

BALANCING THE CLIMATE LEDGER:

How California Can Build a Clean Energy Future
Without Sacrificing Its Greatest Climate Assets

The Golden Pacific Powerlink as a Case Study

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An Anza-Borrego Foundation Thought Leadership Paper



Photo Rendition: Sicco Rood

About This Publication

California has long been recognized as a global leader in both environmental conservation and climate action. It has committed to ambitious renewable energy goals, invested billions in clean energy infrastructure, and established some of the nation's strongest protections for biodiversity, wilderness, and public lands.

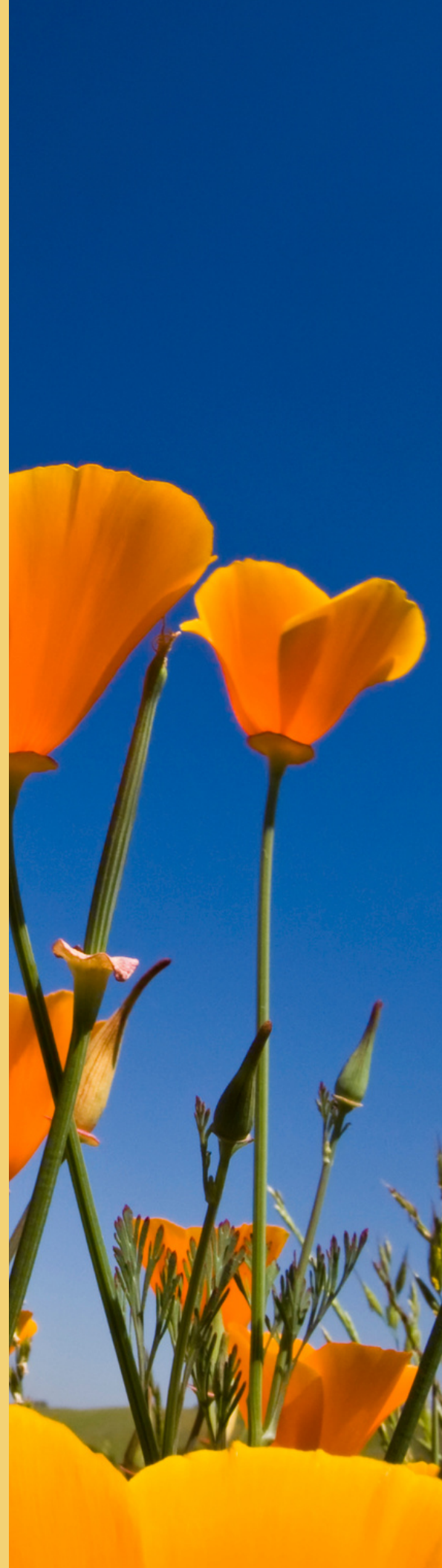
These commitments are often viewed as complementary. Increasingly, however, they are intersecting in ways that demand more thoughtful planning.

As California expands its electrical grid to meet future energy needs, important questions are emerging about how renewable energy infrastructure should be balanced with the protection of the intact ecosystems that already provide essential climate benefits.

This publication introduces The Climate Ledger—a framework for evaluating both sides of that equation.

Using the proposed Golden Pacific Powerlink as a case study, this paper explores how California can continue advancing renewable energy while honoring its commitments to biodiversity, wilderness protection, cultural resources, climate resilience, and the stewardship of public lands held in trust for future generations.

The purpose of this paper is not to oppose renewable energy. Rather, it is to encourage a more comprehensive approach to climate planning—one that recognizes intact ecosystems as essential climate infrastructure and evaluates their long-term value alongside the benefits of new energy development.



Executive Summary

California has established some of the most ambitious climate and clean energy goals in the world. Achieving those goals will require expanding renewable energy generation, modernizing the electrical grid, and investing in new transmission infrastructure capable of supporting a rapidly evolving energy system.

At the same time, California has made equally significant commitments to conserving biodiversity, protecting wilderness, expanding connected habitats through its 30x30 Initiative, and stewarding public lands that provide irreplaceable ecological, cultural, and recreational value.

