

March 11, 2009

U.S. Dept. of the Interior  
Bureau of Land Management  
El Centro Office  
1661 South 4<sup>th</sup> Street  
El Centro, CA 92243

U.S. Dept. of the Interior  
Office of Hearings and Appeals  
Interior Board of Land Appeals  
801 North Quincy Street, MS-300-QC  
Arlington, VA 22203

U.S. Dept. of the Interior  
Office of the Solicitor  
Pacific Southwest Region  
2800 Cottage Way, Room E-2753  
Sacramento, CA 95825-1890

Subject: Statement of Reasons and Formal Notice of Appeal of the Record of Decision (ROD) for the Sunrise Powerlink Transmission Project and Associated Amendment to the Eastern San Diego County Resource Management Plan CACA-47658.

Dear United States Department of the Interior:

This is our Statement of Reasons and Formal Notice of Appeal of the Record of Decision (ROD) for the Sunrise Powerlink Transmission Project and Associated Amendment to the Eastern San Diego County Resource Management Plan CACA-47658 which, if reviewed and implemented, will save ratepayers and SDG&E hundreds of millions of dollars while at the same time preserving pristine Bureau of Land Management (BLM) public land.

We believe the current Southern route of the proposed Sunrise Powerlink is not optimal. The cost and environmental damage of the Sunrise Powerlink can be greatly reduced by Collocation with the existing Southwest Powerlink (SWPL) to the southwest end of the Cleveland National Forest as shown in Figures 1 and 2. Sempra Energy and SDG&E already own the existing SWPL utility corridor adjacent the Mexican border with associated construction and access roads built in the 1980's.

The other large construction project in the backcountry of San Diego County includes the International Border Fence which was recently built on land taken in 2001 through eminent domain by the United States as a 60-foot Public Reserve Right-Of-Way (ROW) for the Border Fence and Utilities. Much of the existing SWPL is located within 2,000 feet of the International Border fence with Mexico with its new associated construction and access roads used to build the fence.

The current proposed route for the Sunrise Powerlink will destroy the beauty of the backcountry of San Diego County, create an unnecessary fire hazard through severe fire hazard public lands, and Wildland Urban Interfaces (WUI) in the communities of Campo, Lake Morena, Boulevard, and McCain Valley for no valid reason.

Prior to this written correspondence, we sent an appeal of the ROD though email on February 28, 2009 to the El Centro Office ([Thomas\\_Zale@blm.gov](mailto:Thomas_Zale@blm.gov)) of the BLM. We have also met with Sempra Energy on March 4, 2009 to discuss alternative routes, collocation with the Southwest Powerlink (SWPL), geology, and fire hazards in the Backcountry of San Diego County.

As Secretary Gale Norton of the U.S. Department of the Interior stated:

*"The great wild places and unspoiled landscapes of this country are the Common Heritage of all Americans, and we must both conserve them and manage them for Americans living today, and for the Americans of the Future – Our children and our children's children. That is our goal."*

We believe the Record of Decision (ROD) did not have all the facts it needed to make an informed decision in regard to the alternative routes in the EIR that eliminated Collocation with the existing Southwest Powerlink (SWPL) due to two reasons:

- The ownership of land south of the Campo Indian Reservation boundary, and north of the International Border fence with Mexico, and
- Incomplete Fire Data in CalFire's database through BLM, County of San Diego, and private lands on which the past fire history was based upon for the years from 1950 to 2007.

The section of the Collocation that needs additional analysis for as it related to fire hazards and Southern boundary of the Campo Indian Reservation is shown in red on Figure 3 which is a portion of the EIR Figure ES-11 Alternatives Eliminate. These alternatives of Collocation with the existing SWPL were eliminated early on in the EIR process due to the two reasons stated above; the ownership of land south of the Campo Indian Reservation boundary and north of the International Border, and incomplete fire data in CalFire's database.

By State and Federal law, existing utilities are meant to use existing utility corridors instead of creating new corridors over publically owned land, such as the BLM land you are in charge of protecting in east San Diego County.

Instead of Co-locating the Sunrise Powerlink with the existing SWPL as much as possible through public BLM land, Sempra is diverging both lines adjacent the southwest corner of the Anza Borrego Desert State Park for the benefit of private interests and the Campo Indians, at a cost of pristine public lands, environmental damage, and huge cost increases.

## UTILITY CORRIDOR SOUTH OF THE CAMPO INDIAN RESERVATION.

When meeting with Sempra project managers on the Sunrise Powerlink they stated that the Campo Indians owned the land all the way south to the United States/Mexican border. They also stated that the Campo Indians would not allow Sempra energy the right to cross their land for another utility corridor. Currently, the existing SWPL is located approximately 2,100 feet from the International Border and is within the Campo Indian Reservation's southern boundary.

After our meeting with Sempra, we went to the County of San Diego Assessors' Office to look who owns the area south of the Campo Indian Reservation and North of the International Border.

Figure 4 shows the ownership of land in this area.

<http://www.flickr.com/photos/laplayaheritage/3328999943/in/set-72157604520538632/>  
The smallest distance from the US Border to the existing SWPL is 1,400 feet. Through official documentation at the County of San Diego Assessor's Office, we found that in 2001 the United States took claim to a 60-foot wide swath of land adjacent the United States/Mexico border as a Public Reserve Right-Of-Way (ROW) for the Border Fence and a public Utility corridor (County Document 2001-0904845). The road for the Border fence is approximately 30 feet, which leaves a 30 foot Right-Of-Way on which to build additional Powerlink towers if needed on existing publically owned land.

As seen in Figure 4, the smallest distance from the Campo Indian Reservation's southern boundary to the International Border is approximately 2,000 feet. On May 22, 2007 less than 2 years ago, and after the EIR process was started, the Campo Band of Mission Indians bought two continuous parcels of land between the official Campo Indian Reservation and the 60-foot wide Public Reserve Right-Of-Way (ROW) adjacent the US/Mexico Border (County Document 2007-0346820). These are Parcel Nos. 658-070-01 and 658-100-01 which although owned by the Campo Indians, are not part of the Official Campo Indian Reservation. Therefore, these two privately owned parcels which pay County of San Diego property taxes are not subject to Official Indian land status. Sempra Energy stated that they believe the Campo Indians are trying to get these two parcels of land they bought in 2007 as an extension of the Campo Indian Reservation to the Public Reserve for the Border Fence. However, the extension of extra land owned by the Campo Indian adjacent their Reservation has not been transferred into Indian lands as of now. It does seem that the Campo Indians specifically bought these two parcels in order to try to block the Collocation of the proposed Sunrise Powerlink with the existing SWPL in order to move the proposed route north of Highway 8, where the Campo Indians have leased Indian Reservation land to private interests for a Wind Farms with Windmills. These Windmills are all ready connected to the Sempra Energy Grid though existing small utility poles.

