

APPENDIX A
Notices

APPENDIX A-1
Notice of Preparation
(posted September 23, 2013)

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102-3298
Edmund G. Brown Jr. *Governor*



USDA FOREST SERVICE
CLEVELAND NATIONAL FOREST
18045 Ranch Bernardo Rd
San Diego, CA 92127-2107
Will Metz, *Forest Supervisor*



**Notice of Preparation
Notice of Public Scoping Meeting
For
SDG&E Master Special Use Permit and Permit to Construct
Power Line Replacement Projects
Environmental Impact Report / Environmental Impact Statement**

Application No. A.12-10-009

To: All Interested Parties

A. Introduction

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. As shown in Figure 1, the CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action described in more detail in Section D.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily include fire hardening along with relocation and undergrounding of certain facilities which will require a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC). As shown in

Figure 1, the power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a PTC the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD. The Revised POD is available on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/DR3Response.htm>.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR”. The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, this Notice of Preparation (NOP) is being sent to interested agencies and members of the public. The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with this NOP for preparation of a joint EIS/EIR. Similar to this NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency. This NOP,

prepared jointly with the Forest Service, provides additional information that supplements the NOI.

This NOP includes background information on the project, a description of the applicant's proposal, the Forest Service Proposed Action, a summary of potential project impacts, time and location of the public scoping meeting, and information on how to provide comments to the CPUC and Forest Service. This NOP and the NOI can be viewed on the project website at the following link:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

B. Background

In 2005, in consultation with the Forest Service, SDG&E submitted an initial application to obtain an MSUP. The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the CNF. As part of the NEPA review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in 2009. In response to public comments received on that EA, the Forest Service determined that additional fire risk reduction measures within the CNF (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required. SDG&E has expanded the scope of the proposed MSUP to include fire hardening, undergrounding and relocation as proposed in the power line replacement projects discussed in this NOP.

C. Applicant's Proposal

C.1 Applicant's Purpose and Objectives

According to SDG&E, the objectives of the MSUP and PTC are to (1) secure Forest Service authorization to continue to operate and maintain existing SDG&E facilities within National Forest System lands; and (2) increase the fire safety and service reliability of these facilities by replacing five existing 69 kV power line facilities and six existing 12 kV distribution line facilities. SDG&E's stated objectives also include undertaking these activities consistent with CPUC General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission (NERC/FERC) requirements and SDG&E standards; and minimizing potential environmental impacts by locating facilities within previously-disturbed areas where feasible.

C.2 Description of the Applicant's Proposed Project

Master Special Use Permit

SDG&E proposes to combine into one MSUP over 70 previously-issued use permits for 69 kV power line and 12 kV distribution line facilities as well as ancillary and appurtenant facilities within the CNF. The MSUP, if approved, would allow the continued maintenance and operation of SDG&E's existing 69 kV power lines, 12 kV distribution lines, ancillary, and appurtenant facilities as well as approximately 45 miles of existing exclusive use access roads required to operate and maintain SDG&E's existing electric facilities within the administrative boundary of the CNF.

Wood-to-Steel Pole Replacements

The Project would also replace the following existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would include fire hardening (wood to steel pole replacement), along with removal, relocation, undergrounding and single to double circuit conversion along certain segments.

- The existing 69 kV Power Line (TL) 625 – is approximately 22.5 miles in total length and generally runs from Loveland Substation east to Barrett Tap, from Barrett Tap east to Descanso Substation, and from Barrett Tap south to Barrett Substation. Proposed replacement includes wood to steel pole conversion along with single circuit to double circuit conversion.
- The existing TL626 – is approximately 18.8 miles in total length and generally runs from Santa Ysabel Substation south to Descanso Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL629 – is approximately 29.8 miles in total length and generally runs from Descanso Substation east to Glenclyff Substation, from Glenclyff Substation southeast to Cameron Tap, from Cameron Tap south to Cameron Substation, and from Cameron Tap east to Crestwood Substation. Proposed replacement includes wood to steel pole conversion, undergrounding and single to double circuit conversion.
- The existing TL682 – is approximately 20.2 miles in total length and generally runs from Rincon Substation east to Warners Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL6923 – is approximately 13.4 miles in total length and generally runs from Barrett Substation east to Cameron Substation. Proposed replacement includes wood to steel pole conversion.

- The existing 12 kV Distribution Line or Circuit (C) 78 – is approximately 1.8 miles in total length and generally runs from east of Viejas Reservation, east along Viejas Grade Road, to Via Arturo Road. Proposed replacement includes wood to steel pole conversion and overhead relocation.
- The existing C79 – is approximately 2.2 miles in total length and generally runs from Boulder Creek Road east to the Cuyamaca Peak communication site. Proposed replacement includes removal of existing overhead line and replacement with new undergrounding through Cuyamaca Rancho State Park.
- The existing C157 – is approximately 3.5 miles in total length and generally runs from Skye Valley Road, near Lyons Valley Road, east to Skye Valley Ranch. Proposed replacement includes wood to steel pole conversion. The Applicant’s proposal includes replacement and motorized use in the congressionally designated Hauser and Pine Creek Wilderness areas. The Forest Service has determined that this aspect of the Applicant’s proposal conflicts with the requirements of the Wilderness Act. The Applicant has requested the Forest Service to include an alternative whereby the Forest Service seeks authority from Congress to approve the fire safety work within the wilderness areas.
- The existing C440 – is approximately 24.0 miles in total length and generally runs from Glencliff Substation northeast to Mount Laguna along Sunrise Highway. Proposed replacement includes wood to steel pole conversion with some line removal, undergrounding and overhead relocation.
- The existing C442 – is approximately 6.2 miles in total length and generally runs south from Pine Valley Road to Los Pinos Peak Forest Station and along Pine Creek Road south toward the community of Pine Valley. Proposed replacement includes wood to steel pole conversion.
- The existing C449 – is approximately 6.7 miles in total length and generally runs from Old Highway 80 south along Buckman Springs Road to Oak Drive and southwest along Morena Stokes Valley Road to Camp Morena. Proposed replacement includes wood to steel pole conversion with some line removal and undergrounding.

The Applicant also proposes to install appurtenant facilities on poles and within the right-of-way as needed to continue to operate and maintain the electric system. These appurtenances may include electrical switches, smart grid control devices, weather stations, surveillance cameras, and other equipment necessary or prudent to ensure safe and reliable operation of its electric system.

D. Forest Service Proposed Action

As described in the introduction, the Forest Service reviewed and accepted the application with modifications to certain actions on National Forest System lands. This modified proposal is the federal proposed action that will be evaluated in the EIS/EIR.

