



CALIFORNIA STATE PARKS FOUNDATION

December 4, 2014

Stephen Berberich
President and Chief Executive Officer
California Independent System Operator
P.O. Box 639014
Folsom, CA 95763-9014

SENT VIA ELECTRONIC MAIL to regionaltransmission@caiso.com

RE: 2014-2015 Transmission Planning Process and Transmission Options and Potential Corridor Designations in Southern California in Response to Closure of San Onofre Nuclear Generating Stations (SONGS): Environmental Feasibility Analysis

Dear Mr. Berberich,

On behalf of the California State Parks Foundation (“CSPF”) and its 130,000 members statewide, I appreciate the opportunity to comment on the 2014-2015 Transmission Planning Process and the Transmission Options and Potential Corridor Designations in Southern California in Response to Closure of San Onofre Nuclear Generating Stations (SONGS): Environmental Feasibility Analysis (“Feasibility Analysis”).

With our 130,000 members, CSPF is the only statewide independent nonprofit organization dedicated to protecting, enhancing and advocating for California’s magnificent state parks. Over the last several years, we have provided leadership on statewide efforts to protect state parks from incompatible developments that impact and threaten public access, visitor enjoyment and the economic vitality of California’s 280 state parks.

CSPF’s interest in the 2014-2015 Transmission Planning Process and Feasibility Analysis are related to impacts to California’s state parks. Meeting the state’s energy and transmission demands is important, but one that cannot be made to be at odds with continued protection of the state’s natural infrastructure. California’s state park system includes more than 1.5 million acres of park lands throughout California. In Fiscal Year 2011-2012, more than 67.9 million people visited California’s state parks. The state park system preserves California’s unique natural resources and culturally significant sites. Any decisions should consider the impacts to these extraordinary places.

Of specific concern are impacts to parks from routes identified in the Feasibility Analysis. Alternative 5, Imperial Valley to Inland (Overhead AC and Overhead/Underground DC), either Option 1A or Option 1B will have direct impacts to Anza-Borrego Desert State Park (“ABDSP”). The issue of a transmission line through ABDSP is not a new proposal. As acknowledged in the Feasibility Analysis, a proposal to site a

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transmission line through ABDSP, known as Sunrise Powerlink was proposed and met with resistance. Ultimately a route that avoided ABDSP was adopted. CSPF made numerous objections to the project because of impacts to ABDSP and concerns of the entire environmental review process, which can be characterized as:

- Destruction of significant cultural sites
- De-designation of State Wilderness Areas—an unprecedented event with significant state implications.
- Significant impacts to travel corridors for Peninsular bighorn sheep, other animals and a number of sensitive plants
- Recreational impacts, including impacts to Tamarisk Grove campground that would have been a potential economic loss to the park.
- Loss of view shed—impacts 50,000 acres—and sense of “timelessness” and tranquility associated with desert open spaces would have been lost.

These concerns remain if any similar proposal were to be pursued. ABDSP supports over 400,000 acres of designated State Wilderness areas. It is the largest state park in the continental United States, with over 600,000 acres of pristine desert and mountain wilderness, hiking trails, and unparalleled vistas. More than 380 land transactions have taken place to accumulate the land mass that is now the park; CSPF itself has participated in eight land acquisitions in the 1970’s and 1980’s.

In addition to concerns regarding ABDSP, Alternatives 1, Submarine HVDC Cable in the Feasibility Analysis may negatively impact other state parks, including Huntington State Beach (“Huntington”) and Silver Strand State Park (“Silver Strand”). Huntington is known for surfing, attracting more than a million visitors in Fiscal Year 2011-12, generating almost \$4 million in revenue in that same fiscal year. Silver Strand welcomed more than 440,000 visitors and generated more than \$1.3 million in revenue in Fiscal Year 2011-2012. Transmission planning decisions should consider any negative impacts and remain consistent with the purpose of these state resources.

Thank you for the opportunity to comment on the 2014-2015 Transmission Planning Process and the Feasibility Analysis. Please do not hesitate to contact me at 916-442-2119 with any questions regarding this letter or CSPF’s position.

Sincerely,



Traci Verardo-Torres
Vice President, Government Affairs

CC: Robert Weisenmiller, Chair of California Energy Commission
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