

Cleveland National Forest Power and Distribution Line Alignment

Orlie Baird

Area Manager, AT&T

9670 Aero Drive

San Diego 92123

January 30, 2013

Debra Hobbs

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Cleveland National Forest

(Phone (858) 674-2904

[dshobbs@fs.fed.us](mailto:dshobbs@fs.fed.us)

Ms. Hobbs,

I want to thank you for meeting with AT&T in December. At our meeting, you asked if I would provide you a letter describing our concerns about a proposal from SDG&E to change out many of their poles in Cleveland National Forest from Wood to Steel and to underground their facilities in other areas. On some of those poles, AT&T has facilities and has had those facilities for many years. In many instances, AT&T paid a one-time lease fee for occupancy for the life of the pole.

Our concern is that AT&T has been asked to participate in this project, but that it is an unfunded mandate with no mechanism for AT&T to recover its costs. The cost of the undergrounding portion of the project is going to be approximately \$5,000,000. The cost of the Wood to Steel portion of the project will be approximately \$3,400,000. The costs include reimbursing SDG&E for providing the substructure in its trench and the ancillary substructure such as manholes/vaults. We would also be replacing all our lines. Aerial facilities are a different cable type than is used in the underground. The old facilities would be spooled up on wrecking reels and sent to recycling yards.

Instead of incurring the costs of the undergrounding, AT&T would like to remain on the poles that SDG&E will be vacating. SDG&E can simply top the pole and quitclaim the pole to AT&T. There are

provisions in the current Joint Pole Agreement between AT&T and SDG&E that outline how this can be done.

SDG&E appears to be embarking on this project to support Sunrise Power Link Application and it is in keeping with SDG&E's emphasis on Fire Hardening. Communications facilities do not pose the same risk of fire danger as power lines located on poles. Thus, there is no compelling need to require AT&T's facilities to be undergrounded.

AT&T usually undertakes undergrounding pursuant to its tariffs on file with the California Public Utilities Commission ("CPUC"). Generally, the CPUC adjudicates any disputes regarding whether a project qualifies for undergrounding under our tariffs. As we discussed, SDG&E currently has pending an Application related to the Sunrise Power Link project, and AT&T may be able to intervene in that proceeding to seek resolution of the undergrounding dispute. AT&T is currently considering whether such intervention would be an effective way of resolving the undergrounding dispute.

One of the things that you asked me to explain more in detail was the impact of doing an undergrounding. While we would share the trench line with SDG&E for most of the distance of the project, there would be more disruption to the areas where this work will occur if communications is included. The trench will be approximately one foot greater in depth. As you pointed out, there are a lot of areas in CNF with rock. AT&T also will be placing an additional 152 manholes/vaults that would not otherwise be placed. Power and Communications never share manholes/vaults for safety and operational reasons.

I talked to Tim Knowd with SDG&E. I had planned on providing you a list of the poles that SDG&E proposes to underground or replace with steel poles. However, AT&T has signed a non-disclosure agreement with SDG&E, and because they have not given us permission to share the list, you will need to get the list from SDG&E.

We also discussed the remaining steps needed to get a new Master Use Permit. We will work diligently to complete the maps that you requested. Bob Correy will be working with you to replace the broken pole and remove the orphan poles in the Escondido Ravine area of the Laguna Meadow.

Please let me know if you have any additional questions that I might answer.

Sincerely Yours,

Orlie Baird

Area Manager, AT&T

(858) 268-2045

## Devin Brookhart

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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Friday, January 31, 2014 3:56 PM  
**To:** CNFMSUP; Will Metz; lisa.orsaba@cpuc.ca.gov  
**Subject:** Master Permit comments to 2nd scoping

I understand that there is a hearing on February 5 as well. Not everyone got an announcement. I filed a protest to this process over a year ago but never heard anything . The POC filed and their protest was honored. What is the difference?. I have asked numerous times about the stakeholder status what it is . I have yet to get an answer.

One thing I want to point out though , because you are trying to co-mingle two projects, one under the State of Ca and the other under the Federal Forest Service, I think this process is breaking Federal Contracting laws by the way stakeholders for the state get this special treatment and furthermore are paid by the process. IN Federal contract procurement and contracting, multiple parties are regarded equally and the times when information is shared it is shared with all and the times when information is held confidential it is confidential for all. The Federal Government contracting laws insure that parties all have an equitable opportunity in a decision. However by designating a party special and providing them with an additional forum to litigate before the draft is created seems would provide them all sorts of advantages over the rest of us.

