



United States
Department of
Agriculture

Forest
Service

Cleveland National Forest
SO

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File Code: 1950-4/2720-1

Date: August 20, 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 Comments on the Recirculated Draft Environmental Impact Report / Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) 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 RDEIR/SDEIS and offer these comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM).

Section 1.3 Analysis Not Included...

The RDEIR/SDEIS characterizes power line fires relative to other ignition sources in response to comments by the Mussey Grade Road Alliance (Page 1-4). The Forest Service maintains fire records for all fires that occur on National Forest System (NFS) lands. This data is available at <http://fam.nwccg.gov/fam-web/weatherfirecd/index.htm>. This data supports the conclusion that power line related fires make up a small percentage of fires starting on National Forest System lands. The data also shows that the small percentage of power line fires accounts for almost 30% of the total acreage burned by fires starting on NFS lands. The data is very similar when compared to all fires that burned on NFS lands (which includes fires starting off NFS lands but burning onto the National Forest). I encourage you to reference this data when characterizing the probability and size of power line related fires in the Final EIR/EIS.

Section 3 Revisions to Proposed and Alternative Transmission Line Routes

In general, the description of the revisions and environmental effects does not describe the level of survey conducted to support the analysis for biological, cultural, or visual resources. The survey approach outlined on Page 1-5 of the RDEIR/SDEIS should be followed for these revised routes, and the results of those surveys presented in the Final EIR/EIS.

The analysis of the revised routes should also include the resource areas presented in the DEIR/DEIS, including land use, noise, transportation, health and safety, air quality, water, geology, and fire and fuels. I would expect that the route revisions would result in different impacts to many of those resource areas. The Final EIR/EIS should also include the details of



proposed mitigation, including the location and specific details of required fuelbreaks and wildlife habitat mitigation lands.

Section 3.3.2 BCD Alternative and BCD South Option Revisions

Section 3.3.2.2 Biological Resources

The discussion of effects should include mitigation for the golden eagle. This may include a modification of mitigation measure B-8a (Draft EIR/EIS Ap.12-41) to include additional restrictions to avoid conflicts with the golden eagle during the nesting season. Mitigation B-10a should be updated to reference the 2006 edition of the Avian Power Line Interaction Committee standards. These and other applicable measures should be disclosed in the Final EIR/EIS.

Section 3.3.6 Pacific Crest Trail (PCT) Reroute

3.3.6.2 Biological Resources

Although I am not aware of any documented presence of least Bell's vireo in upper Hauser Creek, pulling sites should not be located in riparian areas or in occupied habitat. The route should be modified to avoid this impact.

3.3.6.4 Wilderness and Recreation Resources

Although this section of the PCT is on public lands managed by the BLM, the PCT is maintained by the Forest Service under a right-of-way reservation from the BLM. I am enclosing a copy of the reservation for the record. Under condition three:

"The Bureau of Land Management retains the right to occupy and use the right-of-way, and to issue or grant rights-of-way or other land uses provided that the occupancy and use will not unreasonably interfere with the rights granted herein."

The Final EIR/EIS should evaluate the impact to the PCT in the context of the right-of-way reservation, and detail how the construction and operation of the project would affect the use of the PCT.

3.3.6.5 Conclusion

It is unfortunate that the RDEIR/SDEIE was released prior to a final route revision for the PCT crossing, making this part of the document essentially a work in progress. I support the BLM objectives outlined on page 43, and would expect the final route revision to avoid crossing the PCT more than once, avoid crossing the donated parcels, and minimize new road construction. I would also add an objective that the route revision should avoid additional impacts to riparian areas.

Section 5.2 Environmentally Superior Southern Route

Pending the outcome of additional study, the RDEIR/SDEIS suggests that the Modified Route D alignment north of the Modified Route D substation may be used in lieu of the Star Valley Route for the overall environmentally superior southern route. If this route is selected, the route design will require modification to meet the design criteria that I described in my March 12, 2008 comment letter. These design changes would include reducing roads and pulling sites to reduce the overall impact of this segment.

