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Agriculture

Forest
Service

Cleveland National Forest
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Date: MAR 12 2008

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RE: Forest Service Preliminary Comments on the Draft Environmental Impact Report /
Environmental Impact Statement (Draft EIR/EIS) for the Sunrise Powerlink Project. (SCH No.
2006091071, DOI Control No. DES-07-58)

Dear Ms. Blanchard and Ms. Kastoll:

I have completed my initial review of the Sunrise Powerlink Project Draft EIR/EIS and offer these preliminary comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM). These preliminary comments may be useful to those parties participating in the CPUC Phase 2 proceedings for the Certificate of Public Convenience and Necessity (Proceeding A-06-08-010). I will be filing detailed comments on the Draft EIR/EIS by April 11, 2008.

Introduction

Although the proposed Sunrise Powerlink Project would not occupy any National Forest System (NFS) lands, several project alternatives would. If an alternative that uses National Forest System (NFS) lands is selected, I must decide whether to issue a special use authorization under the authority of the Federal Land Policy Management Act (43 USC § 1761). The regulations promulgated by the Council on Environmental Quality for the National Environmental Policy Act (NEPA regulations) provide that agencies with jurisdiction by law shall be a cooperating agency (40 CFR 1501.6). The Forest Service is a cooperating agency with the BLM because of our jurisdiction over several of the alternatives. These preliminary comments are offered pursuant to Part 1503 of the NEPA regulations (40 CFR 1503).

Forest Service involvement improves the efficiency of the regulatory review process, and is consistent with direction in Section 1221 of the Energy Policy Act of 2005 (EPAct) to coordinate the Federal Agency environmental review of proposed transmission projects. I intend to use the Final EIR/EIS to support my evaluation of the selected route if that route occupies NFS lands. If the NEPA analysis conducted by the CPUC/BLM does not meet Forest Service NEPA policy or provide the record necessary to support the findings required by other statutory requirements, a decision regarding the special use authorization would not be likely without preparing a supplement to the EIR/EIS.



Alternatives Considered

By letter of March 16, 2007, Acting Forest Supervisor Peggy Hernandez provided detailed comments on the proposed alternatives, and recommended that several of the proposed alternatives be eliminated from detailed study because of inconsistencies with the Cleveland National Forest Plan and for other unacceptable environmental effects. Forest Supervisor Hernandez also described the Forest Service special use screening process that would be applied to a proposal before it would be accepted for processing as an application for a special use on NFS lands. As describe in that letter, if an alternative that uses NFS lands is selected, it would first be screened to determine if it would be accepted as an application. I am providing my initial review of the proposed action and alternatives in the context of the criteria I will use to screen the selected alternative for consideration. A complete description of the screening criteria can be found in Title 36 Code of Federal Regulations Section 251 Subpart B.

Proposed Action – The Proposed Action does not utilize any NFS lands, and a permit from the Forest Service would not be required.

CNF Existing 69 kV Route – This alternative, which is included in the Environmentally Superior Northern Route Alternative, crosses a short (0.5 mile) section of the Cleveland National Forest in an area designated as Developed Area Interface Land Use Zone (LUZ), along the existing 69 kV power line right-of-way (ROW). Utility ROWs are consistent with this land use zone. The Scenic Integrity Objective (SIO) is mapped as High. Although the alternative potentially conflicts with the SIO, additional analysis would be needed to determine if this conflict could be mitigated. The Final EIR/EIS should identify a key viewing point for this alternative and simulate the visual impact after incorporating the design elements identified in the Scenic Conservation Plan required by mitigation measure V-45a.

BCD Route and BCD South Option – As identified in Forest Supervisor Hernandez’s March 16 letter, the BCD Route crosses several areas designated Back Country Non-Motorized LUZ. Major power lines are not consistent with this zone. It does not appear that the conflict with the Forest Plan could be resolved by reroutes or mitigation, particularly west of milepost 14. The BCD route would not meet the screening criteria and would not be accepted as an application for a special use on NFS lands.

The CPUC and BLM added the BCD South alternative to the analysis after the public scoping period. Although the majority of the BCD South option is consistent with the Back Country LUZ, it utilizes a portion of the BCD route south of “Thing Valley” between milepost 12 and 14 that crosses an area designated as Back Country Non-Motorized. Major power lines are not consistent with this zone. The BCD South Option could also conflict with the High SIO mapped for the area, particularly where it crosses Interstate 8.

In order to accept this route, I would require this route to be rerouted between milepost 12 and 14 to avoid the conflict with the Forest Plan. The Final EIR/EIS should also simulate the visual impact from key view point 79 after incorporating the design elements identified in mitigation measure V-45a, Scenic Conservation Plan. Some specific measures that may be applicable to

this area include changing the support tower type and color, reducing or eliminating roads, and moving the alignment south of Interstate 8 to avoid skylining of support towers.