They can designate additional criteria and leverage additional research and communication that we can not. I've had a horrible time getting communication even when I was the only one that had been to the areas in question. This means they can leverage action onto areas that could impact the wilderness areas that we have spent a decade and a half trying to protect by having a privileged relationship with the state. Indeed this is what happened on the Sunrise Power link because they were able to speech and leverage criteria before us.

I have been a part of the Master permit process well before any of them back about four or five years now. Generally myself and the POC are positioned in similar if not identical ways, that is not the point . Nevertheless this secret early hearings are not disclosed to all of us. They are not even chosen with disclosure because mine was never addressed. Please tell me how this is going to comply with Federal Law?

I think this is severely providing advantage to certain privileged groups if they are selected when we have researched our areas thoroughly much longer yet this biased process could end up harming Federal Wilderness lands because by comingling it with the states very different approach they get advanced attention and position in a process that the Federal Government requires to be equal for all.

Effectively this means, since this is a joint peir/peis that people close to the state, with relationships with the state , and even being paid by the state, would have more favor and influence than the people who have actually seen the land!!!

Indeed I my opinion that happened *in a very big way* on the Sunrise Powerlink. This sets up a very lopsided decision that doesn't recognize the input on the Forest as equitably or even at the same time making assumptions before the USFS has even evaluated the land. Additionally with this potentially crossing private property the ability to influence that decision is doubly complicated.

In the end you could be violating contracting laws as well as usurping NEPA laws. It does not matter that their areas are on state or private property, the fact that the two run together and they have far more access as well as perceived prestige as well as being paid by the State, to this process and its decision makers allows them to dictate placing these lines on private property where they have control and will be so close to wilderness that it will be a horrifically significant impact to a decade of our work, and for perpetuity on the land that was supposed to be unspoiled for perpetuity. I reiterate it is not the deliberate actions of the POC as I likely agree with everything in their position, it is the disproportionate care to evaluating federal wild remote lands time and again that get misrepresented in these proposals and then encumbers my resources for nothing. I am not asking for compensation as clearly I have the objective upper hand, I am asking that by whatever means necessary the USFS themselves need to have this ability and knowledge available or at least an unencumbered way to field mine as a first pass before publishing some of these proposals. We could save a lot of money up front with better initial checking.

I would challenge the legality of this for potentially violating contracting laws as well as imposing illegal use of states rights over the Domain of the US Forest Service and finally in violation of Federal Civil Rights laws that US Citizens ability to participate is being marginalized by a design that favors state law and their privileged stake holders even though I had standing on this project years before they did, and to this day much more ground knowledge. Additionally they are breaking Federal Contracting laws by paying participants in a contract in areas where it would be illegal in federal law to do so giving them financial incentives and advantages to favoring a state position or a decision over another and the relationship with decision makers before federal stakeholders can establish equitable position. I demonstrated this.

I filed a protest months before they did but mine was never acknowledged.

The rules of this process that were provided to all for the meeting on February 19th did not include any guidelines for participating in the hearing on the 5th or the interface of paid stakeholder status..so their position is both privileged and secretive. I think this has created a highly discriminatory, highly class based process where some of the participants are favored and have more information than others. They are given status even when they know less about the land. and have bias for their areas of concern. that would be understandable if they did. However it would be illegal in federal law to allow that influence to impact Federal lands, and the fact that this was placed on top of as many inholdings as possible could be an indication of conflict of interest and fraud. In other words they have the extra time in a sophisticated forum in the company of their attorney and yours, they are paid and they are doing everything they can to keep this from going on their lands. I don't blame them but this is unfairly influencing this decision on Federal lands and additionally usurping the authority of the US Forest Service not to mention horribly unfair to the local inholdings in the Forest.

There is no reason to assume that there is a partial power line. It would serve no purpose. No reasonable person would think that such would be of any value or would view this as a separate project. Clearly it is not and this is an attempt to fractionalize the project. It is contributing to the already gross negligence and hardships this slurry of energy events has created in our community backcountry. This will be a whole line or no line. It is completely reasonable to assume that what transpires adjacent is a continuum of this line and will impact the vicinity on all sides. Therefore for this to be legal it seems to me that the criteria must face the test of Federal Law as well as state law anywhere if it is running in the vicinity of the forest.

To mince hairs to the nanometer of a boundary is not the purpose of a legal decision. I think it likely that the court would clearly address where the line runs in continuum enough to be an issue requiring an intersection of law or a de-mingling of the projects.

There are several areas where the state and Federal laws collide. One of the most significant is the response to question 4 concerning the capacity of the line.. They argue that they got away with discounting amperage to the City of San Diego so they should to any one. I think they will have to abide by Federal definitions of capacity on the Forest.

it is a bogus answer mathematically as well. They claim to only be concerned with voltage and impedance. However Oms law included amperage in the calculation of resistance or impedance.