This concludes the Forest Service comments on the RDEIR/SDEIS. 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,



for WILLIAM METZ
Forest Supervisor

Attachment



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA DESERT DISTRICT
1695 Spruce Street
Riverside, California 92507

F0003

IN REPLY REFER TO:

CA-18772
2800
(CA-067.26)

SEP 29 1986

Michael Rogers, Supervisor
Cleveland National Forest
880 Front Street, Room 5-N-14
San Diego, California 92188

Dear Mr. Rogers:

Enclosed is the right-of-way reservation for the Hauser and Julian segments of the Pacific Crest Trail. A copy of the reservation will be sent to Sacramento for notation of our records.

Sincerely,

Gerald E. Hillier
District Manager

Enclosure

*GWAR -
Never
put there -
Kerr's W.*

W. L. LUNA

 RIGHT-OF-WAY RESERVATION

KNOW ALL MEN BY THESE PRESENTS, That in accordance with the National Trails System Act of October 2, 1968 (82 Stat. 919), that the United States of America acting by and through the Bureau of Land Management, U. S. Department of Interior, does hereby issue and reserve to the Forest Service, Department of Agriculture, and its assigns, a right-of-way to locate, construct, use, control, maintain, improve, and repair a trail over and across the following described real property situated in the County of San Diego, State of California, to wit:

A reservation 10 feet in width and 14 miles in length located within:

T. 13 S., R. 4 E., SBM
Secs. 12, 13, and 24

T. 14 S., R. 5 E., SBM
Sec. 20

T. 17 S., R. 4 E., SBM
Secs. 35 and 36

T. 17 S., R. 5 E., SBM
Sec. 31

T. 18 S., R. 4 E., SBM
Secs. 1 and 12

T. 18 S., R. 5 E., SBM
Secs. 6, 7, 17, 18, and 22


The land to which the above description applies contains 16.910 acres, more or less.

Maps showing the right-of-way described above are contained in Case File CA-18772.

The right-of-way herein granted and reserved is for the use of the above described property for the construction and maintenance of two segments, Julian and Hauser, of the Pacific Crest Trail by the Forest Service, its licensees, permittees, agents and contractors including the right of access for the people of the United States generally to lands owned, administered, or controlled by the UNITED STATES OF AMERICA subject to reasonable rules and regulations of the Secretary of Agriculture, and to the following terms and conditions:

1. The trail constructed under the provisions of this right-of-way will be under control and jurisdiction of the Forest Service.
2. The agency having jurisdiction of the trail may extend or grant rights and privileges for use of the trail to other users, including members of the public and other Government Departments and Agencies, States, and local subdivisions thereof. Such grants may be in the form of regulations, permits, easements, or licenses, as appropriate.
3. The Bureau of Land Management retains the right to occupy and use the right-of-way, and to issue or grant rights-of-way or other land uses provided that the occupancy and use will not unreasonably interfere with the rights granted herein.
4. This reservation shall remain in effect until terminated by mutual agreement of the agencies.

Dated this 26 day of Sept, 1936.

