

Comment Set A0009
United States Department of Agriculture Forest Service

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File Code: 1950-4
Date: MAR 12 2008

Billie Blanchard, CPUC/Lynda Kastoll, BLM
Regulatory Analyst/Realty Specialist
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

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.

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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.

A0009-2

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.

A0009-3

BCD Route and BCD South Option – As identified in Forest Supervisor Hernandez’s March 16 letter, the BCD Route crosses several areas designated Back County 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.

A0009-4

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.

A0009-5

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

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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.

A0009-5 cont.

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.

A0009-6

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.

A0009-7

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.

A0009-8

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

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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.

A0009-8 cont.

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.

A0009-9

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.

A0009-10

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.

A0009-11

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

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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.

A0009-12 cont.

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.

A0009-13

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.

A0009-14

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.

A0009-15

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.

A0009-16

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.

A0009-17

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

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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.

A0009-18 cont.

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.

A0009-19

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)):

A0009-20

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.

A0009-21

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.

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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.

A0009-23

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.

A0009-24

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.

A0009-25

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.

A0009-26

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

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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.

A0009-27 cont.

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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**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.

A0009-28

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

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

A0009-29 cont.

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.

A0009-30

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.

A0009-31

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.

A0009-32

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).”

A0009-33 cont.

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.”

A0009-34

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.

A0009-35

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.

A0009-36

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.

A0009-37

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)

A0009-38