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Supplemental Information Report

Sunrise Powerlink Project

Cleveland National Forest
San Diego County, California

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I. INTRODUCTION

San Diego Gas and Electric Company (SDG&E) proposed to construct, operate, and maintain a new 500 kV transmission line project called the Sunrise Powerlink. This proposed project would bring power from California's Imperial Valley, Mexico, and other sources to northern San Diego County over a 123-mile route through private lands, public lands managed by the Bureau of Land Management (BLM), the Department of Defense, and Anza-Borrego State Park. Applications were filed in 2005 with the BLM and California Public Utilities Commission (CPUC), and notices of the applications were published in August 2006. The Draft Environmental Impact Report/ Environmental Impact Statement (Draft EIR/EIS) was released on January 3, 2008. The Recirculated/Supplemental Draft EIR/EIS was released on July 8, 2008. The Final EIR/EIS was released in October 2008. SDG&E's purposes of the proposed project are to promote renewable energy, improve system reliability, and reduce system congestion and energy transportation costs. The project cost is estimated at $1.9 billion.

The Final EIR/EIS is available online at:

http://www.cpuc.ca.gov/environment/info/aspen/sunrise/toc-feir.htm

The CPUC approved an alternative route to the proposed project on December 18, 2008, selecting a southern route through the Cleveland National Forest (Cleveland NF) over the proposed northern route through Anza-Borrego State Park. The BLM approved the project on January 20, 2009, selecting the same southern route alternative as the CPUC. The Selected Alternative crosses approximately 49 miles of public land administered by the BLM, approximately 19 miles of public National Forest System lands administered by the Cleveland National Forest, approximately two miles of public land administered by the Department of Defense, and approximately 0.4 miles of land administered by the State of California. The remainder of the line crosses private land and land administered by local governments. Neither the BLM nor the CPUC imposed a condition that would require the project to carry renewable energy.

This route utilizes a portion of a utility corridor (corridor 115-238) designated as part the Energy Policy Act of 2005, Section 368, National Forest Land Management Plan amendments, which amended the Cleveland NF Land Management Plan. Table 1 summarizes the key points in the Sunrise Powerlink project timeline.

Table 1: Key points in Sunrise Powerlink Project Timeline	
Date	**Activity**
2005	SDG&E filed applications with BLM and CPUC.
August 2006	Notices of applications are published.
January 3, 2008	Draft EIR/EIS is released.
July 8, 2008	Recirculated/Supplemental EIR/EIS is released
October 2008	Final EIR/EIS is released, identified FESSR as BLM preferred alternative
December 18, 2008	CPUC approved project, selecting southern route through Cleveland NF.
January 2009	SDG&E filed a special use application with Cleveland NF for the project.
January 14, 2009	West-wide Energy Corridor (WWEC) Designated in the WWEC Programmatic EIS prepared by DOE, USFS, and BLM. Decision amends Cleveland NF Land Management Plan.
January 20, 2009	BLM approved project, selecting the same alternative as the CPUC.
April 2009	SDG&E provided a revised project design to the Cleveland NF.
August 2009	SDG&E submits 404 permit application to Army Corps of Engineers
September/October 2009	SDG&E filed additional resource reports and a revised project design in support of special use application.
October 2009	SDG&E submits 401 Certification Request to State Water Resources Control Board
November 2009	State Board notices the 401 certification request. SDG&E begins to share access road and tower pad construction drawings with the Cleveland NF.
January 2010	SDG&E provides revised draft Biological Evaluation and Management Indicator Species analysis to the Forest Service
January 2010	SDG&E files Draft Project Modification Report (PMR) with CPUC, BLM, and other agencies
February 2010	Agencies file replies to the Draft PMR
May 2010	SDG&E files Final PMR
May 2010	Forest Service opens 45 day comment period

The Forest Service participated with the BLM and CPUC as a Cooperating Agency because of our jurisdiction over the alternatives on NFS lands and our expertise and knowledge of those areas. Unlike the CPUC and BLM, the Forest Service did not have an application from SDG&E during the development of the EIR/EIS, because SDG&E opposed the alternative southern route through the Cleveland NF. Since the CPUC and BLM decisions to approve the project, Cleveland NF staff has been working actively with SDG&E to review the proposed project design and review additional resource surveys required by the BLM and CPUC.

II. SUPPLEMENTAL INFORMATION REPORT

This Supplemental Information Report (SIR) documents the evaluation and consideration of new information and changed circumstances for the Sunrise Powerlink Project. Forest Service policy provides for preparation of an SIR to review new information or changed circumstances to determine its importance, with consideration given to whether or not the new information or changed circumstances are within the scope and range of effects considered in the original analysis (Forest Service Handbook (FSH) 1909.15 Section 18.1).

A. Changes in the proposed action

The proposed action is the alternative identified in the BLM and CPUC decisions as the Final Environmentally Superior Southern Route Alternative. This alternative is a composite of segments from four southern alternatives, and is described in Chapter H of the Final EIR/EIS, in various sections of Chapter E, on detailed map sheets in Appendix 11, the response to comments, and revised Chapter 3 of the Recirculated Draft EIR/Supplemental EIS. The Final EIR/EIS (Final EIR/EIS Section H.4.5) also provided some optional route components that were conditioned on additional analysis, including:

- Redesign of the route south of the "Jam" property to avoid impacts to private property (Final EIR/EIS Mitigation Measure WR-2a)
- Design modification in the area of the Interstate 8 crossing at La Posta to reduce the visual impacts (Final EIR/EIS Mitigation Measure B-11)
- Selection of the Star Valley option or the Alpine Boulevard East option
- Implementing Forest Service design criteria on segments along NFS lands that limited road construction based on slope, and limited site disturbance to the minimum necessary to support activities (Final EIR/EIS Mitigation Measure V-45a).

A number of mitigation measures also provided for design changes as necessary to avoid sensitive habitat, cultural resource sites, and to reduce visual impacts from roads and other ground disturbing impacts. These measures applied to the entire project.

The design considered in the Final EIR/EIS included the use of helicopters to support construction (B4.4.2). Helicopters would operate from "fly yards", delivering workers and materials to tower locations that are inaccessible by road. Helicopter construction was also included as a mitigation measure (V-2d) to minimize disturbance in steep terrain. Preliminary fly yards were identified on the maps in the Final EIR/EIS Appendix 11.

Forest Service design criteria included limitation on road construction on slopes greater than 15 percent (Mitigation measure V-45a). Roads and other construction features identified on the maps in the Final EIR/EIS Appendix 11 had not been screened against these criteria, and were proposed as preliminary locations subject to further evaluation.