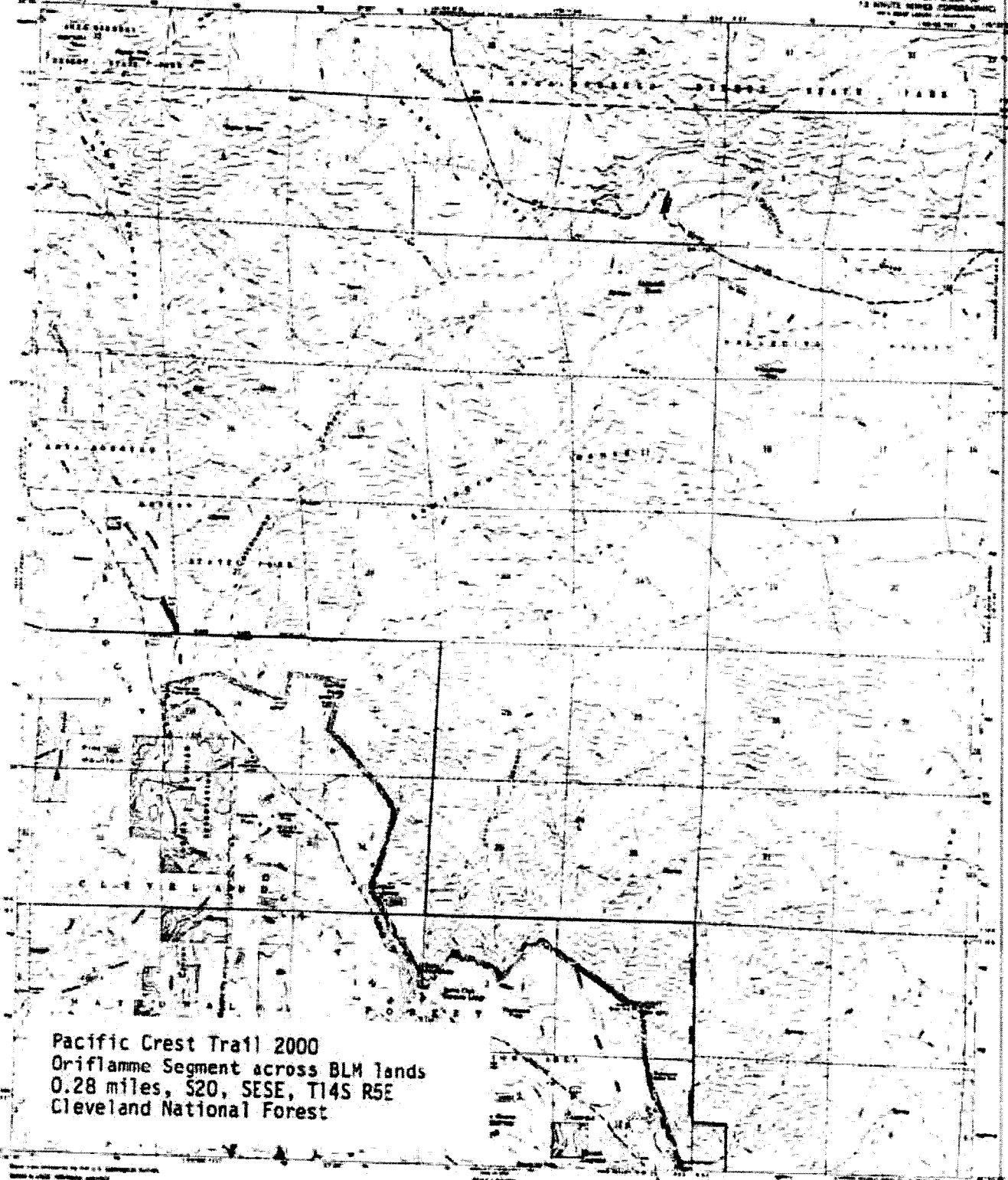


Gerald E. Hillier
District Manager
California Desert District

F0003

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
PROPOSED FOR LAND MANAGEMENT

MONUMENT NEAR QUADRANGLE
CALIFORNIA-SAN DIEGO CO
1:250,000 SERIES (CONFORMING)
MAY 1954 EDITION



Pacific Crest Trail 2000
Oriflamme Segment across BLM lands
0.28 miles, S20, SESE, T14S R5E
Cleveland National Forest

