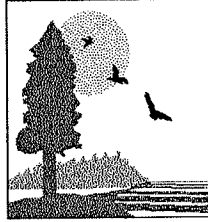


CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



PAUL D. THAYER, Executive Officer
(916) 574-1800 FAX (916) 574-1810
California Relay Service from TDD Phone **1-800-735-2929**
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June 29, 2010

File Ref: 2009071091

Monisha Gangopadhyay/Tom Hurshman
CPUC/BLM
c/o Ecology and Environment, Inc.
130 Battery Street, Suite 400
San Francisco, CA 94111

Subject: Southern California Edison's Eldorado-Ivanpah Transmission Line Project, SCH #2009071091

Dear Madam/Sir:

This letter is sent in response to the release of the draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Eldorado-Ivanpah Transmission Line Project (Project). Please accept our comments for consideration on the EIR/EIS even though it is past the official comment period.

As general background, school lands were granted to the State of California by the federal government under the Act of March 3, 1853 (10 Stat. 244), also known as the School Land Grant of 1853. The State Lands Commission (CSLC) manages 468,600± acres of school lands held in fee ownership by the State and the reserved mineral interests on 790,000± acres where the surface ownerships previously have been sold.

Based on the information and maps provided in the draft EIR/EIS, the Mountain Pass Telecommunications route (Alternative 2) will involve school lands located within Section 36, Township 17 North, Range 13 East, SBM. Please be advised that Southern California Edison Company will be required to obtain a lease from the Commission for the use of these or any other school lands for any part of the Project.

Staff of the CSLC has reviewed the above referenced project and, depending on the Alternative that is selected, may be a Responsible and/or Trustee Agency under the California Environmental Quality Act (CEQA). The CSLC has the following comment on the greenhouse gas analysis section. Please incorporate "best practices" for Greenhouse Gas emissions reduction, either into the project description or as mitigation measures, as enumerated on the Attorney General's website, located at:

http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf. This would include at a minimum: use of low sulfur fuels; reduced idle times; recently tuned engines; etc.

Please contact Jim Porter, Land Management Division, at (916) 574-1865 or by e-mail at porterj@slc.ca.gov, for information concerning our jurisdiction and leasing requirements. If you have any questions on the environmental review, please contact Steven Mindt, at (916) -574-1497 or by e-mail at mindts@slc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Oggins', with a horizontal line extending to the right from the end of the signature.

Cy R. Oggins, Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
J. Porter, CSLC
S. Mindt, CSLC