Sempra Energy and SDG&E do not need the permission of the Department of Indian Affairs, the Federal Government, nor the Campo Indians to access the parcels of land outside and South of the Campo Indian Reservation for a utility corridor for the proposed

Collocation of the Sunrise Powerlink with the existing SWPL. The Campo Indian's ploy of blocking access for Collocation in order to maximum their own private profits while re-routing the Powerlink through pristine publically owned BLM land, and the Backcountry communities of the McCain Valley, Boulevard, Lake Morena, and Campo at enormous financial and environmental costs should not be allowed or encouraged.

There still is a 1,400 to 2,000 foot corridor that is available to Collocate the proposed Sunrise Powerlink with the existing SWPL south of the Campo Indian Reservation and North of the US/Mexico Border.

If somehow the Campo Indians get their two parcels to be considered Official Indian Lands by the United States Government, there is still a 60 foot wide swatch of land on the border owned by the public and the US Government for the border fence and a utility corridor which could be used for the 2,000 foot length of Collocation in question.

### **RELIANCE ON INCOMPLETE FIRE HISTORY DATA IN CALFIRE'S DATABASE.**

Sempria has said they are diverging the lines early on so that the fire redundancy will be improved. This is not proven by the Administrative Law Judge (ALJ), Ali Vieth Decision and fire data and maps from the California Department of Forestry and Fire Protection's (Cal Fire) database linked at

<http://frap.cdf.ca.gov/infocenter.html>

Instead of using all the maps in the fire database, the EIR relied heavily on the CalFire's Map of California entitled "Fire Perimeters: Wildfires 1950-2007." The portion of the Map dealing with San Diego County and the proposed Sunrise Powerlink and existing SWPL routes is attached as Figure 5. The full map for the State of California is linked below.

[http://frap.cdf.ca.gov/webdata/maps/statewide/firep\\_map.pdf](http://frap.cdf.ca.gov/webdata/maps/statewide/firep_map.pdf)

As stated on the Legend of this CalFire Map, CalFire's "database is the most complete digital record of fire history in California, although it is still incomplete in many respects. Users of the fire perimeter database must exercise caution to avoid inaccurate or erroneous conclusions." It goes onto reference a CalFire website which is supposed to provide "more information on potential errors and their sources." However, the website link stated on the CalFire map does not work. Instead the correct link for the Methodology used in creating this California-wide map is attached after Figure 5 and is correctly linked as

[http://www.frap.fire.ca.gov/projects/fire\\_data/fire\\_perimeters/methods.asp](http://www.frap.fire.ca.gov/projects/fire_data/fire_perimeters/methods.asp)

Note that this CalFire map is not complete and does not include agricultural areas and fire within the jurisdiction of local area Fire Departments. Additional information on historic fires in San Diego County is still needed in certain areas (especially BLM and private lands), and this map should be used with caution.

As seen in CalFire's Map of California entitled "Fire Perimeters: Wildfires 1950-2007" the areas of publically owned BLM land in eastern San Diego County, Imperial County, and large portions of other California Counties show that there has been zero to relatively few fires on BLM land and private lands in the eastern part of the State from 1950 to 2007. This fire data on BLM land in California and private lands should be reanalyzed realizing that only fires in 2002 and 2007 on BLM land were included in the CalFire database. Therefore, there are thousands of unrecorded fires on BLM, agricultural, and private lands that are not part of this California-wide map. In fact, we know of several fires in San Diego County from 1950 to 2007 that are missing from the CalFire database and the map entitled "Fire Perimeters: Wildfires 1950-2007."

Portions of the Methodology for the map entitled "Fire Perimeters: Wildfires 1950-2007" which is attached after Figure 5 is shown below.

"The current fire perimeter layer developed by BLM, CDF, NPS and USFS is the most complete digital record of fire perimeters in California. However it is still incomplete in many respects. Fires may be missing altogether or have missing or incorrect attribute data. Some fires may be missing because historical records were lost or damaged, fires were too small for the minimum cutoffs, documentation was inadequate, or fire perimeters have not yet been incorporated into the database. Agencies are at different stages of participation. CDF has completed inventory for the majority of their historical perimeters back to 1950 while only 2002 - 2007 fires are currently present for BLM. ... Furthermore, until the data capture process moves to the local level, the most recent fires will only be uploaded to the database once annually. ... Other errors with the fire perimeter database include duplicate fires and over-generalization. ... Additionally, over-generalization, particularly with large old fires may show unburned "islands" within the final perimeter as burned. Users of the fire perimeter database must exercise caution in application of the data. Careful use of the fire perimeter database will prevent users from drawing inaccurate or erroneous conclusions from the data."

Instead of using CalFire's incomplete and inaccurate assessment of the Fire History in San Diego County from 1950 to 2007, the EIR should have used other more reliable firsthand information. In order to get a more complete picture of Historic Fires in the area from the Southwest corner of the Anza Borrego Desert to the Southwest corner of the Cleveland National Forest, the local fire fighting volunteer departments in Campo, Lake Morena, McCain Valley Camp, Jacumba, Boulevard, Campo Indian Tribe, Cameron, and Cottonwood, etc should be consulted to help fill in the gaps in data, if they exist.

The CalFire Maps shown in Figure 6 entitled "Fire Threat"

[http://frap.cdf.ca.gov/webdata/maps/statewide/fthreat\\_map.pdf](http://frap.cdf.ca.gov/webdata/maps/statewide/fthreat_map.pdf)

and Figure 7 entitled "Fires and Wildland Urban Interface (WUI), Housing Density & Proximate Fire"

[http://frap.cdf.ca.gov/socal03/maps/sc\\_wui.pdf](http://frap.cdf.ca.gov/socal03/maps/sc_wui.pdf)

should be used instead of the incomplete data in the CalFire map entitled "Fire Perimeters: Wildfires 1950-2007."

An additional analysis of the Fire Data and History of Fires in San Diego County needs to be re-examined by BLM, the CPUC, Sempra/SDG&E, and the public. A re-examination on the basis for the supposedly lower risk of Fire Hazards of the proposed Sunrise Powerlink route through McCain Valley, Boulevard, North of Interstate 8, and through the Lake Morena/Campo communities is warranted.

Please note that the Legend of the CalFire Fire Threat Map (Figure 6) states that agricultural lands are omitted from the calculations of Fire Threat. There are many parcels of land in the Backcountry of San Diego County which are classified as agricultural lands in the County of San Diego. Therefore, this California-wide map should also be used with caution.

Figure 7 shows a portion of CalFire's Southern California map entitled " Fires and Wildland Urban Interface (WUI), Housing Density & Proximate Fire Threat" in the backcountry of San Diego County which will be impacted by the proposed route of Sunrise Powerlink. Backcountry community which will have an increase in fire hazards from the proposed route of the Sunrise Powerlink due to housing density and proximate fire threat include the San Diego County communities of Campo, Lake Morena, McCain Valley, and Boulevard. In addition to the Fire Threat and historical fires, the BLM, the CPUC, Sempra/SDG&E, and the public should also reanalyze the fire threat and history of the Wildland Urban Interface (WUI) in the Backcountry of San Diego County.

