

Comment Set B0044
Sierra Club Visual Pollution Task Force

April 11, 2008

Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Ave., Room 2103
San Francisco, CA 94102

Miss Susan Lee
Aspen Environmental Group

Subject: Additions to Draft Environmental Impact Report for San Diego Gas & Electric Company (U-902) Transmission Project A0608010

Dear Ms. Blanchard and Ms. Lee,

We are commenting in support environmentally superior alternative one described in the subject report and to vigorously oppose the proposed route through Anza-Boreggo Desert State Park and alternative 4. We are also submitting a list of facts that are not adequately addressed in the draft EIR and should be addressed in greater depth and breadth in the Final EIR.

As you know, alternative 4, also called the Interstate 8 alternative, allows 19 miles of new 500 Kv transmission lines through the Cleveland National Forest along one of the most scenic and popular highways in the country. This area was jointly designated a Scenic Byway by Federal State and County representatives in 1992.

More than 15,300 people travel this route each day. This section of the Cleveland National Forest is designated as Scenic National Forest. Alternative four is not environmentally superior and hinges on de-designation of the Cleveland National Forest as Scenic.

Alternative four is therefore not viable and should be completely removed from the draft EIR.

An alternative not adequately addressed in the draft EIR is to apply the best available technology for power transmission to the existing Southwest Powerlink. Steel cables could be replaced with aluminum composite cable with ceramic cores that resist heat and sagging and can transmit three to four times the power of current steel cable. This alternative is not adequately developed in the draft EIR

The present load on the Southwest powerlink is not well-described. This is central to the need for an alternative power link. Several routes on the existing Southwest Power Link could be refitted with aluminum composite cables to meet transmission needs without the construction of any new transmission towers through Anza Borrego Desert State Park, or elsewhere. This fact needs to be fully developed as an environmentally superior alternative in the final EIR.

B0044-1

B0044-2

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I would like to add that solar power is largely unavailable during periods of peak electricity demand from 4 to 8:30 PM, particularly for plants located east of the area of peak demand, such as in Imperial County. This is when the peaker plants described in alternative one can be used to supply peak energy needed and reduce risk of outages. The facts that no commercial solar facilities exist in Imperial Valley and that solar energy is largely unavailable during peak electrical demand periods directly contradict the applicants' often-stated need to transmit solar renewable energy within the state.

B0044-3

Transmission of solar energy is therefore not a rational basis for construction of these new powerlines. All mention of the need to transmit solar energy within the state should be removed from the final EIR.

I would like to add that in my view and the view of many experts including some staff members of the California PUC, construction of long-distance powerlines is not the answer to energy security or reliability for California. Most power failures result from interruptions of long distance transmission and propagated failures of the power grid. Local generation facilities like those described in environmentally superior alternative 1 are well known to be more efficient and economical. These points must be further developed in the final EIR.

B0044-4

The proposed transmission towers are inextricably linked to the environmental burdens created by new power generation stations at their sources. These are two large power plants in Mexico. Sempra's new 600 Megawatt power generation station in Mexicali and the 750 Megawatt InterGen power generation station at the La Rosita power complex. Environmental effects on California from these plants, such as nitrogen oxide air pollution and greenhouse gases that are released by them are fully within scope and should be more completely evaluated in the final EIR.

B0044-5

Since air pollution emissions from these plants will not be regulated under United States federal, state or local clean air standards or agencies is a critical aspect of the environmental impact of the construction of these transmission towers and must be considered in the final EIR. The fact that the 750 Megawatt InterGen power station could at any time bypass their catalytic converter and increase emissions of oxides of nitrogen without legal penalties or recourse by air pollution control districts in California is a fact that must be addressed in the final EIR.

The fact that nitric acid rain from these plants will affect Mexico, the Imperial Valley, the Anza Borrego Desert State Park and San Diego County must be considered among the critical environmental impacts of the proposed transmission towers and must be fully addressed in the final EIR.

