



CALIFORNIA STATE PARKS FOUNDATION

*The Voice for
California's
State Parks*

February 15, 2006

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The Honorable Kim Malcolm
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Application of San Diego Gas & Electric Company (U 902-E) for a
Certificate of Public Convenience and Necessity for the Sunrise Powerlink
Transmission Project

Dear Judge Malcolm:

In response to the PUC's decision on January 31, 2006 to invite public comment on the Application of San Diego Gas & Electric Company (U 902-E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project, the California State Parks Foundation submits this letter to express opposition to the bifurcation of the application process and urge avoidance of impacts from electricity transmission through Anza-Borrego Desert State Park (ABDSP).

The California State Parks Foundation, founded in 1969 by William Penn Mott, is a non-profit organization dedicated to protecting, enhancing and advocating for California's 278 magnificent state parks. The Foundation has over 65,000 members throughout California, and advocates on their behalf on critical policy and fiscal issues facing state parks. The Sunrise Powerlink Transmission Project application is one such issue.

Our first objection to the Sunrise Powerlink proposal regards the process for its approval. The Foundation opposes the bifurcation of SDG&E's application process into two parts. We are in agreement with the analyses offered by the Utility Consumers' Action Network and the Division of Ratepayer Advocates in their protests to the PUC, filed on December 14, 2005 and January 18, 2006, respectively. We believe that considering the need for this project without a comprehensive and accurate understanding of the impacts of a specific route selection, environmental and otherwise, is inappropriate. By divorcing analysis of the potential environmental impacts of the project from the decision about the project's justification, it precludes a thorough assessment of the total costs, risks and benefits of the proposal.

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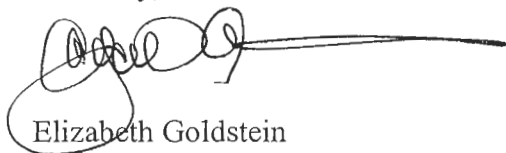
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Second, Anza-Borrego Desert State Park is the largest state park in the continental United States and contains a myriad of natural resources such as the desert bighorn sheep and other endangered and protected species, rare native habitat, mountainous wilderness and arid badlands. We question whether SDG&E has adequately and sufficiently demonstrated the need for additional power lines to run through such a unique and irreplaceable park. Moreover, we believe that other viable alternatives to the proposed transmission routes through ABDSP have not been adequately explored, such as the "Green Path" 500kV transmission line route already in discussion between the Imperial Irrigation District, the Los Angeles Department of Water & Power, and Citizens Energy. We urge that full consideration be given to reasonable alternatives before approving the need for any route through Anza-Borrego.

If transmission through ABDSP continues to be considered, at a minimum it must only be in the context of a route that conforms to the existing easement in the park. The existing easement already has transmission lines and poles along its path and does not directly encroach upon designated wilderness areas.

Thank you for consideration. We urge the PUC to fully explore the issues raised above before making a decision that would so profoundly impact a tremendous asset of the state park system and all the citizens of California who use it.

Sincerely,



Elizabeth Goldstein
President
California State Parks Foundation

cc: California Public Utilities Commission:
The Honorable Michael R. Peevey, President
The Honorable Geoffrey F. Brown
The Honorable Dian M. Grueneich
The Honorable John Bohn
The Honorable Rachelle Chong
PUC Public Advisor