SDG&E provided a revised project design in April 2009 for Forest Service review. This design reflected some of the modifications identified in the Final EIR/EIS but resource surveys were not available to determine if the design met the intent of the Final EIR/EIS mitigation or Forest Service design criteria. The Forest Service provided initial review comments but reserved review pending the outcome of the required resource surveys.

SDG&E provided a proposed final project design in September 2009 for Forest Service review, and provided this same design in October 2009 to the CPUC and BLM. SDG&E began sharing construction drawings with the Forest Service in November 2009. This October 2009 design was not consistent with the requirements in the Final EIR/EIS in a number of areas, including impacts to cultural and natural resources, grading in work areas that was not considered in the Final EIR/EIS, road construction on terrain over 15% slope, and visual impacts at the Interstate 8 crossing at La Posta Road. Forest Service and SDG&E staffs have discussed these issues and SDG&E revised the design in response to Forest Service concerns.

SDG&E filed a Draft and Final Project Modification Report (PMR) with the CPUC, BLM, and other agencies that documents the changes from the EIR/EIS approved route. Both reports are available online at:

http://www.fs.fed.us/r5/cleveland/projects/sunrise-powerlink/index.shtml

Both documents are incorporated into the project record. The design changes include revisions made to the October 2009 design in response to Forest Service concerns, except for the level of disturbance proposed for temporary work areas. Although this SIR uses the disturbance areas proposed in the Final PMR, further reductions in temporary work areas are expected prior to any construction approval under the Special Use Permit. Some proposed temporary work areas have 10 to 20 foot cut and fill areas. Based on the scale and extent of disturbance in the Final PMR, these temporary work areas will result in longer term impacts and will be counted as permanent impacts for mitigation and compensation purposes.

Although the Final PMR covers the entire route, this analysis focuses on the discussion of project modifications on the Cleveland NF. Table 2 summarizes the alignment modifications on the Cleveland NF from west to east, and Figures 1, 2, 3 and 4 show the selected alternative route and the Final PMR route. The overall length of the Final PMR route on National Forest lands is approximately 19 miles.

Table 2. Summary of Modifications on the Cleveland NF		
Location	Modification	General change in effects
P69-2 (230 kv) (El Capitan)	Tower moved to eliminate access road.	Reduce impact to habitat
P99-2 to P105-1(230 kv) (Sweetwater Canyon)	Towers moved west. Maximum shift is 650'. Reduced access road length.	Reduce impact to habitat
P2-3 to P22-1 (500 kv) (Japatul Valley - Carveacre)	Very minor shifts in tower location and added a Stringing Area.	Increased habitat disturbance.
P23-2 to P39-1 (500 kv) (Barber Mountain)	Alignment shifts east to avoid sensitive resources. Maximum shift is 4500'. Access roads reduced, and alignment on CNF reduced.	Less impact on CNF primarily due to the shift to City of San Diego watershed lands.
P57-1 to P58-2 (500 kv) (Round Potrero)	Moved towers from PVT/BLM to CNF	Additional impact to CNF
P108-2 to P113-4 (500 kv)	Moved towers and alignment north to avoid sensitive resources and reduce visual impact. Maximum shift is 1500'. Access roads reduced or eliminated.	Less impact to cultural and visual resources and fewer roads. Stringing areas proposed with 20' cut and fill sections.
P114-2 to P122 (500 kv) La Posta road and I8 crossing	Moved towers to reduce visual impact. Maximum shift is 450'. Reduced and eliminated access roads. Eliminated fly yard in sensitive resource area.	Reduced visual and resource impact. Moved line closer to residence. Minimum distance from residence to line is 550'. Right of Way (ROW) is on NFS lands, no access road on private lands.
P123 to P140 (500 kv) (La Posta road north)	Minor shifts to avoid sensitive resources. Reduced access roads, added one construction yard.	Increased impact with the addition of the construction yard, with 400,000 square feet area and 40,000 cubic yards of terrain modification.
P140 to P142 (500 kv) (Thing Valley)	Alignment shifted south to avoid Jam property, adding two structures on CNF. Maximum shift 4700'. Moved pulling sites onto CNF.	Increased temporary and permanent impact on CNF. One structure in Back Country Non-Motorized Land Use Zone.