Too often, these priorities are discussed as though they are in conflict.

This paper argues they are not.

Instead, it proposes a new framework—The Climate Ledger—for evaluating the full balance sheet of climate action. Today, California carefully measures the benefits of renewable energy infrastructure: megawatts generated, transmission capacity added, emissions reduced, and grid reliability improved. Yet there is no comparable framework for accounting for what may be permanently lost when intact ecosystems are fragmented to build that infrastructure.

Those losses are not simply aesthetic. Healthy landscapes store carbon, regulate water systems, support biodiversity, connect wildlife habitat, preserve cultural resources, and strengthen resilience to climate change. They are not obstacles to climate action—they are part of California's climate solution.

The proposed Golden Pacific Powerlink, a 500-kilovolt transmission project that would cross portions of Anza-Borrego Desert State Park and surrounding backcountry communities, serves as a timely case study. Through this example, the paper explores broader questions about transmission planning, cumulative impacts, environmental review, mitigation, and the long-term stewardship of protected public lands.

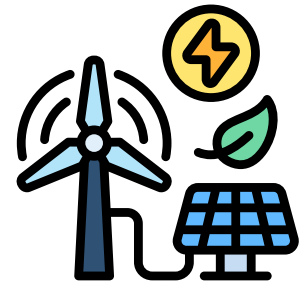
Ultimately, this publication is not an argument against renewable energy or transmission infrastructure. It is an argument for more complete accounting—one that recognizes the measurable climate value of intact ecosystems and ensures that California's clean energy future is built in partnership with, rather than at the expense of, its greatest natural assets.



Key Takeaways

California's Challenge

California has committed to both accelerating renewable energy development and conserving its most important natural landscapes. As these priorities increasingly intersect, decisions about where infrastructure is built will shape both the state's energy future and its conservation legacy.



The Climate Ledger

Current planning carefully measures the benefits of new energy infrastructure but lacks a comparable framework for evaluating the climate value of intact ecosystems that may be permanently altered.



Why It Matters

Protected public lands are more than scenic landscapes. They sequester carbon, support biodiversity, regulate hydrology, preserve wildlife connectivity, protect cultural resources, and increase resilience to climate change. These ecological services represent essential climate infrastructure.



A Case Study

The proposed Golden Pacific Powerlink illustrates the broader challenge facing California: how to expand transmission infrastructure while honoring decades of investment in conservation, wilderness protection, and public trust resources.



The Opportunity

California has the scientific expertise, planning capacity, and conservation leadership to demonstrate that renewable energy development and ecosystem protection are not competing priorities—they are complementary investments in a resilient future.



KEY INSIGHT

The question is not whether California needs renewable energy infrastructure. The question is whether California can build it while protecting the intact ecosystems that are already performing essential climate work.



Part I — The Missing Half of the Climate Ledger

Executive Insight

California has become a global leader in climate action. It carefully measures the benefits of renewable energy development—tracking megawatts of solar installed, transmission capacity added, battery storage deployed, and greenhouse gas emissions reduced. These metrics are essential. They help guide investment, shape public policy, and demonstrate progress toward the state's ambitious climate goals.

But there is another side of the ledger that is rarely measured with the same rigor.

As California accelerates its clean energy transition, decisions about where infrastructure is built increasingly intersect with landscapes that already provide measurable climate benefits. Intact ecosystems store carbon, regulate water, sustain biodiversity, connect wildlife habitat, and strengthen resilience to a changing climate. Yet these ecological services are rarely evaluated as climate assets within the same planning framework used to justify new energy infrastructure.

Part I introduces The Climate Ledger—a framework for considering both sides of California's climate equation.

California keeps a meticulous score on its clean energy progress. Megawatts of solar installed. Miles of transmission approved. Gigawatt-hours of battery storage online. Emissions reduced. Targets met or exceeded. The numbers are tracked, reported, celebrated, and used to justify the next round of infrastructure. By that accounting, the state is winning.