B0044-6

Meteorological wind-rose studies of pollution plumes from these plants by season and weather conditions, such as inversions, are critical to understanding the environmental

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impacts of the proposed transmission towers and must be considered in far more detail the final EIR.

B0044-6 cont.

The proposed transmission project will create environmental injustice by allowing contamination air basins distant from the locations where the electricity will be used, and must be fully evaluated and included as a result in the final EIR.

B0044-7

Power for the SDG&E transmission towers will burden the people of Mexicali, Calexico, and El Centro with air pollution that is unregulated under U.S. laws for the benefit of the energy traders in the profitable markets of Riverside and Orange Counties. This environmental injustice issue should be considered within the final EIR.

Environmental injustice issues arising from pollution from these power plants is inextricably linked to the proposal for this project and fully falls within the scope of evaluation of the current proposal. This is inadequately described in the draft EIR.

Visual pollution and visual impacts of the 150 miles of 160 foot-tall and 65 foot-wide transmission towers covering some of San Diego county's formerly most scenic parks and neighborhoods is inadequately described in the draft EIR. The vast visual impacts amount to a *de facto* expansion of the SDG&E right of way. This causes an added economic burden to adjacent communities that is not recognized or acknowledged in the draft EIR.

B0044-8

Underground alternatives also fall within scope. San Francisco peninsula residents insisted that Pacific Gas and Electric put its 230 Kilovolt lines across the peninsula underground and PG&E complied. This type of precedent should be added to the final EIR and fully considered when weighing new underground alternatives in the final EIR.

B0044-9

The impact of air pollution emissions from power plants in Mexico on visibility in the Imperial and San Diego County air basins are critical to understanding the environmental impacts of the proposed transmission project. Visibility studies must be conducted and requirements for these considered in the final EIR.

B0044-10

The fact that acid rain pollution will occur when moist air from Mexico carries oxides of nitrogen and sulfur dioxide from the power plants that are not subject to Federal or State clean air standards needs to be explicitly stated in final EIR and considered in the context of evaluating alternatives.

B0044-11

Projections of the impact on Imperial County residents of the release of more than 400 tons per year of oxides of nitrogen from the combined-cycle power plants in Mexico assuming they are equipped with catalytic converters needs to be considered in the final EIR.

The facts that catalytic converters to remove oxides of nitrogen and reduce the potential for acid rain are not required for the two power plants in Mexico, and requirements for catalytic converters are not easily enforceable needs to be explicitly stated in final EIR

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and considered when evaluating alternatives including local generation by peaker plants which can be regulated. Emission of substantial quantities of other harmful air pollutants from these power plants in Mexico into a troubled air basin that currently is in violation of Federal and State clean air standards for healthy air several days a year needs to be addressed in the final EIR. B0044-11 cont.

The fact that the transmission towers will damage a National Historic Trail and State and County parks needs to be more heavily weighted in the determination of alternatives in the Final EIR. B0044-12

The fact that Southern California will not gain energy security from these power lines and that these lines won't help prevent power reduction (brownout) or interruption (blackout) needs to be explicitly stated in the final EIR. B0044-13

The fact that long-distance power grid systems are subject to market manipulation that can result in power interruptions needs to be considered in the final EIR. Since these transmission towers will add to that grid and enhance opportunities for market manipulation they have a potential to increase the frequency of brownouts and blackouts.

The fact that costs for electrical power will not be reduced if these lines are constructed needs to be considered in the final EIR. Although the rate charged per kilowatt hour of power is regulated by the State Public Utilities Commission (PUC), the costs of power transmission are passed directly to the customer and are difficult to verify. The facts that transmission costs are difficult for PUC to verify and long distance transmission practices facilitate energy trading need to be fully addressed in the final EIR. B0044-14

The fact that these transmission towers will block aerial fire control efforts because aircraft must avoid them needs to be considered in the final EIR with respect to alternative 4 along I8. B0044-15