Figure 1. Cleveland NF west

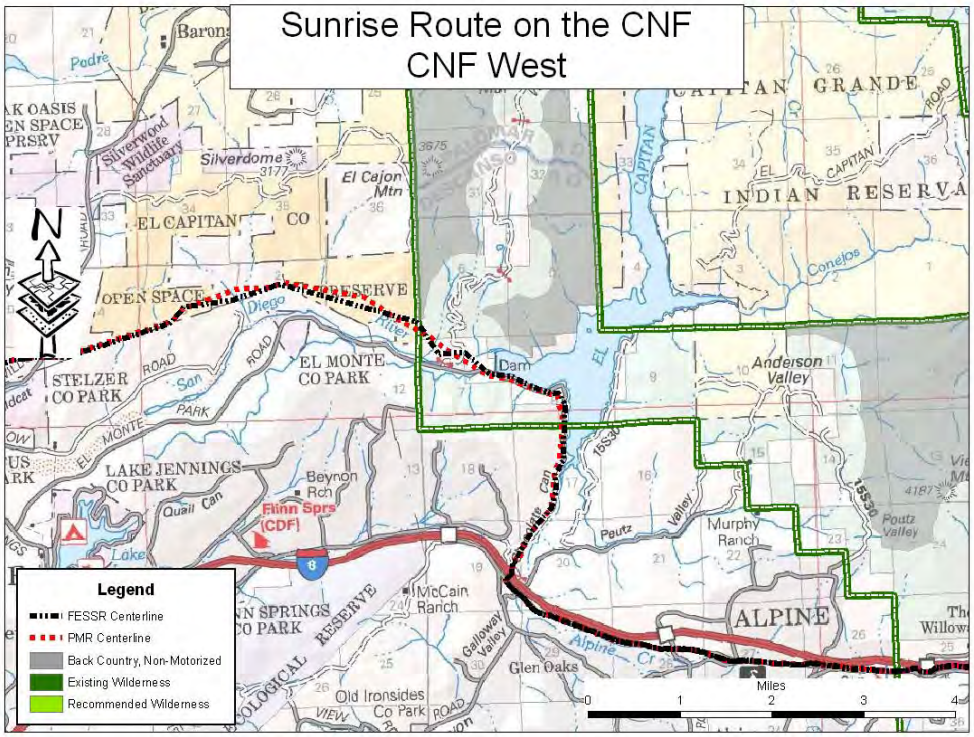


Figure 2. Cleveland NF central west

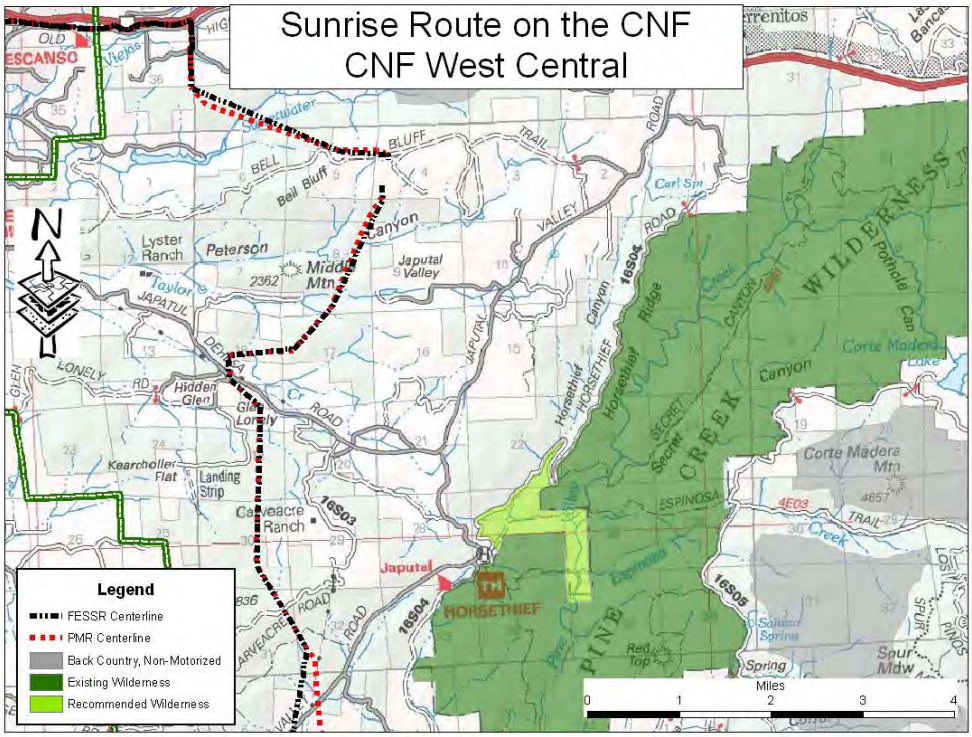


Figure 3. Cleveland NF southwest

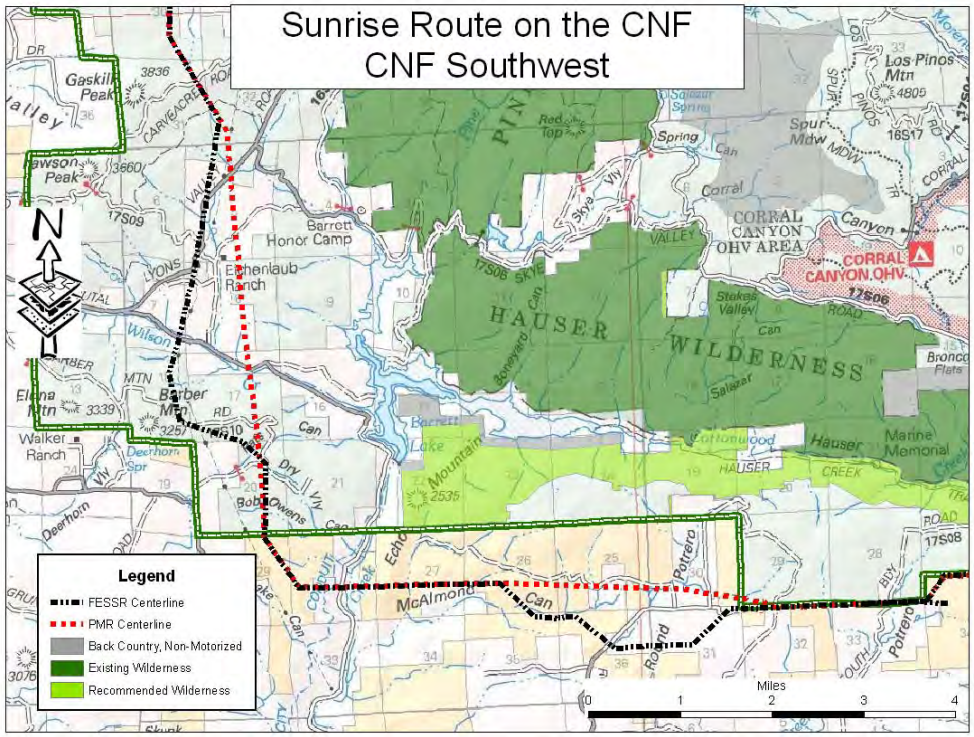
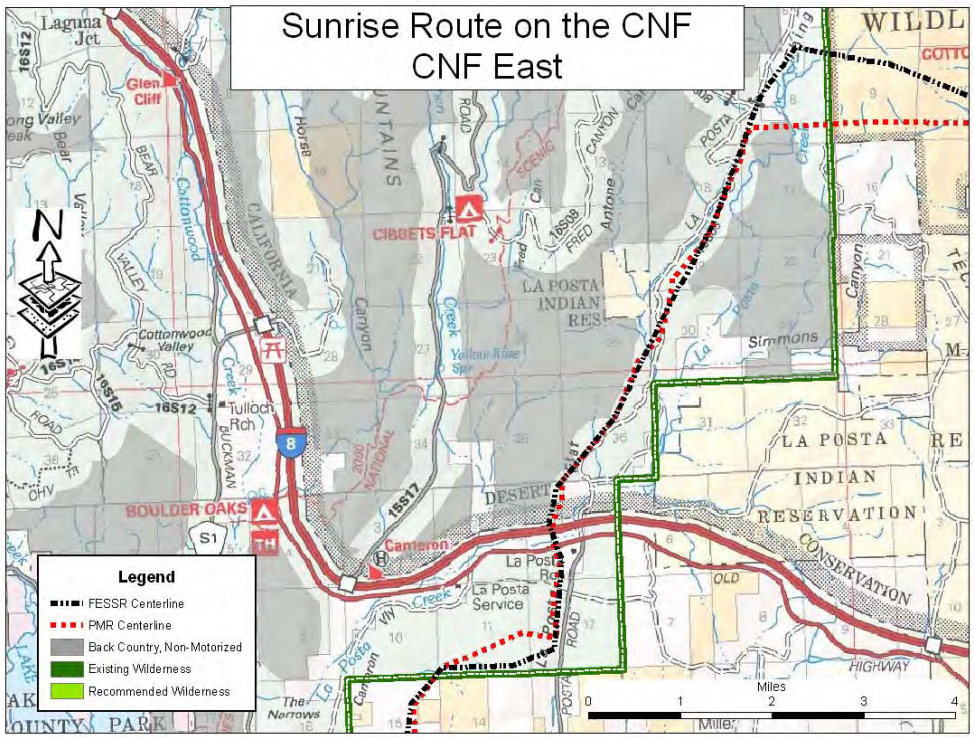


Figure 4. Cleveland NF east



The final PMR design includes locations for fly yards and helicopter landing areas. Fly yards proposed on private lands within proposed critical habitat for arroyo toads are being evaluated by the US Fish and Wildlife Service (FWS). Each tower constructed by helicopter will have a helipad (a constructed pad) or helispot (a cleared flat area) to support construction and maintenance activities, with a trail connecting the helicopter landing area to the tower. There are 48 helicopter landing areas identified on NFS lands. One fly yard and 15 stringing areas are proposed on the Cleveland NF.