Interstate 8 Routes – As identified in Forest Supervisor Hernandez’s March 16 letter, the Interstate 8 Route on the Cleveland National Forest (primarily west of BCD south at milepost 51 and east of Modified Route D at milepost 71) has numerous conflicts with the Forest Plan, including conflicts with LUZ designations, Proposed Research Natural Areas, and SIO’s. The potential impact of the transmission line on emergency operations in this highly used transportation corridor is of great concern. The Buckman Springs Underground Option would mitigate some of these concerns for a short segment of the route. It does not appear that the remaining conflicts with the Forest Plan could be resolved by reroutes or mitigation, unless an underground route was possible for the entire length. As currently described in the Final EIR/EIS, the Interstate 8 route on the Cleveland National Forest (primarily between BCD south and Modified Route D) would not meet the screening criteria and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands.

Route D - As identified in Forest Supervisor Hernandez’s March 16 letter, Route D has conflicts with the Forest Plan Back Country Non-Motorized LUZ, and Inventoried Roadless Areas. It also creates an impact parallel to the existing 69 kV line, in conflict with the Forest Plan direction to co-locate facilities to reduce impacts.

The conflict with the Forest Plan direction and Inventoried Roadless Area would be difficult to resolve or mitigate. As described in the March 16, 2007 letter, activities in Inventoried Roadless Areas are subject to the Roadless Area Conservation Rule. Although the Draft EIR/EIS states that no new roads would be constructed in roadless areas (measure T-11a, Draft EIR/EIS page E.3.9-3), the detailed alternative maps in Appendix 11 (Draft EIR/EIS Figure Ap. 11C-72) show an extensive system of roads proposed within the roadless area. Even if helicopters are used to support construction, several new roads in the Inventoried Roadless Area would be required to provide road access to the proposed pulling sites.

As currently described in the Final EIR/EIS, Route D would not meet the screening criteria, and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands.

Modified Route D - The Modified Route D alternative, which is the primary component of the Environmentally Superior Southern Route Alternative that is located on NFS lands, is generally compatible with the Forest Plan Land Use Zone (LUZ) designations in all areas except the area to the south of Morena Lake near milepost 10. The proposed transmission line and access roads cross through the edge of an area designated as Back Country Non-Motorized. In order to accept this route, I would require a slight modification of alignment, and relocation or elimination of access roads to avoid this conflict.

Modified Route D is co-located along a portion of the route with an existing 69 kV. Co-locating the facilities is consistent with the Forest Plan. A significant portion of Modified Route D is also located within a proposed federal “West-wide Energy Corridor”. The corridor, proposed under

section 368 of the 2005 Energy Policy Act, would be designated by the Chief of the Forest Service through a Forest Plan amendment. Based on the current schedule for the West-wide Energy Corridor Project, the Record of Decision for the corridor designation would be issued sometime in late summer 2008. Utilizing designated corridors for new utility proposals is also consistent with Forest Plan direction.

There are some additional changes in alignment and design to reduce the overall effects of the project on National Forest resources that I am evaluating with my staff. I'll provide those changes in my detailed comments that will be filed by April 11, 2008.

LEAPS - As discussed in Section E.7.1.1, I agree that the LEAPS transmission-only alternative could be built by any of a number of entities; however, the applicant on record with the Forest Service is currently the Elsinore Valley Municipal Water District (EVMWD). As noted in the Draft EIR/EIS, my consideration of the transmission-only project is pending the LEAPS hydroelectric project currently before the Federal Energy Regulatory Commission. If the CPUC and BLM were to select the LEAPS transmission-only alternative, a Forest Service decision on that request would be deferred until the FERC process was complete.

Potential Expansion and Mixed Circuit Capacity

The proposed action and alternatives start in the Imperial Valley with a 500 kV circuit, which transitions through a new substation to a double 230 kV circuit that continues on to northern San Diego County. In all cases, future expansion as described in Section B.2.7, Section E.1.2 and Figures B-1 and E.1.1-6 of the Draft EIR/EIS would be required to utilize the capacity of the 500 kV line. The underlying purpose and need (40 CFR 1502.13) for a 500 kV line to these intermediate substations is only justified if the expansion opportunities are needed. If expansion opportunities are needed, they would qualify as connected actions under NEPA (40 CFR 1508.25(a)(1)), and should be discussed in detail in the Final EIR/EIS.

I recommend that the CPUC and BLM adopt the following changes to the alternatives to clarify the analysis and disclose the effects of future expansion as it relates to the Cleveland National Forest.

The CPUC and BLM should identify and evaluate an option that excludes expansion of the proposed action northwest of the proposed Central East Substation through the Cleveland National Forest along the San Luis Rey River (as shown on Figures B-1, B12a, and B-12b). This route traverses an area constrained by a Critical Biological LUZ below the road, and a Back Country Non-Motorized LUZ above the road. It would be unlikely that a 230 kV or a 500 kV line would fit within the narrow gap between the two constraining land allocations. If the potential for 230 kV or 500 kV expansion is desirable and needed, then a route that is consistent with the Forest Plan should be identified and analyzed.