The Administrative Law Judge (ALJ), Ali Vieth, wrote a Decision mailed October 31, 2008 that disproves all Sempra's fire analysis was not based on actual fire data and that the risk of dual line failure due to wildfire was not based on past fires in the area of concern. The ALJ's Decision came to the conclusion that

"... a dual line outage could occur whether or not a new transmission line is Collocated with the Southwest Powerlink, since special proximity is not the only indicator of a concurrent outage."

and also that the proposed new Southern route would actually be a more fire-prone area, which is not compatible with the proposed utility towers.

Portions of the ALJ's Decision dealing with the inadequacy of the Fire Analysis in the EIR and Wildfire Risks of the proposed Sunrise Powerlink is are shown below. Another reason for not Collocating the Sunrise Powerlink with the SWPL is because SDG&E was concerned that WECC would rate any line parallel to the Southwest Powerlink past Milepost 36 "as a Category C line, and SDG&E wanted the proposed Sunrise Powerlink to obtain a Category D rating, which because it represents a higher measure of reliability, might provide further justification for the line. Only three sets of collated high-voltage transmission lines in California have a Category D Rating. SDG&E filed a Performance Category Upgrade Request with the WECC Reliability Performance Evaluation Work Group on December 19, 2007, about a year after it filed the 2006 Application. SDG&E focused primarily on evaluating the fire-related risks related to the collocated segments....

based upon the historic fire record” from CalFire from 1950 to 2007 which CalFire stated is incomplete and should be used with caution. Therefore, because the data was flawed the WECC should re-evaluate its decision based on new data.

“After reviewing SDG&E’s Request, WECC Reliability Work Group recommended that the collocated 500 kV segment... of the Southern Route (36 miles) be deemed a Category C line. However, “SDG&E’s Request to WECC Reliability Work Group failed to evaluate the risk of multiple simultaneous fires affecting both lines and thus, did not permit a fully comparable analysis. Had SDG&E performed a simultaneous wildfire-reliability analysis on the entire length of each route and not just on co-located portion, and had it included fire history data... it seems likely both lines would have been deemed to meeting Category C requirements and thus, would have been given the same reliability rating.”

“There is also a very high likelihood that the Environmentally Superior Southern Route would have experienced a concurrent outage with the Southwest Powerlink five times since 1970 (in 1970, 1975, 1995, 2003, and 2007). WECC’s rating criteria assesses whether any contingency (such as fire, lightning, aircraft crash) that could affect two transmission lines is likely to occur at a frequency between one in three to one in thirty years, and if so, classifies the proposed transmission route as “N-2,” which fails within the Category C reliability classification... a more accurate assessment of the risk of outage due to concurrent fire appears to fall within Category C standards but does not meet the higher standards of Category D.”

Additional portions of the ALJ’s decision are also shown below:

“The Final EIR/EIS describes why San Diego is one of the most fire prone eco-systems in the world and finds that all of the transmission line alternatives increase fire risk by creating new transmission line corridors in high fire risk areas. New lines also reduce reliability because of the increased possibility of a dual line outage affecting both the new transmission line and SDG&E’s most significant, existing import line, the Southwest Powerlink.... We also review the possibility of a wildfire-induces dual line failure of the Southwest Powerlink.... Assisted by high winds, power line ignitions have caused four of the twenty largest wildfires in California’s history from 1932 to 2007... Three of these four fires occurred in SDG&E’s service area: the 1970 Laguna and Clampitt Fires and the 2007 Witch Fire. The 2007 Rice Fire, also ignited by a power line in SDG&E’s service area according to Cal Fire, is one of the State’s twenty largest wildfires by another measurement, number of structures destroyed. Thus, according to Cal Fire, four of the five most destructive California fires caused by power lines occurred in SDG&E’s service area.... Locating transmission lines in areas with high fire risk creates a reliability risk.... A second issue is reliability-related, that of concurrent failure of the Proposed Project.... and the existing Southwest Powerlink, due to one fire or simultaneous fires... a dual line outage could occur whether or not a new transmission line is collocated with the Southwest Powerlink, since special proximity is not the only indicator of a concurrent outage.”

Instead of creating a new, unnecessary line through pristine BLM land, the environmentally superior option would be to Co-locate the Sunrise Powerlink and the Southwest Powerlink (SWPL) as much as possible based on the new information and analysis provided above. The diverging of the two lines should happen at the last possible area which is the southwest edge of the Cleveland National Forest. This alternative route would be the same as the first 36 Collocated miles within Imperial Valley and below the Anza-Borrego State Park. This alternative route would not caused any additional visual pollution or increase the fire risks of our backcountry. We believe this would eliminate most, if not all, the need for a ROD and save the taxpaying citizens and Sempria Energy hundreds of millions of dollars.

Please deny the ROD for the Sunrise Powerlink. If you have any questions, please do not hesitate to contact us.

Regards,

Handwritten signature of Kathryn Rhodes and Conrad Hartsell. The signature is written in black ink and consists of two names: 'Kathryn Rhodes' and 'Conrad Hartsell', separated by a period. The handwriting is cursive and somewhat stylized.

Katheryn Rhodes and Conrad Hartsell M.D.  
371 San Fernando Street  
San Diego, California 92106  
619-523-4350  
[rhodes@laplayaheritage.com](mailto:rhodes@laplayaheritage.com)