The fact that long transmission towers block access to roads by emergency medical helicopter services needs to be considered in the final EIR with respect to alternative 4 along I8. B0044-16

The claim that these transmission towers would provide access to transmit "renewable" energy must be demonstrated and the factual basis for the need for these transmission towers for transmission of "renewable" energy should either be developed or completely rejected in the final EIR. B0044-17

The transmission tower project defeats the intent of the Western States Energy Corridor to group power transmission thorough designated Federal corridors. Its routing specifically avoids Federal lands. This fact should be explicitly stated and used to weigh alternatives in the final EIR. B0044-18

Alternatives routes along existing corridors including the South West Power Link in conjunction with use of composite aluminum cable with three to four times greater

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transmission capacity, and other equipment that could substantially increase the power transmission of the existing Southwest Power Link needs to be considered and fully developed as an alternative in the final EIR.

B0044-18 cont.

Use of the federally-designated new Western States Energy Corridor near the Mexican border for westbound transmission of electricity from the Imperial substation to the coast must be considered in the final EIR.

B0044-19

Relevant laws that need to be considered in greater depth in weighing alternatives in the final EIR include: San Diego and Imperial County Air Quality Regulations and standards for fixed sources; California Air Resources Board standards, regulations and practices; California Historical Preservation Act - Includes sites of anthropological importance such as Native American Sites; National Historical Preservation Act; US Clean Air Act; California Global Warming Solutions Act of 2006 (AB 32) and the Federal Clear Skies Initiative.

B0044-20

Thank you.

Visual Pollution and Scenic Preservation Task Force
San Diego Sierra Club

Responses to Comment Set B0044

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- B0044-1 The Environmentally Superior Southern Alternative, as designated in the Draft EIR/EIS, did not include the entire Interstate 8 Alternative (See Section H.4.5, Conclusion: Environmentally Superior SWPL Alternative). The Interstate 8 Alternative between the eastern boundary of the Campo Reservation and the eastern end of Alpine Boulevard was not included. This includes the entire I-8 segment within the Cleveland National Forest. Please see Section 5.2 of the RDEIR/SDEIS for an updated description of the Environmentally Superior Southern Route.
- B0044-2 The Draft EIR/EIS provides a discussion of high-temperature low-sag (HTLS) conductors in Section C.5.8.23 (with additional detail in Appendix 1, Alternatives Screening Report, Section 4.9.25). The discussion explains that while HTLS or aluminum conductor composite reinforced (ACCR) conductors could be used as part of the Proposed Project or in existing corridors, the higher costs would not be balanced by any notable environmental advantages. Retrofitting the existing Southwest Powerlink with HTLS or ACCR would incur substantial upgrade costs related to the conductor and tower retrofits without clearly meeting the basic objectives of the project.
- B0044-3 The extent to which the Proposed Project meets the state's renewable energy needs will be determined by the CPUC in the general proceeding. Please see General Responses GR-2 (Feasibility of the New In-Area Renewable Generation Alternative) and GR-5 (Status of Development of Renewable Generation in the Imperial Valley, Eastern San Diego County, and Northern Mexico).
- B0044-4 The commenter's support for the New In-Area Renewable Generation Alternative is acknowledged. The commenter suggests that additional discussion of in-area generation in comparison to transmission lines should be presented in the Final EIR/EIS. The non-wires alternatives were rated as both the first and second environmentally superior alternatives in the Draft EIR/EIS. Further discussion of the non-wires alternatives, specifically related to the feasibility of these alternatives, can be found in General Response GR-1 and General Response GR-2; no additional information is required.
- B0044-5 The Sunrise Powerlink Project would not change the existing cross-border transmission capacity from the existing Mexican power plants in the Mexicali area. Information in the Draft EIR/EIS (in Table D.11-5) shows the relative emissions performance of the existing power plants in the Mexicali area that export to California, and their performance is comparable to domestic plants. This would not change as a result of the Proposed Project or alternatives. See General Response GR-7 on how the environmental effects of the existing Mexican power plants would be influenced by the Proposed Project.
- B0044-6 Please see Response to Comment B0044-5. See also General Response GR-7 on how the environmental effects of the existing Mexican power plants would be influenced by the Proposed Project. Because the Proposed Project is not anticipated to influence operation of these power plants in a way that would adversely affect the environment, no further analysis is necessary.
- B0044-7 Comments regarding the project creating environmental injustice are acknowledged. The Environmental Justice evaluation (Section F.1, Volume 5 of the Draft EIR/EIS) included evaluation of four connected action projects (five connected action projects were