SDG&E also proposed to add infrared lights to many of the proposed towers in response to a request by the U.S. Border Patrol (Border Patrol). These infrared lights will not be visible to the naked eye and will not change the appearance of the project at night. They will be visible to agency pilots with night vision goggles and will provide increased visibility for Border Patrol nighttime aerial operations.

Line markers (typically painted spheres) will also be installed in accordance with Federal Aviation Administration (FAA) regulations (Final EIR/EIS Chapter B.3.2.4). Line markers are generally required for lines spanning highways and in areas where lines are greater than 200' above the ground surface. Specific locations are identified in the PMR, Table 2-2.

Effects associated with the project modifications noted above are discussed below along with survey information for the modified alignment.

B. New circumstances or information

For some resource areas the analysis of the Final Environmentally Superior Southern Route Alternative was based on review and analysis of known information and assumptions about the presence or absence of specific resources. Although field surveys were conducted for some segments of the route, "end-to-end" surveys of biological resources, cultural resources, and jurisdictional waters were conducted after the project was approved by the CPUC and BLM. The discussion below identifies any new information provided by these surveys.

The FWS issued new regulations in September 2009 to implement the Bald and Golden Eagle Protection Act that specifically address permit requirements for take of Bald Eagles and Golden Eagles. FWS is developing guidelines to implement the new rules. The FWS also proposed new areas as critical habitat for arroyo toad. These new regulations and areas will apply to the project and be discussed in the biological resources section below.

1. Biological Resources

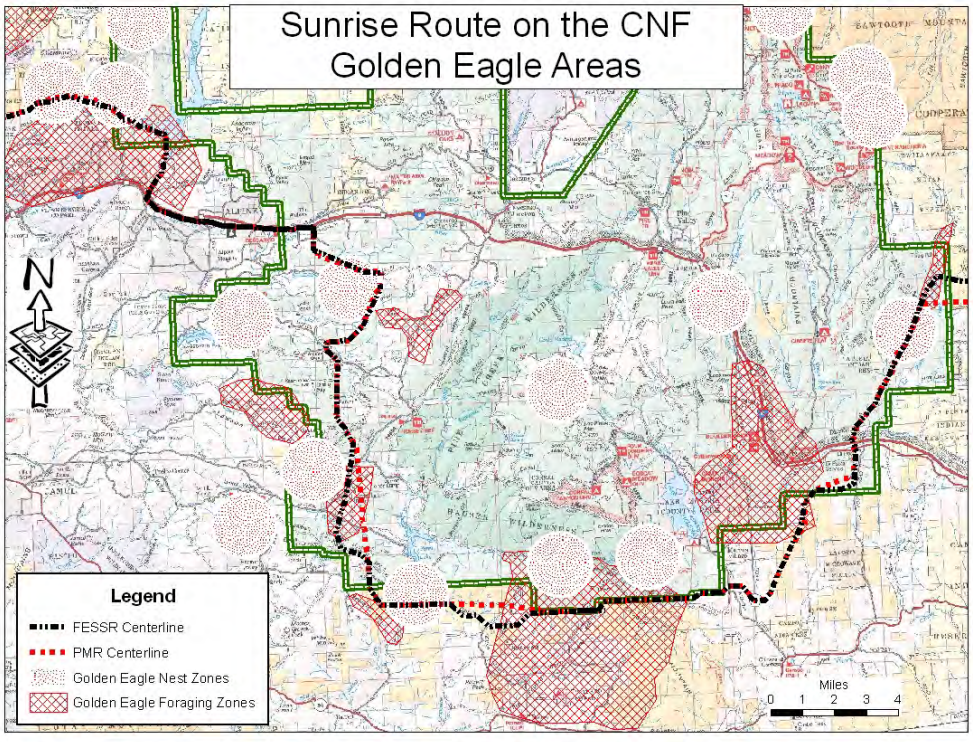
The impact of the selected alternative on biological resources is disclosed in the Final EIR/EIS in various sections of Chapter E (E.1.2 to E.4.2), depending on which segment of route is being considered. Assumptions were made on the presence or absence of certain species and habitat and impacts were quantified using the design disclosed in the Final EIR/EIS Appendix 11 (Map sheets 11C-53-55, 65-69, 78-84). A summary of the impacts for the four primary composite

routes, including the selected alternative was provided in Final EIR/EIS Appendix 8P. The Biological Opinion, issued January 16, 2009, provides summary impact tables for the selected alternative in Tables 2 and 3, and set habitat-based "take" thresholds.

Field resource surveys were completed for the April 2009 design. Revised habitat impacts are based on the revised design and the 2009 survey and habitat information. SDG&E is preparing the Biological Evaluation (BE) and Management Indicator Species (MIS) reports required by Forest Service Policy.

The Final EIR/EIS concluded that the project would have significant impacts to golden eagle nests in four areas (Final EIR/EIS Chapters E.1.3 to E.4.3, Impact B7h, and Appendix 8P). Mitigation measure B-7h would reduce those effects, but not below significant levels (page E 4.2-16). Based on the interim FWS guidelines, the revised alignment will potentially impact 9 total nest locations within the 4 mile radius used by the FWS to determine project effects (Figure 5). The Final EIR/EIS concludes that impacts could result in take of golden eagles (Final EIS/EIR Section D.2.4.1; E.4.2-15; E.4.2-21). SDG&E will be required to consult with the FWS to determine if a permit or further mitigation measures are necessary.

Figure 5. Golden eagle nest and foraging areas



Bald eagles were sighted near El Capitan Reservoir and Barrett Reservoir (http://www.sdnhm.org/ge_files/GE_atlas.html) during the San Diego Bird Atlas project (1997-2002). In spring 2010, bald eagles were observed at Corte Madera

Ranch, El Capitan Reservoir, and San Vicente Reservoir, indicating that they may be nesting in these areas. Project modifications have placed the alignment closer to bald eagle habitat at these locations. The Final EIR/EIS does not include these areas as bald eagle habitat and concludes that there will be no effect on bald eagles (page E 4.2-16). The new regulations define take to include disturbance, and the powerline construction could disturb wintering or nesting eagles at these locations. SDG&E will be required to consult with the FWS to determine if a permit or further mitigation measures are necessary.