But it is only half the accounting. California has no mechanism for balancing the full climate-action ledger—what the state is gaining and what it is losing in pursuit of a clean energy future. We meticulously record the credits: every megawatt installed, every mile of transmission approved, every ton of carbon reduced. But for every line of energy infrastructure California builds, something else is subtracted and those subtractions don't appear anywhere on the ledger. The intact desert ecosystem fragmented by a transmission corridor. The endangered species habitat bisected by an access road. The cultural landscape graded for a substation pad. The wilderness designation overridden for regulatory convenience.

The credits are tracked. The debits are invisible. And from where I sit, after twelve years at the nonprofit partner to California's largest state park, watching the same transmission corridor get proposed through the same protected landscape twice in two decades — the imbalance is not subtle.

Let me be clear about where I stand, and where Anza-Borrego Foundation stands: we are not against renewable energy. We are not against transmission infrastructure. We support California's clean energy transition. What we are against is destroying climate action conservation lands in the name of climate action. That is not a contradiction we should accept. It is a contradiction we should name and fix.

Isn't That What CEQA Is For?

The natural response is: we already have a ledger. It's called the California Environmental Quality Act. CEQA exists precisely to weigh the environmental costs of development projects before they are approved.

It's a fair question. CEQA was designed as a ledger. But in practice, particularly for major transmission projects, it has become a ledger with structural blind spots so large that entire categories of loss pass through unrecorded.

CEQA reviews projects one at a time. A transmission line gets its own review. The solar farms, wind projects, battery storage, and substations that follow each get separate, individual reviews at the local county level. No single review captures the cumulative transformation of a landscape. The landscape-scale impacts: the progressive fragmentation of wildlife corridors, the compounding loss of habitat connectivity, the incremental degradation of watershed function, the slow erosion of the very ecological resilience that makes these lands valuable as climate action conservation assets go unmonitored and unaccounted for across the full scope of a corridor's buildout. The ledger records each transaction in isolation but never tallies the running total. By the time the cumulative damage to climate action lands becomes undeniable, the decisions that caused it are years in the past and the losses are irreversible. CEQA allows debits to be erased through mitigation, on paper. A project proponent proposes a mitigation measure; the impact gets reclassified from "significant" to "mitigated." On the ledger, the debit disappears. On the ground, the loss remains. For irreplaceable resources, contiguous wilderness, archaeological sites, dark sky designations, mitigation is a bookkeeping exercise, not an ecological reality.

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CEQA does not quantify what the landscape is worth as climate infrastructure. It will assess impacts to biological resources, visual quality, noise. It will not assess the carbon sequestration, microclimate regulation, or biodiversity resilience that an intact ecosystem provides. The ledger literally does not have columns for them.

CEQA is under active political pressure to be streamlined for energy projects. Legislation like AB 3238 (Garcia, 2024) and SB 1097 (Wiener, 2025–2026) has sought to create CEQA exemptions or accelerate environmental review for transmission infrastructure.^{[^20][^21]} These bills were not designed to target protected lands, per se. Their intent is to speed renewable energy development on already-disturbed lands and existing corridors—a goal we support. But legislation written broadly enough to streamline one category of project can, without guardrails for special circumstances such as Anza-Borrego and other state parks containing electrical infrastructure, weaken protections for another. The unintended consequences of well-intentioned clean energy legislation must not include weakening the environmental review that protects the very conservation lands California has committed to preserving under 30x30 and its own wilderness protection framework. We must be vigilant in ensuring that the urgency of the energy transition does not inadvertently undo the climate action already embedded in our protected landscapes.

And CEQA operates in a silo. It does not connect to 30x30 commitments, wilderness designations, or dark sky protections. It does not ask whether the project contradicts the state's own conservation goals or the Department of Parks and Recreation's mission statement. The broader balance sheet, the one that would reveal whether California is gaining or losing ground on its combined climate and conservation objectives, does not exist.

CEQA is an essential tool. It is not, however, a balanced ledger.



Photo: Paulette Donnellon

Why This Matters

Climate action is often discussed in terms of infrastructure—solar arrays, wind farms, batteries, and transmission lines. Yet healthy ecosystems are also infrastructure. They perform measurable functions that reduce climate risk, support biodiversity, protect water resources, and strengthen resilience. Recognizing these benefits is not an argument against renewable energy. It is an argument for accounting for all of California's climate assets before irreversible decisions are made.

