



April 9, 2008

California Public Utilities Commission and Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Subject: Sunrise Powerlink Project Draft EIR/EIS

To Whom It May Concern:

Thank you for this opportunity to offer comments on the proposed Sunrise Powerlink Project Draft EIR/EIS. We incorporate by reference the comments on the Draft EIS/EIR submitted by the Center for Biological Diversity, Sierra Club, Natural Resources Defense Council and the California State Parks Association.

The California Wilderness Coalition (CWC) is a non-profit organization incorporated under the laws of the State of California with its central office in Oakland, California, and field offices in Upland and Redding. CWC has more than 5,000 members and more than 200 member organizations and business sponsors. The CWC protects the natural landscapes that make California unique – providing clean air and water, a home to wildlife, and a place for spiritual renewal. In particular, the CWC focuses on the management of roadless areas on National Park Service, US Forest Service (USFS) and Bureau of Land Management (BLM) land.

The great ecological transition zone between the deserts of eastern San Diego and western Imperial County and the coastal sage scrub of central San Diego County is one of the most biologically diverse and scenic areas in California. The steady growth of cities and suburbs in the region has resulted in significant habitat loss and has made the federal, state and local public lands in San Diego and Imperial Counties more important than ever before as refuges for sensitive plant and wildlife species and for maintaining the quality of life for the area's residents.

Given the ecological and social importance of the region's natural places, it is no surprise that it has an exceptional array of designated federal and state wilderness areas, BLM wilderness study areas, USFS inventoried roadless areas and citizen-proposed wilderness areas (hereafter referred to collectively as "wilderness-quality lands"). Other ecologically and socially important areas include state parks and areas managed for non-motorized recreation by the BLM and USFS.

We are appalled by San Diego Gas and Electric Company's unprecedented proposal to violate the boundary of a designated state wilderness within Anza-Borrego Desert State Park. However, we are pleased by the fact that the Draft EIR/EIS, unlike the project's proponents, honestly acknowledges on page D.5-36 that "The loss of land in wilderness areas would be a significant and unmitigable impact (Class I)."

We strongly oppose any alternative that would cross through one or more of the following important natural areas:

- Agua Caliente State Wilderness
- Carrizo Canyon State Wilderness
- Coyote Mountains Wilderness
- Desert Oasis State Wilderness
- Eagle Peak Proposed Wilderness (a citizen-proposed wilderness included in Senator Barbara Boxer's S. 493)
- Fish Creek Wilderness
- Granite Mountain State Wilderness
- Grapevine Mountain State Wilderness
- Grapevine Mountain State Wilderness
- Hauser South Inventoried Roadless Area
- Pinyon Ridge State Wilderness
- Pinyon Ridge State Wilderness
- San Felipe Hills WSA
- Santa Rosa Mountains State Wilderness
- Sawtooth Mountains A WSA
- Sawtooth Mountains Wilderness
- Sheep Canyon State Wilderness
- Sin Nombre State Wilderness
- Sombrero Peak State Wilderness
- Vallecito Mountains State Wilderness
- Vallecito Mountains State Wilderness
- Whale Peak State Wilderness
- Wil-yee State Wilderness

In addition, we encourage the California Public Utilities Commission and BLM to go a step further and select the No Project/No Action Alternative for the proposed project.

Thank you for considering our comments. Please notify us of any further opportunities to comment on the Sunrise Powerlink Project in the future.

Sincerely,
Monica Argandoña
Desert Program Director

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