D.1 Forest Service Purpose and Need

The Forest Service purpose is to authorize the powerlines and associated facilities needed to continue electric service to a variety of users within and adjacent to the Cleveland National Forest through a Master Special Use Permit in a manner that is consistent with the CNF Land Management Plan (LMP). This action is needed because the 70 individual permits or easements for the existing facilities have expired, and a permit is required for the continued occupancy and use of National Forest System lands.

Permits issued by the Forest Service are required by law to be consistent with the LMP. The LMP identifies suitable uses within various land use zones, describes desired conditions based on the LMP goals and objectives, and sets resource management standards. The Forest Service proposed action is designed to be consistent with the LMP requirements. The Forest Service purpose and need will guide the development of alternatives considered on National Forest System lands.

D.2 Forest Service Proposed Action

The Forest Service proposed action modifies the applicant's proposal in the following areas:

- TL 626 – The Forest Service proposed action is to relocate a section of TL 626 out of the Cedar Creek publically proposed undeveloped area and into a location within the study corridor shown in Figure 1. The section of line that is replaced will be removed and the affected area restored. The relocated section of line would be constructed to the same standard described by the applicant. Construction of access roads will depend on the final location identified in the study corridor. A more detailed location including alignments both on and off of the Inaja Indian Reservation will be identified based on input during scoping and analyzed in the Draft EIS/EIR.

The existing powerline access roads are impacting the Cedar Creek riparian area in conflict with the LMP. The steep road gradients prevent effective implementation of erosion control treatments. This area is also being evaluated for recommended wilderness zoning in the LMP. Relocation of the line will avoid riparian impacts and restore the undeveloped character of the landscape.

- C157 – The Forest Service proposed action would relocate the section of C157 out of the Hauser Wilderness and into the area between the Hauser and Pine Creek Wilderness areas as shown in Figure 1. The section of line that is replaced will be removed and the affected area restored consistent with wilderness objectives. The relocated section of line would be constructed to the same standard described by the applicant. Construction in the area between the two designated wilderness areas is consistent with the LMP and the Wilderness Act.
- Appurtenant Facilities – The Forest Service proposes to authorize electrical control devices and weather stations not otherwise specified in the permit, subject to Forest Service review and approval of final design and location. The Forest Service is not proposing to authorize surveillance cameras on National Forest System lands.

The facilities would be authorized by a special use permit. The permit has standard resource protection conditions, along with requirements for various plans to implement those conditions. A sample Master Special Use Permit, draft Operation and Maintenance Plan, and draft Fire Plan are available on the project website.

E. Affected Jurisdictions

As shown in Figure 1, the MSUP/PTC Power line Replacement Projects study area not only traverses National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverses public lands managed by the BLM; tribal lands of the La Jolla, Campo, Inaja, and Viejas Indian Reservations managed by the respective tribes and held in trust by the BIA; Cuyamaca Rancho State Park lands managed by CSP; and private holdings within unincorporated San Diego County amongst others.

F. Potential Environmental Effects

The joint EIS/EIR will evaluate potential environmental effects of the proposed MSUP/PTC Powerline Replacement Projects. The CPUC and Forest Service will propose mitigation measures to reduce or offset any significant or adverse effects identified in the analysis. The EIS/EIR will identify reasonable alternatives, compare the environmental impacts of the alternatives to the proposed action, and propose mitigation to reduce or avoid their effects.

Based on preliminary analysis, the proposed action may have a number of environmental effects. Potential issues and impacts to the existing environment to be analyzed in the EIS/EIR include those listed in Attachment 1. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered

thoroughly. To assist the reader in understanding the range of impacts that could be considered, and to provide a guide for scoping comments, Attachment 2 includes CEQA checklist questions that typically would be evaluated in an EIR.

The EIS/EIR will also address the cumulative environmental consequences of the proposed MSUP/PTC Powerline Replacement Projects in combination with other past, present, and reasonably foreseeable projects in the area, including known renewable energy and utility projects. This will serve to satisfy CEQA/NEPA requirements regarding regional cumulative effect concerns.

Mitigation Measures

SDG&E has proposed measures that could reduce or eliminate potential impacts of the proposed MSUP/PTC Powerline Replacement Projects. The effectiveness of these measures (called applicant proposed measures or APMs) will be evaluated in the EIR/EIS, and additional measures (mitigation or avoidance measures) will be developed to further reduce or avoid impacts, if required. When the CPUC and Forest Service make their final decision on the proposed project, they will define the mitigation measures to be adopted if the project or an alternative is approved, and the CPUC and Forest Service will require implementation of a mitigation monitoring and reporting program.

G. Alternatives

In compliance with CEQA and NEPA, the EIS/EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the Forest Service proposed action and associated MSUP/PTC Powerline Replacement Projects proposed on private lands. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. Reasonable alternatives also attain all or most of the purpose and need and avoid or lessen any of the significant environmental impacts of the proposed project.

Alternatives to be analyzed in the EIR/EIS will be developed during the environmental review process and will consider input received during public scoping.

As required by CEQA and NEPA the EIS/EIR will also evaluate the No Project/No Action Alternative. Under the No Project/Action Alternative, no MSUP or PTC would be issued. SDG&E would not be allowed to continue to operate and maintain its facilities on National Forest System lands as the current permits are expired. The permits require SDG&E to remove the facilities upon expiration of the permits. In

addition, the proposed power line replacement projects including fire hardening for fire prevention would not occur.

H. Public Scoping Meeting

The CPUC and Forest Service will conduct two public scoping meetings in the project area, as shown in Table 1. The purpose of these scoping meetings is to present information about the proposed project and the CPUC and Forest Service's decision-making process, and to listen to the views of the public on the range of issues relevant to the scope and content of the EIS/EIR.

Everyone is encouraged to attend one of these meetings to express their concerns about the project and to offer suggestions regarding the project as proposed, including alternatives.

**Table 1
Public Scoping Meeting**

Location	Day, Date, Time	Directions
Julian Elementary School 1704 Cape Horn Julian, CA 92036	Tuesday, October 22, 2013 5:00 p.m.	<p>From the west: take Highway 78 through Julian. Turn right on 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the east: take Highway 78 west towards Julian. Turn left on 2nd Street (across from the Post Office and after the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the south: take Highway 79 north to Highway 78 in Julian. Turn right onto Highway 78. Take the next left onto 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p>
Alpine Community Center 1830 Alpine Boulevard Alpine, CA 91901	Wednesday, October 23, 2013 5:00 p.m.	<p>From the west, take I-8 east and take exit 30 Tavern Road. Turn right onto Tavern Road (south). Turn left onto Alpine Boulevard. Alpine Community Highland Center will be on the left-hand side.</p> <p>From the east, take I-8 west and take exit 30 Tavern Road. Turn left (south) onto Tavern Road. Turn left onto Alpine Boulevard. Alpine Community Center will be on the left-hand side.</p>

I. Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. Suggestions for submitting scoping comments are presented at the end of this section. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. All scoping comments must be received by November 7, 2013. You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (e-mail), or (3) by attending the public scoping meeting (see time and location in Table 1) and handing in written comments at the scoping meeting.

By Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to:

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

By Electronic Mail: E-mail communications are welcome; however, please remember to include your name and return address in the e-mail message. E-mail messages should be sent to cnfmsup@dudek.com, with a subject line “SDG&E Master Permit”.

A **Scoping Report** will be prepared, summarizing all comments received. This report will be posted on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>;

and copies will be placed in local document repository sites listed in Table 2. In addition, a limited number of copies will be available upon request to the CPUC or Forest Service project managers.

Suggestions for Effective Participation in Scoping

Following are some suggestions for preparing and providing the most useful information for the EIS/EIR scoping process.

- 1. Review the description of the project** (see Sections C and D of this Notice of Preparation and the maps provided). Additional detail on the project description from SDG&E’s POD is available on the project website where the POD may be viewed.

- 2. Review the CEQA impact assessment questions** (see Attachment 2).
- 3. Attend the scoping meeting** to get more information on the project and the environmental review process (see time and date in Table 1).
- 4. Submit written comments** or attend the scoping meeting and **ask questions during the informational meeting**. Explain important issues that the EIS/EIR should cover in written comments.
- 5. Suggest mitigation measures** that could reduce the potential impacts associated with SDG&E’s proposed project.
- 6. Suggest alternatives** to SDG&E’s proposed project that could avoid or reduce the impacts of the proposed project.

J. For Additional Project Information

Internet Website. Information about this application and the environmental review process will be posted on the Internet at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

This site will be used to post all public documents during the environmental review process and to announce upcoming public meetings. In addition, a copy of SDG&E’s POD may be found at this site, and the Draft EIS/EIR will be posted at the site after it is published.

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the proposed project and the EIS/EIR will be made available at the locations listed in Table 2.

K. Issuance of Notice of Preparation

The CPUC hereby issues this NOP of an EIS/EIR, which can be found at the repository sites listed in Table 2.

**Table 2
Repository Sites**

Site	Address	Telephone
Alpine Branch Library	2130 Arnold Way Alpine, California 91901	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94 Campo, California 91906	619.478.5945
Descanso Branch Library	9545 River Drive Descanso, California 91916	619.445-5279

**Table 2
Repository Sites**

Site	Address	Telephone
Pine Valley Branch Library	28804 Old Hwy. 80 Pine Valley, California 91962	619.473.8022
Julian Branch Library	1850 Highway 78 Julian, California 92036	760.765.0370
Ramona Branch Library	1275 Main Street Ramona, California 92065	760.788.5270
Dudek	605 Third Street Encinitas, California 92024	760.942.5147

Attachment 1

Summary of Potential Impacts: MSUP/PTC Powerline Replacement Projects

The CPUC and Forest Service have determined that the following potential issues and impacts to the existing environment require a detailed analysis in the EIS/EIR. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered thoroughly. This overview is presented to assist the public and agencies in preparing written scoping comments.

Environmental Issue Area	Potential Issues or Impacts
Aesthetics	<ul style="list-style-type: none"> • Construction-related activities would result in the temporary degradation of existing visual character and quality in the project study area, including scenic vistas and other designated scenic resources. • Nighttime construction lighting may be used during project construction that could affect the nighttime view. • There may be potential conflicts associated with proposed wood to steel pole replacement with federal, state, and local plans; regulations; or standards applicable to the protection of visual resources.
Air Quality	<ul style="list-style-type: none"> • Project construction will produce short-term air emissions (fugitive dust and vehicle equipment exhaust) and may violate air quality standards during construction.
Biological Resources	<ul style="list-style-type: none"> • Project construction and vegetation management activities could result in temporary and permanent loss of native wildlife and/or their habitat. • Loss of habitat for sensitive species designated by state and federal resource agencies. • Conflict with federal, state, or local policies or ordinances protecting biological resources.
Cultural and Paleontological Resources	<ul style="list-style-type: none"> • Construction and operation could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources. • Temporary use of staging areas and conductor pull sites could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources.
Greenhouse Gas Emissions	<ul style="list-style-type: none"> • Construction activities would result in greenhouse gas emissions.
Hazards, Hazardous Materials, Fire	<ul style="list-style-type: none"> • Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater. • Fire hazard during construction and operation.
Hydrology and Water Quality	<ul style="list-style-type: none"> • Project construction and operation and maintenance could affect surface water flow and erosion rates causing subsequent downstream sedimentation and reduced surface water quality.
Land Use and Planning	<ul style="list-style-type: none"> • Construction would temporarily disturb ongoing or traditional land uses within the project study area. • Possible conflicts with pending land management plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

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SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects*

Environmental Issue Area	Potential Issues or Impacts
Noise	<ul style="list-style-type: none"> Project construction will produce short-term noise (from helicopters, vehicles and construction equipment) and may violate noise standards during construction.
Public Services and Utilities	<ul style="list-style-type: none"> Construction activities could result in increased generation of waste and disposal needs. Fire and emergency services may be required to service the proposed project and project study area during construction and operation.
Wilderness and Recreation	<ul style="list-style-type: none"> Construction or operation could cause conflicts with ongoing or traditional recreation uses in the project study area. Construction or operation could cause conflicts with the Wilderness Act of 1964.
Transportation and Traffic	<ul style="list-style-type: none"> Traffic would be generated by construction worker commute trips and equipment deliveries. Hauling materials, such as poles, concrete, conductor, and excavation spoils, would temporarily increase existing traffic volumes in the project study area. Access roads could increase vehicle trespass into areas where vehicles are not authorized.
Socioeconomics/Environmental Justice	<ul style="list-style-type: none"> The relocation of certain transmission facilities may result in social and economic effects as well as have disproportionately high or adverse effects on minority or low-income populations.

Environmental resources areas preliminarily determined to have a less than significant impact as a result of the proposed project and to not require further analysis include:

- Agriculture and Forestry Resources:** Since no land use changes are proposed with the replacement and fire hardening of the existing transmission and distribution lines, the proposed project would not convert existing agriculture or forestry lands to non-agricultural or non-forest uses.
- Geology, Soils, and Seismicity:** The proposed new steel power line structures would be more structurally sound than the existing wood poles due to improved engineering characteristics, increased material strength, and improved design safety requirements. The proposed project would be built to existing SDG&E design standards. Soil erosion will be addressed under Hydrology and Water Quality.
- Population and Housing:** The proposed project would not result in population growth in the area because no new homes or businesses are proposed, and no new infrastructure related to population growth is proposed. In addition, no new housing is needed because non-local construction workers would use available temporary housing throughout San Diego County. Further, the workers would be in the area only during construction and are not expected to become permanent residents.
- Electric Magnetic Field (EMF):** While the proposed project would relocate and underground certain transmission facilities, there will be no increase in the voltage used; therefore, there would be no significant change to EMF.

