts to these developments would be significant if the mitigation cannot be effectively implemented. It is expected that minor route revisions will reduce impacts to less than significant levels (Class II) but that there may also be situations where the alignment or facility components cannot be relocated, and the impact would remain significant (Class I).</i> This modification implements Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.</p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
12	E	E.1.79, 80	Last, 2	<p><b>Lightner Substation Ingress/Egress:</b> The Lightner Substation 500kV ingress and 230kV egress have been modified to fit updated substation civil and electrical engineering and to provide for increased separation between the incoming 500kV line and the outgoing 230kV line to accommodate future transmission expansion. This modification is proposed to address <b>Cumulative Impact V-2FT: <i>Increased structure contrast, industrial character, view blockage, and skylining resulting in cumulative visual impacts (Class I).</i></b> <i>The visual sensitivity of the existing landscape and viewing conditions, structure design, site-specific siting locations of future transmission structures, and the resulting cumulative visual impacts of the future 230 kV lines vary along the length of the potential future routes. Where two transmission lines are lined up, viewers would be able to see a doubling of the built features (structures and conductors) with increased visual contrast and view blockage. Assuming that the new transmission line is of identical design and is effectively matched up with an existing 230 kV line, tower for tower with synchronized conductor spans, the cumulative impact would be less than significant. However, with three or more transmission lines in a corridor, even with identical designs, it would be very unlikely that natural terrain variations would allow for a consistent matching of structures. As a result, structures would likely be offset in terms of both location and elevation. This would cause asynchronous structure positioning and conductor spans. The corridor would appear more structurally complex with substantially greater industrial character. View blockage of higher valued landscape features (hills, ridgelines, mountains, and sky) would also be more substantial. The resulting cumulative visual impact would be significant and unmitigable (Class I). The future 230 kV lines that would be located along existing 69 kV routes, could also cause substantial cumulative impacts on visual resources due to the larger, taller pole sizes needed to support the weight of the new lines. The new towers would be structurally more prominent with increased industrial character compared to the existing transmission line facilities and would likely result in more instances of structure skylining (extending above the horizon). View blockage of higher valued landscape features would increase. Such substantial cumulative visual impacts would be significant and unavoidable (Class I). This modification is a specific implementation of Mitigation Measure V-25a, Structure design and placement guidance.</i></p>

Mitigation Re-Routes – Corresponding Impact and Mitigation Table

Reroute #	Chapter #	Page #	Para #	Comment
13	D	D.4-31, 32	Third Bullet bottom of 31 and second full paragraph on 32	<b>Coastal Link Alternative - Chicarita Cable Pole:</b> The relocation of the Chicarita Cable Pole provides an alternative that avoids construction within close proximity to an apartment complex and avoids crossing over two 138 kV existing lines originating at Chicarita Substation and going under a 230 kV structure that has a 69 kV circuit on it. <b>This relocation directly addresses Impact L-1:</b> <i>Construction would temporarily disturb land uses at or near the alignment (Class II, III) Within the Coastal Link, including the Sycamore Canyon to Elliot Substation reconductoring, land uses traversed by or adjacent to the proposed route include commercial and office use, industrial uses, military facilities, public roadways, a religious facility, schools, open space preserves, parks, and single- and multi-family residential. Construction of the Coastal Link would temporarily disturb the surrounding areas as a result of heavy construction equipment, trenching activities associated with the undergrounding of a portion of the proposed transmission line, and the movement of building materials to sites and returning to construction staging areas. MP 142.3 Chicarita Substation) to MP 146.5 (end of Park Village Road). Figure Ap.LU-17 provides a map of sensitive land uses along this segment. This underground segment would pass within 1,000 feet of nearly 1900 residential structures. This relocation augments and partially replaces APMs LU-1, LU-4, and LU-6.</i>
14	D	D.7-45, 46	Last, First	<b>Santa Ysabel Partial UG Avoiding Cultural Sites:</b> This is an alternative to the Santa Ysabel Full Underground Alternative that utilizes the Proposed Project overhead route and is routed underground along Mesa Grande Road and adjacent to property lines to avoid impacts to cultural resources and reduce visual and property impacts. This segment option specifically mitigates <b>for Impact C-1:</b> <i>Forty-three (43) cultural resources within the Central Link are potentially eligible for listing on the NRHP or CRHR. Eleven of the resources identified within the Central Link are located in areas of direct impact. All but one of these resources is prehistoric, and two prehistoric habitation sites are among those that would be impacted. If these sites were evaluated and recommended eligible for NRHP and/or CRHR, it would likely be under Criterion D (data potential). As such, impacts to these resources could be mitigated through data recovery; however, avoidance is always preferred. This segment relocation implements Mitigation Measure C-1b, Avoid and protect potentially significant resources.</i>