



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

August 25, 2008

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California Public Utilities Commission  
c/o Aspen Environmental Group  
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San Francisco, CA 94104-3002

Lynda Kastoll  
Project Manager  
Bureau of Land Management  
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San Francisco, CA 94104-3002

Subject: Recirculated Draft Environmental Impact Report/Supplemental Draft  
Environmental Impact Statement (RDEIR/SDEIS) for the Sunrise Powerlink  
Project (CEQ# 20080267)

Dear Ms. Blanchard and Ms. Kastoll:

The U.S. Environmental Protection Agency (EPA) has reviewed the RDEIR/SDEIS referenced above. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and our NEPA review authority Section 309 of the Clean Air Act.

The Sunrise Powerlink Project (SRPL) is a proposal by the San Diego Gas & Electric Company (SDG&E) to construct a 150-mile transmission line from the Imperial Valley to coastal San Diego (Northern Route Alternative – Proposed Project). SDG&E proposes to construct this transmission line to maintain reliability, reduce the cost of energy, and accommodate the delivery of renewable energy.

EPA reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) and provided comments to the California Public Utilities Commission (CPUC) and the Bureau of Land Management (BLM) on April 3, 2008. We rated the DEIR/EIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns regarding purpose and need, the disclosure of costs and benefits, and potential adverse impacts to watershed resources, air quality, and the Anza-Borrego Desert State Park. We recommended that the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) include additional information about basic project objectives, the disclosure of economic benefits, a comparison of costs associated with the alternatives, and impacts to water resources, air quality, and project conformity with the State Implementation Plan.

The CPUC and the BLM have prepared this RDEIR/SDEIS because there is new information regarding the “connected actions” and “reroutes” analyzed in the DEIR/EIS. The

RDEIR/SDEIS addresses the following components: 1) New and Revised Analysis of the La Rumorosa Wind Project; 2) Description and Analysis of Transmission Line Route Revisions; 3) Revision of Components of the Environmentally Superior Alternatives for Northern and Southern Transmission Lines.

In our comment letter dated April 3, 2008, we expressed our concern about the need for the proposed project based on information presented in the SEMPRA Generational Presidential Permit Application (Federal Register Notice dated February 22, 2008). The Federal Register notice stated that the existing system (southwest power link 500 kV transmission line) is capable of transmitting up to 1,250 MW of renewable energy from the La Rumorosa Wind Project. This seemingly refutes one of the major reasons for constructing the SRPL project, namely the need to bring renewable energy resources to San Diego County. Although the RDEIR/SDEIS contains additional info about the La Rumorosa Wind Project, our concerns regarding purpose and need were not fully addressed. Nor does the RDEIR/SDEIS address the other concerns identified in our comment letter dated April 3, 2008 regarding the disclosure of economic benefits, comparison of costs, and impacts to water resources and air quality. Therefore we are rating this RDEIR/SDEIS as EC-2, Environmental Concerns – Insufficient Information (See attached “Summary of EPA Rating System”). From the perspective of environmental stewardship, we continue to encourage the CPUC and BLM to consider the Environmentally Superior Alternatives over the Proposed Project.

We appreciate the opportunity to review this RDEIR/SDEIS and we are available to answer questions you may have regarding our comments. We request one copy of the FEIS/EIR when it is officially filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3521, or have your staff contact Ann McPherson at (415) 972-3545 or [mcpherson.ann@epa.gov](mailto:mcpherson.ann@epa.gov).

Sincerely,

/s/

Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

Enclosure: Summary of Rating Definitions