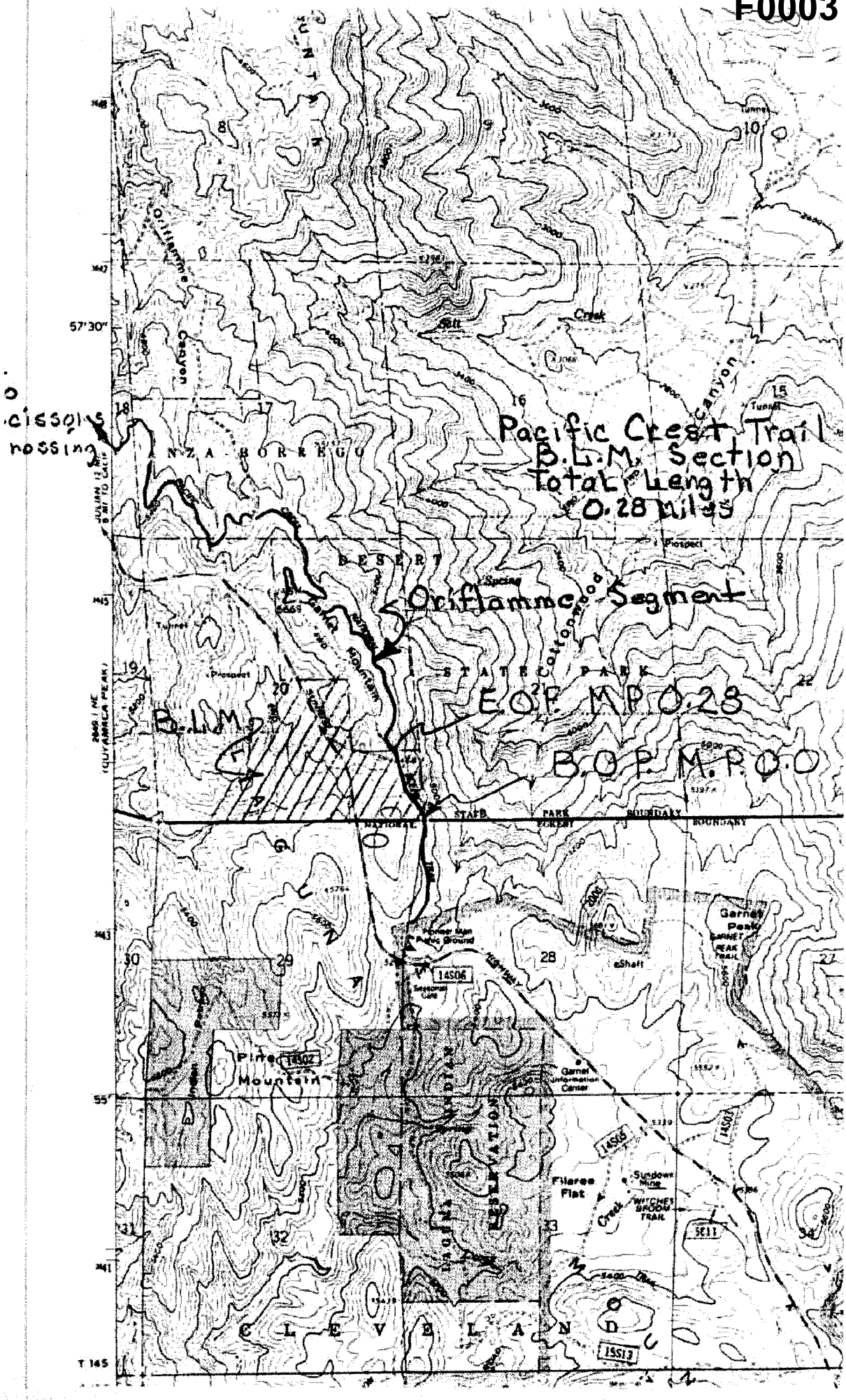
This map was prepared by the U.S. Geological Survey under contract to the Bureau of Land Management, Department of the Interior. It is a derivative of the 1:250,000-scale topographic map of the area, and does not show the most current information. All features shown are based on the 1954 edition of the map. The map is not intended for use as a legal document. For more information, contact the Bureau of Land Management, Department of the Interior, 1015 North Hill Street, Sacramento, CA 95812.