**Ohm's law** states that the current through a conductor between two points is directly proportional to the potential difference across the two points.

Volts = Amps / Ohms

If Volts = 69 and amps = 1 Ohms = 69 and wattage = 69

If Volts = 69 and amps = 5.5 (the increase in the new wires) Ohms = 12.54 and Wattage = 379.5

And what they means is they did not answer your question and they haven't explained a thing. They just didn't want to answer a very simple answer that would clearly indicate that they are trying to fly this under the radar without disclosure.

I would insist that there is no reason for this to be on private lands at all. The portions that are on private lands are in a line that is also relevant to the silting issues of our watershed and for which the Forest Service has recommended a reroute in the first place. therefore along with moving the line from Cedar Gorge I would ask that this be moved off all private inholding and aligned as reasonably close to the already impacted Boulder Creek road corridor as possible. The broad option in the first scoping that included Sill Hill unit of Recommended wilderness is crossing both a current IRA and a draft Recommended Wilderness and environmentally having been to all of these areas many times I would say that that is the worst notion to date for an energy project since the Sunrise Powerlink itself. I challenge anyone to state differently as a matter of telling the truth to the Federal Government.

There are other options for accommodating energy needs in San Diego. Most are bad but a lot better than that one. Some are good like undergrounding under 79 and some are better still like moving the infrastructure to town and begin renting roof tops. who better to jump start that industry. You or someone else? Nevertheless once this is in the Forest given there are no major national emergencies to the contrary I DO think some rerouting is necessary but I Do think the entire line should be on USFS land if only right beside Boulder Creek road so that the USFS will be entirely in charge of overseeing this interface..

These projects since 2005 have put ridiculous pressure on our Forest. They have to take care of Utilities to the demise of many other regular projects. It is little secret. It is very well and commonly understood among the people who live or frequent the forest. I think the USFS could do better coordinating and communicating with volunteers but by the same token there are times to the point that they do not have the time to stop and manage and organize even that. And volunteers are really only allowed to do so much with confidence. That being said there needs to be much more much clearer interface with the USFS as well as a very clear separation between them and utilities.

They cannot make deals out side of the Federal contracting and permitting process by persuading subordinate forest employees to do their bidding. The Forest supervisor has to be the first line of all communication and he has to be part of all communications.

You need to be giving them the money for several positions to add their management portions of these lines. I have had to make NUMEROUS trips to the land often under time constraints because they are not provided the resources to do full environmental assessments and I find critical errors. Some times I've had to intervene on other issues even potentially life threatening because they are so swamped with energy and bureaucracy. Time and again it is because they have had to stop and spend their time on you and there is nothing left to

give. I'm getting really tired myself and sick of the disproportionate forestry to utilities that traditionally was not the focus of the USFS to have to do.

Those who manage utilities need special federal contracting and public sector training and they need to be fully communicating with all lands and environmental personnel before committing the Forest Service to decisions that favor utility development. That means what ever you have been paying them it isn't enough or it isn't going back in to this forest and it needs to be.

Sincerely  
Cindy Buxton  
Chair of the Forest Committee, San Diego Sierra Club

*1964 \* Civil Rights 50 -- Wilderness 50 \* 2014*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

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## Devin Brookhart

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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Friday, January 31, 2014 6:38 PM  
**To:** CNFMSUP; Will Metz; Joan Friedlander; lisa.orsaba@cpuc.ca.gov  
**Cc:** kelly@kellyfuller.net; Bill Powers; Nathan Weflen  
**Subject:** Sdgc master permit scopingII questions

Page 4 of the answers to questions about the master permit and line capacity:

The common definition of "system capacity" is the maximum amount of power, generally expressed in terms of MVA or MW that can be transferred from one location to another. In the context of a transmission line the term "capacity" would imply the maximum amount of electric power that can be transferred over the transmission facility in a reliable manner.

While the **voltage** of the facility is a key parameter the amount of **current** (ampacity) the conductor can safely transmit is also critical in determining the power transferred. For example a 69kV line capable of carrying 100 amps will have twice as much capacity to transmit power as a line carrying 50 amps.

As explained more fully below, Commission precedent is the source for the statement that "capacity" refers to the nominal operating voltages of the power line facilities in question and is tied to voltage, not to power being transmitted.