If California measures every megawatt generated, should it also measure the climate value of the ecosystems that may be permanently altered to generate it?



Looking Ahead

The concept of the Climate Ledger becomes especially relevant when applied to real-world decisions. The proposed Golden Pacific Powerlink offers an opportunity to examine how California currently balances renewable energy development with the conservation of its most ecologically significant public lands—and where that balance may need to evolve.

Part II — The Golden Pacific Powerlink Case Study

Executive Insight

The Golden Pacific Powerlink puts California's climate-action accounting problem into concrete terms. The project promises reliability, additional transmission capacity, and access to future generation, but those benefits are being evaluated without an equivalent accounting of what would be permanently lost: protected wilderness, biodiversity, cultural landscapes, watershed function, climate resilience, and public trust resources.

The central question is not whether transmission infrastructure has value. It is whether California can determine that a project represents a true climate gain when the full ecological and social costs of the corridor—and the development it may enable—are never placed on the same balance sheet.

SDG&E is proposing the Golden Pacific Powerlink, a 500-kilovolt transmission line running approximately 135 miles from the Imperial Valley Substation to a new substation near the San Diego–Orange County border — the single largest and most expensive project in CAISO's current transmission plan, estimated at \$2.3 billion.^[1]^[2]

The proposed route would cross directly through Anza-Borrego Desert State Park, California's largest state park, the most biodiverse park in the state system, and a cornerstone of 30x30.^[13] The corridor would follow State Route 78, passing near Tamarisk Grove Campground, through Grapevine Canyon, and through the Angelina Spring Cultural Preserve, then continue northwest through Lake Henshaw, Warner Springs, and into Riverside County near Temecula.^[3] On the credit side of the ledger, SDG&E's April 2026 fact sheet describes the project's benefits: a vital new transmission pathway, enhanced grid reliability, greater integration of "more electricity generation."^[4]

On the debit side, the proposed corridor would introduce a major new industrial footprint into a more than 650,000-acre park that contains approximately 85 percent of California State Parks' designated State Wilderness acreage. The landscape at risk includes critical habitat for the federally endangered Peninsular bighorn sheep;^[5] over 50 reptile species; more than 4,400 documented archaeological sites; one of North America's most significant Pleistocene fossil records; International Dark Sky Park^[6] and Quiet Parks International: Quiet Conservation Area^[7] designations. And an ecosystem already under extraordinary stress, UC Irvine scientists have documented a 37.5% decline in native vegetation across the Colorado Desert region since the 1980s, concluding that dryland ecosystems "may be more susceptible to climate change than expected."^[8] San Felipe Creek, which runs along the very corridor the proposed line would follow, has dried up along several miles in recent years.^[9]



CEQA will identify many of these impacts individually and attempt to mitigate them. But the climate action ledger is not a checklist of individual impacts to be managed one by one; it is a balance sheet. And on that balance sheet, the cumulative value of what this landscape represents as functioning climate infrastructure: its carbon sequestration, its biodiversity resilience, its watershed protection, its role in 30x30, is never weighed against the project's claimed benefits. The individual debits may be acknowledged. The full account is never tallied.

They Have Tried This Before

In 2006, SDG&E proposed the Sunrise Powerlink through approximately the same corridor. The CPUC determined in Decision D.08-12-058 that all routes through Anza-Borrego were "environmentally unacceptable and infeasible," identifying 52 significant, unmitigable environmental impacts.[^10]

A comparison of SDG&E's April 2026 route map with the 2008 record indicates the Park portion appears to be substantially the same corridor.[^3] Both originate at the same Imperial Valley Substation. Both follow the same existing 69 kV right-of-way, a line built before the Park was established and before CEQA existed.[^11] Not a line approved through a park but adopted by one. What differs is the destination beyond the Park.

The only thing that has fundamentally changed since 2008 is that the Park is more vulnerable, not less.

