

August 21, 2008

CPUC/BLM
Billie C. Blanchard, CPUC Project Manager
Lynda Kastoll, BLM, Project Manager
Sunrise Powerlink Project EIR/EIS
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: Sunrise Powerlink Project-Preferred Route;
Lansing Industries Comments to Draft EIR/EIS

Dear Ms. Blanchard and Ms. Kastoll:

The California Public Utilities Commission (CPUC), as Lead Agency under the California Environmental Quality Act (CEQA), and the U.S. Department of the Interior, Bureau of Land Management (BLM) as Lead Agency under the National Environmental Policy Act (NEPA) have prepared a revised Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Proposed Land Use Plan Amendment for consideration of San Diego Gas & Electric Company's (SDG&E) application to build and operate the Sunrise Powerlink Transmission Line Project.

Our Client, Lansing Industries, is the owner of approximately 8,000 acres located in the Boulevard, California area, and as such has a vital interest in the placement of the Sunrise Project. For the sake of specificity, we have attached as an exhibit to this letter a list of the Assessor Parcel Numbers ("APN's) that comprise the property (the "Lansing Industries Properties"). We would like to take this opportunity to comment on the proposed route for the Sunrise Powerlink Transmission Line.

I it is our understanding that SDG&E proposes to construct a new 91-mile, 500 kilovolt (kV) electric transmission from Imperial Valley Substation (in Imperial County, near the City of El Centro to a new Central East Substation, (in central San Diego County, southwest of the intersection of County Highways S22 and S2) and a new 59-mile 230 kV transmission line that includes both overhead and underground segments from the new Central East Substation to SDG&E's existing Penasquitos Substation (in the City of San Diego).

The Draft EIR/EIS describes, among other things, the Proposed Project and the SDG&E Preferred Route for the Project, evaluates and describes the potential environmental impacts

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associated with the construction and operation of the Proposed Project over the Preferred Route, identifies those impacts that could be significant, and presents mitigation measures, which, if adopted by the CPUC, BLM, or other responsible agencies, the lead agency believes could avoid or minimize these impacts. The Draft EIR/EIS also evaluates 27 alternatives (including alternative alignments) to the Proposed Project. One or more of these alternative alignments would cause the Project lines to run near the City of Boulevard, California and through portions of the Lansing Industries property (referred to herein as the "Boulevard Routes").

Lansing Industries strongly supports the SDG&E Preferred Route and views this as the best alternative. Among other things, the SDG&E Preferred Route will have the least amount of impact on inhabited areas, and thus will have the least adverse impact on the quality of life and health of the residents of more populated areas. Conversely, Lansing Industries strongly opposes any alternate Boulevard Routes since that route would have a significant adverse impact to several inhabited communities, including those in the vicinity of the Lansing Industries Properties. There can be little doubt that the SDG&E Preferred Route is the route that has the fewest impacts and is thus the best alternative. In addition, the alternate Boulevard Route would have a substantial adverse impact to the existing and future use of the Lansing Industries property. As such, it can be expected that in the event that the alternate Boulevard Routes were selected as the route for the Sunrise Powerlink Project, Lansing Industries, as well as many others in the community, will exert every effort to oppose and prevent the alternate Boulevard Route from being utilized. Thus, we urge in the strongest terms possible the approval of the SDG&E Preferred Route for the Sunrise Powerlink Project.

Thank you for this opportunity to comment on the project. Should you have any questions or desire clarification with respect to the position of my client in this matter, please do not hesitate to contact me.

Respectfully submitted,

RUTAN & TUCKER, LLP



Jeffrey A. Goldfarb

FKB:at

cc: Gregory Lansing
Oliver Cagle

Assessor Parcel Number Acreage

528-220-02	2280 ac	
528-220-03	2280 ac	
529-050-01	2280 ac	
529-050-02	2280 ac	
529-060-01	2280 ac	
529-090-02	2280 ac	
529-090-03	2280 ac	McCain Valley Ranch
529-100-01	2280 ac	
529-100-02	2280 ac	
529-100-03	2280 ac	
529-120-01	2280 ac	
529-120-03	2280 ac	
529-130-01	2280 ac	
611-010-01	2280 ac	
611-010-02	2280 ac	
611-010-03	2280 ac	
611-020-01	2280 ac	
611-050-04	2280 ac	
611-050-05	2280 ac	

612-030-18	Grizzle 248	
612-091-13	Grizzle 248	McCain Valley Rd and Old Hwy 80
613-030-35	Grizzle 248	

528-100-01	529 Gastellum	
529-120-02	529 Gastellum	Adjacent to McCain Valley Ranch
528-160-01	529 Gastellum	
529-050-02	529 Gastellum	
529-090-01	529 Gastellum	

613-030-28	37.82 ac McCain Valley	
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610-120-34	4000 ac Empire
612-041-02	4000 ac Empire
612-060-14	4000 ac Empire
612-082-12	4000 ac Empire
612-100-01	4000 ac Empire
612-100-02	4000 ac Empire
612-110-02	4000 ac Empire
612-110-04	4000 ac Empire
612-110-11	4000 ac Empire
612-110-17	4000 ac Empire
612-110-18	4000 ac Empire
612-110-19	4000 ac Empire
612-120-01	4000 ac Empire
612-120-14	4000 ac Empire
659-010-01	4000 ac Empire
659-010-15	4000 ac Empire
659-020-01	4000 ac Empire
659-020-02	4000 ac Empire
659-020-05	4000 ac Empire
659-020-06	4000 ac Empire
659-020-07	4000 ac Empire
659-020-13	4000 ac Empire
659-020-23	4000 ac Empire
659-030-01	4000 ac Empire
659-140-01	4000 ac Empire
659-140-02	4000 ac Empire
659-070-16	4000 ac Empire
659-080-01	4000 ac Empire
659-080-02	4000 ac Empire
659-080-03	4000 ac Empire
659-080-05	4000 ac Empire
659-080-06	4000 ac Empire
659-080-07	4000 ac Empire
659-080-10	4000 ac Empire
659-090-06	4000 ac Empire
659-130-03	4000 ac Empire
613-030-28	Tohey 31 acres
612-011-05	34 acres Ribbonwood