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Billie Blanchard
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Dear Ms. Blanchard and Ms. Kastoll: Sunrise Modified Route D Alternative

At earlier hearings conducted by the PUC and BLM on the Sunrise PowerLink project I have expressed my strong reservations about the Sunrise PowerLink project. This letter is to voice my opposition to the Modified Route D Alternative that is being proposed as one option for Sunrise PowerLink. The Modified Route D Alternative is environmentally unsound and has a host of other problems which make it a choice that obviously should be rejected. I live in the Campo Lake Morena area, and the failings of this route are so very obvious that it is a puzzlement to me why you would continue to propose this as a very likely and viable alternative to other routes.

In addition to my opposition to the Modified Route D alternative, I also wish to state again my opposition and total rejection of the entire Sunrise PowerLink project. I have stated my objections in previous letters and also in public hearings in Alpine and Borrego Springs. As details of the project have been disseminated over the past 18 months and as the testimony from the various interveners in the evidentiary hearings has come forward, my reasons for rejection of the Sunrise PowerLink project and Route D have only been confirmed.

There are a number of issues to be considered. While you are trying to isolate Route D from all the other issues in this proceeding, this is not possible since all the issues are interrelated and interdependent. Route D is only one line or one thread in a fabric that is the San Diego area and our energy needs. Looking at Modified Route D there are a number of environmental and community specific issues which need to be addressed. There are alternatives which are far superior to Route D including some alternatives in our general geographic area and these need to be evaluated. Finally Route D is part of an overall picture of how to handle the energy needs for San Diego. Actions and decisions taken with respect to Modified Route D impact numerous other alternatives. The wrong choice or decision on Route D can impair or eliminate other superior alternatives.

In earlier decisions you have summarily rejected use of the Southwest Power Link corridor as an alternative to the Sunrise PowerLink and to the various alternatives suggested such as Interstate 8 and routes D, C and B. I have not studied all the deliberations and testimony in microscopic detail but the

analyses seemed cursory at best. One alternative that should be reconsidered and reevaluated is use of the existing Southwest PowerLink corridor. Much of the land is in the hands of Bureau of Land Management, which is the land owner that you have selected as the best alternative for the Route D Alternative. You want to use BLM land but are rejecting the Southwest route which is mainly BLM. The Southwest PowerLink route also goes over private land along the border. These private lands are for the most part not residential and many of them are available for sale to the Bureau of Land Management or to the federal government. This would provide an almost exclusive BLM corridor. These lands are already disturbed with numerous roads used by SDG&E and by the Border Patrol and Homeland Security. In some areas there has been of substantial clearing of brush. The alternative of brush clearing has not been explored as a means of reducing what you have described as an excessive risk to reliability. It seems clear to me that you should analyze utilizing this strip of land along the border, clearing brush and burying the route in many areas. If there has to be a route (and I do not believe this is the case) this route needs to be evaluated more carefully. This is a far superior alternative to Modified Route De.

The practice applicants in land use application to initially decide what they want and what they do not want is standard. Then the applicants come up with all sorts of good reasons for their preferred alternative and propose some alternatives which they don't want. The alternatives the applicant does not want are given short shrift and inadequate analysis and become a self fulfilling prophecy for rejection. This scenario is clearly what has been done here as reflected by the comments of SDG&E that they do not want a southern route and did not give a lot of attention to the southern alternatives. The rejection out of hand of the Southwest PowerLink with minimal consideration and analysis only further supports the inadequate consideration. I would suggest that you might want to review recent California Supreme Court case is all on the identification of and the proper evaluation of alternatives in land use cases. The city of San Jose has learned the hard way that you cannot give alternatives no consideration. The court's finding in that case provides the basis for a lawsuit against any project, which is not adequately consider all of the alternatives.