The superior southern route should be modified to increase the circuit capacity through Alpine to match the capacity of a 500 kV circuit. This could be accomplished by a four circuit 230 kV duct vault as described in Section E.1.2 of the Draft EIR/EIS, or it could be accomplished by switching to an underground gas insulated transmission line (GIL's) operating at 500 kV, using

the same technology proposed for the underground segments of the proposed Telega-Escondido to Valley-Serrano transmission line (LEAPS). The GIL's would require less space than a four duct 230 kV system, require fewer vaults, and would eliminate the need for a 500/230 kV substation.

The CPUC and BLM should drop the Route D alternative from consideration as an expansion area in Section E.1.2. As described above, this route is inconsistent with the Forest Plan and conflicts with the Roadless Conservation Rule. It is unlikely that expansion would be authorized in this area.

The location of the Modified Route D substation should be re-evaluated in light of the potential for expansion through Alpine. Based on Figure E.1.1-6, the most likely expansion scenario would bring an additional circuit south in parallel with the initial 500 kV line, before turning west. A better option would be to locate the substation closer to the likely junction with the western expansion (near milepost 25), eliminating the potential dead-end situation at the proposed substation location.

Forest Service Design Considerations for alternatives on NFS lands

I would like to see the project design, as reflected in the alternative description and detailed alternative maps, incorporate the following design and mitigation measures to minimize impacts to National Forest resources:

Minimize road construction – additional access roads should be minimized. Roads will not be authorized on terrain greater than 15% in slope. Temporary roads necessary to access pulling areas will need to be fully restored. These design restrictions should be reflected on the maps in Appendix 11, which currently show an access road to every tower location. Approved access roads will be limited to administrative use only.

Incorporate measures to reduce visual contrast – design elements described in the Scenery Conservation Plan required by Mitigation Measure V-45a (Draft EIR/EIS Appendix 12 page 54) should be incorporated into the description of alternatives and evaluated as part of the environmental effects. The current visual analysis is based on the effects of using galvanized lattice towers. The Scenery Conservation Plan requires consideration of several options for support towers, conductors, vegetation clearing, and roads, which should reduce the overall visual impact of the project.

Avoid sensitive areas – project related facilities such as roads and staging areas should be designed to avoid known sensitive habitat areas, including riparian zones and meadow areas as described in part by Biological mitigation measure B-2c (Avoid Sensitive Areas, Draft EIR/EIS Appendix 12 page 13). When these sensitive areas are included in identified impact areas as shown on the maps in Appendix 8J, the analysis should describe why those areas cannot be avoided.

Integrated Vegetation Management – The Forest Service supports the implementation of Integrated Vegetation Management as described in the Memorandum of Understanding between

the Forest Service, Interior Agencies, and the Environmental Protection Agency. The Draft EIR/EIS should specifically disclose the extent and locations of proposed vegetation management treatments so the effects of project operation on habitat, water quality, and other resources can be evaluated.

Mitigation specificity and effectiveness – Future connected actions that are identified in mitigation measures, such as the fuelbreaks required by mitigation measure F-3a (Construct and Maintain Fuelbreaks, Draft EIR/EIS Appendix 12 page 108), should be identified and analyzed in the Final EIR/EIS. Deferring analysis of these connected actions fails to consider the effects of the alternatives as required by NEPA.

Other Statutory Requirements

If an alternative that uses NFS lands is selected by the CPUC and BLM, and accepted as an application by the Forest Service, any potential decision to authorize that use needs to make certain findings related to the consistency of the project with applicable statutes. The Forest Service would use the Final EIS to support the consistency findings that are made in my Record of Decision. Based on my initial review, the analysis of alternatives needs additional disclosure to fulfill other applicable environmental reviews or consultation and to support the findings necessary for compliance with the following statutory requirements (40 CFR 1503.3(c)):

National Forest Management Act - Forest plan consistency

Riparian Conservation Areas – The Forest Plan directs that the Cleveland National Forest manage Riparian Conservation Areas (RCA's) to maintain riparian dependant resources. The Draft EIR/EIS describes the process used to identify and screen projects in RCA's on page E.1.2-5. It is not clear that the five step process was applied and the alternatives screened in accordance with Forest Plan direction. I recommend that the CPUC and BLM identify RCA's for alternatives on NFS lands, and disclose the results of the five step screening process in the Final EIR/EIS. Project design elements and mitigation measures should be evaluated to determine if the project effects are consistent with RCA direction.