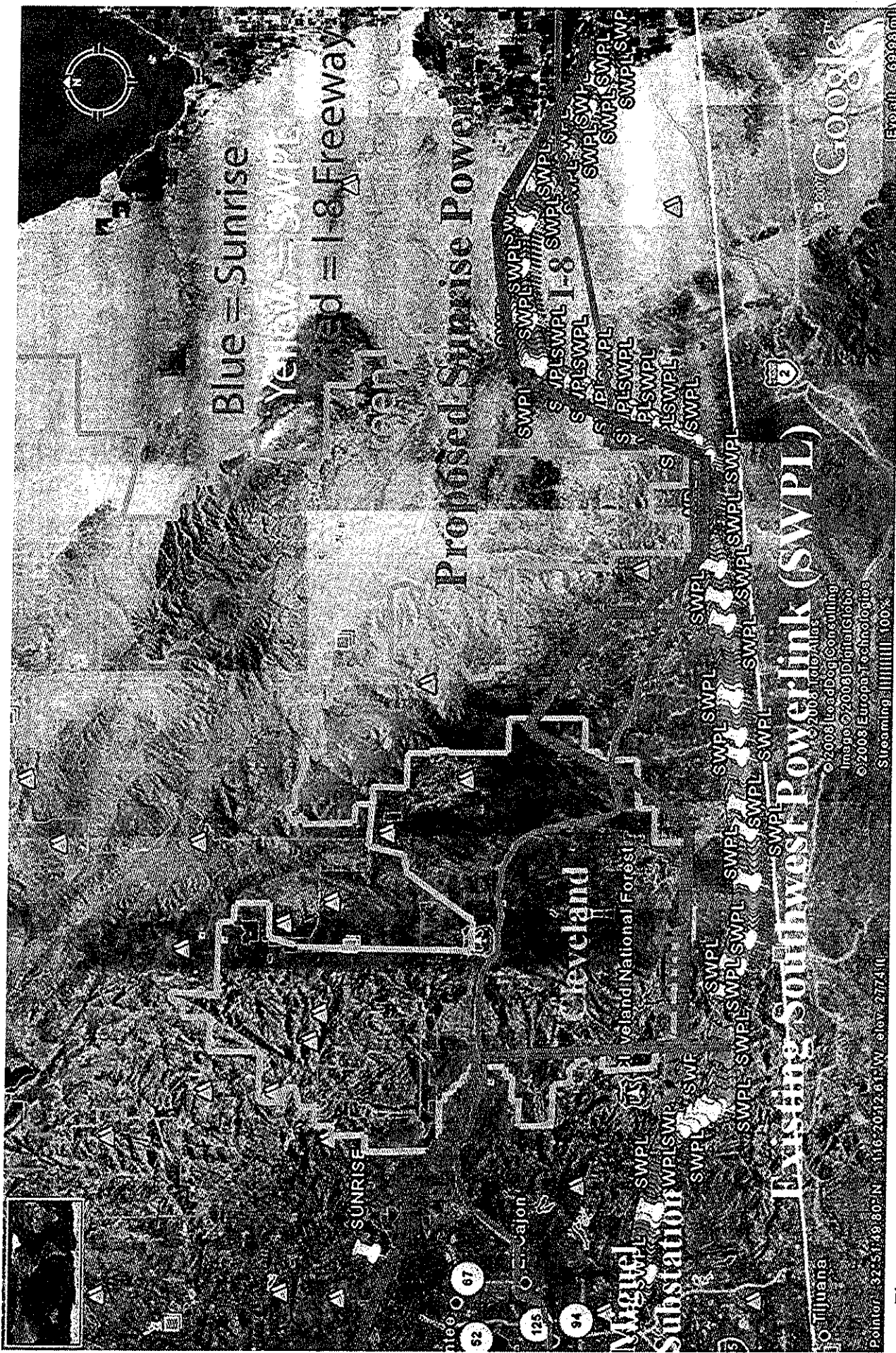


Figure 1 - Existing straight Southwest Powerlink (SWPL) in Yellow owned by SDG&E. Proposed Sunrise Powerlink in Blue meanders North & South of Interstate 8 (in Red) in order to create redundancy for fire protection. However, as stated in the Administrative Law Judge Vieth Decision, the fire protection redundancy level is does not increase from Level C, so there is no reason not to parallel lines as much as possible in a straight line. The proposed New Link in Pink from SWPL to Sunrise Powerlink route at SW end of the Cleveland National Forest instead of Anza-Borrego. Ratepayers and SDG&E will save money on land and access road and use less forest land and pristine BLM land.

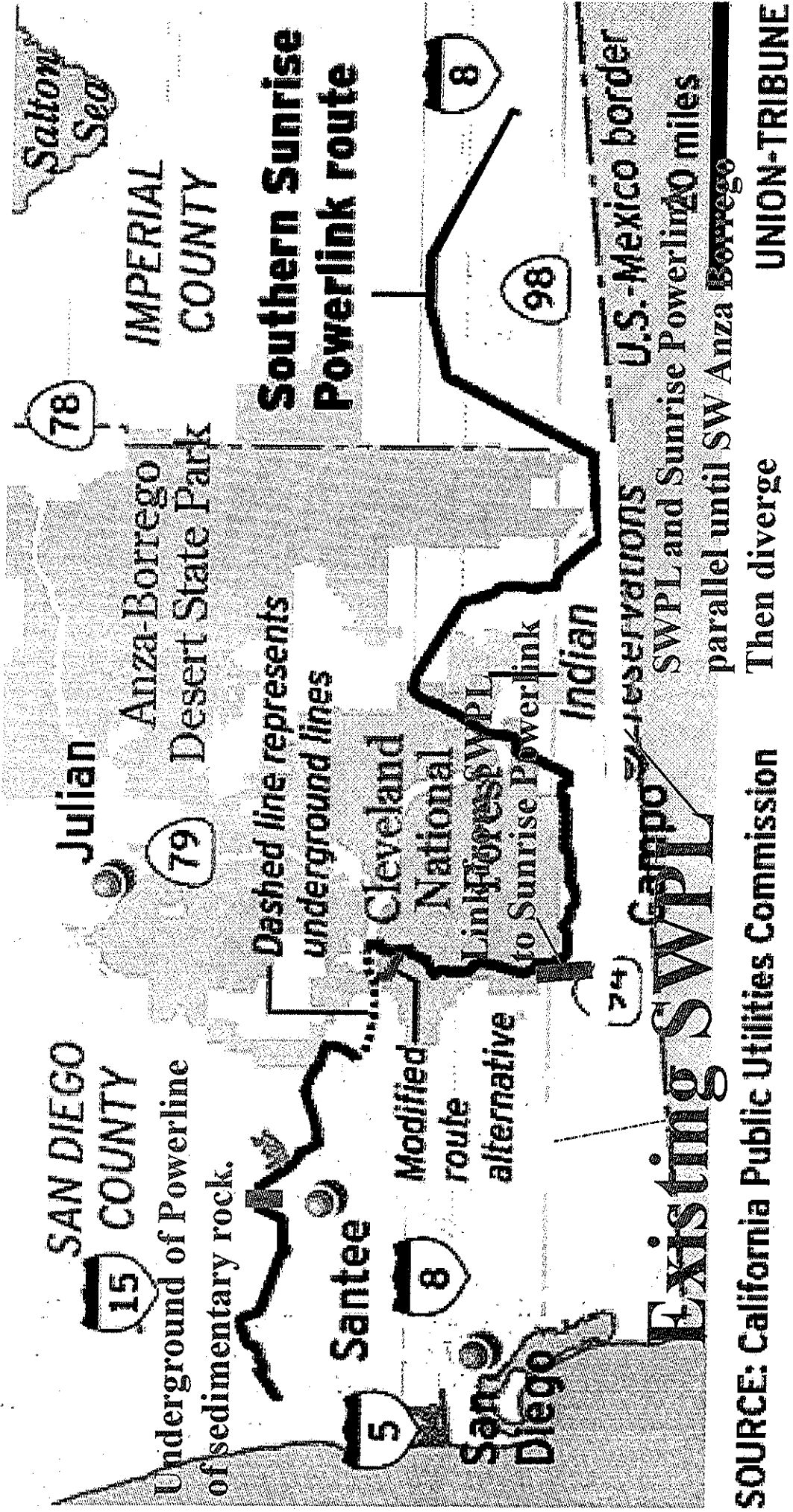


Figure 2 - SDG&E already owns the land and access roads beneath the existing 500 kilovolt SWPL (yellow) adjacent the International Border with Mexico. The proposed 500 kilovolt Sunrise Powerlink parallels the existing SWPL from Imperial Valley to the SW end of Anza Borrego Park. The superior route to save money and environmental damage, instead of diverging early on, would continue to parallel the SWPL to the SW end of the Cleveland National Forest. Then create a new northern link from the SWPL to Sunrise Powerlink. From Santee to Rancho Penasquitos including all of the City of San Diego, underground the Sunrise Powerlink because of undergrounding is easy through sedimentary soils instead of hard rock.

