United States Department of Agriculture **Forest Service** **Cleveland National Forest SO**

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File Code: 1950-5/1950-4
Date: October 17, 2006

Ms. Billie Blanchard, CPUC/Ms. Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Ms. Blanchard and Ms. Kastoll:

Based on the quantity of information you have provided and the wide range of Forest Service program areas potentially affected, the Cleveland National Forest requests additional time to complete our review of the Notice of Preparation for an Environmental Impact Report/Environmental Impact Statement for the San Diego Gas and Electric Sunrise Powerlink Project.

I believe we can complete our comments to you by the end of October.

Sincerely,

/s/ Tina J. Terrell
TINA J TERRELL
Forest Supervisor

cc: Richard K Tobin
Graciela Terrazas
Thomas F Gillett
Tom White

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92011
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California Department of Fish & Game
South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
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In Reply, Refer To:
FWS-SDG-5021.3

October 20, 2006

Billie Blanchard, CPUC/ Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104-3106

Re: Comments on the Notice of Preparation of a draft Environmental Impact Report/Environmental Impact Statement for the Sunrise Powerlink Project, San Diego and Imperial Counties, California (SCH 2006091071)

Dear Ms. Blanchard and Kastoll:

The California Department of Fish and Game (Department) and the U.S. Fish and Wildlife Service (Service), collectively the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) for a draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Sunrise Powerlink Project (Project). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381 respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA), and administers the Natural Community Conservation Planning Program (NCCP). The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*).

The San Diego Gas and Electric Company (SDG&E) has filed applications for a Certificate of Public Convenience and Necessity with the California Public Utilities Commission for the proposed Sunrise Powerlink Project. SDG&E has also filed an application for a Right-of-Way Grant with the United States Department of the Interior, Bureau of Land Management. The draft EIR/EIS will be prepared with the California Public Utilities Commission (CPUC) as the CEQA lead agency and the Bureau of Land Management (BLM) as the federal lead agency National Environmental Policy Act, NEPA). The BLM published a Notice of Intent in the Federal Register dated August 31, 2006 (FR Vol. 71, No. 169, page 51848). SDG&E's stated purpose for the project is to bring renewable resources into San Diego County from Imperial County, and to improve electric reliability for the San Diego Region. According to SDG&E, the proposed

project is needed for three primary reasons: 1) maintain reliability of service; 2) provide transmission capability for renewable resources; and 3) reduce energy costs in the San Diego Region. Although SDG&E has an NCCP Plan, it does not cover the Sunrise Powerlink Project.

The proposed project is the construction and operation of a 150-mile electric transmission line between the El Centro area of Imperial County and northwestern San Diego County. The 150-mile line would consist of a 91-mile 500 kilovolt (kV) transmission line from El Centro to eastern San Diego County, and a 59-mile 230 kV line from eastern to western San Diego County. The project would include 676 new towers, a new substation in central San Diego County, and upgrades at four existing substations. Although the powerlines would be mostly overhead, the project would also include underground segments. New rights of way would be needed for some segments of the project, along with approximately 102 miles of new access roads that would impact 347 acres. The alternatives proposed by SDG&E include only transmission line route alternatives; some system alternatives were considered, but all were eliminated. According to the NOP, all previous and current SDG&E alternatives will be re-evaluated by the CPUC and BLM, and additional alternatives may be developed as a result of scoping or project analysis.

The Wildlife Agencies have several concerns regarding the potential effects of this project on sensitive biological resources and the process proposed to date for the CEQA/NEPA documentation. This letter contains recommendations intended to assist the CPUC and BLM (Lead Agencies) in the analysis of direct and indirect project impacts and to assist in the development of a draft EIR/EIS that complies with the provisions of both CEQA and NEPA.

Specific Comments

1. As discussed during the meeting on August 9, 2006, at the Service's office in Carlsbad, the Wildlife Agencies request that the Lead Agencies evaluate the independence of Stirling Energy Systems' planned solar facility in the Imperial Valley, and other power generation projects, in determining the scope of the draft EIR/EIS. The CEQA Guidelines define a project as "the *whole* of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...." (CEQA Guidelines, Section 15378(a), emphasis added). "'Project' is given a broad interpretation in order to maximize protection of the environment." (*McQueen v. Board of Directors of the Midpeninsula Regional Open Space District* (1988) 202 Cal.App.3d 1136, 1143 [249 Cal.Rptr. 439]). This approach ensures that a lead agency will fully analyze each "project" in a single environmental document so "that environmental considerations do not become submerged by chopping a large project into many little ones, each with potential impact on the environment, which cumulatively may have disastrous consequences." (*Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 592 [284 CalRptr.498].) (CUE 2002) The Council on Environmental Quality's implementing regulations for NEPA indicates that: "Actions are connected if they cannot or will not proceed unless other actions are taken previously or simultaneously (40 CFR 1508.25(a)(1)(ii)).

