

Comment Set B0009
Julian Community Planning Group



**Julian Community
Planning Group**

P.O. Box 249, Julian, CA 92036

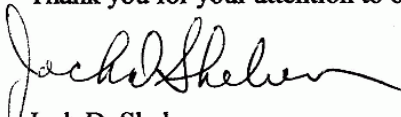
March 15, 2008

B0009-1

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

Enclosed is a resolution regarding the Sunrise Powerlink EIR/EIS adopted by the Julian Community Planning Group. The resolution was adopted at a regular meeting of the Julian Community Planning Group on March 10, 2008. The Julian Community Planning Group is a duly elected body whose role is to advise the San Diego County Planning staff, County Planning Commission and the County Board of Supervisors, as well as any other organization which has the authority to make land use decisions in the Julian Community Planning Area or locations that may have an impact on the Julian Community Planning area.

Thank you for your attention to our position on this matter.


Jack D. Shelver
Chair

Comment Set B0009, cont.
Julian Community Planning Group



Julian Community Planning Group

P.O. Box 249, Julian, CA 92036

RESOLUTION OF THE JULIAN COMMUNITY PLANNING GROUP REGARDING THE EIR/EIS FOR THE SUNRISE POWERLINK

B0009-1 cont.

WHEREAS: The California Public Utilities Commission and the United States Bureau of Land Management have published a combined EIR/EIS for the project known as the Sunrise Powerlink proposed by the San Diego Gas & Electric Company, a Sempra Energy Company; and

WHEREAS: The Julian Community Planning Group has been monitoring the progress of the proposed project since its inception and members of the Julian Community Planning Group have attended numerous information meetings and public hearings regarding the proposed project and have familiarized themselves with the issues identified in the EIR/EIS; and

WHEREAS: In February 2006 the Julian Community Planning Group went on record opposing the construction of the Sunrise Powerlink project and specifically urged the Public Utilities Commission not to approve any route that would pass through or near the community of Julian; and

WHEREAS: Based on a thorough review of the factors outlined in the EIR/EIS, as well as our particular concerns for the environment of the Julian Community and surrounding areas, the Julian Community Planning Group finds that:

- There is reason to believe that the future growth of the San Diego Metropolitan Area will require additional energy resources in the foreseeable future and that no single source will adequately satisfy those needs.
- In addition to the energy demands from population and business growth, two of the major electric generating plants (South Bay and Carlsbad) and the San Onofre nuclear generating plant, all of which provide energy to the San Diego Region are scheduled to be phased out of service.
- A number of methods of meeting the future energy needs, such as a major expansion of photo voltaic generation, conservation, and new stand alone electric generating plants in the San Diego region have been proposed as an alternative to the Sunrise Powerlink. While admirable, they rely on untested technology, levels of conservation that may be unacceptable to the majority of users, and the ability to find agencies or companies willing to build new electric generating plants and who have the ability to finance and obtain the necessary permits.
- We have stated that we have not been shown the need for the Sunrise Powerlink, however, we acknowledge that there will be a need for additional energy resources in the future and the ability to obtain power from outside the region may serve a portion of that need.

Comment Set B0009, cont.
Julian Community Planning Group

- The EIR/EIS identified the Alternative 4 South Route as the power line alternative that offered the most favorable environmental option. The Interstate 8 route with alternatives Campo North and West Buckman, while not as environmentally benign as the route paralleling the SW Powerlink, offers significant environmental advantages over the north Routes and appears to meet the needs of San Diego Gas & Electric Company
- Both the findings of the EIR/EIS and testimony at the Public Hearing conducted at the Julian Town Hall by a member of the Public Utilities Commission and an Administrative Law Judge clearly demonstrated that the SDG&E-preferred north route through Anza Borrego State Park and the Santa Ysabel valley would have devastating environmental impacts on Anza Borrego State Park and on the historically pristine Santa Ysabel valley.
- The Town of Julian is a designated Historic Site that depends on tourism for a healthy economy and it is our considered opinion that desecrating the Santa Ysabel valley with massive electric towers and wires would have a dampening effect on people coming to Julian to enjoy the historic rural ambience.
- The preferred north routes would have major and lasting negative impacts on one of the best grazing grasslands in San Diego County. Grazing has a long and colorful history and needs protection and preservation as a cultural artifact.
- If your Commission finds that the Sunrise Powerlink is a necessary element in the provision of energy to the San Diego region as well as the requirement to provide twenty percent of the regions' energy through renewable resources, we strongly urge that only the least environmentally sensitive routes be considered.