However, there is a second alternative which has not been discussed but which seems very obvious to me. That alternative would be to do one of two things, either 1) replace the existing Southwest PowerLink 500 KV line with a 750 KV line. This is technically feasible today. There are 750 KV lines in existence. Or 2) the other option, which seems even more logical would be to take down the Southwest PowerLink and erect in its place a new Southwest PowerLink that would carry 1,000 KV.

Construction of a larger Southwest PowerLink is very feasible. There is an existing 1,000 KV line in China and that could provide the input needed to do a reasonable and valid analysis. A 1,000 KV transmission system with limited interruption to our energy to the San Diego market. First of all the route was designed for alternative energy from Imperial County and there is not much of that flowing on the Southwest PowerLink. To shut down the line for short periods so it could carry more alternative energy seems reasonable. There is some question if the line is even used to capacity in bringing power to San Diego and to Los Angeles from Mexico. The construction scenario I see is that the towers could be constructed beneath the existing line up to a certain height. You would then shut the power on Southwest, cut the line, raise the new tower to the correct height and then reconnect the Southwest line. You could work your way West and would eventually have an entirely new set of towers carrying the Southwest energy. Then you would go back and string additional lines to bring the capacity up to 1000 KV. Then you would remove the existing towers. An engineering analysis might indicate whether would even be necessary to remove the existing towers or if some combination of existing towers and new towers would be the best solution.

A part of a single Southwest PowerLink line carrying 1000 KV would be an improved brush clearing maintenance program which could be done in conjunction with Border Patrol and Homeland Security. This would eliminate one of your concerns about fire affecting a power line in this area.. In fact, this may

be a far superior fire protection area than a line running through the middle of the forest or some of the other areas of the County where clearing would be even more difficult. There are areas in the County, where fires are more difficult to fight and a greater problem than this area and that was evidenced by the Cedar fires in 2003

I find it very strange that in one meeting SDG&E tells people that there is such a large fire risk with the Southwest PowerLink. Yet in another meeting three weeks later with a different group of people SDG&E brags about how they clean under the line and remove brush and then maintain the line so there are no problems. It can't be both. What is clear is that vegetation under the power lines must be managed but you have not considered that option for either Modified Route D alternative or for Southwest PowerLink route option.

As a corollary this would benefit Homeland Security and the Border Patrol. They use the same routes and same roads you use for their interdiction efforts on illegal immigrants trying to cross in the United States. Their efforts would help you in maintaining your corridor and your efforts would help them. As part of your analysis you should evaluate cost and capabilities to do this.

However, I do not think that the Modified Route D capacity is needed. I do not see evidence that the Sunrise application has adequately evaluated whether there is in fact a need for the entire project and for Route D since it is an integral part of the proposed project. Without D there would be no project if the Anza Borrego route is rejected. I will address more on the subject of need later in this letter.

I do want to express other concerns about Modified Route D Alternative going through this area.

The County of San Diego in its current revision of the General Plan has made it very clear that the Back Country areas should remain rural and with a small population. The County is designing a general plan that concentrates the majority of the growth in urban areas and in the more populated areas of the County. Infrastructure to support large growth in rural areas does not exist. The County does not have the money to add the infrastructure to support a larger population. Any change in the land use would be very expensive and developer fees have been proven to fall far short of providing infrastructure which is one reason the County does not want development in Campo and other rural areas. Campo and Lake Morena are communities that have a limited population. With the exception of Lake Morena, which is an old summer vacation campground that grew into a community with a little land use planning, this rural area has large parcels and ranches that provide a great deal of privacy and quiet and the ability to have animals, including horses and cattle. The proposed Route D is an industrial type facility and conflicts with the lifestyle and the character of this community. More than half of the 90 mi.² in the community planning area is public lands and that is one of the reasons why there is a greater fire danger here than in some other areas. The modified Route D Alternative impact is not limited to BLM land. It impacts substantial areas of both public lands and private lands. In addition, the proposed line runs adjacent to the Hauser Creek Wilderness Area and the Pine Valley Wilderness Area. Certainly, power lines are a direct conflict with decisions by the Congress of the United States to set aside these areas for their environmental and scenic values. The power lines will destroy the visual resource that is an integral part of public lands usage and value and the PowerLink should not be allowed to override those values. Your map with the circles which shows areas still under consideration for a route seems to recognize this. The area north of Potrero is an area being purchased with public funds for stewardship by Back Country Land Trust yet you are avoiding input by not showing us where the route will be

