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April 10, 2008

BY EMAIL

Ms. Billie Blanchard
California Public Utilities Commission

Ms. Lynda Kastoll
United States Bureau of Land Management

Re: Comments on Draft Environmental Impact Report/Statement in Proceeding
A.06-08-010

Dear Ms. Blanchard and Kastoll:

The Mussey Grade Road Alliance has reviewed the extensive DEIR produced by the Commission in this proceeding. We want to compliment the Commission, its consultant Aspen Environmental Group, and the BLM for the thorough work that has been done. We understand that the DEIR is one of the most comprehensive, if not the most comprehensive, written in the history of the Commission.

We truly appreciate the heroic effort that went into the making of this document; we believe that beautiful and biologically diverse San Diego County deserves no less than the fullest exploration of the issues involved in the proposed building of a massive transmission line through the county. We support the order of the environmentally superior recommendations - and particularly non-transmission recommendations Numbers 1 and 2.

Nevertheless, we would be remiss if we did not identify a key missing element in the document: namely, a thorough surveying of the landscape and species of San Diego County in the wake of the 2007 Firestorm. As we have reviewed the document, we see no indication that the Commission undertook a full investigation through field surveys and other tools at the Commission's disposal to assess the ***changed conditions*** of the natural world – in particular in the county's backcountry – following the catastrophic Witch and Harris fires.

Therefore, we believe that this work should be done and that the DEIR should be recirculated after the county has been reassessed. There is no doubt that things have

changed in San Diego County's backcountry as a result of the fires and, specifically, along the proposed route and southern alternative route of the so-called "Sunrise Powerlink" project proposed by San Diego Gas & Electric (SDG&E).

The recirculated document should also contain more information regarding wildland fire; specifically an investigation into the nexus between Santa Ana wind conditions and wildland fire ignitions by power lines should be thoroughly reviewed and discussed. We cannot forget that three of the fires, including the largest fire – Witch Fire – of the 2007 Firestorm in October of last year were caused by power lines¹ and that there is a history of 230 kV power line fire ignitions in the short data collection period of SDG&E (2004 to present).

Finally, we are attaching to this email a copy of Appendix 2E of our Phase 2 Direct Testimony in this proceeding, which contains additional recommendations.

We do not recommend recirculation lightly. However, we realize that the Commission did not have adequate time between the October 2007 fires and the release of the DEIR on January 3, 2008 to do justice to the *changed conditions* of the environment of San Diego County. The Commission must not ignore these *changed conditions*. As you may know and appreciate, the Alliance understands the nature of changes in the environment following a catastrophic fire (Cedar Fire 2003) and the slow recovery following such an event.

Thank you for your consideration.

Sincerely,

/S/ Diane Conklin

Diane Conklin
Spokesperson
Mussey Grade Road Alliance

cc: Susan Lee, Aspen Environmental Group

¹ See Cal Fire News Release "October Fire Causes", November 16, 2007.