

***VIA Hand Delivery and Electronic Mail***

April 11, 2008

CPUC/BLM
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Re: Draft Environmental Impact Report/Environmental Impact Statement for the Sunrise Powerlink Transmission Line Project

Introduction

These comments are submitted on behalf of the Center for Biological Diversity and the Sierra Club.¹ The joint Draft EIR/EIS (DEIR/EIS) prepared by the California Public Utilities Commission (PUC) and the Bureau of Land Management (BLM) describes how the proposed project would cause at least 50 significant impacts, far more impacts than any transmission project ever approved by the PUC. We thank the agencies for working hard to prepare a thorough DEIR/EIS. We also appreciate the efforts of Aspen Environmental Group in preparing the document, and for being available to respond to questions we have had. The level of professionalism and courtesy throughout the process has been exceptional. As will be explained in more detail in these comments, however, the agencies have produced the DEIR/EIS under exceptionally difficult circumstances that have prevented an adequate analysis of many critical issues. San Diego Gas & Electric Company (“Applicant,” “Company,” or “SDG&E”) has repeatedly failed to provide adequate information, leaving the DEIR/EIS with significant flaws in its analysis and inadequate information for the public to consider. The Center and the Sierra Club describe in these comments gaps in analysis, and discuss significant impacts that could result from the proposed project, including but not limited to: impacts to biological resources, wilderness, visual resources, air quality, water quality, global warming, and cumulative impacts. We do not support any transmission line route alternative and therefore, the mitigation recommendations in this comment letter are only intended to assist in reducing harm from the project in the event that the CPUC / BLM approves a transmission alternative.

¹ The Center for Biological Diversity and the Sierra Club’s Scoping Comments are incorporated into these comments as well.

We request that the DEIR/EIS be re-circulated due to a) the failure to adequately consider the widespread environmental impacts of the October 2007 fires, b) the failure of SDG&E to provide the agencies preparing the DEIR/EIS as well as the public with sufficient species surveys necessary to understand the extent of impacts, c) the failure of SDG&E to use detailed and adequate species surveys to design routes and enable the agencies to design alternatives that reduce the record number of significant and unmitigable impacts of each of the alternatives, d) the failure to adequately disclose how the alternatives will impact permitting under existing and developing multi-species conservation plans in the region, f) the failure to address the full extent of increases in global warming emissions anticipated by the STP, and g) other reasons as discussed in the comments.

The Center has over 40,000 members throughout the United States, many of whom reside in California. The Center is a non-profit organization dedicated to the preservation, protection, and restoration of biological diversity, native species, ecosystems, and public lands. The Center's members and staff regularly use the public lands and waters that will be impacted by the project for observation, research, aesthetic enjoyment, and other recreational, scientific, and educational activities. The Center's members and staff have researched, studied, observed, and sought protection for the public lands along the proposed route and for many of the rare, threatened, endangered and special status species that may be impacted by the project and for the habitats on which these species' survival depends. The Center's staff and members derive scientific, recreational, conservation, and aesthetic benefits from these public lands and from these species' existence in the wild.

The Sierra Club is a non-profit advocacy organization whose mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote responsible use of the Earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. Attachment 1 to these joint comments of the Center and the Sierra Club are comments prepared by volunteers from the San Diego Chapter of the Sierra Club. The comments represent just a portion of what may be unprecedented public opposition to a proposed transmission project in California. We ask that the comments receive the same scrutiny and response as the joint comments of our organizations.

The level of opposition to the Sunrise transmission project (STP) is no surprise when stepping away from the many details in the 7500 page DEIR/EIS and looking at the bigger picture. We are unaware of a single instance in the country where a wilderness designation has been removed; approval of the proposed project would be the first time ever, and in the cherished Anza-Borrego Desert State Park (Anza- Borrego). The 50 significant, unmitigable impacts of the project overwhelmingly are more destructive than any other transmission project in California. We have reviewed every transmission project identified in the PUC's public database and found the next most destructive project by number of significant impacts had 20 – and these were visual impacts from another SDG&E project. We ask that the agencies look at this bigger picture in the final EIR/EIS. Our findings are identified in the chart in Attachment 2.² It should

² The projects are all found at <http://www.cpuc.ca.gov/PUC/energy/electric/Environment/Current+Projects/pastproj.htm>. Significant unmitigable impacts were found in the Executive Summaries.