The Missing Clean Energy Commitment

When CAISO approved this project, one justification was to "unlock access to renewable generation resources."^[^2] When SDG&E announced it in August 2025, the press release called it "essential for California to achieve its ambitious carbon reduction goals."^[^12]

SDG&E's April 2026 fact sheet has dropped that framing entirely. The renewable energy language has been replaced with source-neutral terms: "more electricity generation," "growing demand," "reliability and resilience."^[^4] There is no binding commitment anywhere in the project's documentation that this line will carry clean energy. A 500 kV line, once built, carries whatever is connected to it.

But there is a deeper problem with the project's own logic. The renewable generation resources this line is meant to "unlock" do not yet exist at the scale needed to fill a 500 kV corridor. If the clean energy that justifies this line has not yet been built, then the infrastructure to generate it, the utility-scale solar arrays, the wind farms, the battery storage facilities, the substations, these will have to be constructed along and around the corridor to meet CAISO's goals. The line is not a standalone project. It is the spine of an industrialized renewable energy corridor that has not yet been proposed, reviewed, or approved as such.

What is being presented to the public as a single transmission line is, in its own internal logic, the first phase of a much larger industrial buildout. The solar farms will follow. The wind projects will follow. The substations will follow. They will have to, because the line cannot fulfill its stated purpose without them, this is why SDGE is not claiming it will carry renewable energy, because it won't at first. And yet none of that foreseeable development is included in the project's current environmental review, cost-benefit analysis, or stakeholder engagement.

None of this makes renewable energy companies villains. A new 500 kV corridor is a legitimate business opportunity for developers to spec projects, build out generation portfolios, expand battery storage capacity, and meet the newly identified demand from data centers and electrification. That is how the energy economy works, and we do not begrudge it. But we do insist that the full scope of what a corridor like this sets in motion be honestly disclosed and honestly reviewed, not presented as a single transmission line while the industrial buildout it requires remains unacknowledged.

This is not just a line. It is an industrialized energy corridor proposed through the heart of the most biodiverse, climate action-rich region in the California State Park system. Do we all feel comfortable with this debit in the ledger?

The public is being asked to accept a guaranteed loss for an unguaranteed gain.

Who Is This For?

The traceable justification for grid expansion of this scale rests on the CEC's demand forecasts and power flow studies. The most recent projections suggest CAISO peak demand could increase by as much as 61 percent over the next two decades.[^22] That projection is now driving the urgency behind transmission buildout across the state.

But the demand landscape is shifting beneath the justification. Data centers are the fastest-growing new electricity load in California, projected to grow from approximately 1,000 MW (2 percent of peak demand) in early 2026 to 4,500 MW (9 percent) by 2040.[^23] They were included in the CEC forecast for the first time in the 2024 update, after the 2022–2023 CAISO Transmission Plan that justified the Golden Pacific Powerlink had already been approved.[^24] The original demand projections that underpinned this project did not account for data center load. The dramatically revised projections that now amplify the urgency around projects like this one are driven in significant part by an industry generating enormous private profit.

This does not mean the GPP was approved because of data centers. But it does mean the demand picture has changed materially since the project was justified, and the public deserves to understand what is now driving it. The communities along this corridor: Imperial, Borrego Springs, Shelter Valley, Lake Henshaw, Warner Springs, the foothills of Palomar Mountain, and Temecula, are being asked to absorb the industrial footprint of infrastructure that will carry electricity to urban load centers. The landscapes being sacrificed are public trust resources. The energy they carry may not be clean. And a growing share of the demand it serves may be corporate, not public.

These are questions worth asking. The answers will shape whether California's energy transition serves all of its people and landscapes, or only some of them.

Biodiversity Is the Strategy — Not an Obstacle to It

Here is the deeper contradiction. The current framework treats biodiversity as a cost of doing business. A regrettable line item to be minimized and mitigated. But intact ecosystems are among our most essential tools for surviving climate change. They sequester carbon, regulate microclimates, buffer extreme weather, sustain water systems, and maintain the resilience that allows natural systems to adapt. California's 30x30 initiative recognizes this explicitly: biodiversity protection and climate action are the same priority.[^13] To permanently debit irreplaceable natural climate infrastructure from the ledger in order to build energy infrastructure that is not even committed to being renewable is not a tradeoff between conservation and climate action. It is the potential destruction of both.