2. Since providing access to renewable power resources is a primary purpose of the project, we request that the Lead Agencies also evaluate the ability of existing and reasonably foreseeable future renewable resources to supply not only the Project, but also the Green Path project. Please include in this evaluation an assessment as to whether construction of one or both of these transmission lines will result in excess capacity that will facilitate additional development of non-renewable energy.

3. The NOP indicates that the Lead Agencies will be re-evaluating the alternatives presented by SDG&E. In addition to this, the Wildlife Agencies request that the need for another transmission line also be independently evaluated in the context of the existing regional transmission network and the location of current and feasible sources of renewable energy. There are currently three major transmission lines in the Project vicinity: Devers-Palo Verde, a 500 kV line in Riverside County; Southwest Powerlink, a 500 kV line in southern San Diego County; and two 230 kV lines just south of the border in Mexico. In addition, a second 500 kV line is planned adjacent to the existing Devers-Palo Verde line, and the Green Path project, which has goals similar to the Project, is planned to connect Imperial Valley renewable energy resources to Los Angeles Department of Water and Power. The analysis should evaluate whether all of these projects are essential to the transmission network, and whether improvements along any or all of the existing corridors would provide benefits equivalent to the proposed Project. In an effort to accomplish the same objectives without the need for a new transmission corridor, an alternative that would remedy bottlenecks in the existing system should be considered. The need for this proposed Project should also be evaluated in the context of new powerplants which are being proposed in the San Diego area.

4. One of the basic purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives...when the governmental agency finds the changes to be feasible" (CEQA Guidelines, Section 15002 (a)(3)). Because of the magnitude of the acreage involved and the many sensitive species and habitats that potentially may be negatively affected by the proposed Project, the CEQA alternatives analysis for this Project is extremely important.

   The Wildlife Agencies are particularly interested in the draft EIR/EIS describing "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives," as required by Section 15126.6 (a) of the CEQA Guidelines. This should include "alternatives [that] would impede to some degree the attainment of the project objectives, or would be more costly" (Section 15126.6 (b) of the CEQA Guidelines). "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (Section 15126.6 (f) of the CEQA Guidelines).

The Wildlife Agencies are concerned that the Project objectives have been too narrowly defined, and that this will limit the range of feasible alternatives. As currently stated, the objectives clearly favor adding to the existing transmission capacity. However, the stated purpose of the project is to: maintain reliability, promote renewable energy, and reduce energy costs. The purpose provides a more accurate description of the objectives pursuant to CEQA, and the purpose and need pursuant to NEPA; the stated purpose also allows for consideration of a wider range of alternatives that are capable of fulfilling the purpose of the project. We request that the Lead Agencies consider using the project purpose to more broadly define the project objectives, and include feasible non-transmission alternatives in the draft EIR/EIS.

The Wildlife Agencies request that the Lead Agencies reconsider an alternative that parallels the Southwest Powerlink. If necessary to address concerns expressed by SDG&E, the reconsideration should address the potential to make a new transmission line in this location more resistant to fire.

5. The Wildlife Agencies have previously provided comments to the CPUC regarding the applicants desire to circulate the draft EIR/EIS prior to incorporating the results of sensitive species surveys planned for 2007. We provided these comments in the following manners: orally during our August 9, 2006, meeting; on August 15, 2006, in electronic correspondence from the Department as a follow-up to the August 9 meeting; on August 25, 2006, in electronic correspondence from the Service as a follow-up to the August 9 meeting; and, as a joint written Pre-hearing Conference Statement dated September 13, 2006. The Service also provided comments regarding this issue to the BLM in a letter dated October 16, 2006. Those comments are incorporated herein by reference. The preceding comments recognized that the decision to incorporate the survey results in the draft EIR/EIS ultimately rests with the Lead Agencies. The Wildlife Agencies suggested that these survey results should be included in the draft EIR/EIS so that the potential project alternatives and impacts can be adequately evaluated and to allow for public review. Absent this information in the draft EIS/EIR, we may request revisions to, and recirculation of, the draft EIR/EIS (pursuant to Section 15088.5 of the CEQA Guidelines) once the survey data become available and can be included in the alternatives and impact analyses.