The FWS proposed new areas as critical habitat for arroyo toad in October 2009. The selected alternative will permanently impact approximately 2.5 acres of the proposed habitat and temporarily impact 44 acres of this habitat (PMR, Table 3-7). The impact areas will be on private land but will affect toad populations on the Cleveland NF. The Final EIR/EIS concluded that the project would have significant impacts to arroyo toad (Final EIR/EIS Chapters E.1.3 to E.4.3, Impact B-7k, and Appendix 8P). Mitigation measures B-1a, 1c, 2a, and 7j would reduce those effects to below significant levels.

The addition of infrared lights to most towers is a new action that was not analyzed in the Final EIR/EIS. A large number of bird species migrate at night, and some forage during migration. Adding lights to most or all towers is likely to significantly increase the risk of collisions. The magnitude of this effect has not been quantified, so there is no meaningful basis for comparing the "no lights" option covered in the EIS with the new "many lights" alternative proposed in the Final PMR. Bats do not always echolocate when hunting, since some prey species can detect echolocation calls; adding lights to towers could increase effects on bats.

2. Cultural Resources

The potential for impacts to cultural resources associated with the selected alternative are generally disclosed in the Final EIR/EIS in various sections of Chapter E (E.1.7 to E.4.7), depending on which alternative of the originally proposed route is being considered. The potential for effects to cultural resources was disclosed based on the results of archival research and cultural resource surveys of the originally proposed route and a 30% sample of project alternatives, and were quantified using the design disclosed in the Final EIR/EIS Appendix 11 (Map sheets 11C-53-55, 65-69, 78-84). The potential for effects to known sites within the proposed route and alternatives was also discussed in Appendix 9AB, although many of the sites documented were listed as having insufficient information to reliably determine the potential for effects. Potential effects to cultural resources within the portion of the originally proposed route or alternatives that are within the Cleveland NF boundary were based on record searches of previously recorded sites.

The process by which compliance with the requirements of the National Historic Preservation Act (NHPA), specifically identification of and assessment of the

potential for effects to cultural resources would be completed for the project was documented by the development and execution of a project specific Programmatic Agreement (PA) by the BLM. The Cleveland NF was an invited signatory to the PA between the State Historic Preservation Officer (SHPO) and the BLM, and signed the PA along with SDG&E and other land management agencies associated with the proposed project.

The Area of Potential Effect (APE) for the selected alternative, including National Forest System lands, has been surveyed by a qualified cultural resource contractor retained by SDG&E (ASM Affiliates, Inc.). The surveys included Class III intensive pedestrian surveys, archival research, and a visual evaluation of the indirect impacts to the historic built environment.

During this Class III intensive pedestrian survey, a total of 33 sites were identified as being within the project area in the Cleveland NF. This includes both sites that had previously been recorded or reported and the newly recorded sites that were the result of the Class III survey effort. Twenty-seven of these sites were located and visited during the survey with 6 of the previously recorded sites not revisited or found. Among the total, ASM identified 22 new sites and remainder are previously recorded or reported resources on or immediately adjacent to the Cleveland NF. No National Register eligible historic-era properties were identified on the Cleveland NF within areas of potential indirect visual effects.

All unevaluated cultural resources on Cleveland NF lands are to be treated as historic properties for the purpose of the assessment of potential effects and all mitigation measures implemented in association with the proposed project, in accord with Part B of Section 1 (Scope and Objectives) of the RPA. Part B of the RPA specifically applies to the establishment and implementation of Environmentally Sensitive Areas (ESA) for the purpose of avoidance of potential effects to cultural resources contained in the Historic Properties Management Plan (HPMP). In accord with Stipulation III.D(3) of the RPA, all historic properties, and/or unevaluated properties that are within the APE will be managed and maintained in such a way that their potential National Register values are protected through avoidance and/or the implementation of ESA.

Potential effects to historic properties associated with the proposed project have been identified, and potential effects that cannot be avoided through modification and redesign of the proposed project will be avoided through the application of Standard Resource Protection Measures (SRPM). SRPM will include flagging and avoidance of archaeological sites, as defined in the Regional Programmatic Agreement (SRPM I(A)(1)). Flagged areas will be referred to as Environmentally Sensitive Areas (ESA) in management and construction documents associated with the project in an effort to maintain site location confidentiality.

Additional SRPM include the establishment of 10 meter wide buffer zones around mapped site boundaries (SRPM I(B)(1), notification of the project planner (in this

case, SDG&E cultural resources personnel and qualified consultants) (SRPM I(B)(2)), and monitoring of construction activities in proximity to identified cultural resources (SRPM I(E)), in accord with Stipulation III(D)(3)) of the Regional Programmatic Agreement (RPA). Protective flagging and/or staking will be installed by a qualified archaeologist prior to the implementation of any ground disturbing activity associated with the proposed project, and will include a 10-meter buffer from the mapped limits of archaeological site boundaries. The protective staking will be in place and maintained over the duration of the construction work in the vicinity of identified sites. The contracted archaeological field monitors will be responsible for maintaining the staking and for reporting any violations of the exclusion zones directly to the Cleveland NF heritage program manager.

With implementation of the required mitigation measures, there is no potential for effects to historic properties associated with the implementation of ground disturbing construction associated with the portion of the Final PMR design within the boundary of the Cleveland NF. Any inadvertent discovery of cultural resources outside of ESA during project related ground disturbance within the portion of the final route on the Cleveland NF will result in termination of the ground disturbing activity in the vicinity of the discovery, notification of the Cleveland NF heritage program manager, analysis of the discovery by a qualified archaeologist, consultation with appropriate parties (Native American tribes and qualified cultural resource management professionals), and the development, implementation, and documentation of appropriate avoidance, preservation, or mitigation measures prior to resumption of ground disturbing activities. Ground disturbing activities will not be resumed without the approval of the Cleveland NF heritage program manager, per the Historic Properties Management Plan and the Programmatic Agreement for the SRPL project.

The surveys found new sites that were not disclosed in the Final EIR/EIS for the proposed project. However, the survey results and the "No Effect" determination based on the implementation of mitigation is within the scope of inventory activities described and potential for effects considered in the Final EIR/EIS, and is consistent with the requirements of the Land Management Plan (LMP) and the stipulations of the RPA.