B0009-2

NOW THEREFORE BE IT RESOLVED: That the Julian Community Planning Group supports the findings of the Sunrise Powerlink EIR/EIS in determining that the Alternative 4 Southern Route offers the most environmentally benign option for the Sunrise Powerlink.

BE IT FURTHER RESOLVED: That if the Commission finds that the Sunrise Powerlink must be built, that the Commission find that only the Alternate 4 Southern route is an acceptable route and that only that route be approved.

BE IT FURTHER RESOLVED: That the Julian Community Planning Group strenuously objects to any consideration of the North Routes that would transverse the Anza-Borrego State Park and/or the pristine Santa Ysabel valley.

Passed and adopted this Tenth day of March, Two Thousand and Eight by a vote of 6 voting yes and 0 voting no and 1 abstention.


Jack D. Shelver
Chair


Victoria Bryan
Secretary

Responses to Comment Set B0009 Julian Community Planning Group

B0009-1 The commenter's opposition to the Proposed Project and support of the Alternative 4 Southern Route if a transmission line is found to be needed is acknowledged. Please refer to General Response GR-12 (CEQA, NEPA and the Decision-Making Process) and Section A.2 in the Draft EIR/EIS for discussion of Purpose and Need of the project.

B0009-2 Please refer to Response to Comment B0009-1.

The commenter's views and concerns that the visual impacts to the Santa Ysabel region would affect tourism, especially in the town of Julian, are acknowledged; however, the presence of the proposed route would be more than five miles from the Town of Julian and would not cause a significant change in tourism or associated revenues. The route would be installed underground in SR79 for the length of the Santa Ysabel Valley and all operational visual impacts would be eliminated. Grazing and cultural impacts to the area are discussed under the Central Link in Sections D.6 (Agricultural Resources) and D.7 (Cultural Resources). As stated in the RDEIR/SDEIS, the Santa Ysabel All Underground Alternative (replacing the Proposed Project from MP 100 to MP 109) is the environmentally preferred alternative. However, if the Santa Ysabel All Underground Alternative is determined to be infeasible, the Mesa Grande Alternative with the northern portion only of SDG&E Santa Ysabel Partial Underground Revision (near the Santa Ysabel Mission) and the remainder of the Santa Ysabel Partial Underground Alternative would be constructed to replace the Santa Ysabel All Underground Alternative (see discussion in Section 3.2.2).

Comment Set B0010
Jamul Dulzura Community Planning Group

JAMUL DULZURA COMMUNITY PLANNING GROUP
P.O. Box 613
Jamul, CA 91935

March 18, 2008

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

Subject: Sunrise Powerlink Project – Comments on Draft EIR/EIS
Modified Route D Alternative

Dear Ms. Blanchard and Ms. Kastoll:

This letter by the Jamul/Dulzura Community Planning Group (JDCPG) is written on behalf of the residents of the Jamul/Dulzura area in response to the Draft EIR/EIS and Proposed Land Use Amendment issued by the CPUC/BLM dated January 2008. The JDCPG members are residents of the Jamul/Dulzura area who are elected-at-large for the express purpose of making recommendations to the County of San Diego agencies regarding land use issues.

The area that the proposed Modified Route D Alternative would traverse is subject to highly volatile seasonal fire storms induced by natural as well as man made causes. The addition of a new transmission line in this area would lend itself to a greater number of visitors, authorized or not, and their motor vehicles, which in itself would increase the potential for fires. During the fire storms of the past (most recently the Harris Fire '07) the existing power supply lines have had to be taken out of service to protect the environment in the chance there might be a failure in the structures or lines themselves. At the time of the recent Harris and Witch Fires the greater San Diego Region was "off grid" and the area was adequately served by existing local power plants.

The damage to the eco-system with the creation of new access roads, material handling areas / helicopter landing pads, and tower locations for the construction and the on going system maintenance can never be mitigated. The soil erosion can only be arrested by the continued filling and re-grading of these locations, which conversely makes the area much more accessible for non-authorized visitors. Even the most experienced truck drivers and equipment operators would cause damage to the road shoulders which in turn would lead to the expansion and degradation of those roads. Additionally, as the soil is washed off these areas the eroded material would find its way into the seasonal stream

B0010-1

B0010-2

Comment Set B0010, cont.
Jamul Dulzura Community Planning Group

beds only to cause potential alteration of their natural channels and the pollution of natural ponds.