Attachment 2

Environmental Checklist

Following are the questions included in Appendix G of the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form (California Public Resources Code, Section 21000 et seq.). These are issues that may be evaluated in an environmental impact report (EIR), if they are determined to be relevant to the project. This list is provided only to provide the reader with a general idea of the types of impacts that will be considered for the proposed project.

I. AESTHETICS. Would the project:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- Result in the loss of forest land or conversion of forest land to non-forest use?
- Involve other changes in the existing environmental which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

IV. BIOLOGICAL RESOURCES. Would the project:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

V. CULTURAL RESOURCES. Would the project:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

VI. GEOLOGY AND SOILS. Would the project:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to the California Division of Mines and Geology Spec. Pub. 42)
 - Strong seismic groundshaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-

existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- Otherwise substantially degrade water quality?
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Inundation by seiche, tsunami, or mudflow?

X. LAND USE AND PLANNING. Would the project:

- Physically divide an established community?
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

XI. MINERAL RESOURCES. Would the project:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

XII. NOISE. Would the project result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

XIII. POPULATION AND HOUSING. Would the project:

- Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extensions of roads or other infrastructure)?
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES AND UTILITIES.

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire protection?
 - Police Protection?
 - Schools?
 - Parks?
 - Other public facilities?

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

XV. RECREATION. Would the project:

- Increase the use of existing neighborhood, and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

MANDATORY FINDINGS OF SIGNIFICANCE:

- Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?
- Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

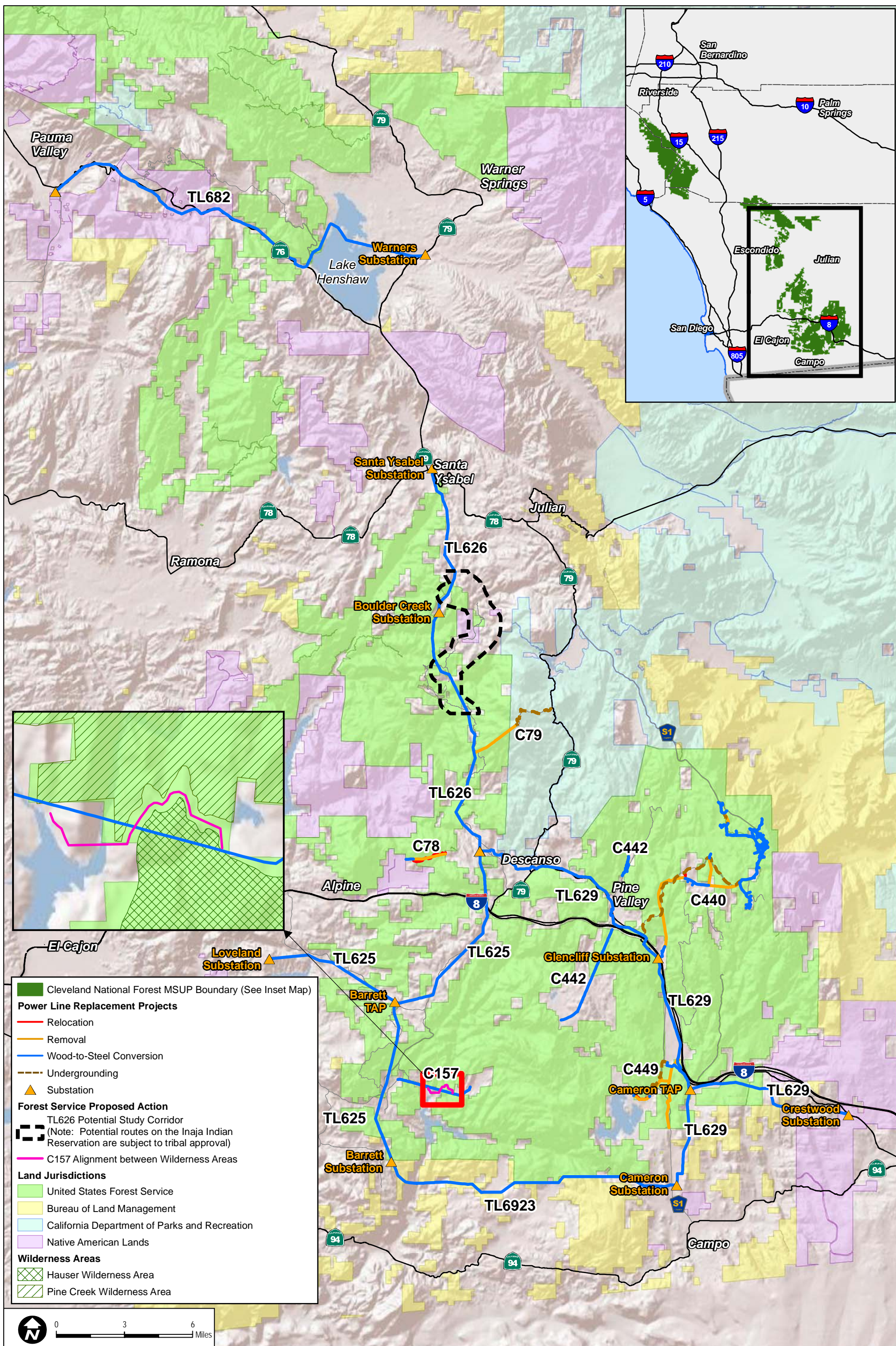


FIGURE 1
Vicinity Overview Map

APPENDIX A-2

Notice of Intent

*(published in the Federal Register
on September 23, 2013)*

about the livestock population and to provide a foundation for possible future studies. The objectives of the study are to:

- Provide a baseline description of the U.S. bison industry, including general characteristics of operations, such as inventory, size, and type;
- Describe current U.S. bison industry production practices and challenges, including animal identification, confinement and handling, care, and disease testing;
- Describe health management and biosecurity practices important for the productivity and health of ranched bison; and
- Describe producer-reported occurrence of select health problems and evaluate potentially associated risk factors.

The study will consist of a self-administered questionnaire. APHIS will analyze and organize the information collected into one or more reports. The information collected will be used by APHIS to describe current bison health and management practices, help policymakers and industry make informed decisions, help researchers and private enterprise identify and focus on vital issues related to bison health and productivity, facilitate the education of future producers and veterinarians, and conduct economic analyses of the health and production of the U.S. bison industry.

