



# SunCal Companies

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August 22, 2008

Billie Blanchard, CPUC  
Lynda Kastoll, BLM  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, California 94104-3002

Re: Comments of SCC Acquisitions, LLC to the Recirculated Draft  
Environmental Impact Report/Supplemental Draft Environmental Impact  
Statement on the San Diego Gas & Electric Company's Sunrise Powerlink  
Project issued July 2008; Applications A.05-12-014 and A.06-08-010

Dear Ms. Blanchard and Ms. Kastoll:

On behalf of SCC Acquisitions, LLC (SunCal), we appreciate this opportunity to submit comments on the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement ("Recirculated Draft") prepared jointly by the California Public Utilities Commission ("CPUC") and the U.S. Department of Interior Bureau of Land Management ("BLM") regarding the Sunrise Powerlink Project ("SRPL"). SunCal has previously submitted comments on the SRPL on October 8, 2007 and on April 11, 2007 expressing its opposition to the Southern Alternatives and identifying specific impacts related to those routes that the Draft EIS/EIR has failed to analyze. We incorporate those letters by reference. As discussed herein, such comments have been ignored in the Recirculated Draft and in the Draft EIR/EIS as a whole.

As described in our prior comments, SunCal had requested recirculation of the prior Draft EIS/EIR in order that environmental impacts to its Ketchum Ranch site and the town of Jacumba be addressed. These concerns were ignored in the Recirculated Draft.

Although every other party that presented a request for alternative siting was accommodated in the Recirculated Draft EIS/EIR, the concerns of SunCal and the town of Jacumba were not. As such, although numerous alternatives are considered for every other aspect of the Powerlink, only in the vicinity of Ketchum Ranch and the Jacumba community are there no alternatives considered. The Draft EIS/EIR, as recirculated, does not provide any analysis of the impacts to these properties, deferring all analysis to further documents. This fundamental flaw in the document leads to a second fundamental flaw, namely, the document fails to provide any mitigation to address these impacts or alternatives to avoid them. This piecemealing approach is incompatible with CEQA's requirement to analyze all impacts at the earliest possible opportunity and to devise

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alternatives to avoid or mitigate impacts. With all utility corridors leading to and through the Ketchum Ranch, there will be no later opportunity to avoid the many impacts to the project. These impacts should be analyzed now.

In fact, the Recirculated Draft EIR/EIS, rather than minimizing impacts to Ketchum Ranch and Jacumba, actually increases the extent, number and severity of these impacts. Through the addition of the La Rumerosa wind farm and the Jacumba substation relocation, new impacts are added. Yet again, the impacts of these aspects of the project on the SunCal Property and Jacumba are not analyzed, even though both will be highly visible and are likely audible from the town and the Ketchum Ranch development. For example, the Sempra wind project would occupy an approximately 7,500-acre area beginning at the U.S./Mexico border and continuing south for about 4.6 miles. The location of the substation appears to cause the proposed SRPL alternative to run through Ketchum Ranch to the south of the existing Southwest powerline which is more of a problem to development of the site, yet this issue is also not analyzed.

Similarly, the aesthetic and noise impacts of the proposed Jacumba substation on Ketchum Ranch and Jacumba are not analyzed, although the substation will also be within close proximity to each. The viewpoints provided for the substation, the windfarm and the powerlines are wholly inadequate to provide a proper evaluation of the impact. Stationery viewpoint and moving viewpoints should be included and private viewpoints versus public viewpoints should be distinguished.

Biological, cultural, land use and environmental justice impacts of the La Rumorosa windfarm and the Jacumba substation are also not analyzed, particularly as relates to the SunCal properties and the town of Jacumba. Even construction impacts of these major new components of the project are not analyzed in the Draft EIR/EIS. In fact, none of the impacts of this project on the environment are analyzed, even though the project may have direct impacts on communities and residences.

Moreover, the size of the substation is considerably larger than what appears to be needed for the initial windfarm. As such, the growth inducing impacts of this substation must be analyzed. In addition, given the sizing of the substation, the question arises whether the extent of the windfarm and other generating facilities are accurately and fully disclosed

Finally, the cumulative impact of placing such a significant component of the state's energy generation through a single corridor is not analyzed. Nor is the cumulative impact of locating two large power lines within 200 feet of each other, which does not avoid a simultaneous catastrophe such as seismic, fire, terrorist but merely avoids one toppling onto the other.

As described in these comments, the Draft EIR/EIS fails to analyze the impacts of the SWPL on the Ketchum Ranch project and the community of Jacumba. We urge the Commission to comply with CEQA, to recirculate the Draft EIR/EIS and to analyze and consider the potential impacts of the SWPL on the SunCal Ketchum Ranch project and Jacumba. SunCal seeks to develop a community in a unique area that is otherwise

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constrained by topography and natural resources, and which will benefit economically from the SunCal Ketchum Ranch project. The impact of the SWPL project may cause irreparable harm to this project; however, this is unknown due the failure of the Commission to properly undertake the environmental impact analysis required of it by law.

Accordingly, SunCal strongly urges the Commission to carefully consider SunCal's comments on the Draft EIR/EIS and to require further recirculation in order to address these comments. Failure to do so will render the Final EIR/EIS deficient.

Respectfully submitted,



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