I also have a problem with the location of Route D so close to the Southwest PowerLink. I don't have a problem with Southwest PowerLink, but you have stated as I will quote below your objection to putting power lines close to one another.

“The CPUC notice on The Additional Alternative (Modified Route D Alternative) said CPUC had originally rejected route because of the risk of wildfires causing a concurrent outage of the existing Southwest PowerLink transmission line and a second line that same quarter.”

Now, you have taken those rejected routes, and actually moved them even closer to The Southwest Power Link transmission line. Nothing has changed with the conditions that caused CPUC to eliminate what is now the part of modified Route D Alternative except pressure from the United States Forest Service and other parties. Now you're going to dump a rejected alternative our community. How can you justify the overturning of your earlier analysis and evaluation. If it was that bad initially, it is bad now. Find another alternative or improve what you now have.

Yet, what you propose is to violate your earlier decision. When I look at the tentative map I see the proposed route running parallel to the Southwest PowerLink and only a couple of miles away. Since our fires are often 1,000, 2,000 or even 6,000 acres your basic standard would be violated. You do not appear to have analyzed that in your proposal of Modified Route D..

I also checked the route. It appear this route is very circuitous and covers a longer distance than other routes. A longer line through difficult terrain translates into higher costs for Route D. As ratepayers we have to pay for this extra cost and for the extra profits these higher costs will generate for your parent company, Sempra Energy. We see only deleterious impacts and no benefits yet we are expected to pay for the route. The impacts appear to be greater than some of the other alternatives.

I participated in many of the hearings that were a part of the preparation of the Forest Service Cleveland National Forest Management Plan. Your own documents and all the information we have heard indicate that this particular route is a result of the Forest Service sitting down behind closed doors and telling you where they want the route to go because they do not want it on their land. That is not an acceptable procedure to me. The Management Plan was adopted in 2006 and plans can be changed. Many other federal agencies change their management plans when conditions dictate. I have never heard of a federal agency saying while we won't modify their plan. BLM has changed their South Coast Plan to accommodate newly acquired conservation lands and to accommodate new rules for off road trails and paths. Letting the Forest Service dictate the route is wrong and should be changed since it is forcing you to adopt a route that you do not want and which SDG&E does not want and which impacts negatively so many areas including lands important to wildlife conservation.

While I realize that the EIR includes evaluation of the impact on biological and wildlife resources, I believe there will be numerous problems with this route that have not been identified. Consultation with the County of San Diego over the resources that they have identified in the their preparation of the East San Diego County Multiple Species Conservation Plan should be undertaken immediately to see how many threatened and endangered species will be impacted by this proposed Route. We already know that the Quino checkerspot butterfly has been found in BLM areas in the vicinity of the Naval Special Warfare Training Facility at La Posta road. Towers and construction and maintenance activity will seriously impact this species as well as others.

I am a member of the Pacific Crest Trail Association and I object strenuously to this proposed Route going over the trail. It is unfortunate that start of the trail, which is in Campo at the Border, starts under the Southwest PowerLink. Yet departing from a point with a gigantic footprint of development as you go into a 2,000 + mile trek through wilderness seems appropriated. The trail has undertaken a mission which is ongoing to make the trail a total wilderness experience throughout the length of the trail. Land is being acquired to put the trail in areas where there are no signs of human activity other than the trail itself. Land swaps and land purchases and land exchanges and rerouting are all being done to accomplish this goal.