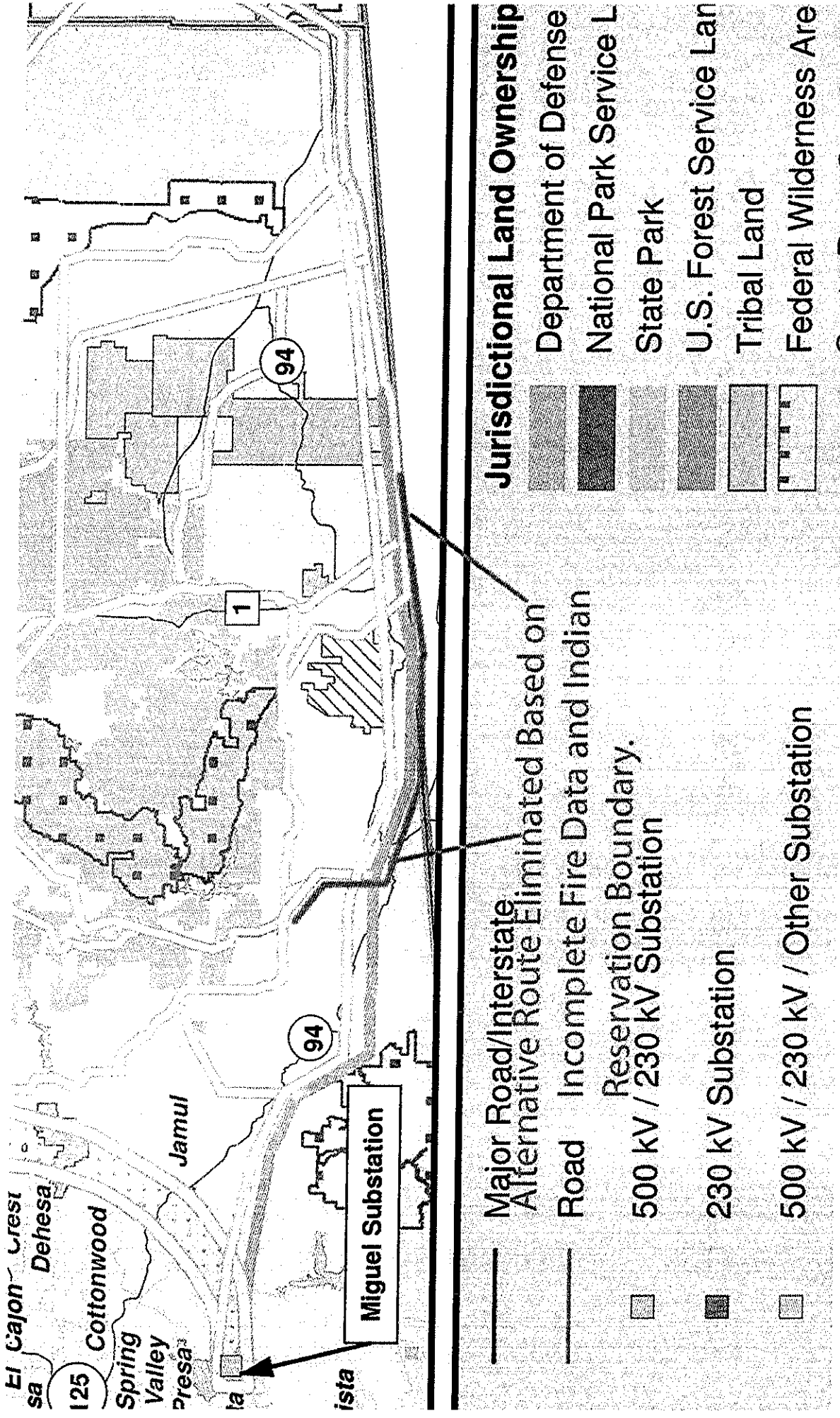


Figure 3 – Portion of EIR Figure ES-11 Alternatives Eliminated. The Collocation of the proposed Sunrise Powerlink with the Existing Southwest Powerlink (SWPL) was eliminated early on in the EIR process due to CalFire's incomplete record of historic fires in the Backcountry of San Diego County and the Southern boundary of the Campo Indian Reservation.