evaluated in the Draft EIR/EIS). The connected actions and indirect effects included the Esmeralda–San Felipe Geothermal Project, Stirling Solar Two Project, Jacumba Station, and Sempra La Rumorosa Wind Energy Projects (see RDEIR/SDEIS Section 2 and the Draft EIR/EIS Project Description, Section B.6, Volume 1 for more information on these projects). The Sempra La Rumorosa Wind Energy Projects would be located in Mexico. The Environmental Justice assessment used minority and low-income data from the 2000 U.S. Census for populations within 0.5 miles of these anticipated projects. However, there was no equivalent information available for the project (indirect effect) in Mexico and therefore, the environmental justice evaluation for this project could not be completed. In addition to the environmental justice evaluation in Section F.1, Section 2 of the RDEIR/SDEIS analyzes the La Rumorosa Wind Energy Projects Presidential Permit and Related Facilities. Therefore, the potential impacts associated with connected actions and indirect effects, whether in the U.S. or Mexico, were disclosed in the EIR/EIS. The EIR/EIS evaluates each of the connected actions/indirect effect for the benefit of decision-makers and the public.

B0044-8 The visual resources analysis presented in Sections D.3, E.1.3, E.2.3, E.3.3, and E.4.3 of the Draft EIR/EIS is comprehensive, and concludes that numerous significant and unmitigable impacts would occur. The significance of the impacts is in part due to the vast vistas in the desert areas and the area over which the project would be visible.

An economic evaluation of the project is beyond the scope of the CEQA and NEPA analysis required in the EIR/EIS. As cited in CEQA Guidelines Section 15131, economic and social effects of a project are not considered significant effects on the environment unless there is an indirect physical effect to the environment. However, the cost and benefit of the project will be considered by the CPUC in its General Proceeding.

B0044-9 The commenter is correct that PG&E has installed portions of its 230 kV transmission system underground in scenic areas, dense urban areas, and residential areas. For these same reasons, numerous underground alternatives (for example: the Partial Underground 230 kV ABDSP SR78 to S2 Alternative (Section C.4.3.1), Santa Ysabel All Underground Alternative (Section C.4.4.2), Santa Ysabel Partial Underground Alternative (Section C.4.4.3), Oak Hollow Road Underground Alternative (Section C.4.5.2), and Buckman Springs Underground Option (Section E.1.1.3)) are considered in the Draft EIR/EIS.

B0044-10 Please see General Response GR-7 regarding the potential connection of the Sunrise Powerlink Project to Mexican Generation. Because these power plants are already operating, visual pollution is not expected to increase as a result of the Sunrise project. See also Response to Comment B0044-6.

B0044-11 See Response to Comment B0044-6.

B0044-12 The “National Historic Trail” noted in this comment is presumably the National Register–listed Fages–De Anza Trail–Southern Emigrant Road in the Imperial Valley Link of the Proposed Project. This resource was given weight in the EIR/EIS analysis as a Class II impact, one that is significant, but that can be reduced to a level that is less than significant with mitigation. (See Draft EIR/EIS Sections D.7.2, D.7.9, and D.7.16.2). Impacts to this important trail are considered Class II because the trail would not be impacted directly by towers, or other facilities, but may be lightly graded for an access road. Visual intrusions would be mitigated by reducing the contrast of nearby towers and visual

screening. As well, impacts would be partially mitigated by emplacing interpretive signage in accordance with an existing management plan for this resource.