Local groups as well as national conservation organizations are working to acquire these lands and to put those lands into a permanent conservation. Your route is a violation of that objective.

Modified Route D alternative will disrupt extensive areas used by wildlife for movement between Mexico and the United States. These wildlife corridors are an essential part of the county's Multiple Species Conservation Plan. These areas are also the object of acquisition efforts by the California Wildlife Conservation Board and other conservation agencies and entities to acquire sensitive lands in the Backcountry. You must review the Las California's Linkages Initiative Report to see where these biological and environmentally significant areas are located. One of the primary corridors is the one that runs from Mexico across the border through the area between Potrero and the Campo Indian Reservation and then moves north under of the La Posta /Interstate 8 over crossing to connect to the Laguna Mountain. The Modified Route D. Alternative will affect almost this entire corridor. Adequate analysis must be completed because it would appear to me that route rejection or substantial mitigation efforts must be the only methods to accommodate this vital natural resource.

As stated our area is to be kept as much in the natural state as possible according to the County plans. Our visual landscape which is enjoyed by the residents and by tourists and visitors who come to the area should be preserved without all the hubris of civilizations like tall large transmission towers standing over homes and sitting on 200 to 300 foot right of ways. The noise needs to be banished. And these towers are a risk for failure with the 70 to 100 mile and hours Santa Ana winds we regularly receive every year. Do not destroy the ambiance of the Campo area with these lines.

The PowerLink will not bring any economic benefit to the Campo area. I see only minimal employment that might come from maintenance of the lines. A far better use for money would be installation of solar roofs on all houses in this area, which is one of with the highest level of sunlight in the County.

Solar energy in our local area is another example of in basin generation, which is the ultimate in reliability and lower costs. Solar in the Campo area is green power and is alternative energy. The less we rely on imported power and use our own locally generated power the better off everyone in Campo will be. We will not need either Modified Route D Alternative or we will not need Sunrise PowerLink. If you incentivize solar, and if you had time of use rates on electrical use which would reward people for wise energy use and if you paid people for excess energy generated by their solar roofs, this discussion about Sunrise PowerLink would not be necessary. What the people in Campo want is to be self-reliant. That is the nature of people who live in the Backcountry and deal with the environment and weather and fires and water and transportation and does these things on their own. We do not rely on other people providing everything for our independence. What we need is SDG&E providing in basin energy and providing assistance for our local area to develop generation for our homes with the excess to support others in the San Diego area that do not have our resources. What we need in Campo is not Route D but smart meters and smart energy solutions and use of the natural resources for solar roofs that minimize the impact to our environment. That should be the focus of your efforts.

We have heard or seen no evidence that the modified Route D. Alternative meets the criteria San Diego gas and electric established of the highest benefit/cost ratio no cost or benefit data has been published for this route. And since you have not even establish the final route. How could you have published data as stated earlier, the cost-benefit ratio on this route seems to exceed other routes. Your earlier decision to eliminate Route D. Seems to support that position since the modified Route is even longer and more difficult than some of your earlier iterations of the route.

We see no discussion of environmental justice factors. While you may choose to ignore environmental justice, it is our understanding that CEQA requires an analysis of this factor. Low income and minority

communities are impacted by this project, and you appear to be discriminating against low income areas. Why else would you decide to come this way with an overhead round while being so agreeable to undergrounding the line in areas with high income. Why else would you be so anxious to underground the route when you are in places like Alpine or Rancho Penasquitos or in North County or around Santa Ysabel. If you are to adequately address environmental justice issues, you must underground the route if it does end up going through the Campo area.. You can not discriminate against Campo because it is a low income area and has a large Native American population and has a large minority population. Our minority population is people that are not rich.