We did not request the commission precedent we requested a statement on the increase in capacity as defined by most of the world as the first paragraph above in power transferred from one location to another. You did not answer the question. You supplied a definition out of a Ceqa legal case definition for the threshold needed for a new permit. We did not ask about the Ceqa definition. In fact this is in the US Forest and what we need is the capacity as seen by every electrical engineer in the country, we need the science answer not the legal one. This should be obvious to any reasonable person. YOU are supposed to be working under both the Federal government and the State and you have to honor the science definition to capacity or power transferred not a Ceqa one or you need to de-comingle this project from state and federal forest.

It appears that this is a difficult question for you to answer and you are trying to avoid the truth that in fact the wattage and the amperage even according to your numbers will increase by 4.2. that would be consistent with the increased cross-sectional area of the wire but you failed to add in the increase in temperature adding another 40% to the amperage.

Please readdress this question. What is the increase in the amount of electric power that can be transferred over the transmission facility from the current one to the proposed one? Said another way, what is the percentage of increase in 100 watt light bulbs the new one can light over the old one? Is that not an increase of 400% plus the increase in temperature bringing the real total to 500% -or 5 times as many, of the current number of 100 watt light bulbs the proposed line could theoretically light over the old one even if the other components of this system are what they are in this proposal?

By comparison doesn't that make the proposed ability of the proposed line to transfer electrical power over the transmission facility greater than one of the 230 kV lines going from the Bell Bluff substation to Alpine, in fact that would make the 626 line 1.6 times the ability to transfer electrical power over one of the 230 lines would it not? So given the ability of the southwest power line and the Sunrise Powerlink to switch, failover, and load balance at the Jacumba substation, would it not be true that this is in reality not for the purpose of

accommodating distribution customers , all one of them but for the purpose of moving power from the Sunrise Powerlink and its affiliated energy project to your northern markets , and this will be happening from the moment it goes operational thanks to the increase in ability to transfer that power? Not in the likely **future** expansion but it is happening **WITH** this proposed upgrade?

Cindy Buxton  
Chair of the Forest Committee San Diego Sierra Club  
541 Spruce Street  
Imperial Beach , Ca 91932

*1964 \* Civil Rights 50 -- Wilderness 50 \* 2014*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*



## Devin Brookhart

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**From:** Kelly Fuller <kelly@kellyfuller.net>  
**Sent:** Friday, February 07, 2014 1:59 PM  
**To:** lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us; rhhawkins@fs.fed.us; CNFMSUP  
**Subject:** Letter of thanks re: supplemental scoping for SDG&E MSUP project  
**Attachments:** A.12-10-009\_POC\_2014-02-07.pdf

Dear Ms. Orsaba and Mr. Metz:

The Protect Our Communities Foundation would like to thank the California Public Utilities Commission and U.S. Forest Service for your agencies' decision to open a supplemental scoping period for SDG&E's Master Special Use Permit project, as explained in the attached letter. If you have any problems opening the attachment, please let me know.

Best wishes,

Kelly Fuller  
Consultant to The Protect Our Communities Foundation  
(619) 659-5133  
[kelly@kellyfuller.net](mailto:kelly@kellyfuller.net)



The Protect Our Communities Foundation  
P.O. Box 305  
Santa Ysabel, CA 92070

February 7, 2014

Lisa Orsaba, California Public Utilities Commission  
Will Metz, U.S. Forest Supervisor, Cleveland National Forest  
c/o Dudek  
605 Third Street  
Encinitas, California 92024

*Sent via Electronic Mail: [lisa.orsaba@cpuc.ca.gov](mailto:lisa.orsaba@cpuc.ca.gov), [wmetz@fs.fed.us](mailto:wmetz@fs.fed.us), [rhawkins@fs.fed.us](mailto:rhawkins@fs.fed.us), [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)*

**Subject: SDG&E's Master Special Use Permit – Supplemental Scoping Comment Period**

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of The Protect Our Communities Foundation (POC) to thank the California Public Utilities Commission (CPUC) and U.S. Forest Service (Forest Service) for opening a supplemental scoping period in regard to SDG&E's Master Special Use Permit project.

POC was one of the organizations that urged the CPUC and Forest Service to extend the original scoping period for this project. We greatly appreciate this new opportunity for the public to provide scoping comments, as well as the decision of your agencies to host another scoping meeting.

We also thank you for posting the supplemental scoping notice at public locations in the San Diego backcountry, such as local post offices.

POC believes there is much value in government agencies and nonprofit organizations working cooperatively when possible. Therefore, when POC asked that the scoping period be extended, we pledged that we would publicize it if our request were granted. We have begun outreach to the public about the supplemental scoping period and will continue our efforts.