B0044-13 The commenter states that the Proposed Project would not result in increased energy security. The CPUC and BLM disagree with this statement; one of basic objectives that SDG&E aims to satisfy with the Proposed Project is to maintain reliability in the delivery of power to the SDG&E service. Adding infrastructure to improve reliability would improve domestic energy security. The potential for market manipulation is not an environmental issue and is beyond the scope of this EIR/EIS.

B0044-14 The cost of power is not an environmental issue and is beyond the scope of the EIR/EIS.

B0044-15 Sections E.1.15 and E.4.15 of Volume 4 of the Draft EIR/EIS considered the impacts to firefighting operations that the components of the Environmentally Superior Southern Route would present. Over the entire length of the Environmentally Superior Southern Route, there would be 6.5 miles of significant Wildfire Containment Conflict areas. Please see General Response GR-9 for a comparison of the southern and northern routes in all wildfire risk categories.

B0044-16 The commenter states that “long transmission towers block access to roads by emergency medical helicopter services” and requests that this be considered in the Final EIR/EIS.

Towers and conductors pose a potential hazard to aircraft, including helicopters, as discussed in Section D.9, Traffic and Transportation, of Volume 3 of the Draft EIR/EIS. However, it is not clear how a transmission line within a specified ROW would block access to roads for landing. A helicopter could not land at the exact location of the transmission line, but could land on the road on either side if it or in suitable open space.

B0044-17 Please see General Response GR-5 (Status of Development of Renewable Generation in the Imperial Valley, Eastern San Diego County, and Northern Mexico). While there are no operational large scale solar generation facilities in Imperial County at this time, it is not the responsibility of the EIR/EIS document to evaluate the relative importance of SDG&E’s project objectives. The decision-makers (CPUC and BLM management) will consider these issues in making their decisions.

B0044-18 The commenter is correct that portions of the Proposed Project are not within federally designated energy corridors. However The Proposed Project traverses 33.78 miles of BLM land and of that, 4.7 miles would be within BLM-designated corridor “N” and 16.6 miles would be within contingent corridor “Z.” (See Draft EIR/EIS Section D.17.2.1 on BLM Plan Amendments.)

Regarding the suggested use of composite aluminum conductors to upgrade the capacity of the Southwest Powerlink, please see the Alternatives Screening Report (Appendix 1 to the EIR/EIS), Section 4.9. This section describes several alternatives that would upgrade the SWPL in different ways, and the reasons that each was not evaluated in the EIR/EIS. Please also see Response to Comment B0044-2.

B0044-19 The commenter suggests that the federally designated “new Western States Energy Corridor” near the Mexican border be considered for the new transmission line. In fact, the Environmentally Superior Southern Route Alternative does follow the corridor designated in the Draft Programmatic EIS on the West-wide Energy Corridors along the Modified Route D Alternative, as stated in Section E.4.1 in Volume 4 of the Draft EIR/EIS.

B0044-20 As detailed in Section D.7.7, numerous federal, state and local regulations and requirements were employed to develop the significance criteria used for the Proposed Project and alternatives. Among these were the National Historic Preservation Act and the California Public Resources Code Section 5024.1 and Title 14 C.C.R., Section 4852, which is the “California Historical Preservation Act” to which this comment refers. Not only were these laws used in the alternatives analysis, but they were integral to the development of the mitigation measures that will reduce adverse effects to cultural resources.

The relevant climate change and New Source Review requirements for stationary sources of emissions are considered in the weighing of alternatives to the Proposed Project. New Source Review requirements, with the federal Clear Skies Initiative, are part of Clean Air Act requirements and are reflected in local air district rules and state-wide standards. No further information is needed in the Final EIR/EIS because these regulations are identified generally in Section D.11.3.3 and in Section E.6.11 for power plants in the New In-Area All-Source Generation Alternative. See General Response GR-8 for more information on the consistency of the project and alternatives with AB32.