Endangered Species Act (ESA) and Forest Service Sensitive Species

Forest Service policy requires that we complete a Biological Evaluation (an internal Forest Service document that describes the effects of the project on Forest Service Sensitive Species) and the ESA process prior to a decision. The Biological Evaluation is typically completed in conjunction with the Final EIS, and is based on the Forest Service Preferred Alternative. The ESA consultation is also completed around that time, and the results of any Biological Assessments are incorporated into the Final EIS, including the determinations made for the affected species. Ideally any Biological Opinions issued as part of that process are incorporated in the Final EIS, including a description of reasonable and prudent measures if required. If the BLM Preferred Alternative (which remains to be identified) includes NFS lands, I recommend that the Biological Evaluation and Biological Assessment be complete for that alternative, and the results of the consultation be incorporated into the Final EIR/EIS.

Clean Water Act

The State Water Resource Control Board designated the Forest Service as the Water Quality Management Agency for NFS lands in California in 1981. The Forest Service meets its obligations for compliance with water quality standards by implementing state certified and Environmental Protection Agency approved Best Management Practices (BMPs). Practice 7-5 requires that special use permits include measures to protect water quality, including conformance with other water quality agency permit requirements.

The Draft EIR/EIS does not delineate jurisdictional waters or wetlands at this time; instead it uses a vegetation proxy to identify potential areas. Based on the proxy, the Draft EIR/EIS concludes that the project or the alternatives would impact jurisdictional waters. Rather than working within the uncertainty caused by using a proxy, I recommend that the CPUC and BLM identify jurisdictional waters and consult with the Army Corps of Engineers and the Regional Water Quality Control Board, and include the results of that consultation in the Final EIR/EIS.

Clean Air Act

The Final EIS/EIR should provide a focused air quality impact evaluation of project emissions by alternative, air pollution control district and proximity to wilderness areas. Summarizing construction, operations and maintenance emissions in this manner assists the air districts and federal and state land managers in determining the significance of the project on public health and welfare, the State Implementation Plan (SIP), and wilderness Air Quality Related Values. The Forest Service needs this data to support my findings under the general conformity requirements of the Clean Air Act. Project emission organized in this manner will greatly clarify the need for any mitigation to meet Ambient Air Quality Standards and project compatibility with the various SIPs.

National Historic Preservation Act (NHPA)

Forest Service policy requires that compliance with the NHPA be complete prior to a decision to authorize an action. As described in the Draft EIR/EIS Section D.7.7, the BLM, as lead Federal Agency, will be complying with the NHPA in a phased approach as allowed by Section 106 of the NHPA. The Forest Service would typically implement this phased approach under a programmatic agreement executed pursuant to 36 CFR 800.14(b), prior to a decision. I recommend that the CPUC and the BLM identify what method of phased identification will be used, and disclose the details of that method in the Final EIR/EIS. If the CPUC and BLM select an alternative on NFS lands, any decision that I might make to authorize that use would be deferred until the 106 process is complete.

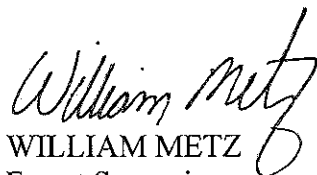
Conclusion

The Forest Service offers these preliminary comments on the Draft EIR/EIS for the Sunrise Powerlink Project, and will file additional detailed comments by April 11, 2008. I would require that Modified Route D and the BCD South Option be realigned in specific areas to be consistent with the Forest Plan before accepting those routes for further consideration. I also recommend

several changes to the alternatives to clarify the disclosure of effects associated with future expansion. I would like to see the Final EIR/EIS incorporate and disclose the effects of the alternative after evaluating several design factors. Finally, I recommend additional analysis to support my findings required by other laws should an alternative that uses NFS lands be selected by the CPUC and BLM. This additional analysis is necessary for the Final EIR/EIS to meet Forest Service policy, and to reduce the potential for delay or supplemental analysis.

I would be glad to meet at your convenience to discuss these comments. Please contact Project Manager Bob Hawkins at (707) 562-8699 or by email at rhawkins@fs.fed.us to arrange a meeting.

Sincerely,


WILLIAM METZ
Forest Supervisor



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Date: April 10, 2008

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**RE: Forest Service Final Comments on the Draft Environmental Impact Report /
Environmental Impact Statement (Draft EIR/EIS) for the Sunrise Powerlink Project (SCH
No. 2006091071, DOI Control No. DES-07-58)**

Dear Ms. Blanchard and Ms. Kastoll:

I have completed my review of the Sunrise Powerlink Project Draft EIR/EIS and supporting documents and offer these final comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM). These final comments incorporate by reference my initial March 12, 2008 comments, with the following clarification regarding the Interstate 8 (I-8) alignment. On page 3 of my initial comment letter, I described the conflict between the I-8 alignment and the Cleveland National Forest Land Management Plan (LMP). To clarify, the section of the I-8 alignment with the greatest conflict is west of milepost 51 (where the BCD South route crosses the I-8 alignment) and east of milepost 71 (where the Modified Route D route rejoins the I-8 alignment). My final sentence of that section mistakenly referred to the Final EIR/EIS. The corrected sentence (with the correction in italics) is "As currently described in the *Draft EIR/EIS*, the Interstate 8 route on the Cleveland National Forest (primarily between BCD south and Modified Route D) would not meet the screening criteria and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands." There is a short section of the I-8 alignment east of milepost 51 on National Forest System (NFS) lands, and that short section is consistent with the LMP land use zones. There is also a section of the I-8 alignment that crosses NFS lands between I-8 milepost 81 and milepost 83, and that section is consistent with the LMP land use zones.