Sincerely yours,

A handwritten signature in black ink that reads "Kelly Fuller". The signature is written in a cursive, flowing style.

Kelly Fuller  
Consultant to The Protect Our Communities Foundation  
[kelly@kellyfuller.net](mailto:kelly@kellyfuller.net)



## Devin Brookhart

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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Monday, February 24, 2014 5:32 PM  
**To:** CNFMSUP; Will Metz  
**Cc:** Molly Bigger; Joan Friedlander; Don Christiansen; Bjorn Fredrickson; jaheys@fs.fed.us; dshobbs@fs.fed.us  
**Subject:** comments on SDG&E master permit.

Dear CPUC., DUDEK, Forest Service, and SDG&E:

I have been discussing this project and it comes to my attention that "parties" and Nonparties are identified by the CPUC but not by the USFS. This means that "parties" identified by the CPUC get privileged input to projects in the USFS via special hearing even where the US Forest Service is not present. Indeed at the last hearing the term capacity is defined as a CEQA legal status but at the recent public meeting with the USFS the term Capacity received the FERC definition of wattage and volt-amps.

How is this legal in a Federal Permit to treat parties differently and not even disclose this? I know there were power points making reference to the party status but the word party is very different in every NEPA commenting I've been "party" to.

SDG&E plastered laminated flyers on every gate and many poles in the backcountry saying that we could object to their *ex parte* request for a permit. I objected. The POC (protect our communities) was invited to participate but I was not for myself or for the Sierra Club. There was no mention even in asking that they had a special status.

I had raised a very relevant question concerning capacity well validated now by public forums for both party and non party status; but was not able to interact equitably on this issue with parties that had less knowledge of the ground for the areas I've been involved in. How is this not flat out discrimination or preference for certain groups over others? Or is this what I perceive is avoidance of an issue by granting a different status to a group but failing to tell us when per your flyers we were allowed to do so?

I know of no major issues I have with the position of the POC as I think it likely that we are very similar on the issues. That is not the point.

I was a "party" to this commenting before they were by nearly a year. Your original document says that you will find a legal intersection with Federal Law but that is clearly not happening.

I find this shocking that the US Forest Service would have to recognize a state special status for certain commenters forced upon them by state process, and would necessitate that we are excluded in that consideration when we were commenters even during the original release of this project. It seems clear to me that in a Federal contracting process making this distinction is not allowed. I have asked for someone to call me on this but it did not happen. That request stands. Please call and tell me how you can mitigate this so that we can move forward. I do not think at this time that I'm comfortable with your ability to collaborate a mutual project with the US Forest Service because by all observations this and other issues have not been well integrated in this process nor is that communication happening in agile fashion with them.

Likewise within the domain of the Forest Service this project should be as much within the Forest boundary as

possible as they should maintain full control within their dominion. This confusion is unacceptable especially in light of the intended increase in wattage that this project could carry and I do not think putting this leverage and confusion upon private land owners would be the least bit fair to them. Additionally it would make the adjacent Forest Lands vulnerable and a multitude of environmental concerns in peril to activities they do not have management authority over.

Unlike some of the philosophies of the past that looked for remote areas to "hide" these projects and subsequently did damage by ever more chopping up contiguous wild lands; the current general philosophy in routing should still be to maintain or increase contiguous wild lands by logically siting on the periphery, for example , an alignment close to Boulder Creek Road. This alignment should be in conjunction with maintaining a safe distance from private lands-at least as much as the distance for hunting and the Wild Urban interface for fire management, or undergrounding as much as possible especially where wind issues, scenic issues , and private property can not be protected.

One of the cases in point is that if these criteria are met the only way to get through a ROW at the Marston Ranch, because it fully spans the boundary of the Sill Hill recommended wilderness as well as the Cedar Creek Recommended wilderness, with considerable avian and scenic integrity issues, and the Inaja Reservation as well, is to underground under Boulder Creek Road no less than the duration of those properties. Fire hardening issues should mandate that considerably more of this route should be underground, especially where wind speeds exceed the rating of even the proposed conductor.

Furthermore it has become evident that the increase in capacity impacts so much of this permit that before new poles and conductor can be installed this entire permit needs redesign. It is akin to the dilemma portrayed in "Back to the Future": If we patch the past we do not necessarily get the future result we want. For example putting 5 fold conductor on a pole next to someone's bedroom as mentioned in the open house. Whether you argue you have easement, whether you argue that there is no evidence to the contrary , (as do tobacco companies) , or not this would be asking them to live with the fear that this could be potentially lethal and forced upon them. No one could be comfortable with such a thing being forced upon them. In the year 2014 we do not run transmission and sub transmission over peoples home or in close proximity. We CAN do better. This mandates that these lines get moved off of their lands and the entire infrastructure needs to be rolled back to a point where it can get redesigned with the full intent and components in mind. This piece meal approach is not going to serve anyone.