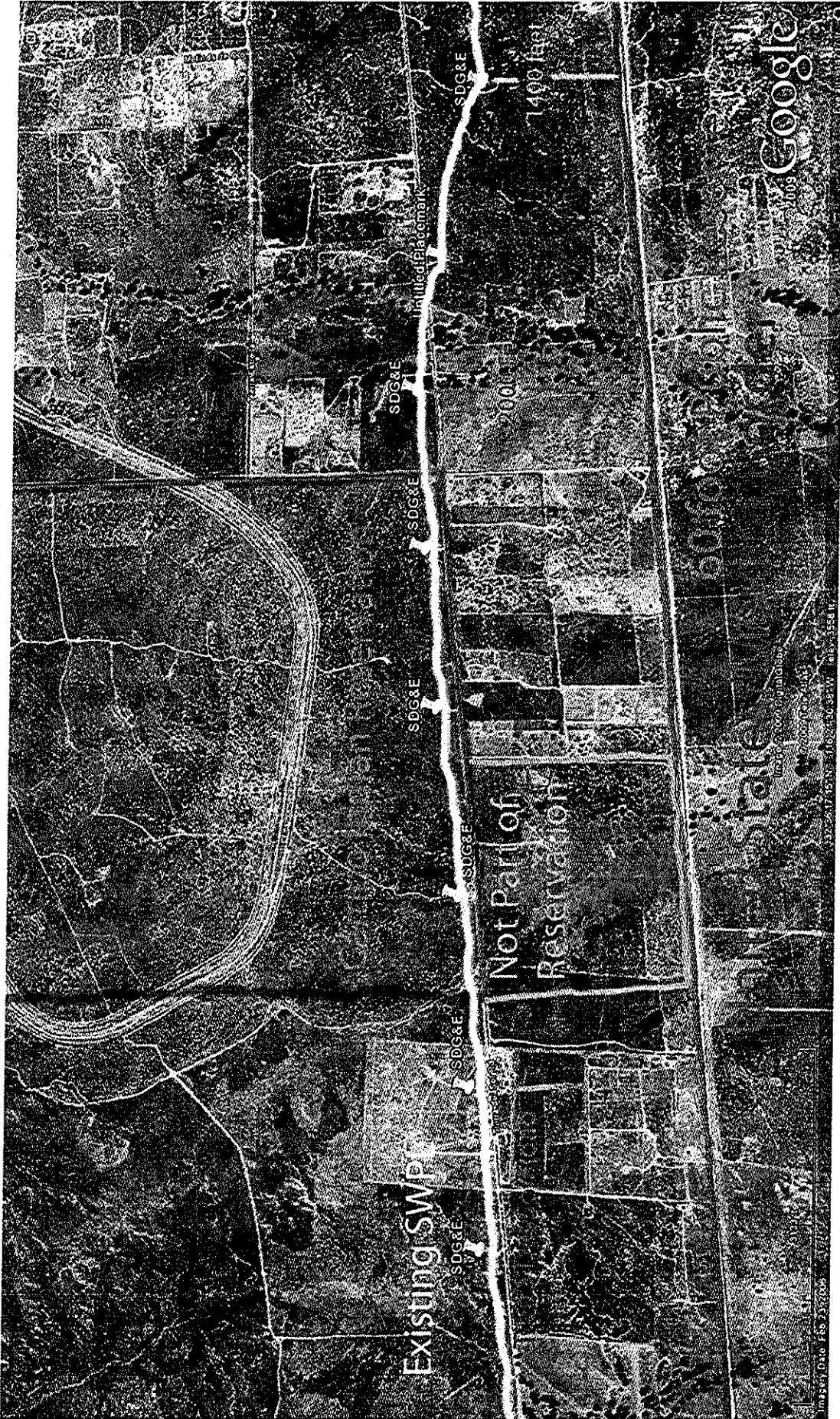


Figure 4 – Ownership of Land south of the Campo Indian Reservation and north of the International Border with Mexico. The smallest distance from the US Border to the existing SWPL is 1,400 feet. Through official documentation at the County of San Diego Assessor's Office, we found that in 2001 the United States took claim to a 60-foot wide swath of land adjacent the United States/Mexico border as a Public Reserve Right-Of-Way (ROW) for the Border Fence and a public Utility corridor (County Document 2001-0904845). On May 22, 2007 less than 2 years ago, and after the EIR process was started, the Campo Band of Mission Indians bought two continuous parcels of land between the official Campo Indian Reservation and the 60-foot wide Public Reserve Right-Of-Way (ROW) adjacent the US/Mexico Border (County Document 2007-0346820). These are Parcel Nos. 658-070-01 and 658-100-01 which although owned by the Campo Indians, are not part of the Official Campo Indian Reservation. Therefore, these two privately owned parcels which pay County of San Diego property taxes are not subject to Official Indian land status. It does seem that the Campo Indians specifically bought these two parcels of land in order to try to block the Collocation of the proposed Sunrise Powerlink with the existing SWPL for their private benefit.

# FIRE PERIMETERS: WILDFIRES

## 1950-2007

- Private Lands
- Public Lands
- 2000-2007
- 1990-1999
- 1980-1989
- 1970-1979
- 1960-1969
- 1950-1959

FRAP compiled this statewide spatial database of fire perimeters from BLM, NPS, and USFS fires 10 acres and greater in size and CAL FIRE fires 300 acres and greater in size. Collection criteria for CAL FIRE fires changed in 2002 to include timber fires greater than 10 acres, brush fires greater than 10 acres, grass fires greater than 300 acres, fires destroying three or more structures, and fires causing \$300,000 or more in damage. In 2008 collection criteria for CAL FIRE fires eliminated the monetary criterion and redefined the definition of structures damaged. FRAP fire perimeter attributes include year, state, unit, id, fire, num, fire name, agency, alarm, date, cont data, c method, cause, and other data. This database was developed by BLM, CDF, NPS, and USFS represents the most complete digital record of fire history in California. It may still be incomplete in many respects. Users of the fire perimeter database must exercise caution to avoid inaccurate conclusions. For more information on potential errors and their sources please visit our website at [http://frap.cdf.ca.gov/projects/fire\\_data/fire\\_perimeters/](http://frap.cdf.ca.gov/projects/fire_data/fire_perimeters/).

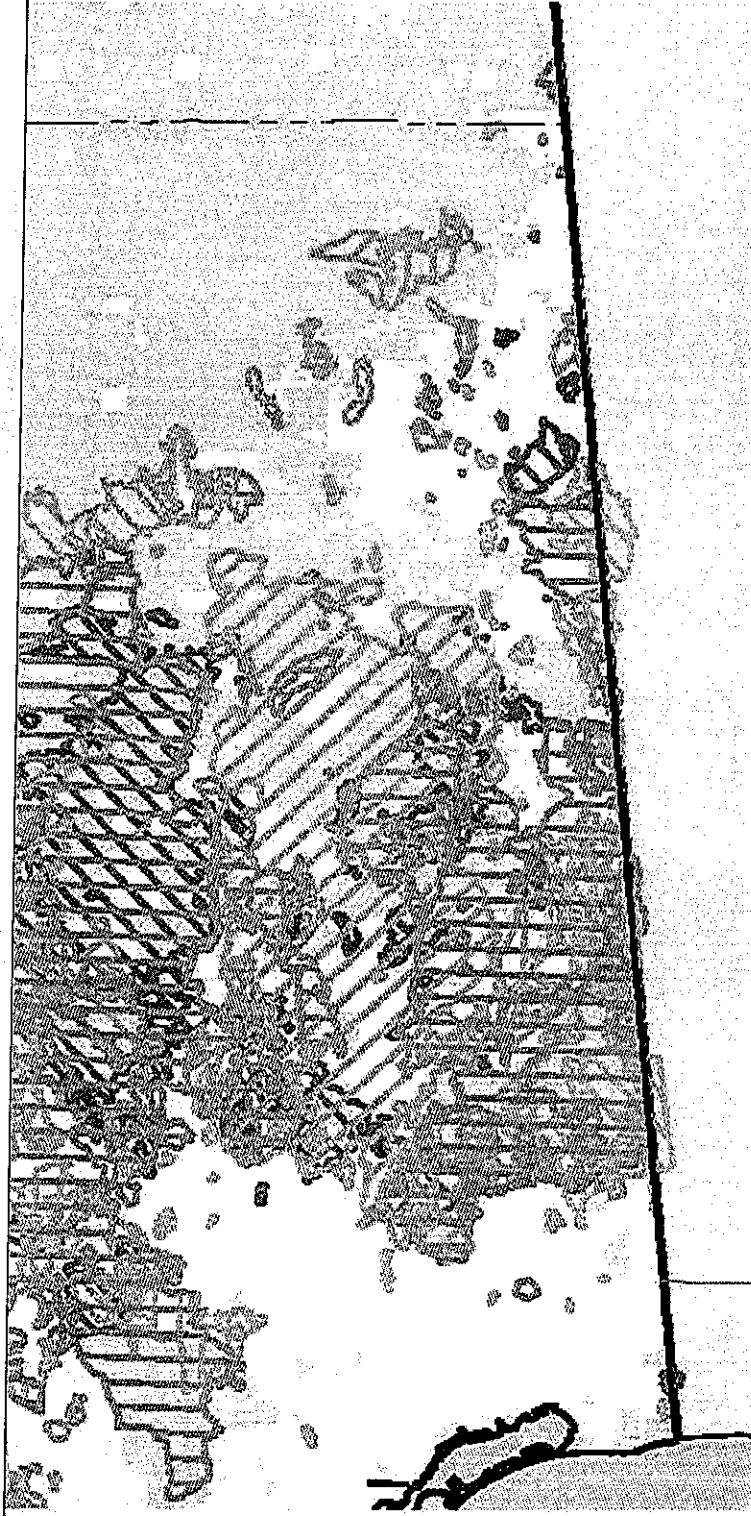


Figure 5 – Portion of the Map of California for Fire Perimeters: Wildfires 1950-2007.  
[http://frap.cdf.ca.gov/webdata/maps/statewide/firep\\_map.pdf](http://frap.cdf.ca.gov/webdata/maps/statewide/firep_map.pdf)