B0010-2 cont.

The JDCPG would prefer to see the efforts of SDG&E redirected and look to the retrofitting of the existing power plants that are scheduled for removal. The Sunrise Powerlink or similar alternative, when proven necessary, should be secondary and not a replacement to local production facilities. Currently there are no new energy sources available either in Imperial Valley or along the proposed routes, with the exception of the conventional generating plants located in the Mexicali, Mexico region.

B0010-3

SDG&E has for decades been involved with geo-thermal trials in Imperial Valley but to date has not been successful in marketing this source of power. Individuals and business are installing photovoltaic systems at their homes and businesses but SDG&E has made no effort to encourage the growth in this form of generation other than to offer credits up to the amount of energy consumed by that account holder.

On December 12, 2006, at a regularly scheduled meeting, the JDCPG voted unanimously to oppose the entire Sunrise Powerlink Project. Subsequently, after review of the Draft EIR/EIS and Proposed Land Use Amendment at the JDCPG meeting, March 12, 2008, a vote was conducted and again the JDCPG opposes the Sunrise Powerlink Project in total. Motion carried: Yes, 8; No, 1; Abstentions, 0.

Respectfully Submitted,



Dan Neirinckx, Chair
Jamul/Dulzura Community Planning Group

cc: Dianne Jacob, Supervisor, Second District County of San Diego

Responses to Comment Set B0010

Jamul Dulzura Community Planning Group

B0010-1 Please see General Response GR-9, relating to fire risk amongst alternatives, and General Response GR-3, relating to reliability and wildfire.

B0010-2 The commenter notes that new access roads, material handling areas/helicopter landing pads, and tower locations along the Modified Route D would cause soil erosion that would require filling and re-grading, causing widening of roads and increased access to non-authorized visitors in the Jamul/Dulzura region. In order to reduce unlawful use of the access roads, Mitigation Measure B-1a (Provide restoration/compensation for affected sensitive vegetation communities) includes a provision that gates shall be provided to prevent unauthorized access.

This mitigation measure would ensure SDG&E coordinate with the authorized officer for the applicable federal, State, or local landowner/administrator before construction in order to determine if gates shall be installed on access roads, especially trails that would be dually used as access roads, to prevent unauthorized vehicular access to the ROW. Gate installation would be required at the discretion of the land management agency.

The commenter also notes that the erosion caused by this grading would impact the seasonal stream beds and cause increased pollution. Impact H-1 in Section E.4.12 in Volume 4 of the Draft EIR/EIS addresses erosion during construction and concludes this would be a less than significant with the inclusion mitigation that would require that the construction comply with Forest Service Conditions, and have site-specific SWPPP and sediment control plan for construction on Forest Service land. It should also be noted that the Applicant Proposed Measure WQ-APM 4 addresses erosion through the preparation and implementation of a Storm Water Pollution Prevention Plan which would be designed with the approval of the water district for the region and as such would be specific to that region. Additionally, silt fencing, straw mulch, and straw bale check dams would be installed to contain sediment within construction work areas and staging areas. Should soils and slopes exhibit high erosion potential, erosion control blankets, matting, and other fabrics and/or other erosion control measures would be used. Applicant Proposed Measure WQ-APM-14 would also be required; this measure requires compliance with General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization from the State Water Resources Control Board and/or the RWQCB for construction activities. Compliance would require development of a SWPPP which would describe implementation of erosion control best management practices which would include measures such as soil binders, hydroseeding, siltation control structures such as geotextiles and mats, and streambank stabilization. Compliance and best management practices would be according to RWQCB guidelines.

B0010-3 The commenter suggests SDG&E should retrofit existing power plants rather than build the Proposed Sunrise Powerlink and that currently there are not renewable energy plants in the Imperial Valley. Please see General Response GR-5 regarding the status of renewable energy in Imperial Valley and General Response GR-1 regarding the feasibility of the in-basin conventional generation. The commenter's opposition to the entire Proposed Sunrise Powerlink is acknowledged.