Biological Resources

In my initial comment letter, I discussed the need for the Final EIR/EIS to disclose the effects of the alternatives on Endangered Species and Forest Service Sensitive Species in a context that supports the findings required by law, regulation, and policy. A similar requirement exists for Forest Service Management Indicator Species (MIS). The MIS Report (Appendix 8M) does not provide the information required to support the findings about how the proposed project or alternatives will affect population and habitat trends for the affected species. Disclosure of how the project or alternatives will affect population and habitat trends is required, including



additional analysis beyond the direct effects on the species in terms of acres of habitat destroyed or disturbed.

Visual Resources

The Visual Resource Section discloses the effects of the proposed project and alternatives on impact V-1, Short-term visibility of construction activities, equipment, and night lighting. The LMP describes the “night sky” as a significant resource in the Palomar Place, particularly as it relates to the Palomar Observatory. Other observatories in the area, such as the Mount Laguna Observatory, may also be affected by night lighting, and the Final EIR/EIS should disclose the effect of the proposed project and alternatives on those resources.

Simulation of the visual impacts plays an important role in the assessment and the document provides many good examples of the visual impact of the proposed project and the alternatives. Even with those illustrations, it is difficult to determine the extent to which the proposed transmission lines will be seen throughout a given landscape, and to determine if the transmission line will be visible from key use areas of the National Forest, including recreation sites such as campgrounds, trailheads, trails, and wilderness areas. The Final EIR/EIS should include a “viewshed analysis” and use maps to display the areas where the transmission line will be visible.

In my initial comment letter I requested that the analysis reflect the design elements described by the Scenery Conservation Plan required by Mitigation Measure V-45a. The following comments will identify those areas where I would like to have clarification of the overlapping mitigation measures.

In review of Appendix 12, Full Text of Mitigation Measures, starting with the Visual Resources on page AP.12-50, it appears the Measures V-2d and V-2f, V-2g, and V-3a may not accomplish as much as their titles would imply based on the following discussion.

V-2d – Construction by Helicopter: The title implies that application of the mitigation measure would require construction by helicopter, but the full text states that: “In those areas where long term land-scarring and vegetation clearance impacts would be visible to sensitive public viewing locations, or where construction would occur on slopes over 15 percent, San Diego Gas and Electric (SDG&E) will consult with the Authorized Officer and appropriate land management agency, on a site by site basis regarding the use of helicopter construction techniques and the prohibition of access and spur roads. Agency consultations must be conducted and approvals received at least 120 days prior to the start of construction.” The Final EIR/EIS should disclose where this mitigation measure would be applied, and describe how visual resource impacts would be reduced by eliminating roads. The detailed maps in Appendix 11 should reflect the application of this measure.

V-2f (and V-2g) Reduce land scarring and vegetation clearance impacts on USFS-administered lands: “Vegetation within the right of way will... be limited to the clearing necessary to comply with the electrical safety and fire clearance requirements. Mitigation will

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be incorporated to reduce the total visual impact of all vegetation clearing performed for the power line (USFS Scenery Conservation Plan).”

Based on the text bottom of page E.2.3-16 in discussion of the previously mentioned mitigation measure, the final conclusion is that “However, if site specific conditions indicate that the mitigation measures would not be effective in eliminating unnatural demarcations in the vegetation landscape and reducing the resulting visual impact to a level that would be less than significant, then Mitigation Measure V-2d (Construction by Helicopter) would be required following consultations with the CPUC and USFS as appropriate. As noted above, this mitigation measure requires consultation, and may not result in construction by helicopter. This is particularly true for pulling sites and wire set-up sites that require road access. It would help clarify the effects analysis if those areas that would be constructed by helicopter could be identified in the Final EIR/EIS.

The impact of the fuel breaks proposed in Table D.15-26 for I-8 Alt. from MP 41.4-43.5, 44-47, and 62-63.5 or for Modified D MP10.5013 and 15-16.5 on visual resources is unclear. The implementation of a fuelbreak strategy will have priority, and the degree to which the visual impacts of the fuelbreak system can be mitigated should be disclosed.

V-3a – Reduce visual Contrast of towers and conductors: This label is misleading since it addresses using non-specular wires of the conductors and the road approaches to the towers, but not the towers themselves. I suggest that V-3A be labeled as “Reduce Visual Contrast of Conductors” and that the roads be addressed as a separate mitigation line such as “V-3d – Roads to towers will not highlight tower location.”