6. We are concerned about the potential project-related direct and indirect impacts to migratory and resident bird species particularly since the project is located along a major migration corridor and will traverse areas that support sensitive avian species. The project applicant has proposed mitigation measures which include: "Structures shall be constructed to conform to 'Suggested Practices for Raptor Protection on Power Lines' (Raptor Research Foundation, Inc. 1981), to minimize impacts to raptors." However, it is not appropriate to assume that these practices are effective. They must be evaluated based on their implementation for previous projects; this discussion should be included in the impact analysis in order to demonstrate that this measure will actually mitigate the impact.

7. The project will provide access to, and create disturbance in, areas that are currently undeveloped. This often results in the introduction of nonnative plant and animal species which can reduce the quality of native habitats. This is particularly relevant concerning the proposed Project since it will traverse the area to be covered by the East County Multiple Species Conservation Program plan, which is currently in the planning phase. The draft EIR/EIS should address this, and provide appropriate mitigation measures as needed.

General Comments

In addition to the information requested in the preceding comments, the Wildlife Agencies request that the draft EIR/EIS also contain, at a minimum, the following information to assist in our review of the document, and assist the Lead Agencies in compliance with pertinent State and Federal statutes and regulations.

8. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

9. A complete list and assessment of the flora and fauna within and adjacent to the project area, with particular emphasis on identifying State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Specifically, the draft EIR/EIS should include:

   a. A thorough assessment of Rare Natural Communities on site and within the area of impact, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (revised May 8, 2000, Enclosure 1).

   b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

   c. An inventory of rare, threatened, and endangered species on site and within the area of impact. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380).

   d. Discussions regarding seasonal variations in use by sensitive species of the project site as well as the area of impact on those species, using acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

9. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the draft EIR/EIS should provide:

   a. Specific acreage and descriptions of the types of wetlands and other sensitive habitats that will or may be affected by the proposed project or project alternatives. Maps and tables should be used to summarize such information.

   b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region and that would be affected by the project. This discussion is critical to an assessment of environmental impacts.

   c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.

   d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should be included. The latter subject should address: project-related changes to drainage patterns both on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

   e. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.

   f. If applicable, an analysis of the effect that the project may have on completion and implementation of regional and/or subregional conservation programs. Under § 2800 - § 2840 of the Fish and Game Code, the Department, through the NCCP program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity.

10. A thorough discussion of mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Measures to fully avoid and otherwise protect Rare

Natural Communities (Enclosure 2) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation through acquisition and preservation in perpetuity of the affected habitats should be addressed. The Wildlife Agencies generally do not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

This discussion should include measures to perpetually protect the targeted habitat values where impacts are avoided during construction and where preservation and/or restoration are proposed. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc. For mitigation measures that include restoration, plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic depicting the mitigation area; (d) time of year that planting will occur; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the entity(ies) that will guarantee achieving the success criteria and provide for conservation of the mitigation site in perpetuity.

Mitigation measures to alleviate indirect project impacts on biological resources must be included, including measures to minimize changes in the hydrologic regimes on site, and the means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.

11. As discussed previously, descriptions and analyses of a range of alternatives to ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise reduce impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas of lower resource sensitivity where appropriate.

12. The Wildlife Agencies have responsibility for the conservation of wetland and riparian habitats. It is the policy of the Wildlife Agencies to strongly discourage development in or conversion of wetlands. Any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage would be

problematic. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and chanalization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

If appropriate, the draft EIR/EIS should include a jurisdictional delineation of lakes, streams, and associated riparian habitats, including a wetland delineation pursuant to the U.S. Fish and Wildlife Service definition (Cowardin 1979) adopted by the Department. Please note that wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

The proposed project may require a Lake or Streambed Alteration Agreement (SAA). The Department has direct authority under Fish and Game Code Section 1600 *et. seq.* regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake. The Department's issuance of a SAA for a project that is subject to CEQA, requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the Lead Agencies' CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the lake, stream, or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the SAA. A SAA notification form may be obtained by writing to the Department of Fish and Game, 4949 Viewridge Avenue, San Diego, California 92123-1662, by calling (858) 636-3160, or by accessing the Department's web site at www.dfg.ca.gov/1600.