## **Methodology for Figure 5 - Fire Perimeters: Wildfires 1950-2007.**

Initially CDF and the USDA Forest Service jointly developed a comprehensive fire perimeter GIS layer for public and private lands throughout California. The data covered the period 1950 to 2001 and included USFS wildland fires 10 acres and greater, and CDF fires 300 acres and greater. BLM and NPS joined the effort in 2002, collecting fires 10 acres and greater. Also in 2002, CDF's criteria expanded to include timber fires 10 acres and greater in size, brush fires 50 acres and greater in size, grass fires 300 acres and greater in size, wildland fires destroying three or more structures, and wildland fires causing \$300,000 or more in damage. This project provides for annual updates. Whenever possible, CDF, the USFS, BLM, and NPS solicit additional fire perimeter data from other federal agencies (e.g. BIA, DOD) and local agencies, for incorporation into the fire perimeters mapping project.

The project produces an annual statewide fire history GIS data layer through four steps:

1. Standardize and combine existing digitized fire perimeters into a statewide GIS layer,
2. Identify and remove duplicate fires;
3. Fill in the gaps in data; and
4. Perform annual updates of the GIS layer.

In 1989, CDF units were requested to fill in gaps in their fire perimeter data as part of the California Fire Plan. FRAP provided each unit with a preliminary map of 1950-89 fire perimeters. Unit personnel also verified the pre-1989 perimeter maps to determine if any fires were missing or should be re-mapped. Each CDF Unit then generated a list of 300+ acre fires that started since 1989 using the CDF Emergency Activity Reporting System (EARS). The CDF personnel used this list to gather post-1989 perimeter maps for digitizing. The final product is a statewide GIS layer spanning the period 1950-1999. Annual updates have been made thereafter.

The current fire perimeter layer developed by BLM, CDF, NPS and USFS is the most complete digital record of fire perimeters in California. However it is still incomplete in many respects. Fires may be missing altogether or have missing or incorrect attribute data. Some fires may be missing because historical records were lost or damaged, fires were too small for the minimum cutoffs, documentation was inadequate, or fire perimeters have not yet been incorporated into the database. Agencies are at different stages of participation. CDF has completed inventory for the majority of their historical perimeters back to 1950 while only 2002 - 2007 fires are currently present for BLM. The USFS has submitted records as far back as 1878 and NPS records date to 1921. Furthermore, until the data capture process moves to the local level, the most recent fires will only be uploaded to the database once annually, during the month of February.

Other errors with the fire perimeter database include duplicate fires and over-generalization. While the data capture process attempts to identify duplicate fires resulting from multiple data sources (i.e. the USFS and CDF both captured and submitted the fire perimeter), some duplicates may still exist. Additionally, over-generalization, particularly with large old fires may show unburned "islands" within the final perimeter as burned. Users of the fire perimeter database must exercise caution in application of the data. Careful use of the fire perimeter database will prevent users from drawing inaccurate or erroneous conclusions from the data.

In some cases, different agencies record differing fire perimeters for the same fire. Above you can see two instances of duplicate fires with different perimeters, the White Deer fire and the Pierce fire. In the Pierce fire the most accurate fire perimeter is preserved along with the best metadata, such as date, cause, etc. (see tables A and B below). \*Note: only sampling of fires and not spatially accurate.

Fire perimeter data from the statewide database are constantly under development. The data are maintained as an ArcGIS Feature Class, which provides effective tools for handling overlapping polygons (for instance areas that burn more than once). Data contained in this Feature Class come from many sources. Some sources are more accurate or complete than others.

The "AGENCY" field identifies the data source. Not all sources report all information, thus some records will have fields with no values. FRAP produces the annual statewide fire perimeter GIS data layer by combining digitized fire perimeters from BLM, CDF, NPS, and USFS. The long-range goal for maintenance of fire perimeter data will eventually decentralize the data capture process to the individual fire station level. Immediately following a fire event local fire station personnel will map fires into the database. This process will be facilitated by a user friendly computer application that connects the local field user to a client-server database in Sacramento. CDF implemented a similar process, Emergency Activity Reporting System (EARS), for non-spatial data in 1989.

# FIRE THREAT





-  Extreme
-  Moderate
-  Very High
-  Non-fuel
-  High
-  Not Mapped

CDF-FRAP has developed a rating of wildland fire threat based on the combination of potential fire behavior (Fuel Rank) and expected fire frequency (Fire Rotation) to create a 4-class index for risk assessment. Areas that do not support wildland fuels (e.g. open water, agricultural lands, etc.) are omitted from the calculation. Most large riparian areas receive a moderate fire threat classification to account for fires started by ornamental vegetation and flammable structures. For a detailed description of these data and methods please visit [http://frap.cdf.ca.gov/projects/fire\\_threat/](http://frap.cdf.ca.gov/projects/fire_threat/)



Figure 6 – Fire Threat in San Diego County from CalFire’s database. Does not include agricultural land. [http://frap.cdf.ca.gov/webdata/maps/statewide/ffthreat\\_map.pdf](http://frap.cdf.ca.gov/webdata/maps/statewide/ffthreat_map.pdf)

# FIRES AND WILDLAND URBAN INTERFACE (WUI) HOUSING DENSITY & PROXIMATE FIRE THREAT

-  Rural Residential (1 or more units per 20 acres & less than 1
-  Interface (1 or more units per 5 acres & less than 1 unit per acre)
-  Urban (One or more units per acre)
-  Not Mapped

