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## County of San Diego

ERIC GIBSON  
INTERIM DIRECTOR

### DEPARTMENT OF PLANNING AND LAND USE

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July 6, 2007

Mr. Jim Bartridge  
California Energy Commission, MS-46  
1516 Ninth Street  
Sacramento, CA 95814-5504

### CALIFORNIA ENERGY COMMISSION CORRIDOR DESIGNATION PROCESS

Dear Mr. Bartridge,

Thank you for the opportunity to comment on the California Energy Commission's corridor designation process per Senate Bill 1059. We appreciate your efforts to ensure that the County of San Diego was included in the California Energy Commission's Joint Committee workshop on March 5, 2007, and the time that you and Mr. Tooker spent talking with us during our follow-up call.

The County of San Diego recognizes the importance of planning for effective long-term energy development and distribution throughout the State of California, including within the local region. This process requires planning not just for near-term energy needs, but development of a long-term vision for sustainable energy generation and transmission in a rapidly changing environment.

The County of San Diego would like to continue to work with the California Energy Commission on the identification of transmission corridors within the County of San Diego. Our focus is to ensure that future corridors are sited with attention to energy needs as well as to an array of potential land use, environmental, economic, and other impacts.

Please see the attached documents for our comments regarding the California Energy Commission's staff-proposed regulations for an electric transmission corridor designation process under SB-1059 (Part I). Also attached are written responses to some of the questions presented by the California Energy Commission in March regarding the process for corridor designation (Part II). Please feel free to contact me or Dahvia Lynch, LUEG Program Manager at (858) 694-3075 if we may be of further assistance.

We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Gibson". The signature is fluid and cursive, with a prominent initial "E" and "G".

ERIC GIBSON, Interim Director  
Department of Planning and Land Use

**PART I: STAFF-PROPOSED REGULATIONS FOR AN ELECTRIC TRANSMISSION CORRIDOR DESIGNATION PROCESS UNDER SB 1059 (DOCKET NO. 07-OIR-1)**

The County of San Diego has the following comments regarding the staff-proposed regulations for an electric transmission corridor designation process under SB-1059 as proposed at the Siting Committee workshop on Friday, June 29, 2007:

• **Section 2403- Format and Number of Copies**

The County of San Diego would like to receive a minimum of one electronic and one hard copy of any applications for designation of an electric transmission corridor within the County's jurisdiction or within an adjacent jurisdiction.

• **Section 2404- Review and Acceptance of Application,**

Item (e) indicates that "After the commission has acted on the executive director's recommendation *even if the application is determined to be incomplete*, the commission shall consider whether to assign a committee to preside over the proceeding on the application for designation of a transmission corridor zone..." [emphasis added]. The County of San Diego recommends that a committee be assigned only upon submittal of a complete application in order to ensure that only qualifying applications are considered, and to limit public costs for review of incomplete applications.

• **Section 2410- Preparation of Environmental Impact Report, Need Assessment, and Staff's Role**

The programmatic environmental impact report does not substitute for a project-level environmental impact report for any specific project proposal. The potential environmental impacts particular to any project must be sufficiently examined and evaluated beyond the programmatic environmental impact report for the surrounding corridor. Cumulative impacts of additional projects within the corridor must also be specifically examined.

• **Appendix G**

Part (c) regarding Corridor Alternatives addresses only wire alternatives. Alternatives analyzed should include non-wire alternatives to proposed corridors.

## **PART II: ELECTRIC TRANSMISSION CORRIDOR DESIGNATION PROCESS UNDER SB 1059**

### **General**

- **What do you believe the specific objectives of the corridor designation process should be?**
  - A comprehensive, iterative stakeholder outreach process involving local jurisdictions as central participants.
  - Effective response to local jurisdiction input regarding the designation of corridors.
  - Thorough review, analysis, and consideration of an array of feasible alternatives for each potential corridor. This should include a thorough examination of the no-project alternative in each case. This may encompass a broader focus on alternative locations and methods of generation as well as alternative methods of distribution.
- **What stakeholder needs and objectives should be considered during the implementation of SB 1059 and the corridor designation process?**
  - Corridor locations compatible with existing and planned land uses, typically including avoidance of residential communities and planned conservation areas.

### **Planning**

- **What is an appropriate planning horizon for future projects that would use a designated corridor?**
  - Approximately five years- consistent with or slightly longer than the major infrastructure and capital improvement plans of most jurisdictions.
- **What important land use and environmental issues need to be considered in the Strategic Plan after the corridor designation process is in place?**
  - The Strategic Plan should examine all impacts analyzed under the California Environmental Quality Act (CEQA) at a programmatic level. The following impacts are generally of particular concern:

visual (*to communities and park or wilderness areas*), biological (*to planned conservation areas such as those identified in habitat conservation plans and to species*), and safety (*particularly with respect to fire hazards*). Physical constraints should also be examined and analyzed with respect to the economic costs of project development and the impacts of related infrastructure requirements (i.e., service roads, etc.).

- **How should future (competing) projects in a designated corridor be prioritized?**
  - A process should be established that includes clear quantitative and qualitative measures for gauging the public benefit or impact of a potential project with respect to the designated transmission corridor. Alternative corridor routes should be identified that includes an appeal process in which local jurisdictions may engage.
- **What would prevent a programmatic corridor environmental impact report (EIR) from becoming stale?**
  - Update on an ongoing basis approximately every two to four years. Ensure that updates occur following significant land use or environmental changes.

### **Impediments**

- **What issues could prevent the corridor designation process from succeeding?**
  - A determined lack of need for the project, identification of significant environmental impacts, and unanticipated costs outside of the project scope. A showing that energy needs could be met by conservation or less impactive local generation.
- **What circumstances could prevent the use of a previously designated corridor over time?**
  - Significant changes in circumstances, including land use or other changes.
- **If a TLSE pursues corridor designation process but does not acquire the land, should another TLSE be able to use the corridor?**
  - Yes. However, project-level environmental analyses must consider the individual project on a case by case basis. Analysis from a

previous or similar project may not be utilized as the analysis for a new and independent project.

## **Permitting**

- **How will alternatives considered in the corridor designation process affect alternatives considered in the permitting process?**
  - Alternatives considered in the corridor designation process (programmatic level) should serve as a framework for those alternatives considered in the permitting process (project level). Alternatives designated at the programmatic level should not be determined to be feasible or preferred until a full project-level environmental review is completed. Project level review may provide information or produce public input that would indicate that the alternative is infeasible or should be replaced with a less impactful alternative.
- **What is the best way to ensure that environmental work conducted in the programmatic corridor EIR is used in a later, project-specific CEQA process?**
  - Ensure that the programmatic EIR remains current, particularly when significant changes occur.
- **How can the California Public Utilities Commission use the results of a programmatic corridor EIR in the permitting process?**
  - A project-level environmental analysis will be required.