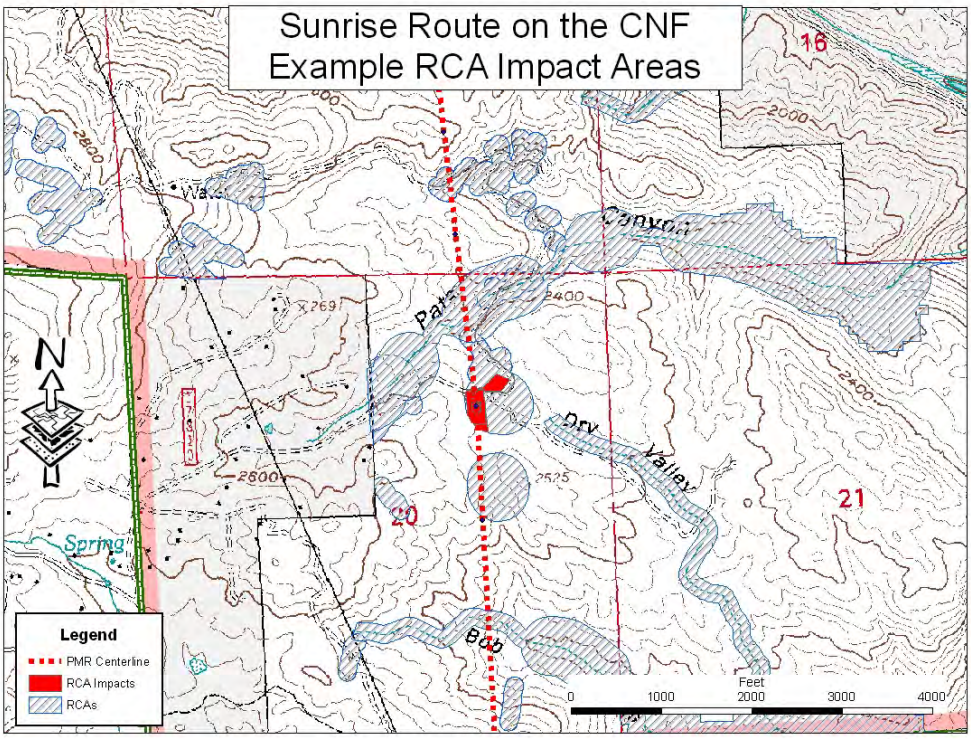
3. Riparian Conservation Areas, Jurisdictional Waters, and water use

The LMP designates Riparian Conservation Areas (RCAs) along streams, lakes, ponds, and other water features (LMP, Part 2, pg. 95). LMP design criteria (LMP Part 3, S47) require application of the Five-Step Project Screening Process for Riparian Conservation Areas as described in LMP Part 3, Appendix E. Under the LMP, actions in RCAs must either have neutral impacts or move the area closer towards the desired conditions. If actions do not meet that threshold, there is a need to modify the project proposal, deny the proposal, or complete a project-driven land management plan amendment (LMP Part 3, Appendix E, page 66).

The impact of the selected alternative on RCAs is disclosed in the Final EIR/EIS in various sections of Chapter E (E.1.2 to E.4.2), depending on which segment of route is being considered. The Final EIR/EIS Chapter E discussion is based on the Appendix 11 project design, and supported by additional analysis in Final EIR/EIS Appendix 8Q. The Appendix 8Q analysis used RCA maps provided by the Cleveland NF to determine if project facilities or activities would occur within RCAs. These RCA maps are generally used for planning purposes and were developed from existing topographic mapping of streams combined with suitable habitat for riparian dependant species. Water features depicted on these maps are not field verified. Based on the analysis in Appendix 8Q, the selected alternative proposes project features within 12 RCAs. Unless the final design avoided RCAs, the Final EIR/EIS concluded that effects would be significant and not mitigable.

Field surveys for jurisdictional waters were completed for the final project design. These field surveys were used to support applications for Clean Water Act permits and water quality certification. The field based jurisdictional water mapping documented additional water features meeting RCA designation standards. SDG&E staff and consultants incorporated this new information into the RCA map. Revised RCA impacts are based on the revised design and the survey information and were incorporated in the analysis (PMR Tables 3-9, 3-10, 3-11, and 3-15). Figure 6 provides an example of the RCA mapping and expected impact within RCAs. The final project design will have greater permanent impacts to RCA's and fewer temporary impacts when compared to the effects disclosed in the Final EIR/EIS. This increase in expected impacts is due to better mapping of waters of the US and associated RCAs. Based on the analysis approach used in the Final EIR/EIS, the impacts to RCAs from the Final PMR design are significant and not mitigable. The new information on the effects of the Final PMR design is within the scope of activities and effects considered in the Final EIR/EIS.

Figure 6. Example RCA mapping



The Final EIR/EIS estimates for project water use are summarized in Chapter B Table B-4a. The Final EIR/EIS evaluated project impacts for the selected alternative based on the assumption that water would be obtained from the Imperial Irrigation District in Imperial County and the San Diego County Water Agency in San Diego County, or local reservoirs (E.1.14 to E.4.14) depending on which segment of route is being considered. The impacts of this proposed use were less than significant. SDG&E revised their proposal to use local groundwater and now plan to use water from the sources described in the Final EIR/EIS. SDG&E filed a Water Resources Availability Study with the CPUC and BLM in April 2010 and provided a summary of effects in the PMR Section 3.3.10.2. Based on the current SDG&E proposal, the project impacts would be within the scope of the Final EIR/EIS analysis.

4. Visual Resources

The impact of the selected alternative on visual resources is disclosed in the Final EIR/EIS in various sections of Chapter E (E.1.3 to E.4.3), depending on which segment of route is being considered. A viewshed report was also completed for the routes crossing the Cleveland NF and is presented in Final EIR/EIS Appendix 14. The analysis was based on the Final EIR/EIS Appendix 11 design. Impacts were presented in narrative form and illustrated with photographic simulation from key viewpoints. Even with mitigation designed to minimize the visual impact, construction of the transmission line was expected to have long term

impacts on landscape character and visual quality that were inconsistent with LMP Scenic Integrity Objectives (LMP Part 3, S9 and S10).

The Final EIR/EIS discloses that minor grading may be needed for some temporary pulling and tensioning sites (Final EIR/EIS B.4.1.1) and clearing for construction staging areas (Final EIR/EIS B.4.5). The extent of visible ground disturbance from grading related to temporary work areas was not displayed in the visual simulation analysis of the Final EIR/EIS, but was described in the narrative analysis for Impact V-2 (Final EIR/EIS E.1.3.2 to 4.3.2). The grading associated with the Final PMR design exceeds most common definitions of minor in at least four of 15 stringing areas proposed for the Cleveland NF. The construction area grading is considered temporary and will be restored to original contours, but as described in the Final EIR/EIS, the disturbance can be long-lasting (several years) in arid and semi-arid environments where vegetation recruitment and growth are slow.