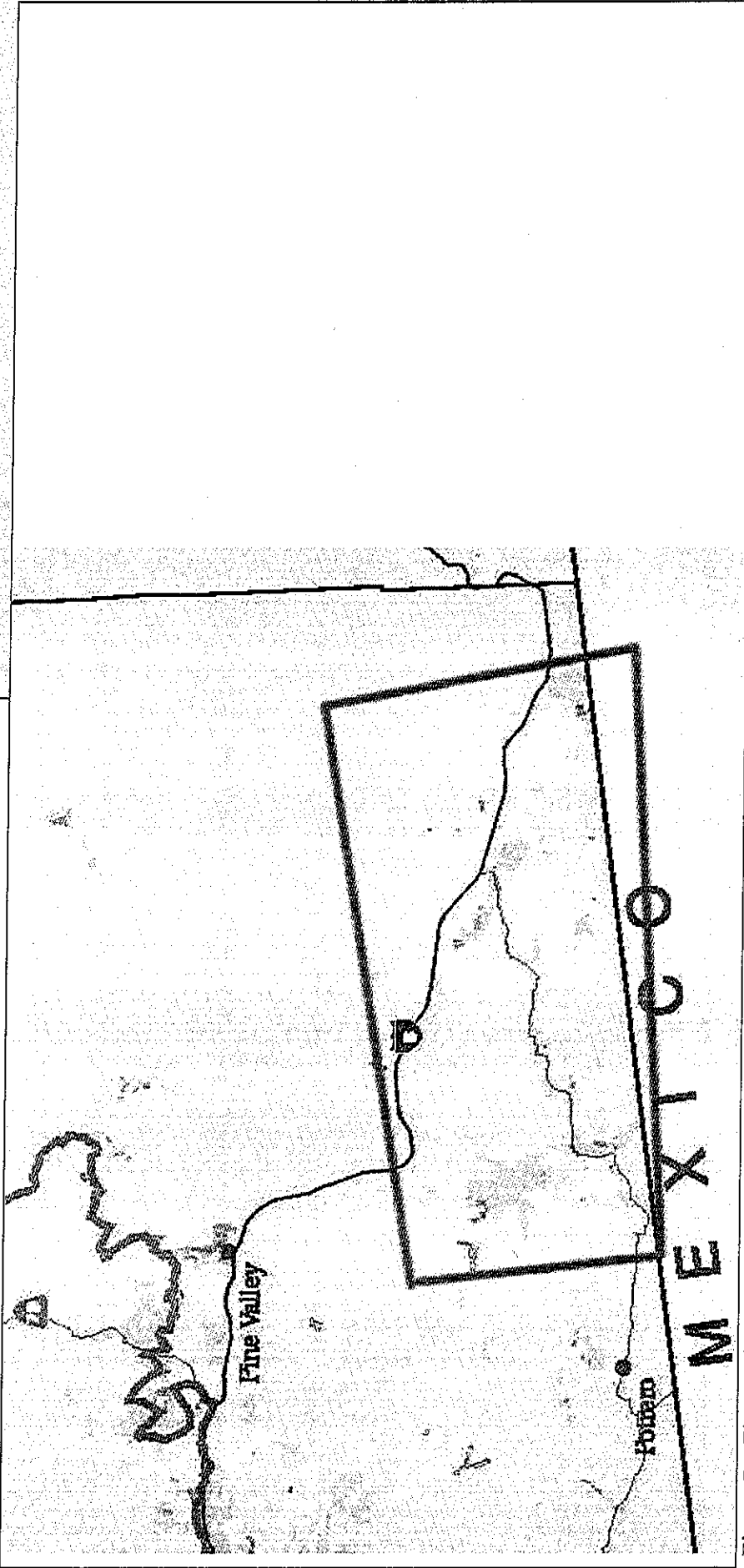


Figure 7 – Fires and Wildland Urban Interface (WUI), Housing Density & Proximate Fire Threat in the backcountry of San Diego County which will be impacted by the proposed route of Sunrise Powerlink. Backcountry communities which will have an increase in fire hazards due to housing density and proximate fire threat include the San Diego County communities of Campo, Lake Morena, McCain Valley, and Boulevard. [http://frap.cdf.ca.gov/socal03/maps/sc\\_wui.pdf](http://frap.cdf.ca.gov/socal03/maps/sc_wui.pdf)



<http://www.tradingmarkets.com/.site/news/Stock%20News/2187703/>

Notice of Availability of the Record of Decision for the Sunrise Powerlink Transmission Project and Associated Amendment to the Eastern San Diego County Resource Management Plan

Fri February 20, 2009; Posted: 09:41 AM

Feb 20, 2009 (FIND, Inc. via COMTEX) -- PowerRating -- SUMMARY: The Bureau of Land Management (BLM) announces the availability of the Record of Decision (ROD) offering two right-of-way grants to San Diego Gas & Electric (SDG&E) for the Sunrise Powerlink Transmission Project and an associated Amendment to the Eastern San Diego County Resource Management Plan (RMP). The project is located in Imperial and San Diego Counties. The California State Director, BLM, signed the ROD on January 20, 2009. DATES: These decisions are effective immediately upon publication of this notice and publication initiates a 30-day appeal period. Information regarding the appeals process is provided below.

ADDRESSES: Copies of the ROD are available upon request from the Field Manager, El Centro Field Office, Bureau of Land Management, 1661 S. 4<sup>th</sup> Street, El Centro, CA 92243 or via the internet at BLM's El Centro Field Office Web site: [http://www.blm.gov/style/medialib/blm/ca/pdf/elcentro/nepa/2007/eis.Par.9361.File.dat/ROD-SunrisePowerlinkJa\\*2009.pdf](http://www.blm.gov/style/medialib/blm/ca/pdf/elcentro/nepa/2007/eis.Par.9361.File.dat/ROD-SunrisePowerlinkJa*2009.pdf).

FOR FURTHER INFORMATION CONTACT: Information concerning the ROD may be obtained from Thomas Zale, El Centro Associate Field Manager, at (760) 337- 4400, or e-mail at [Thomas\\_Zale@blm.gov](mailto:Thomas_Zale@blm.gov).

SUPPLEMENTARY INFORMATION: After extensive environmental analysis, consideration of public comments, and application of pertinent Federal laws and policies, it is the decision of the BLM to offer to SDG&E two right-of-way [Page Number 7917] grants for the construction, operation, maintenance, and termination of the transmission lines, ancillary facilities, and access roads of the project across public lands administered by BLM; and amend the Eastern San Diego RMP. One right-of-way grant will authorize the use of public lands for the project for a term of 50 years, which is subject to renewal, and the other will authorize the use of public lands for the construction of the project for a term of 2 years, which is also subject to renewal. The amendment of the RMP will allow for a one-time exemption for a single utility crossing outside of an established corridor on public lands. BLM's decision authorizes issuance of right-of-way grant to SDG&E for the final environmentally superior southern route alternative as analyzed in the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR), issued in October 2008. The Environmental Protection Agency published a Notice of Availability of the FEIS/EIR in the Federal Register on October 17, 2008 (73 FR 61859).

The decision by BLM to offer the two right-of-way grants to SDG&E is appealable subject to 43 CFR part 4, Subpart E-- Special Rules Applicable to Public Land Hearings and Appeals, and 43 CFR 2801.10. Any party adversely affected by this decision may appeal within the timeframe as described above in the DATES section. Appeals must be filed with the Field Manager, El Centro Field Office (at the address listed below) on or before March 23, 2009. If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your Notice of Appeal (43 CFR 4.21 or 43 CFR 2801.10). The appeal and petition for a stay (if requested) must be filed with the El Centro Field Manager at the above listed address on or before March 23, 2009. Copies of the appeal and petition for a stay (if requested) should also be filed with Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy Street, Suite 300, Arlington, Virginia 22203-1710; and the Office of the Solicitor, Pacific Southwest Region, U.S. Department of the Interior, 2800 Cottage Way, Suite E-1712, Sacramento, California 95825-1890. You are encouraged to consult the cited Federal regulations for further appeal requirements.

Authority: 43 U.S.C. 1712 and 1761.

Robert M. Doyel,

Chief, Branch of Lands Management (CA-930).

[FR Doc. E9-3618 Filed 2-19-09; 8:45 am]

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