The Wildlife Agencies appreciate the opportunity to comment on the NOP. Please contact Pam Beare of the Department at (858) 467-4229, or Chris Otahal of the Service at (760) 431-9440, if you have any questions or comments concerning this letter, and for further coordination on this project.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

for Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

cc: State Clearinghouse

Literature Cited

Cowardin, Lewis M., V. Carter, G. C. Golet, and E. T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. Fish and Wildlife Service, U.S. Department of the Interior. U. S. Government Printing Office, Washington, D.C.

CUE 2002. Before the Public Utilities Commission of the State of California. Reply Brief of the Coalition of the California Utility Employees Regarding the Applicability of General Order 131-D to the Proposed Path 15 Upgrade Project. July 18, 2002.

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

   A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

   Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:

   a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
   b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.

3. Botanical consultants should possess the following qualifications:

   a. Experience conducting floristic field surveys;
   b. Knowledge of plant taxonomy and plant community ecology;
   c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
   d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
   e. Experience with analyzing impacts of development on native plant species and communities.

4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:

   a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.

c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.

e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:

a. Project description, including a detailed map of the project location and study area.
b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
c. Detailed description of survey methodology.
d. Dates of field surveys and total person-hours spent on field surveys.
e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
h. Recommended measures to avoid impacts.
i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
l. Name of field investigator(s).
j. References cited, persons contacted, herbaria visited, and the location of voucher specimens.

ATTACHMENT 2

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Less than 6 known locations and/or on less than 2,000 acres of habitat remaining.

S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh

S1.2	Southern Foredunes
	Mono Pumice Flat
	Southern Interior Basalt Flow Vernal Pool
S2.1	Venturan Coastal Sage Scrub
	Diegan Coastal Sage Scrub
	Riversidean Upland Coastal Sage Scrub
	Riversidean Desert Sage Scrub
	Sagebrush Steppe
	Desert Sink Scrub
	Mafic Southern Mixed Chaparral
	San Diego Mesa Hardpan Vernal Pool
	San Diego Mesa Claypan Vernal Pool
	Alkali Meadow
	Southern Coastal Salt Marsh
	Coastal Brackish Marsh
	Transmontane Alkali Marsh
	Coastal and Valley Freshwater Marsh
	Southern Arroyo Willow Riparian Forest
	Southern Willow Scrub
	Modoc-Great Basin Cottonwood Willow Riparian
	Modoc-Great Basin Riparian Scrub
	Mojave Desert Wash Scrub
	Engelmann Oak Woodland
	Open Engelmann Oak Woodland
	Closed Engelmann Oak Woodland
	Island Oak Woodland
	California Walnut Woodland
	Island Ironwood Forest
	Island Cherry Forest
	Southern Interior Cypress Forest
	Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes
	Active Desert Dunes
	Stabilized and Partially Stabilized Desert Dunes
	Stabilized and Partially Stabilized Desert Sandfield
	Mojave Mixed Steppe
	Transmontane Freshwater Marsh
	Coulter Pine Forest
	Southern California Fellfield
	White Mountains Fellfield
S2.3	Bristlecone Pine Forest
	Limber Pine Forest

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File Code: 1950-4/1950-5
Date: NOV 01 2006

Ms. Billie Blanchard, CPUC/Ms. Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Ms. Blanchard and Ms. Kastoll:

The following information is provided as the Forest's response to the Notice of Preparation for an Environmental Impact Report/Environmental Impact Statement for the San Diego Gas and Electric (SDG&E) Sunrise Powerlink Project.

Over the last several years, numerous members of my staff have attended SDG&E's workshops and CPUC's hearings and workshops on this project. On Tuesday, October 3, members of my staff met with you and your consultants regarding the proposed project and the document preparation. At that time, you were provided with copies of the Cleveland's visitor map and the electronic version of our Revised Land Management Plan and Final Environmental Impact Statement.