On March 20, 2012, NAHMS was recognized by the Office of Management and Budget (OMB) as a statistical unit under the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA). Information acquired under NAHMS will be used for statistical purposes only and will be treated as confidential in accordance with CIPSEA guidelines. Only NAHMS staff and designated agents will be permitted access to individual-level data.

We are asking OMB to approve our use of this information collection activity for 3 years.

The purpose of this notice is to solicit comments from the public (as well as affected agencies) concerning our information collection. These comments will help us:

- (1) Evaluate whether the collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;
- (2) Evaluate the accuracy of our estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

(3) Enhance the quality, utility, and clarity of the information to be collected; and

(4) Minimize the burden of the collection of information on those who are to respond, through use, as appropriate, of automated, electronic, mechanical, and other collection technologies, such as electronic submission of responses.

Estimate of burden: The public reporting burden for this collection of information is estimated to average 0.33 hours per response.

Respondents: Bison owners and operators.

Estimated annual number of respondents: 1,200.

Estimated annual number of responses per respondent: 1.

Estimated annual number of responses: 1,200.

Estimated total annual burden on respondents: 396 hours. (Due to averaging, the total annual burden hours may not equal the product of the annual number of responses multiplied by the reporting burden per response.)

All responses to this notice will be summarized and included in the request for OMB approval. All comments will also become a matter of public record.

Done in Washington, DC, this 17th day of September 2013.

Michael C. Gregoire,

Acting Administrator, Animal and Plant Health Inspection Service.

[FR Doc. 2013-23038 Filed 9-20-13; 8:45 am]

BILLING CODE 3410-34-P

DEPARTMENT OF AGRICULTURE

Forest Service

Cleveland National Forest, California, SDG&E Master Special Use Permit and Permit To Construct Power Line Replacement Projects EIR/EIS

AGENCY: Forest Service, USDA.

ACTION: Notice of intent to prepare a joint Environmental Impact Report/ Environmental Impact Statement.

SUMMARY: Pursuant to section 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA), as amended, notice is hereby given that the Cleveland National Forest (CNF), together with the California Public Utilities Commission (CPUC), intends to prepare a joint Environmental Impact Report and Environmental Impact Statement (EIR/EIS), for the San Diego Gas & Electric Company (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects. The Master Special Use Permit would authorize

SDG&E to upgrade and/or relocate certain electric powerlines on National Forest System lands, while providing for the operation and maintenance of the SDG&E electric powerline system. The project area is located in multiple locations within the Trabuco, Palomar, and Descanso Ranger Districts, Cleveland National Forest, Orange and San Diego Counties, California. This action is needed because the existing authorizations are expired, and the existing powerlines are needed to supply power to local communities, residents, businesses, and government owned facilities located within and adjacent to the National Forest. The project study area not only traverses National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverses the National System of Public Lands managed by the Bureau of Land Management (BLM); tribal lands of the La Jolla, Campo, Inaja, and Viejas Indian Reservations managed by the respective tribes and held in trust by the Bureau of Indian Affairs (BIA); Cuyamaca Rancho State Park lands managed by California State Parks (CSP); and private holdings within unincorporated San Diego County amongst others.

DATES: All scoping comments must be received by November 7, 2013.

ADDRESSES: You may submit comments to Lisa Orsaba, California Public Utilities Commission, and Will Metz, Forest Supervisor, Cleveland National Forest by either of the following methods:

Email: cnfmsup@dudek.com.
Mail: c/o Dudek, 605 Third Street, Encinitas, California 92024.

FOR FURTHER INFORMATION CONTACT: Information can be requested by leaving a voice message at 866-467-4727 or by checking the project Web site at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

SUPPLEMENTARY INFORMATION: In 2005, in consultation with the Forest Service, SDG&E submitted an initial application to obtain a Master Special Use Permit (MSUP). The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the CNF. As part of the NEPA review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in

Start of Federal Register Notice

2009. In response to public comments received on that EA, the Forest Service determined that additional fire risk reduction measures within the CNF (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required.

SDG&E has expanded the scope of the proposed MSUP to include fire hardening, undergrounding and relocation as proposed in the power line replacement projects discussed in their application to the CPUC. The proposed power line replacement projects will require approval from the CPUC.

The CPUC, Forest Service, BLM, BIA, and CSP have independent jurisdiction and approval authority for the project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the "SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIR/EIS. The BLM and BIA are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

Purpose and Need for Action

The Forest Service purpose is to authorize the powerlines and associated facilities needed to continue electric service to a variety of users within and adjacent to the CNF through a Master Special Use Permit in a manner that is consistent with the CNF Land Management Plan (LMP). This action is needed because the 70 individual permits or easements for the existing facilities have expired, and a permit is required for the continued occupancy and use of National Forest System lands.

Permits issued by the Forest Service are required by law to be consistent with the LMP. The LMP identifies suitable uses within various land use zones, describes desired conditions based on the LMP goals and objectives, and sets resource management standards. The Forest Service proposed action is designed to be consistent with

the LMP requirements. The Forest Service purpose and need will guide the development of alternatives considered on National Forest System lands.

The BLM purpose is to authorize the powerlines and associated facilities needed to continue electric service to a variety of users within and adjacent to the National System of Public Lands in a manner that is consistent with the South Coast Resource Area Plan. This action is needed because the Right-of-Way (ROW) grants for the existing facilities have expired or were never issued, and a ROW grant is required for the continued occupancy and use of Public Lands.

The BIA purpose is to authorize the powerlines and associated upgrades needed to continue electric service to a variety of users within and adjacent to the Indian trust lands in a manner that is consistent with tribal land use goals and policies. The action is needed to amend the existing easements to include the proposed fire hardening measures and locations and to extend their term.

Proposed Action

The Forest Service proposed action would combine over 70 existing use permits for electric line facilities within the CNF into one MSUP. The MSUP would allow the continued maintenance and operation of more than 50 miles of 69 kV power lines and 12 kV distribution lines and ancillary facilities that are required to operate and maintain existing electric facilities located within the administrative boundary of the CNF. The Project would also replace several existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would include fire hardening (wood to steel pole replacement), along with removal, relocation, undergrounding and single to double circuit conversion along certain segments. Specific components of the Forest Service proposed action include relocating transmission line (TL) number 626 out of the Cedar Creek undeveloped area, relocating distribution line 79 out of the Sill Hill Inventoried Roadless Area, and relocating distribution line 157 out of the Hauser Wilderness Area. A more detailed description of the proposed action is available in the Notice of Preparation posted on the project Web site.

The BLM proposed action would authorize one electric line and issue new ROW grants for two electric lines, and authorize the fire hardening upgrades. This action includes portions of TL 629, TL 6923, and TL 625.