V-3b – Use non-specular design to reduce conductor visibility and visual contrast: I request that all the towers and conductors that are not painted within the context of the Scenery Mitigation Plan be non-specular.

V-45a – Prepare and implement Scenery Conservation Plan: Based on statements in the Draft EIR/EIS that limit application of mitigation measure to specific circumstances, designation of measure V-45a at certain points, and describing the impacts with roads in all photo simulations, it is not clear where the requirements of the Scenery Mitigation Plan will apply. My intent is to apply this mitigation measure throughout the Cleveland National Forest.

I recognize that the final details of many of the mitigation measures will be developed as part of the final project design, which won't be available until after the CPUC decision. However, the project does have an initial design as displayed on the maps in Appendix 11. Applying the design standards and mitigation measures to this initial design will disclose the relative effectiveness of the mitigation, and reduce the uncertainty about project effects. The analysis should highlight areas where the application of mitigation measures will not be effective.

Wilderness and Recreation

The Draft EIR/EIS considers the effects of the proposed project and the alternatives on wilderness in the context of the recreation setting. The 1964 Wilderness Act section 2(c)

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describes the five attributes that define wilderness character, one of which is recreation. The Final EIR/EIS should disclose the effects of the proposed project and the alternatives on the attributes described by the Wilderness Act. Route D traverses an area that has been included in proposed wilderness legislation, and the effect of a transmission line on the potential wilderness character of that area should also be disclosed.

Modified Route D impact WR-2 (Draft EIR/EIS page E.4.5-3) states that the alternative will be highly visible to hikers on the Pacific Crest Trail (PCT) and to visitors in the Hauser Wilderness. Since this area does not overlap with any of the key viewing points selected for this alternative, the Final EIS/EIR should include additional viewpoints from the PCT and Hauser Wilderness to address the impacts in this key area. The location of the PCT on Figure AP. 11C-77 should be corrected.

The LMP identified Cottonwood Creek as eligible for the Wild and Scenic River System. The LMP direction is to protect the outstandingly remarkable values (ORV's) and water quality of eligible river segments. The Final EIR/EIS should disclose the effects of any alternatives that cross Cottonwood Creek on the ORV's and water quality.

Cultural and Paleontological Resources

The technical reports supporting the cultural resource analysis are not complete, and my staff has been informed that they will not be complete until April 11, 2008. Review of this section will be deferred until the technical reports are available for staff review.

Transportation

The miles of existing roads used or upgraded, and new roads constructed should be quantified for the alternatives and included in the analysis. Many of the existing roads on the Cleveland National Forest will not be able to handle the construction traffic, and upgrades and increases in footprint will be required to support the anticipated machinery. Road widths ranging from 14 feet in straight section of road to 20 feet at corners or curves would be required to facilitate safe movement of equipment and vehicles. The miles of trails used as roads should also be identified. Mitigation will be required to return trails to their prior configuration. Plans will also be needed for alternative trail alignments during construction. The initial details of those plans should be disclosed in the Final EIR/EIS.

The Final EIR/EIS should quantify the numbers and acres of pull sites, describe the type of land modification needed at each site, and evaluate the impacts to soil compaction and potential sedimentation from these sites. In addition, when pull sites are located close to tributaries, distance from tributaries should be added to the document. Restoration plans for pull sites should be described.

Implementation of Mitigation Measure T-10b, (Draft EIR/EIS, page E.2.9-5) which revises the BCD South Option to avoid placing a tower in the CalTrans right of way, may address the visual resource issues I raised for this segment on pages 2 and 3 of my initial comment letter. It appears however that a portion of this proposed alignment may be inconsistent with the LMP

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land use zone for the area north of I-8. The alignment south of I-8 looks like it is located along a ridge top, which will exacerbate the “skylining” concern in this highly visible area. I encourage the CPUC and BLM to work collaboratively with the Forest Service, CalTrans, and SDG&E to develop a route that addresses all the issues in this area. The modified route should serve as the basis for a revised visual analysis, and modification of the location of key view point 79 may be necessary to accurately reflect the impact of the reroute on visual resources.

The discussion for Route D impact T-11 (Draft EIR/EIS page E.3.9-3) states that 1.5 miles of Route D would pass through an Inventoried Roadless Area (IRA) on the Cleveland National Forest. Based on the maps used to develop the Roadless Area Conservation Rule (36 CFR 294), the Route D alignment crosses approximately 2.5 miles of IRA, including approximately 0.5 miles in the Sill Hill IRA, and 2 miles in the No Name IRA. The Final EIR/EIS should disclose the effect of the Route D alternative on the seven Roadless Area Characteristics outlined by the Roadless Area Conservation Rule. The Final EIR/EIS should also disclose the effect of the Route D alternative relative to the State of California’s roadless area policy.