I would like to bring to your attention several items which are in our Forest Plan which may guide you in your environmental review of the proposed project:

- Parts 1 and 3 of the Plan are common for the four National Forests in southern California. While Part 1 identifies the strategic goals and desired conditions, Part 3 contains design criteria (in the form of standards, beginning on page 3) for a wide range of potentially affected resources. Part 3 also contains appendices with operational guidelines for land and resource management for selected operations, some of which would apply to the construction, operation and maintenance of a powerline and related facilities.
- Part 2 of the Plan applies specifically to individual forests. In the Cleveland's Part 2, you will find the description and definitions of our land use zones beginning with the last paragraph of page 5, and displayed graphically in the maps that accompany the Plan. We have identified the land uses which may or may not be suitable within each zone (beginning on page 2). Any major utility corridor (one which serves a regional need) would require placement in a designated area. The Cleveland's only currently-designated utility corridor is identified in Table 485, located on page 14 of Part 2 of the revised Plan; any additional utility corridor would require a Plan Amendment, with a decision document following evaluation under the National Environmental Policy Act, as amended. Also consider that various land uses associated with constructing, operating, and maintaining such a corridor (such as roads, in addition to the powerlines and their upright structures and substations potentially containing hazardous materials) have their own requirements within our land use zones.

- Our Forest Plan (beginning on page 33 of Part 2) takes a place-based program emphasis for land and resource management and desired future conditions by geographic area. For each place, we have identified the general setting and attributes as well as the desired condition; delineation and naming of each of the places can be found on the "Places" map included in our Plan.
- Appendix A of Part 2 of the Cleveland Plan identifies special designation overlays (also shown in the maps which accompany the Plan) for existing and recommended proposed wilderness areas, wild and scenic rivers, Research Natural Areas (RNAs), and Special Interest Areas (SIAs).
- Cleveland-specific standards (e.g., design criteria) begin on page 6 of Part 2 of the Forest Plan. Please note Standard CNF S5 regarding the preferred consolidation and co-location of major utility corridors. Additional program strategies and tactics are found in Appendix B of Part 2 and address aesthetics (including Scenic Integrity Objectives which are displayed in the maps found in Appendix C of Part 2); fish and wildlife; soil, water, riparian and heritage; and cultural and historic resources.
- While Appendix B of Part 2 identifies program conservation strategies and tactics, these are supplemental to the Forest- and Place-specific standards (beginning on page 68 of Part 2); a number of items in this portion of the Plan are applicable to the disturbance required to install, operate, and maintain a powerline and appurtenances, regardless of geographic location on National Forest System lands.
- Part 3 of the Plan contains standards which are required by agency regulation, as well as various appendices related to project planning and implementation.
- Inventoried Roadless Areas (IRAs) are identified in the maps included in the revised Forest Plan. However, due to a recent decision of the U.S. District Court for the Northern District of California, Forest Service roadless areas based on the agency's 2001 roadless rule may still be in effect. Under the agency's 2001 Record of Decision for Roadless Area Conservation, roads would not be constructed or reconstructed in these areas unless the Responsible Official determined that the proposed project met at least one of only seven conditions to be considered for road construction or reconstruction (see the Final Rule for 36 CFR 294 as published in the Federal Register at 66 FR 3243 on January 12, 2001). Further information on IRAs can be found on the Forest Service internet site at http://roadless.fs.fed.us/. You will notice on the Cleveland map (found on the Roadless site at http://roadless.fs.fed.us/states/ca/cleve.pdf), as well as in the Forest Plan map, that there is extensive roadless area designation between Capitan Grande Reservation and Cuyamaca Rancho State Park. Further descriptive information on the Eagle Peak, No Name, and Sill Hill IRAs can be found in the "Reading Room" section of the Forest Plan.

We understand that the alternatives appearing in the Notice of Preparation may not be the final combination of corridors studied in detail during the environmental analysis. Therefore, at this time we are offering some general suggestions to be considered during the selection of alternatives studied in detail and those which are eliminated from further consideration:

- Sunrise Scenic Byway (County Road S1) provides public access to and through the designated Mount Laguna Recreation Area. The Recreation Area contains the highest concentration of developed recreation sites on the Cleveland, a portion of the Pacific Crest National Scenic Trail (also see Forest-specific design criteria CNF S12), and numerous archaeological resources, as well as habitat for federally-listed species,

including the Laguna Mountains skipper (see Forest-specific design criteria CNF S9) which has critical habitat proposed by the U.S. Fish and Wildlife Service. A proposed major utility corridor through this area would conflict with the primary management objectives for the area – recreational purposes and scenic beauty.