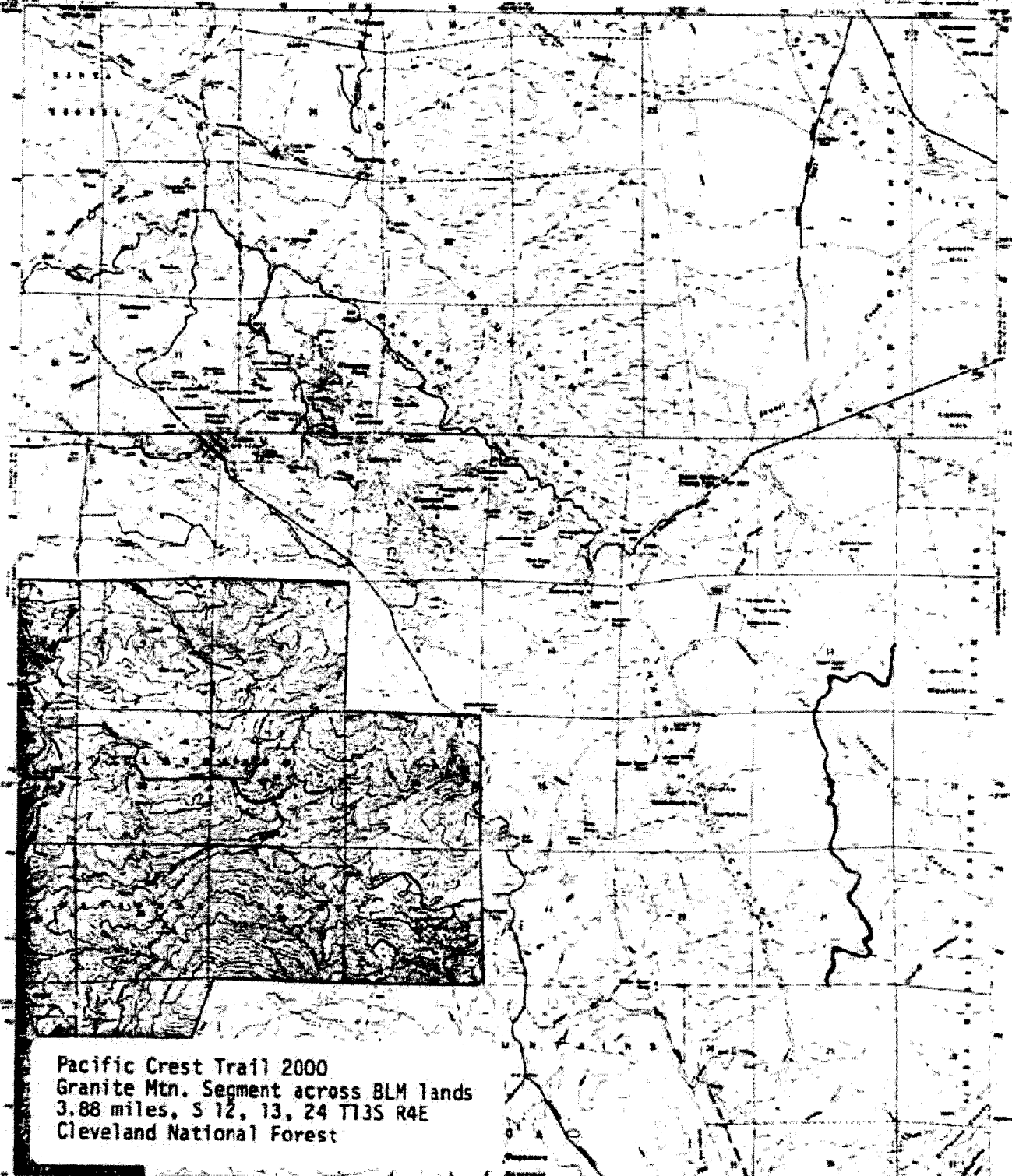


Bureau of Land Management	National Forest	Section boundary	Township boundary
Range boundary	County boundary	State boundary	Water feature
Road	Trail	Contour line	Spot elevation
Railroad	Power line	Elevation contour	Elevation spot

MONUMENT NEAR CALIF
1:250,000 SERIES (CONFORMING)
MAY 1954 EDITION

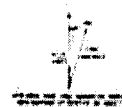
19-2C



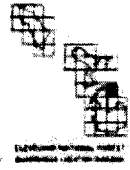


**Pacific Crest Trail 2000
 Granite Mtn. Segment across BLM lands
 3.88 miles, S 12, 13, 24 T13S R4E
 Cleveland National Forest**