The BIA proposed action would authorize the fire hardening upgrades and amend the term and location of the existing easements. This action includes portions of TL 629 and TL 682.

Possible Alternatives

The EIR/EIS will describe and evaluate the comparative merits of a reasonable range of alternatives to the proposed action and associated Powerline Replacement Projects. Alternatives to be analyzed in the EIR/EIS will be developed during the environmental review process and will consider input received during scoping, and will include the no action alternative as required by law.

Responsible Official

The Responsible Official for the Forest Service decision is Will Metz, Forest Supervisor, Cleveland National Forest.

The Responsible Official for the BLM decision is John Kalish, Field Manager, Palm Springs South Coast Field Office.

The Responsible Official for the BIA decision is Amy L. Dutschke, Regional Director, BIA Pacific Region.

The Commissioners appointed to the CPUC are the deciding body for the Permit to Construct.

The Responsible Official for the CSP decision is Dan Falat, Colorado Desert District Superintendent.

Nature of Decision To Be Made

Each agency has independent decision authority within their jurisdictional area. The federal responsible officials, as well as the CSP, will decide whether or not to authorize their portions of the project, and if so, under what conditions. The CPUC has independent jurisdiction over power lines and will determine if a Permit to Construct will be issued, and if so, under what conditions.

Preliminary Issues

The Forest Service and CPUC have identified potential issues and impacts to the existing environment require a detailed analysis in the EIR/EIS. Those issues and impacts include aesthetics, air quality, biological resources, cultural and paleontological resources, greenhouse gas emissions, fire, water quality, land use, noise, public services, recreation, wilderness, and transportation. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIR/EIS after the issues are considered thoroughly. This overview is presented to assist the public and

agencies in preparing written scoping comments.

Invitation to Cooperating Agencies

The Forest Service invites other federal agencies or tribes to join as cooperating agencies. Requests for cooperating agency status may be submitted to Forest Supervisor Will Metz, Cleveland National Forest, 10845 Rancho Bernardo Road, Suite 200, San Diego, CA 92127-2107.

Scoping Process

The CPUC and Forest Service are initiating the joint CEQA/NEPA scoping process with this Notice of Intent and associated Notice of Preparation. The comments received during scoping will help guide the development of the EIR/EIS. Two public workshops will be held during the scoping process to answer questions about the proposed action. Workshops will be held at the Julian Elementary School, 1704 Cape Horn, Julian, California, on Tuesday, October 22, 2013 at 5:00 p.m., and at the Alpine Community Center, 1830 Alpine Boulevard, Alpine, California, on Wednesday, October 23, 2013 at 5:00 p.m.

It is important that reviewers provide their comments at such times and in such a way that they are useful to the CPUC and Forest Service preparation of the EIR/EIS. Therefore, comments should be provided prior to the close of the comment period and should clearly articulate the reviewer's concerns and contentions.

Comments received during scoping, including names and addresses of those who comment, will be part of the public record for this proposed project. Comments submitted anonymously will be accepted and considered; however, anonymous comments will not provide the respondent with standing to participate in subsequent administrative review or judicial review of the Forest Service decision. This project will follow the predecisional administrative review process pursuant to 36 CFR 218, Subparts A and B.

Dated: September 16, 2013.

William Metz,

Forest Supervisor.

[FR Doc. 2013-22904 Filed 9-20-13; 8:45 am]

BILLING CODE 3410-11-P

DEPARTMENT OF AGRICULTURE

Rural Housing Service

Notice of Intent To Review Online Homeownership Education Courses for Nationwide Use in the Single Family Housing Section 502 Direct Loan Program

AGENCY: Rural Housing Service, USDA.
ACTION: Notice.

SUMMARY: Effective on May 7, 2007, first-time homebuyers financed under the direct loan program must successfully complete an approved homeownership education course prior to loan closing. 7 CFR Part 3550.11 outlines the order of preference given to courses. First preference is given to classroom, one-on-one counseling, or interactive video conference. These formats are generally extensive and require a significant time and participation commitment from the Agency applicants. Second preference is given to interactive home-study or interactive telephone counseling of at least four hours duration. These formats may only be used if the formats under the first preference are not reasonably available. Third preference, which can only be used if all other formats are not reasonably available, is given to online counseling. It also outlines the requirements an education provider and their course must meet in order to be approved for use by Agency applicants.

While approval is generally made by the Agency at the state level, there is currently one nationally approved online education provider. To expand the Agency applicants' access to and options of approved education providers, the Agency will consider approving other online education providers on a national level. Approval will be subject to meeting course criteria, a recommendation by the Agency-selected panel of housing partners, and signoff by the Administrator. Approval will be given as a third preference format unless the education provider is able to demonstrate and document how their online course along with a required supplemented service provides the same level of training and individualized attention as a first or second preference.

A notice of education providers approved through this process will be issued via a memorandum to the Rural Development (RD) state offices. The memorandum will list the format preference assigned to each provider. A copy of the memorandum will be simultaneously emailed to all education providers who applied through this notice.

Approvals are not subject to expiration. However, an approval may be revoked for justifiable cause.

DATES: Online homeownership education providers interested in having their courses reviewed should submit a complete package to the Single Family Housing Direct Division within 30 days of this notice. Submissions may be sent electronically to SFHDIRECTPROGRAM@wdc.usda.gov or by mail to 1400 Independence Avenue, Stop 0783, Washington, DC 20250-0783.

FOR FURTHER INFORMATION CONTACT: Shantelle Gordon, shantelle.gordon@wdc.usda.gov or (202) 205-9567.

Non-Discrimination Statement

USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.)

To file a complaint of discrimination, complete, sign and mail a program discrimination complaint form, (available at any USDA office location or online at www.ascr.usda.gov, or write to: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue SW., STOP 9410, Washington, DC 20250-9410.

Or call toll-free (866) 632-9992 (voice) to obtain additional information, the appropriate office or to request documents. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339 or (877) 845-6136 (in Spanish). "USDA is an equal opportunity provider, employer and lender."

Persons with disabilities who require alternative means for communication of program information (e.g. Brail, large print, audiotape, etc.) should contact USDA TARTET Center at (202) 720-2600 (voice and TDD).

SUPPLEMENTARY INFORMATION: At a minimum, courses submitted for consideration must contain the following content:

- Preparing for homeownership (evaluate readiness to go from rental to homeownership)
- Budgeting (pre and post purchase)
- Credit counseling
- Shopping for a home
- Lender differences (predatory lending)

End of Federal Register Notice

APPENDIX B
Public Notices

APPENDIX B-1
Public Notice (September 23, 2013)



Public Notice

SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects Public Scoping

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. The CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily consist of fire hardening, relocation and undergrounding of certain facilities which will require a Permit To Construct (PTC) from the California Public Utilities Commission (CPUC). The power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a Permit to Construct (PTC) the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR.” The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, the CPUC has prepared a Notice of Preparation (NOP). The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with the NOP for preparation of a joint EIS/EIR. Similar to the NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency.

