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California Public Utilities Commission/Bureau of Land Management
c/o Aspen Environmental Group
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San Francisco, California 94104

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Subject: Comments on the Draft EIR/EIS for the Sunrise Powerlink Transmission Line Project

To Whom It May Concern:

We are the owners of land located on Tubb Canyon Road in Borrego Springs (APN 198-320-03). We are also long-time visitors to and lovers of Anza Borrego Desert State Park (ABDSP or the Park). We would like to take this opportunity to provide comments on the Draft EIR/EIS prepared by the CPUC/BLM.

We support the analyses and conclusions of the Draft EIR/EIS. As discussed in the Draft EIR/EIS, the environmental impacts that would result from construction and operation of the proposed Sunrise Powerlink Project through ABDSP are significant, unprecedented and unmitigable. The CPUC should use the recommendations and ranking of the alternatives to the project to conclude that the Sunrise Powerlink Project's proposed transmission line through ABDSP be denied. Many other alternatives to a transmission line through any part of ABDSP are preferable, and will meet most if not all of San Diego Gas and Electric Company's objectives.

The Draft EIR/EIS identifies 35 significant and unmitigable impacts due to the Anza-Borrego Link portion of the project. (Draft EIR/EIS, p. ES-27.) This number of impacts is greater than those associated with any of the other transmission links in the proposed project.

As lovers of ABDSP for thirty years, and more recently as owners of property near the Park, we have watched with alarm any proposals to impinge upon the Park, its wilderness areas and wildlife. We support any of the alternatives that do not violate the sanctity of any portion of the Park.

Among the impacts to the Park is a precedent-setting "de-designation" of State Wilderness land that would be, we understand, a first in California history. If wilderness is de-designated here, it can and likely will happen anywhere, and such change should not be allowed. Wilderness, especially fragile desert wilderness, cannot simply be recreated when disrupted. All of the other objectives SDG&E hopes to achieve with the Sunrise line – meeting growing demand, increasing reliability, developing renewables – can be met without harming ABDSP and its wilderness. We believe that preservation of Park lands in general, and Wilderness areas in particular, should be given “first priority” by State policy makers as they weigh public and private needs.

The other impacts to ABDSP as identified in the Draft are equally significant; the impacts to sensitive species, including disturbance to and mortality of Peninsular Bighorn Sheep due to maintenance activities, and the deleterious effects on visual, cultural and recreational resources are potentially catastrophic.

We believe that most or all of these significant and unmitigable impacts would result from any transmission line that would be routed through any portion of ABDSP, including all of the eliminated Anza-Borrego Link Route Segment Alternatives.

The Draft EIR/EIS identifies five alternatives as environmentally superior to the Proposed Project and its transmission line through ABDSP. These are alternatives that could avoid or minimize significant environmental impacts associated with the project as proposed by SDG&E, while meeting most if not all of SDG&E's objectives. The CPUC should evaluate these alternatives and conclude that no transmission line should be allowed through Anza-Borrego Desert State Park. Protect this jewel.

Thank you for your consideration.

Sincerely,

[signed]

Bruce R. Bowen
Junona A. Jonas