One of the environmental justice questions is why a second 500 K. We already have an existing 500 KV line. Setting aside a discussion of what the possible routes could be and whether a single 1,000 KV route is desirable, there are serious issues about fairness and equity and environmental justice by putting two routes in the same area. The plan of the PUC and SDG&E has always been to run a route where there might not be very many people. You chose the Desert Park for that purpose, and now that so much objection is been raised that route you are putting it through some other rural areas like Boulevard and the Campo Reservation and Campo and Potrero and places where there are few people. Especially since you have done the minimal amount of analysis of the impacts on the route and have not involve the community in the discussions. I attended the presentations made by SDG&E employees at the various planning and sponsor groups the backcountry. At no time did they ever advise people of what the likelihood of a route in their area would be they downplayed any route come in this direction and they told each area a little different story. There was no of the are there is very little information about the broad scope of this project and it was all sold assembly had to have.

This CPUC told SDG&E in the summer of 2006 to “Avoid Anza Borrego State Desert Park and wilderness areas”. That direction had little impact on SDG&E although they seem to ignore most of the relevant facts and options and alternatives to Sunrise. This Modified Route D proposal would appear to violate the intent of that direction. CPUC should require the route avoid all wilderness areas and CPUC should be very definitive about what “avoidance” means. The fact that a power tower may not be sitting within the boundary of a wilderness area does not mean you have avoided a wilderness area and impacts on a wilderness area. Proximity and impacts and should be avoided or else CPUC needs to rescind their direction.

I do not understand why this line is necessary and why Campo’s serenity and peacefulness would have to be disturbed by modified Route D. The statements made by SDG&E about the need for the line and he need NOW have routinely been shown as incorrect, miscalculated, in error, over stated and generally disinformation. Alternatives are available to conserve energy. All of us would agree that water and electricity are two of the primary needs of society. Water is in critical supply yet we are finding ways to conserve water in the face of declining availability. The City of San Diego uses LESS water today than they did in 1990 despite an increase in population. That reduced consumption is not because people don’t take baths anymore. It’s because of the implementation of a myriad of conservation measures including rate structures that reward lower use. Yet we see very little similar action by SDG&E to help conserve energy. There are more efficient appliances today, and people are buying them when their old ones fail. But there is no program like the City of San Diego’s low flush toilet program which made it so convenient to replace your toilet and mandated that you replace your toilet with low flow devices. Why should the Campo area be saddled with an unneeded line when we have not taken the necessary steps to conserve and reduce energy use. There are many ways that this can be done. You are not doing it and then are trying to scare us into building an unneeded line. The height of folly was demonstrated by of the false information promulgated by SDG&E that we’re going to have rolling blackouts during the hot weeks we had earlier in the summer. That was not the case. There were not going to be blackouts. But SDG&E attempted to panic us so that we would think Modified Route D is our savior. What should be in place is a proactive approach to reducing energy consumption.

There is so much you need to do. You need to inform the community with the information that represents what is planned and not with some circles on a map. You need to hold meetings in the community to discuss your plans and the alternatives. You need to give the community a chance to comment. You need to avoid trying to slip something past the community and you need to observe CEQA rules and requirements. You need to do better analysis of the alternatives and you need to look at all the alternatives and not eliminate certain routes without fully analyzing them. You need to look at ALL the alternatives including all the non wires opportunities and you need to hold true to your highest benefit/lowest cost standard. You need to avoid wilderness areas and ABSDP. You need to reject the Forest Service design and treat their lands as part of a blank canvas for designing a route should it be proven that there is a need. You need to set aside maximizing SEMPRA profits by building the highest cost alternative that we would all have to pay for. You need to lead the way on conservation measures and intelligent rate structures. You need to modernize your existing transmission grid to be more efficient. You need to take a leadership role in defining what is best for the region and how we achieve that goal. You need to reject Modified Route D Alternative and the entire Sunrise PowerLink and come up with a new strategy and operating plan. SDG&E may be a private company driven by the profit motive but you are a public utility and your responsibilities to the public are being subjugated to profit at any cost to the environment and to the public. Change before it is too late.

Sincerely yours,

Michael C. Thometz