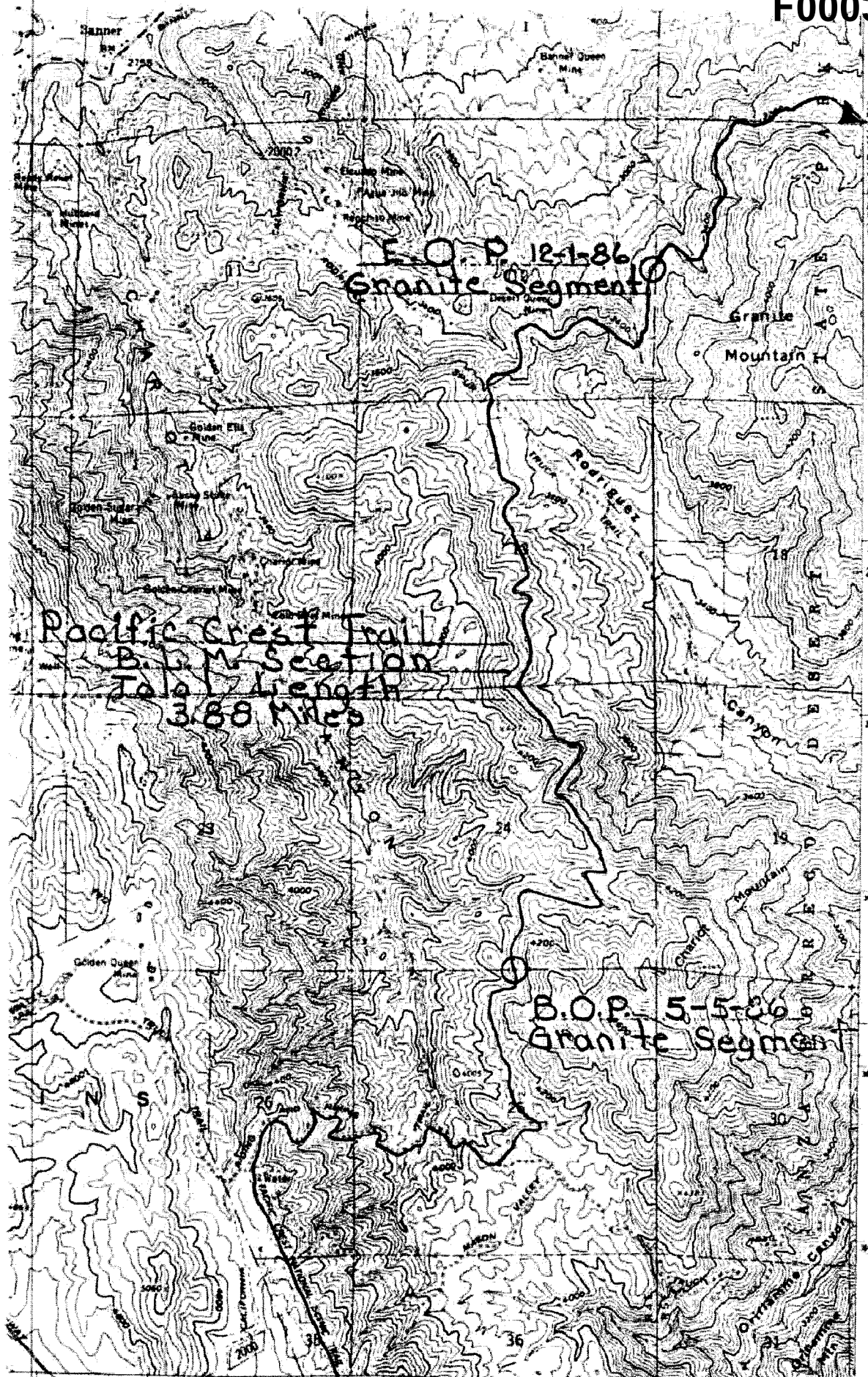
Map Symbols
 This map is prepared for the U.S. Geological Survey
 under a contract with the BLM. It is not a
 navigational chart and should not be used for
 navigation. It is not a legal document and
 should not be used for legal purposes.
 The map is based on the 1987 map of the
 Pacific Crest Trail 2000. It is not a
 legal document and should not be used for
 legal purposes. It is based on the 1987
 map of the Pacific Crest Trail 2000.



- National Forest Boundary
- BLM Land
- Private Land
- State Land
- Federal Land
- National Forest Boundary
- BLM Land
- Private Land
- State Land
- Federal Land



JULIAN, CALIF.
 1:25,000 Scale
 1987
 13-4C



E.O.P. 12-1-86
Granite Segment

Pacific Crest Trail
B.T.M. Section
Total Length
3.88 Miles

B.O.P. 5-5-86
Granite Segment

MOUNT. LAB. 52° 30' 143

INTERIOR GEOLOGICAL SURVEY SECTION 116° 30'

116° 30'