Water Resources

In my initial comments I discussed the need for the Final EIR/EIS to identify Riparian Conservation Areas (RCA’s) on NFS lands for the proposed project and the alternatives. This analysis should include all project activities, including the use of existing roads located within RCA’s. All applicable Best Management Practices (BMPs) should be identified and followed to meet agency direction in Forest Service Handbook 2509.22 Chapter 3.21 (1). These BMPs would be incorporated into the special use permit if an alternative on NFS lands is selected by the CPUC and BLM and authorized by the Forest Service.

The Final EIR/EIS should also disclose the effects of the proposed project and the alternatives on the Beneficial Uses and Water Quality Objectives listed in relevant Basin Plans for the affected watercourses. The project effects on Water Quality Limited Segments should also be disclosed and evaluated.

Given the importance of riparian areas, stream crossings on NFS lands will need individual assessment to develop the current riparian condition, disclose the effects of the project, identify appropriate BMPs, and to plan for effectiveness monitoring of BMPs and riparian condition as long as the road crossings are in use, consistent with mitigation measure H1-i (with Forest Service review and direction).

My staff has identified the following crossings of particular concern. These anticipated impacts occur across several resource areas, and an interdisciplinary review of the crossings should be conducted.

I-8 Alternative: 79 identified watercourse crossings, including (in reference to Wild and Scenic eligibility):

- App 11C-48 pdf; I-8-56, S3075, and access road crosses unnamed tributary of Cottonwood Creek in T.16S., R.5E. Section 28.

A0009 cont.

- App 11C-49 pdf; Vicinity of BSW-5.6: Pull site near unnamed tributary and access road crosses unnamed tributary of Cottonwood Creek in T.16S., R.5E. Section 18.
- App 11C-59 pdf; Access roads cross Cottonwood Creek, unnamed tributaries to Cottonwood Creek, and the PCT in T.17S., R.5E. Section 5.
- App 11C-60 pdf; Access roads cross unnamed tributaries to Cottonwood Creek in T.16S., R.5E. Sections 31, 30, and 19.

BCD Alternative

- App 11C-66 pdf; access roads in T.16S., R.6E. Section 8 cross unnamed tributaries to reservoirs in Thing Valley. The path follows a trail, which would need upgrading. Additional concerns with public trail foot traffic and safety. The roads also pass mapped prospects. Inspections of the area should include abandoned mine adits, etc for safety purposes.
- App 11C-66 pdf; Access roads near S20076 in Antone Canyon, an unnamed tributary upstream of the La Posta Indian Reservation in T.16S., R.5E. Section 13. The water source of the La Posta Indian Reservation and other uses of the tributary should be checked with the Tribe.
- App 11C-66 pdf; Access roads are shown on top of the PCT. Changing the character of the trail to support heavy equipment should be evaluated in the historic and recreation impacts section.

Route D Alternative - 22 major crossings that will need assessments; some specific areas noted:

App 11C-71.pdf

- Access road off Old Viejas Grade to the east of Poser Mountain follows a trail in T.15S., R.3E. Sections 15/10. The trail follows an unnamed tributary of King Creek. Upgrades will require assessment work, etc.
- Pull sites of D-3 near Forest Service road 15S24 near Capitan Grande Indian reservation in vicinity of unnamed tributary to King Creek near T.15S., R.3E. Sections 3, 4, 9, 10.
- Access road to east of D-3 (private land) near Boy Scout Lake.

App 11C-72.pdf

- Access Road from Forest Service road 14S09 (Dubois Truck Trail) to S10068 crosses an unnamed tributary of Conejos Creek in T.14S., R.3E. Section 27. The truck trail may need upgrades and runs along drainages.
- Pull sites and access roads near S10065 near headwaters of Conejos Creek in T.14S., R.3E. Section 22.
- Access roads near SR2026 near headwaters of Conejos Creek in T.14S., R.3E. Section 23.

SDG&E proposes measure WQ-APM-6 #4 – which provides that SDG&E will “negotiate with affected landowner to provide alternative water supplies in the event supply wells or springs dry up directly caused by project activities.” Given that springs are developed on the Forest for multiple uses (wildlife, campgrounds, special use permits, etc.), and given that the monitoring necessary to know whether or not the spring is being affected (reduced flow) due to project impacts is significant, it is recommended that the project alignment and roads be surveyed for

springs within ½ mile of the alignment. If the line cannot be moved to avoid springs, then springs will be monitored during construction of a facility or if the construction encounters fractured rocks that could be a part of a spring system.

Work in stream courses is required to have pre-implementation, implementation during construction, and post-implementation effectiveness monitoring. This requirement indicates an earth scientist representative trained in the Forest Service BMP evaluation protocol process should be on site. This requirement also requires an ongoing commitment of the permit holder to continued funding for monitoring and reporting.