The NOP includes background information on the project, a description of the applicant’s proposal, the Forest Service Proposed Action, and a summary of potential project impacts. The NOP and the NOI can be viewed on the project website at the following link: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Public Scoping Meetings

The CPUC and Forest Service are holding two public scoping meetings to provide an opportunity for the public to learn about the project and to share any concerns or comments they may have. Please join us on either day or location listed below. Your attendance at one of these meetings will provide you with additional opportunities to learn more about the projects and to comment on the scope and content of the environmental information to be included in the Draft EIS/EIR.

Tuesday, October 22, 2013
Julian Elementary School
1704 Cape Horn
Julian, California 92036
5:00 p.m. to 7:00 p.m.

Wednesday, October 23, 2013
Alpine Community Center
1830 Alpine Boulevard
Alpine, California 91901
5:00 p.m. to 7:00 p.m.

Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. **All scoping comments must be received by November 7, 2013.** You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (email), or (3) by attending one of the public scoping meetings and handing in written comments at the scoping meeting.

By U.S. Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to: Lisa Orsaba, California Public Utilities Commission/Will Metz, United States Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024.

By Electronic Mail: Email communications are welcome; however, please remember to include your name and return address in the email message. Email messages should be sent to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit".

Additional Project Information

Internet Website. The NOP and information about this application and the environmental review process will be posted on the Internet at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the MSUP/PTC Power Line Replacement Projects and the EIS/EIR will be made available in the repositories listed below.

Environmental Document Repositories

Location	Address	Telephone
Alpine Branch Library	2130 Arnold Way, Alpine, California	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94, Campo, California	619.478.5945
Descanso Branch Library	9545 River Drive, Descanso, California	619.445.5279
Pine Valley Branch Library	28804 Old Hwy. 80, Pine Valley, California	619.473.8022
Julian Branch Library	1850 Highway 78, Julian, California	760.765.0370
Ramona Branch Library	1275 Main Street, Ramona, California	760.788.5270
Dudek	605 Third Street, Encinitas, California	760.942.5147

APPENDIX B-2

Legal Notices

Union Tribune (September 23, 2013)
North County Times (September 23, 2013)
Julian News (September 25, 2013)
Alpine Sun (September 26, 2013)



P.O. Box 120191, San Diego, CA 92112-0191

AFFIDAVIT OF PUBLICATION

DUDEK ENGINEERING + ENVIRONMENTAL
605 THIRD STREET
ENCINITAS, CA 92024

STATE OF CALIFORNIA } ss.
County of San Diego }

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he is a resident of the County of San Diego. That he is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he is not a party to, nor interested in the above entitled matter; that he is Chief Clerk for the publisher of

The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Sep 23, 2013

Zach Manuel
Chief Clerk for the Publisher

9/30/13

Date

Affidavit of Publication of

Legal Advertisement
Ad # 0010778463#
ORDERED BY: EMILY LYONS

**Scoping Notice for
the San Diego Gas
and Electric
Master Special Use
Permit and Permit
to Construct
Power Line
Replacement Projects
Environmental Impact
Statement /
Environmental Impact
Report**

The U.S. Forest Service (Forest Service), Cleveland National Forest (CNF) and the California Public Utilities Commission (CPUC) intend to prepare a joint Environmental Impact Statement and Environmental Impact Report (EIS/EIR) for the San Diego Gas & Electric Company (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects. The Master Special Use Permit would authorize SDG&E to upgrade and/or relocate certain electric powerlines on National Forest System lands, while providing for the operation and maintenance of the SDG&E electric powerline system on the CNF. The CPUC must also approve this project by issuing a Permit to Construct for all power lines, both on and off Forest Service lands. The project area is located in multiple locations within the Trabuco, Palomar and Descanso Ranger Districts, Cleveland National Forest, Orange and San Diego Counties, California. This action is needed because the existing authorizations are expired, and the existing powerlines are needed to supply power to local communities, residents, and government owned facilities located within and adjacent to the National Forest.

As required by CEQA, the CPUC has prepared a Notice of Preparation (NOP). The purpose of the NOP is to in-

form recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with the NOP for preparation of a joint EIS/EIR. Similar to the NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency.

The NOP includes background information on the project, a description of the applicant's proposal, the Forest Service Proposed Action, and a summary of potential project impacts. The NOP and the NOI along with detailed information about the project can be viewed on the project website at the following link: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>. The CPUC and Forest Service are holding two public scoping meetings to provide an opportunity for the public to learn about the project and to share any concerns or comments they may have. The meetings will be held at Julian Elementary School, 1704 Cape Horn, Julian, California, on Tuesday, October 22, 2013 at 5:00 P.M. and at the Alpine Community Center, 1830 Alpine Boulevard, Alpine, California, on Wednesday, October 23, 2013 at 5:00 P.M.

All scoping comments must be received by November 7, 2013. Send written comments to Lisa Orsaba, California Public Utilities Commission and Will Metz, Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024.

Comments may also be sent via e-mail to cnfmsup@dudek.com, with a subject line 'SDG&E Master Permit'.

**PROOF OF PUBLICATION
(2010 & 2011 C.C.P.)**

This space is for the County Clerk's Filing Stamp

**STATE OF CALIFORNIA
County of San Diego**

I am a citizen of the United States and a resident of the County aforesaid: I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of

UT - North County

Formerly known as the North County Times and which newspaper has been adjudicated as a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, for the City of Oceanside and the City of Escondido, Court Decree numbers 171349 & 172171, for the County of San Diego, that the notice of which the annexed is a printed copy (set in type not smaller than nonpariel), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

September 23rd, 2013

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at **Oceanside**, California
On This 23rd day September 2013



Jane Allshouse
NORTH COUNTY TIMES
Legal Advertising

Proof of Publication of

Scoping Notice for the San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Projects Environmental Impact Statement / Environmental Impact Report

The U.S. Forest Service (Forest Service), Cleveland National Forest (CNF) and the California Public Utilities Commission (CPUC) intend to prepare a joint Environmental Impact Statement and Environmental Impact Report (EIS/EIR) for the San Diego Gas & Electric Company (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects. The Master Special Use Permit would authorize SDG&E to upgrade and/or relocate certain electric powerlines on National Forest System lands, while providing for the operation and maintenance of the SDG&E electric powerline system on the CNF. The CPUC must also approve this project by issuing a Permit to Construct for all power lines, both on and off Forest Service lands. The project area is located in multiple locations within the Trabuco, Palomar and Descanso Ranger Districts, Cleveland National Forest, Orange and San Diego Counties, California. This action is needed because the existing authorizations are expired, and the existing powerlines are needed to supply power to local communities, residents, and government owned facilities located within and adjacent to the National Forest.