Visual resource impacts of the April 2009 and September 2009 design have been reduced by eliminating roads, limiting grading, and relocating towers to less visible positions. Additional visual simulation work was done for the Interstate 8 crossing at La Posta and the Star Valley Option. Even though these modifications have reduced some of the visual impact, the Final PMR design will have significant impacts on visual resources. The impact on the landscape character was noted in particular for the La Posta Valley in the Moreno Place (Figure 7).

Figure 7. Thing Valley, headwaters of La Posta Creek

5. Fire

The impact of the selected alternative on fire and fuels is disclosed in the Final EIR/EIS Chapter D15 and in various sections of Chapter E (E.1.15 to E.4.15), depending on which segment of route is being considered. The analysis considered the potential for the project to start wildfires and the potential for the project to interfere with fire suppression actions. The analysis used a fireshed approach to evaluate the impacts associated with the project. Firesheds are regional landscapes that are delineated based on fire history, fire regime, vegetation, topography, and potential wildfire behavior (Final EIR/EIS D.15.1).

Fire history data was obtained primarily through the California Department of Forestry and Fire Protection Fire and Resource Assessment Program (FRAP) and supplemented with local data. FRAP has been working cooperatively with the Forest Service to compile a seamless inventory of fire data throughout California, so the FRAP data set includes all Forest Service records. FRAP describes the methodology for the data set at:

http://frap.cdf.ca.gov/projects/fire_data/fire_perimeters/methods.asp.

Firesheds within the Cleveland NF are well represented in this data with over 50 years of data.

The various transmission alternatives were compared in several different locations within the Final EIR/EIS, including the Executive Summary (Final EIR/EIS Section ES.8.2, Table ES-3), the Response to General Comments (GR-9), and the Comparison of Alternatives chapter (Final EIR/EIS Chapter H, Table H-25). The analysis concludes that the selected alternative will have a significant impact on the potential to start wildfires during project construction and through operation and maintenance of the line. The selected alternative will also reduce fire suppression effectiveness adjacent to the line. Mitigation can reduce the impacts but not below the significance level established in the analysis. There are typographical errors in Chapter H, Table H-25, for the estimates of miles of fire suppression conflict. The correct values are summarized in Table GR.9.3. The discussion in GR-9 concludes that the preferred northern and preferred southern routes are equivalent in fire risk.

The San Diego County Fire Authority, working with the San Diego County Planning Department, analyzed the assets at risk from the fires modeled in the Final EIR/EIS using the county's assessor parcel data, and provided this analysis to the Forest Service on May 26, 2010. Their estimate of assets at risk (3,217) was greater than the estimate disclosed in the Final EIR/EIS (1,380). In discussion with county staff, they also pointed out that the limitations of the Final EIR/EIS model (as described in General Response G-9) did not account for modeled fire spread outside of the Final EIR/EIS firesheds.

6. Land Management Plan Consistency

Consistency with the Cleveland NF Land Management Plan (LMP) is discussed in two sections of the Final EIR/EIS. Final EIR/EIS Chapter D.16 discusses the LMP and describes the three interrelated documents that provide direction and policies for the Cleveland NF, while evaluating the proposed action and the alternatives consistency with the plan components. Final EIR/EIS Chapter D.17 describes the LMP amendment process and evaluates the LMP amendments needed to approve the proposed action or the alternatives.

As described in Final EIR/EIS Chapter D.16, the Cleveland NF LMP consists of three interrelated documents. Part 1 is the vision for the forest expressed through goals and desired conditions. Not every goal and desired condition is implemented by or applicable to every site-specific project. As described in the LMP, desired conditions are not commitments and may only be achievable over the long term. (LMP Part 1, page 2). Goal 4.1 is applicable to the proposed project and provides that energy development should be managed to facilitate energy production while protecting ecosystem health. This goal is implemented through the strategic direction provided in Part 2 of the LMP, which consists of program strategies (Appendix B) and suitable uses consistent with the achievement of the desired conditions in Part 1 (LMP Part 2, page 2). Part 2 establishes suitable uses through land use zones. Part 3 contains LMP standards, which are mandatory requirements that apply to site-specific projects.

Final EIR/EIS Chapter D.16 summarized the LMP consistency analysis in tabular form. Table 3 summarizes the review of the Final PMR design for the LMP Part 2, Cleveland NF specific design criteria, and LMP Part 3 standards that had a "NO" or "MAYBE" conclusion in the Final EIR/EIS.

Table 3. Review of the Final PMR design for LMP consistency

LMP Standard	Final EIR/EIS Conclusion	Final PMR design consistency	Comments
CNF S12 - Pacific Crest Trail (PCT)	No	Yes	The Final PMR design does not cross the PCT on National Forest System lands. The BLM incorporated mitigation measures WR-2b and 2c to address the PCT
S9 – Scenic Integrity Standards(SIO)	No	No	No change in effects
S10 – SIO exceptions	No	No	No change in effects
S11 – Project specific design criteria for threatened, endangered, proposed, candidate or sensitive species	Maybe	Yes	The application of the required biological mitigation measures, including habitat compensation, will comply with this standard.
S12 – Conservation practices	Maybe	Yes	The application of the required biological mitigation measures, including habitat compensation, will comply with this standard.
S47 - RCAs	Maybe	No	The Final PMR design did not avoid RCAs.

Chapter D17 discusses policy direction for the LMP amendment process and distinguishes between changes that are not significant or significant based on criteria described in the Forest Service Handbook (FSH) 1909.12. The Forest Service direction referenced in Chapter D.17 was revised based on court rulings revoking the 2005 Planning Rule, and direction for amending plans is now found in Forest Service Manual (FSM) section 1926.5.