That is not climate action. That is an accounting fraud against the landscape.

Part III — The Industrialization Cascade

Executive Insight

A transmission corridor does not end with the transmission line. Once high-capacity infrastructure is in place, it can reshape the development future of an entire region—making new generation, substations, storage, and additional industrial projects more feasible and easier to justify.

The Sunrise Powerlink demonstrates how that transformation can occur incrementally, with each project reviewed on its own while the cumulative conversion of a landscape goes largely uncounted. That is the central warning for the Golden Pacific Powerlink: the true debit is not simply the footprint of one 500 kV line, but the industrialization cascade it may set in motion across protected lands and communities.

If California is serious about balancing its climate ledger, it must evaluate the full foreseeable buildout, recognize that some losses cannot be mitigated, and ensure that conservation commitments such as 30x30 carry real weight in infrastructure siting. The question is not whether California should build clean energy infrastructure. It is whether the state will build it in a way that does not consume the very climate assets it has already committed to protect.

A transmission line is not a single debit on the ledger. It is a category header. Once a high-capacity line is built, it does not simply attract follow-on development, it becomes the justification for it. The existence of the transmission infrastructure is cited as the demand signal and feasibility basis for every subsequent project. The corridor becomes a self-justifying engine for industrial buildout and each follow-on project goes through its own individual CEQA review, with little to no room for the public to raise the cumulative reality of what the corridor has become.

The Sunrise Powerlink corridor is the documented proof. After that line was completed in 2012, SDG&E's Senior Vice President of Power Supply called the first project to connect the Ocotillo Express Wind Facility, 112 turbines on 10,000+ acres, "precisely the type of project the Sunrise Powerlink was designed to support."^[14] Here is what followed, each approved through its own individual review, each justified by the line's existence:

Ocotillo Express Wind — 112 turbines, 450 feet tall, 10,000+ acres of public land. Photo ©2013 by Jamey Stillings.



- ECO Substation — major new substation interconnecting renewable projects with the Sunrise line
- Boulevard Substation — additional grid infrastructure
- Campo Wind — industrial wind project in the Campo/Boulevard area
- Tule Wind — 200 MW wind project, requiring BLM to downgrade visual resource classifications. Photo: San Diego Union Tribune^[15]
- Jacumba Valley Ranch (JVR) Energy Park — 600+ acres of solar surrounding the town of Jacumba Hot Springs, approved over unanimous community opposition
- Boulder Brush Substation — additional corridor infrastructure
- Starlight Solar — 588 acres of pristine chaparral in Boulevard, paired with 217 MW battery storage, currently under review. Residents and tribal leaders describe their community as a "sacrifice zone."^[25]



Body
Tule Wind Photo: San Diego Union Tribune

At no point in this progression did anyone conduct a programmatic review of what the Sunrise corridor had collectively become, from a single transmission line to an industrial energy district spanning the San Diego backcountry. The Golden Pacific Powerlink could set this same process in motion across a new corridor through some of California's most biodiverse and highly protected public lands.

The Mitigation Illusion

If the one-sided ledger is the structural problem, mitigation is the accounting trick that keeps it in place.

The CPUC itself already told us mitigation doesn't work in Anza-Borrego. That is what "unmitigable" means in the 2008 decision. And the ecosystem has only grown more fragile since. You cannot offset bifurcating 471,000 acres of contiguous wilderness by restoring habitat somewhere else. You cannot replace archaeological sites. You cannot re-create a dark sky or a quiet soundscape.