- Interstate 8 is a major corridor for emergency response within that area of the Forest, both for fires and in response to traffic collisions at any time of the night or day. A major powerline in this corridor would likely have an effect on aerial operations, whether for fire suppression or for airlifting people to emergency medical treatment.
- The Guatay Mountain area (found in the Sweetwater Place) contains an existing 180 acre SIA managed for its botanical resource (Tecate cypress) and has been proposed as a 1,337 acre potential RNA. RNAs are part of a national network of ecological areas designated in perpetuity for research and education and/or to maintain biological diversity on National Forest System lands. A decision is to be made within 3 years of the Plan decision to determine if this candidate RNA will be recommended for establishment (see footnote to Table 318, Plan Final Environmental Impact Statement, page 324). The Forest is also aware that Guatay Mountain has religious significance for the local Native American people.
- Sheeps Head near Glen Cliff (near Interstate 8, southeast of the community of Pine Valley) is one of the Forest's popular hang gliding areas, and would create user conflicts if a major power corridor were in this area.
- The Forest contains two Congressionally-designated Wilderness Areas that are in the vicinity of various powerline alternatives. Both Hauser and Pine Creek wilderness areas were authorized by Public Law 98-425, September 28, 1984, as part of the California Wilderness Act of 1984. The recent Plan revision identified areas for consideration as additions to the above two wilderness areas (see the Land-Use Zones map in the revised Forest Plan). Forest Service policy dictates that any area identified for potential wilderness designation be managed as wilderness pending the Secretary's recommendation and/or the enactment of legislation to designate an area as wilderness.
- There are four areas of the Cleveland which are raptor-sensitive: Valle de San Jose Grant surrounding Lake Henshaw, the Santa Ysabel Valley, the Witch Creek area, and the San Vicente Valley in the vicinity of San Diego Country Estates. In addition, there are two known nesting areas of golden eagles located on Forest Service land: one is in the Santa Ysabel area, and the other near Mt. Gower. There is also a nesting pair of bald eagles located in the Lake Henshaw area (and sometimes visible from the Forest's Henshaw Scenic Vista Wildlife Viewing Platform, completed in 2005, located above the west shore of Lake Henshaw). Eagles and other raptors are addressed in Forest Plan standard S18 (found on page 7 of Part 3) and S42 (on page 9 of Part 3).
- Additional species information can be found in the "Reading Room" section of the Forest Plan revision documents in the form of species accounts for both plants and animals and a habitat status report.

The threat of wildfire is a constant concern for the Forest, whether from natural causes (such as summer lightening storms) or human causes (accidentally or intentionally). We have found that roads associated with utility corridors become inviting to dumping of hazardous materials and visitor vehicle use. In turn, the visitor access on the non-public roads has led to fire starts and ultimate conversion of vegetation type which affects habitats (including the introduction of non-

native invasive species), but also puts communities at risk (those just outside of the Forest boundary as well as the private property within the proclaimed Forest boundary). Additional information concerning the Forest's management challenges with fire and forest health can be found in Part 1 of the Forest Plan. The fire history of the Cleveland National Forest can be found on our Region's GIS Clearinghouse internet site at http://www.fs.fed.us/r5/rsl/clearinghouse/gis-download.shtml#sc.

In addition to landscape-scale effects of wildland fire, the safety of our firefighting personnel is affected by the placement of major utility corridors – not only do they create an aerial hazard for helicopters and other equipment during fire suppression activities, but they also can create physical hazards for firefighters on the ground when powerlines begin arcing from heavy smoke. If placed over a key fire control point, transmission lines can cause fires to become larger than would be if the lines were not present.

At the present time, the Forest is conducting an environmental analysis for the re-issuance of approximately 75 permits which address existing SDG&E facilities on National Forest System land. The consolidated re-issuance is expected to be completed in Spring 2007. For further information on this effort, contact Tim Cardoza who can be reached at (619) 445-6235 or by e-mail at tcardoza@fs.fed.us.

If there are any questions regarding the above information, please contact Bernice Bigelow, Forest Resource and Planning Staff Officer, or Tom White, Forest Planner at (858)674-2901.

Sincerely,

Richard D Hawkins

FOR TINA J TERRELL
Forest Supervisor

cc: SLee, Bernice Bigelow, Graciela Terrazas, Thomas F Gillett, Richard K Tobin, Tom White, Steve Eastwood, Richard D Hawkins