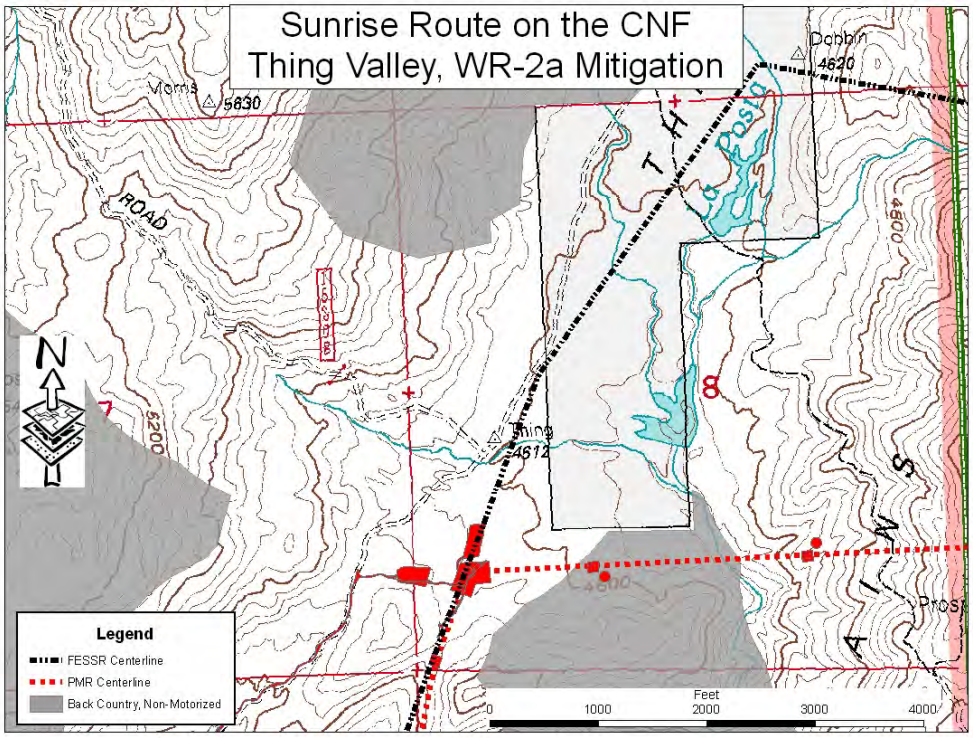
The Forest Service Public Notice issued May 15, 2010 identified the need for three LMP amendments. A discussion of the amendments associated with the Scenic Integrity Objectives and RCAs was provided in previous sections of this SIR. The Land Uses Zone amendment is discussed in the following section.

The management intent of the Back County Non-motorized Land Use Zone (BCNM) is to retain the undeveloped character and natural appearance of this zone. Large transmission lines introduce a dominant industrial form that alters the naturally appearing landscape to developed lands that require intensive management and attract unauthorized uses (Final EIR/EIS Sections E.1.3.2 to

E.4.3.2), and locating a transmission line in this zone is not consistent with the LMP (Final EIR/EIS D.17.2.3).

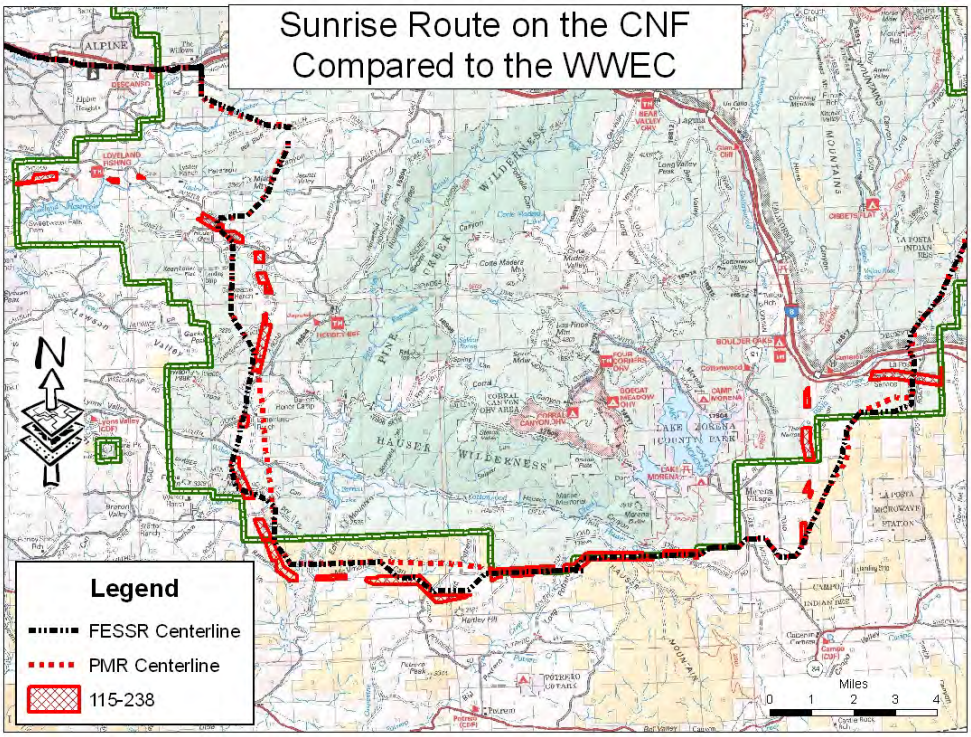
In the Final EIR/EIS there were no project features proposed within the BCNM land use zone (Final EIR/EIS Table D.17-3). Mitigation Measure WR-2a requires that the alignment "shall avoid Back County Non-Motorized land use zones on the Cleveland National Forest" (BLM ROD Appendix A). SDG&E considered several alternatives to implement this measure in consultation with the Forest Service. The other alternatives considered impacted private land, sensitive resources, and riparian habitat (Final PMR page 3-47). The design proposed by SDG&E in the Final PMR in response to Mitigation Measure WR-2a would place one tower and 1,500 feet of Right-of-Way in BCNM land use zone (Figure 8).

Figure 8. Implementation of Mitigation Measure WR-2a



The Final EIR/EIS disclosed the Modified route D location relative to the proposed West-Wide Energy Corridor (WWEC) 115-238 (Final EIR/EIS Chapter E.4.1.1). The Forest Service decision for the WWEC Programmatic EIS designated 10 miles of corridor 115-238 within the Cleveland NF on January 14, 2009. Corridor designation identifies preferred locations for future utility proposals. The Sunrise Powerlink overlaps with 1.3 miles of the designated corridor, and creates a new parallel ROW outside of the remaining designated corridor (Figure 9).

Figure 9. Location of the WWEC



The selected alternative does not cross any Inventoried Roadless Area. Because the selected alternative is designed to support future transmission system expansion, the Final EIR/EIS does describe and analyze several alternative expansion scenarios, including routes in Inventoried Roadless Areas. The expansion is possible because the 500 kV portion of the project delivers approximately twice the capacity of the projects two 230 kV circuits (Final EIR/EIS Section B.2.7.1). The various expansion scenarios are described in the Final EIR/EIS section E.1.1.5, and the option through the roadless area is one of three possible expansion routes. The BLM and CPUC decisions did not include expansion, and a proposal for expansion is not before any agency at this time.

C. Interdisciplinary Review

As directed by Forest Service policy, the SIR documents the interdisciplinary review of changed circumstances and new information. The Interdisciplinary Team (IDT) began their review of the Special Use Application in January 2009. The review included two field trips and numerous IDT meetings.