Financial mitigation is particularly hollow. When the Ocotillo Wind Facility was built adjacent to the Park, mitigation funding was directed to archaeological research. That funding is now gone — fully expended — having barely scratched the surface of the program's needs. And now another industrial project is proposed through the same region. The mitigation payment was negligible relative to the scale of the impact. Financial mitigation does not make a landscape whole. It makes a project approvable.[^18]

Convenience Is Not a Justification

Protected conservation lands should be non-negotiable when it comes to industrial energy siting. Not difficult. Not disfavored. Non-negotiable. During a March 26, 2026 stakeholder meeting, the Golden Pacific Powerlink project team acknowledged that corridors through military and other federally managed lands were characterized as not feasible because routing through them would require an act of Congress, and the project "does not have time for that." The preferred route through Anza-Borrego was selected because it was the easier regulatory pathway, not because it was the least impactful.[^19] Military lands are treated as untouchable. The most biodiverse state park in California, a 30x30 cornerstone holding International Dark Sky, Quiet Conservation Area, and critical endangered species habitat designations, is treated as the convenient alternative. Conservation designations carry less practical weight than defense designations, even when the conservation landscape is more ecologically significant to the state's long-term interests. This also raises a question about corporate accountability. SDG&E operates within a service district that includes this Park. Sempra publishes sustainability reports emphasizing biodiversity and habitat conservation. What does it say about those commitments when the company's own proposed route would industrialize the most ecologically significant landscape within its service territory?

If 30x30 means anything, it must mean that California's most significant protected lands are not available as paths of least resistance. Routing industrial infrastructure through them because it is faster and easier is not climate action. It is the consumption of climate action for the sake of convenience.

What a Balanced Ledger Would Require

This paper does not have all the answers. The questions it raises are systemic, embedded in siloed regulatory frameworks not designed for the speed and scale of California's energy transition. But the direction is clear. At minimum:

- Net Climate Impact Assessments for projects sited on or near protected lands, quantifying the climate function lost, not just the energy gained.
- Binding clean energy commitments. No commitment, no justification.
- Programmatic environmental review for transmission corridors encompassing the full, reasonably foreseeable buildout, not just the line itself.
- 30x30 as a non-negotiable standard. If it can be overridden for convenience, it is not a commitment, it is a suggestion.
- Community and tribal sovereignty in the accounting. The people absorbing the debits deserve a voice in how they're counted.

The Ledger Must Balance

In the race to zero carbon emissions, something has gone wrong with the accounting. CEC forecasts the demand, CAISO plans transmission. The CPUC reviews/approves applications. Counties permit the follow-on solar, battery and wind. State Parks manages the land around it. No single entity asks the most basic question: what is the net impact on the landscapes we are claiming to protect? These are not failures of intention. They are failures of architecture.

I said at the beginning of this piece that Anza-Borrego Foundation is not against renewable energy. I want to say it again here, because it matters. We support the clean energy transition. We understand its urgency. We want California to succeed. What we cannot accept, what no one should accept, is destroying climate action conservation lands in the name of climate action. That is not a tradeoff. It is a contradiction. And until our regulatory systems are capable of seeing it as one, the ledger will remain unbalanced.

The debits are real. The losses are permanent. And right now, nobody is counting them. The ledger must balance. And the first step is admitting that it doesn't.



Photo: Rebecca Kuritz

Anza-Borrego Foundation is the official cooperating association and nonprofit partner of Anza-Borrego Desert State Park. SDG&E is accepting stakeholder feedback on the Golden Pacific Powerlink through early November 2026. To learn more about the project and how to engage, visit theabf.org/park-threat. To submit feedback directly to SDG&E, email GoldenPacific@sdge.com.

Sources

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- [^2]: CAISO 2022–2023 Transmission Plan, Executive Summary. The plan was developed to "unlock access to renewable generation resources to meet state energy needs." [CAISO Executive Summary \(PDF\)](#).
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- [^17]: [NextEra Energy](#).
- [^18]: Ocotillo Wind mitigation funding to Anza-Borrego: directed to archaeological research, now fully expended. ABF records.
- [^19]: SDG&E/GPP project team, stakeholder meeting, March 26, 2026. Military/federal lands characterized as not feasible; preferred route selected as more feasible regulatory pathway.
- [^20]: AB 3238 (Garcia, 2024). [Bill text](#). See also [CalMatters, July 2024](#).
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- [^23]: CEC data center projections: 1,000 MW to 4,500 MW by 2040. [CEC Data Centers page](#).
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