The Forest Service will limit operations during the rainy season or during periods of wet soil conditions to reduce the potential for soil compaction, rutting, and loss of soil productivity. The BMP standard on Forest Service system lands specifies the soil is too wet for work when rutting occurs in greater than 10% of the road within an RCA and when rills more than 10 feet in length develop and lead off the road surface. Another standard operating procedure is for the operator to be informed when there is a >30% chance of rain, so additional BMPs can be added to stabilize an area if the precipitation materializes. The Forest Service Permit Administrator will have the authority to stop work and require fixes if degradation occurs.

Fire and Fuels Management

In my initial comment letter, I suggested the Final EIR/EIS should identify the proposed fuelbreaks associated with mitigation measure F3a, “Construct and Maintain Fuelbreaks”. These connected actions are a critical component of the long term management of the proposed project and the alternatives. Although Table D.15-26 indicates milepost locations for fuelbreaks, it is not clear where the actual fuelbreaks will be constructed, if they will be effective, and what effect fuelbreak construction will have on other resources.

Another aspect of the long term management of the area is the relationship between the powerline and fire suppression effectiveness as described by Impact F-3. Although the Wildfire Containment Conflict Model provides a graphical illustration of Impact F-3 in a generalized sense, some simple maps using the data built into the model would help disclose two key factors, namely where fires start (ignitions) and where fires are fought (historical fire perimeters). The Final EIR/EIS should provide a map of ignitions and a map of historical fires for each fireshed evaluated in the analysis using the data referenced in Draft EIR/EIS pages D.15-68 to D.15-69.

The influence of fuel type on the difficulty to control fires should also be evaluated as part of the Wildfire Containment Conflict Model. Consideration of this factor may show some significant differences between the alternatives. For example, the portions of the I-8, LEAPS, and Modified Route D alternatives on the Cleveland National Forest occur in areas of heavy fuels in steep terrain, where fires are difficult to control. The northern alternatives may have different characteristics, and quantifying this factor would add to the comparison of the proposed project and the alternatives.

The summary of the Wildfire Containment Conflict Model is presented in terms of the percent of the route in various conflict classes. Because the alternatives vary in length, and the analysis is

segmented by fire, it would be helpful if the Final EIR/EIS would display the total length of conflict areas by alternative in miles rather than percent. This would provide a more accurate disclosure of the magnitude of the conflict based on the classification system used in the analysis and facilitate comparison between the alternatives.

The impact of the proposed project or the alternatives on fire suppression effectiveness is a critical issue for the Forest Service. I encourage the CPUC and the BLM to host a technical workshop between the affected federal, state, and local fire agencies and SDG&E so that the agencies responsible for fire suppression in the area can discuss the analysis and mitigation in a collaborative setting prior to the release of the Final EIR/EIS.

Cumulative Impact Analysis of Alternatives

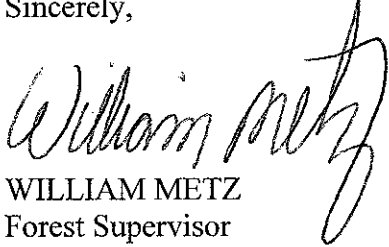
The cumulative effects analysis for the biological resources associated with the Southern alternatives should be quantified. Acres of habitat disturbed by the reasonably foreseeable projects listed in Table G.3 should be summarized and presented in comparison to the acres of habitat disturbed by the various alternatives. The analysis should include cumulative impacts on population and habitat trends for the Forest Service Management Indicator Species.

The analysis of cumulative effects on Water Resources should also be quantified in terms of the cumulative amount of disturbed area, particularly since the analysis concludes that there will be cumulatively significant impacts to water quality (Draft EIR/EIS, page G-143). For those alternatives that cross Forest Service lands, each sub-watershed (preferably at the size level of 500 to 5,000 acres) should be modeled using the Equivalent Roaded Acres method to determine the level of disturbance relative to the Watershed Threshold of Concern. Coefficients within the method are somewhat dependent on the sensitivity of the watershed and parent material to disturbance. This method combines cumulative effects of watershed and soils (dependent on geology).

The narrative description of the reasonably foreseeable projects for Modified Route D on Draft EIR/EIS page G-161 does not match the list of projects in Table G.3 or the projects located near the Modified Route D alignment shown on Map G-9. Some key projects that are not discussed in the Modified Route D cumulative impact analysis include the 2,100 acre Star Ranch subdivision, the Blackwater paramilitary training facility (withdrawn by Blackwater in March, 2008), and the 2,250 acre La Posta Mountain Warfare Training Facility. The Final EIR/EIS should clarify the reasonably foreseeable projects associated with Modified Route D, and revise the analysis accordingly.

This concludes the Forest Service comments on the Draft EIR/EIS and available supporting documents. As always, I would be glad to meet at your convenience to discuss these comments. Please contact Project Manager Bob Hawkins at 707-562-8699 or by email at rhawkins@fs.fed.us to arrange a meeting.

Sincerely,

A handwritten signature in black ink that reads "William Metz". The signature is written in a cursive style with a large, sweeping "M" and "Z".

WILLIAM METZ
Forest Supervisor