I am expecting to make many more comments but the "party" status concern has come up among my constituents and I would appreciate a call.

Thank you !

I am hoping to receive a call a in time to comment before the dead line.

Sincerely ,  
Cindy Buxton  
Chair Forest Committee, Sierra Club San Diego  
619 817-3804 work  
619 823-3620 cell

1964 Civil Rights 50 ~ Wilderness 50 ~ Beatles 50 Yea yea yea!

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

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## Devin Brookhart

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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Wednesday, February 26, 2014 8:48 AM  
**To:** lisa.orsaba@cpuc.ca.gov; Will Metz; CNFMSUP; Bjorn Fredrickson; Joan Friedlander; jaheys@fs.fed.us; dshobbs@fs.fed.us; Jeff Wells; Kirstin Winter  
**Subject:** TL 626 master permit: discussion of three sub options at Boulder Creek

See video link and photos below:

This is a drive along Boulder Creek road starting at "the High Point" at about mile 6 and goes to the Dance Hall, -actually it starts at the Dance Hall and then ends there. You can skip through-I provide a "Table of contents" of sorts , below. I discuss some possible alternatives for a row for TL626. It is just brainstorming , nothing more but some suggestions of things to check out. Three sub alternatives are discussed coming to the west of the existing route to address issues at Boulder Creek.

Yes I do contradict myself at about minute 20 where I'm looking at possibilities nearer Boulder Creek Road around mile 12. I need to walk this whole stretch a bit more. It shows the Mineral Hill Mine coming close to a hypothetical route on the topo. Somewhere in the back of my mind I'm thinking maybe that mine is not in the right place on the topo. I've been there and it is pretty much like all of them. I suspect that has a good chance of including bats. These appear to have been very important habitat for them -the one at the miner pond 1/2 mile up Boulder Creek was loaded with them before the grate-probably even more now but of course I can't get in to look.

Mineral Hill Mine -the time I went is not easy to find -I had the help of David McCoy whose family has been here 160 years. The Mine was no "biggy" but the terrain in the canyon leading back to the Green Pond (formerly owned by David's Uncle) is stunning, two sections of legacy trees the upper woods I wonder if it is virgin- never cut. The lower has the remains of an old homestead, There is also a very sad but interesting story at this location about a mad who almost homestead here - Johnson hmmm there's a Stewart in the name too, not sure but the namesake of the side stream there. Much gorgeous polished rock along the stream between woods.

There are also golden eagles on the hidden ridges to the north of it. So one thing that remains for me in this option is to walk that stretch to the west of it as it may still have some possibilities. Originally I was thinking that the existing line is stable, politically, where it is from Mineral Hill through Green but as you can tell in the video I start to ask about other options that might get a bit lower and then come out just above -east - of the Dance Hall and run the cow pasture above. The access road there was created arbitrarily right before the Cedar Fire. You'll notice on the older topo's that it is a trail not a road. However currently it would provide some access for the lines. SDG&E's vendors were nice enough to move their heavy equipment off of the roots of the big tree at the dance hall as it is struggling. Much appreciated and something to add to a list of criteria , some of this repeated weight of the bigger equipment should avoid them, and where they break ground they should not get too close to the roots -about the same areas as the canopy and additionally they should not cover the roots and tree trunk with more dirt than it had before when they are done as this can kill a tree too.

I didn't cover the areas further on up near Boulder Creek road at Marston and Inaja. It is my opinion that you should pave this section -not all of Boulder Creek Road but that one section for the purpose of undergrounding from the big meadow through Inaja to the Fire Station. That would be about mile 15 to 19. I do not see any good way of getting through the trees at Marston without going under ground or pretty much

