February 25, 2008

To: California Public Utilities Commission

Re: Sunrise Powerlink DEIR

Please direct SDG&E to pursue more environmentally sensitive and cost effective alternatives to Sunrise Powerlink that preserve our public assets, quality of life and natural resources. How can we support the Sunrise Powerlink when five alternatives have less environmental impact? Why not consider either Alternative 1 – New In Area All Source Generation or even Alternative 2. - New In Area Renewable Generation?

Previous hearings, public comment and now the DEIR have cited numerous serious environmental impacts of SDG&E's destructive proposed project, and have also found that alternatives not considered by SDG&E will more efficiently meet the project's stated goals. We are particularly concerned by the following environmental problems:

According to the DEIR, the proposed project has 50 impacts that can't be mitigated, including increased greenhouse gas emissions from construction, loss of wilderness, biological and cultural resources, damage to our visual and cultural resources and greater fire safety risks.

The Anza Borrego State Park link of 22.6 miles faces 35 significant and unmitigable impacts, including the following:

- Sensitive species impact on the big horn sheep, flat tailed horned lizard, golden eagle, quino checkerspot butterfly and gecko facing habitat loss.
- The corona noise of buzzing and crackling which can destroy the dessert solitude and recreational value. The Tamarisk campground may have to be relocated.
- The industrial visual blight of 160 foot high towers and wires needlessly crossing our treasured dessert state park. Fewer people will want to visit such a place. Access will be limited. Tourism business may suffer.
- Significant risk of fire in the Western half of the state park.

The Central Link likewise faces scarring visual impact in the Ranchita and Santa Ysabel areas. Furthermore, both the Central and Inland Valley links will encounter greater fire risk dangers as well as loss of wildlife, plants. wilderness and recreational opportunities.

The DEIR raises serious questions about the destructive impact of Sunrise Powerlink on our quality of life, open spaces, wildlife, air quality and public safety. The CPUC and California Energy Commission priorities include steps we must first take to improve energy efficiency, reduce electricity demand during peak periods and expand renewable energy resources.

We need to implement the Smart Energy 2020 plan to (1) maximize greenhouse gas reduction (2) reduce dependence on natural gas power generation and (3) greatly expand

local clean peak generation capacity to minimize reliance on power imports. This essential plan can increase local peak generation in 2020 by 2670 MW **beyond** SDG&E's plan. Green building design, solar, energy efficiency, CHP projects and modernization of the old distribution system are all vital steps of Smart Energy 2020.

We request that SDG&E be directed to conduct financial and cost-benefit analyses of the five project alternatives identified in the DEIR's executive summary, which would have less environmental impact than the proposed project. At the very least, Alternatives 1 and 2 deserve consideration. Only then will the CPUC be in a position to make an informed decision about the best path forward.

axinen Keckeman & Rhea Kuhlman

Thank you for your consideration.

Armin & Rhea Kuhlman

5069 Catoctin Drive

San Dieggo, CA 92115