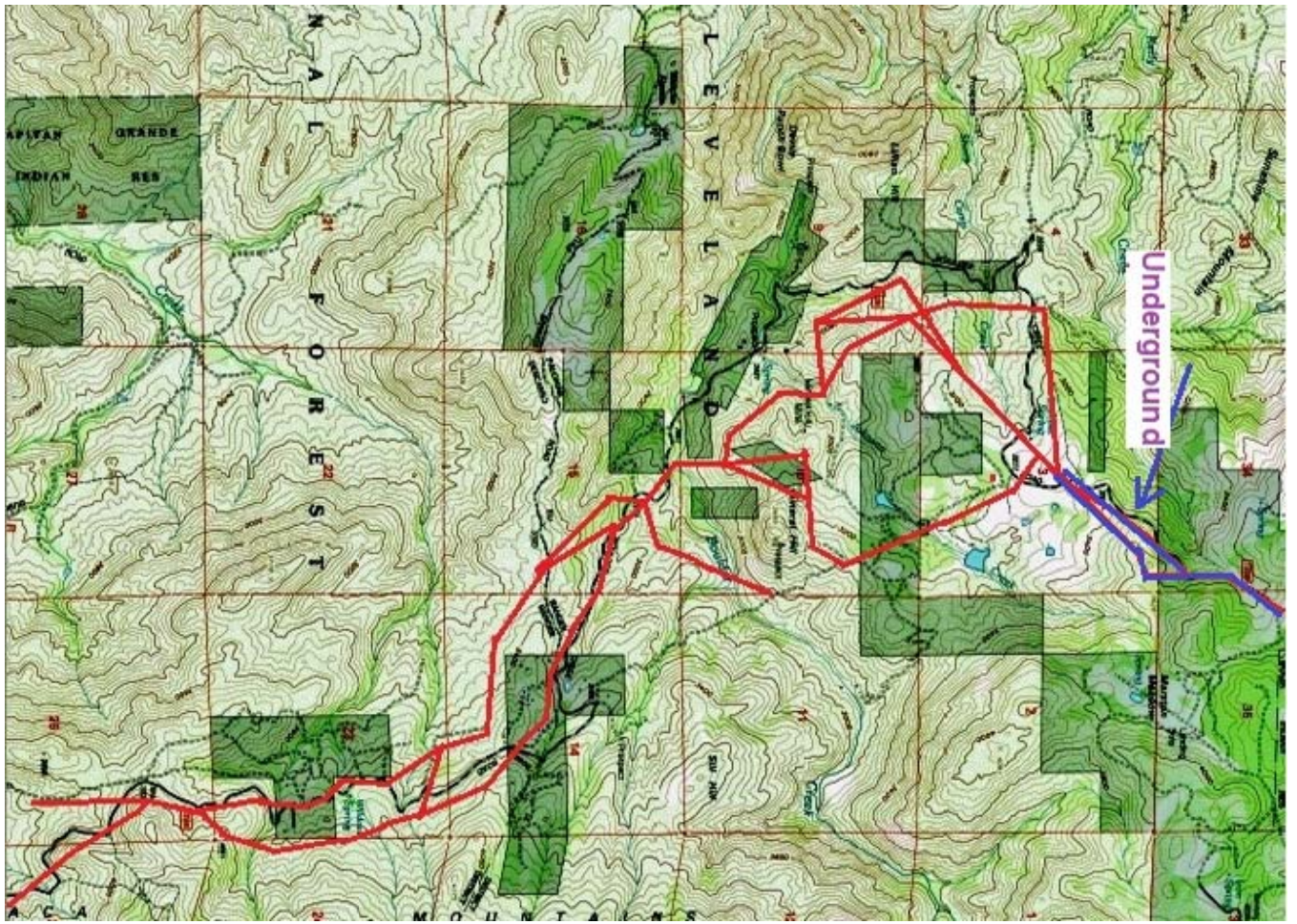




Cindy has files to share with you on OneDrive. To view them, click the links below.







## Devin Brookhart

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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Monday, March 03, 2014 9:52 PM  
**To:** Will Metz; lisa.orsaba@cpuc.ca.gov; CNFMSUP; Robert Hawkins; Joan Friedlander; dshobbs@fs.fed.us; jaheys@fs.fed.us; Bjorn Fredrickson  
**Cc:** Molly Bigger; Bill Powers; kelly@kellyfuller.net; donna tisdale1; kay taff  
**Subject:** Comments on the SDG&E Master Permit, Photos of Erosion into streams crossed by TL 626  
**Attachments:** Erosion from this last rain storm .pdf

The attached is a power point converted to PDF. This document contains before and after photos of the last storm at the Boulder Creek TL 626 power line access road. These demonstrate the erosion occurring into our streams due to this practice.

Please add these to our comments on the Master RE-Permit project.

I'm not sure that Bob Hawkins is receiving these, can you please forward? thank you!

Cindy Buxton

Chair , Forest Committee, Sierra Club San Diego

*1964 Civil Rights 50 ~ Wilderness 50 ~ Beatles 50 Yea yea yea!*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

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# Erosion from Feb 27 2014 Rain Storm

This is a series of before and after photos of the recent storm taken at the south end of the Boulder Creek access road. These photos demonstrate the erosion that is happening due to SDG&E's grading practices on their access roads to the TL 626 over Boulder and Cedar Creeks. These are from Boulder Creek where the grade is up to 46 %. Sdg&E has been grading these access roads in this fashion 2-4 times a year sending tons of silt into the streams.

















**note eroded  
drainage as well**























**This was one large rain storm, 4.5 inches. This grading is happening 2-4 times a year. They grade and stir up 6-10 inches of dirt and then the dirt is washed away into the streams at the first good rain. These are showing erosion that goes into Fugitive creek. Not far below, Fugitive Creek flows into Boulder Creek at a cold confluence where the trout like to “hang out” looking for food.**





**SDG&E's current alternative routing for the new Master permit did not address the silting into Boulder Creek. The plan does call for the removal of the line from crossing Cedar Creek. Currently the same situation occurs over Cedar Gorge as well. Even though the new Master Plan is calling for the prudent removal of this line, due to this and other issues there, SDG&E re-graded the two-three mile access road across Cedar Gorge only a month before this storm.**



DESCANSO COMMUNITY PLANNING GROUP

Post Office Box 38, Descanso CA 91916-0038

March 3, 2014

Lisa Orsaba, California Public Utilities Commission

c/o Dudek

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Via email to [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)

**COMMENTS ON THE SDG&E MASTER SPECIAL USE PERMIT AND PERMIT TO CONSTRUCT POWERLINE REPLACEMENT DRAFT JANUARY 2014 SCOPING REPORT**

Dear Ms Orsaba:

The Descanso Community Planning Group has received and reviewed the Draft January 2014 Scoping Report including the Appendix and has comments that support comments received during the initial scoping comment period and a few of our own.

1. Based on a review of the documents produced to date it does not appear that the project would include any increases in transmission line capacity. The MSUP should confirm in the documents that there will be specific limitations to restrict increases in capacity and voltage on existing lines. This is a significant point as the health effects of increased voltage Electric Magnetic Field was determined not to be considered as a significant change in the pending Draft Environmental Impact Report. There are many centralized renewable energy projects planned throughout the study area and they should be analyzed as potential connected

actions. A current proposed project within Descanso is an Ecoplexus solar project on Viejas Blvd. **Future changes proposed by SDG&E to increase transmission line capacity should not be allowed without full impact review and modification of this proposed MSUP.**

2. The project's visual impacts should be thoroughly analyzed in the EIR/EIS. Many of the visual simulations in the Revised Plan of Development seem to show that the new poles are going to be significantly larger than the current wooden poles. Will the poles be that much larger through the Country Town of Descanso? This will be a significant impact to the view shed of the area and ruin the country feel of the area. It will look industrial and hard as you drive down Viejas Blvd, River Road and Highway 79. **The community of Descanso would like this section of line within the country town to be placed underground so as to reduce this impact.**
3. Several of the individual comments to the NOP and Scoping Letter indicated a lack of security and BMP maintenance to existing SDG&E power line service roads. Require compliance with follow-up for proper BMPs: vegetation management, erosion control and locked gate maintenance for security for this project as well as the correction of existing concerns identified in the Appendix containing Individual Comments.
4. The EIR/EIS should identify and include a detailed project description that includes phasing plans for specific projects and limitations to hours of operations and duration of construction activities. Impacts of helicopters on residents, livestock, pets, and wildlife (especially eagles and other raptors), including but not limited to impacts of noise and vibration should be analyzed. It has been reported that there were many problems with helicopters disturbing residents and their animals during the construction of the Sunrise Powerlink, as well as the inherent safety issues of construction components having been dropped and helicopter rotors having struck objects. There were also reported problems with helicopters flying low over homes, and helicopters flying with suspended loads over homes. There needs to be strict conditions set for helicopter use, helicopter use needs to be monitored carefully throughout construction and SDG&E should not be allowed any waivers for helicopter use outside of normal hours or days because it puts an undue burden on our community.
5. The EIR/EIS should include requirements for adequate property owner notifications; generally 50 feet would not be adequate notification distance. The result of the noise analysis would be needed to determine appropriate notification distances to ensure all affected residents are notified.
6. All Project documents should be provided in hardcopy form at the Descanso County Library. Fast internet is not an option to our residents and as a result the

downloading of these large documents is not a viable option and CD's will not work at the library computer systems. One set of hardcopy documents is also requested for the review of the Descanso Community Planning Group.

The Descanso Community Planning Group will be following this proposal with great interest and look forward to receiving future environmental documents related to this project.

Regards

Kerry Forrest, Chair

Descanso Community Planning Group