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All scoping comments must be received by November 7, 2013. Send written comments to Lisa Orsaba, California Public Utilities Commission and Will Metz, Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024. Comments may also be sent via e-mail to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit". 9/23/13

AFFIDAVIT OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO
JULIAN

This space for the
Court or
County Clerk's
Filing Stamp

PUBLIC NOTICE

**Scoping Notice for the San Diego Gas and Electric
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects
Environmental Impact Statement / Environmental Impact Report**

The U.S. Forest Service (Forest Service), Cleveland National Forest (CNF) and the California Public Utilities Commission (CPUC) intend to prepare a joint Environmental Impact Statement and Environmental Impact Report (EIS/EIR) for the San Diego Gas & Electric Company (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects. The Master Special Use Permit would authorize SDG&E to upgrade and/or relocate certain electric powerlines on National Forest System lands, while providing for the operation and maintenance of the SDG&E electric powerline system on the CNF. The CPUC must also approve this project by issuing a Permit to Construct for all power lines, both on and off Forest Service lands. The project area is located in multiple locations within the Trabuco, Palomar and Descanso Ranger Districts, Cleveland National Forest, Orange and San Diego Counties, California. This action is needed because the existing authorizations are expired, and the existing powerlines are needed to supply power to local communities, residents, and government owned facilities located within and adjacent to the National Forest.

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Legal: 06357
Publish: September 25, 2013

I am a citizen of the United States, over eighteen years of age; I am and was, at all times herein mentioned the Publisher of the Julian News, a newspaper adjudged by the Superior Court of the County of San Diego on February 9, 1987, to be newspaper of general circulation published and circulated at least once a week in Julian, San Diego County, State of California.

And that the PUBLIC NOTICE
SCOPING NOTICE FOR THE
SDG&E MASTER SPECIAL
USE PERMIT EIS/EIR
#06357

of which the annexed is a true printed copy, was published in said newspaper for 1 issues, and on the following date(s), to wit:

SEPTEMBER 25, 2013

and in the regular and entire issue of said newspaper, and not in any supplement.

THE JULIAN NEWS
Legal No. 577843

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Julian, California, this 25 day of SEPTEMBER

20 13

Michael Jon Hart
Michael Jon Hart, Publisher

Julian News
PO Box 639
Julian, CA 92036-0639

Proof of Publication
(2015.5 C.C.P.)

This space is for the County Clerk's filing stamp.

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

I, Christine Seiveno, am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and I am not a party to or interested in the notice published. I am the legal advertising manager of the publisher of

The Alpine Sun

a newspaper of general circulation, printed and published weekly in the city of Alpine, County of San Diego, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of November 1959, Case No. 238120, that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

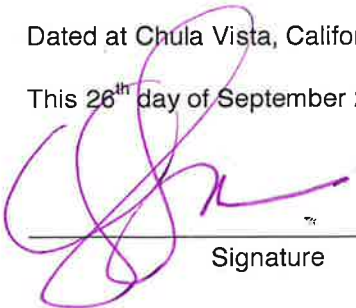
9/26

all in the year 2013

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Chula Vista, California

This 26th day of September 2013



Signature

San Diego Neighborhood Newspapers
The Alpine Sun
2144 Alpine Blvd.
Alpine, CA 91901
619.445-3288

Proof of Publication of

AL 40794

SCOPING NOTICE FOR THE SAN DIEGO GAS AND ELECTRIC

Scoping Notice for the San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Projects Environmental Impact Statement / Environmental Impact Report

The U.S. Forest Service (Forest Service), Cleveland National Forest (CNF) and the California Public Utilities Commission (CPUC) intend to prepare a joint Environmental Impact Statement and Environmental Impact Report (EIS/EIR) for the San Diego Gas & Electric Company (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects. The Master Special Use Permit would authorize SDG&E to upgrade and/or relocate certain electric powerlines on National Forest System lands, while providing for the operation and maintenance of the SDG&E electric powerline system on the CNF. The CPUC must also approve this project by issuing a Permit to Construct for all power lines, both on and off Forest Service lands. The project area is located in multiple locations within the Trabuco, Palomar and Descanso Ranger Districts, Cleveland National Forest, Orange and San Diego Counties, California. This action is needed because the existing authorizations are expired, and the existing powerlines are needed to supply power to local communities, residents, and government owned facilities located within and adjacent to the National Forest.

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The CPUC and Forest Service are holding two public scoping meetings to provide an opportunity for the public to learn about the project and to share any concerns or comments they may have. The meetings will be held at Julian Elementary School, 1704 Cape Horn, Julian, California, on Tuesday, October 22, 2013 at 5:00 PM, and at the Alpine Community Center, 1830 Alpine Boulevard, Alpine, California, on Wednesday, October 23, 2013 at 5:00 PM.

All scoping comments must be received by November 7, 2013. Send written comments to Lisa Orsaba, California Public Utilities Commission and Will Metz, Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024. Comments may also be sent via e-mail to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit".
Alpine Sun 9/26/2013 -40794

APPENDIX C
Scoping Meeting Materials

APPENDIX C-1
Meeting Agenda



Public Scoping Meeting Agenda



CALIFORNIA PUBLIC UTILITIES COMMISSION /
UNITED STATES FOREST SERVICE

San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects
October 22, 2013 and October 23, 2013 at 5:00 p.m.

- I. Sign-in**
- II. Purpose of meeting**
- III. Overview of proposed project**
- IV. Environmental review**
 - a. U.S. Forest Service
 - b. California Public Utilities Commission
 - c. Responsible and cooperating agencies
- V. Overview of EIR/EIS public input and review process**
- VI. Draft EIR/EIS scope**
- VII. Public input on the scope of the EIR/EIS**
- VIII. Open house workshop**

(Turn over for additional information)

Information Repositories

Location	Address
Alpine Branch Library	2130 Arnold Way, Alpine, California
Campo-Morena Village Branch Library	31356 Highway 94, Campo, California
Descanso Branch Library	9545 River Drive, Descanso, California
Pine Valley Branch Library	28804 Old Hwy. 80, Pine Valley, California
Julian Branch Library	1850 Highway 78, Julian, California
Ramona Branch Library	1275 Main Street, Ramona, California
San Diego Public Library	330 Park Blvd, San Diego, California
Dudek	605 Third Street, Encinitas, California

Or Project Website:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

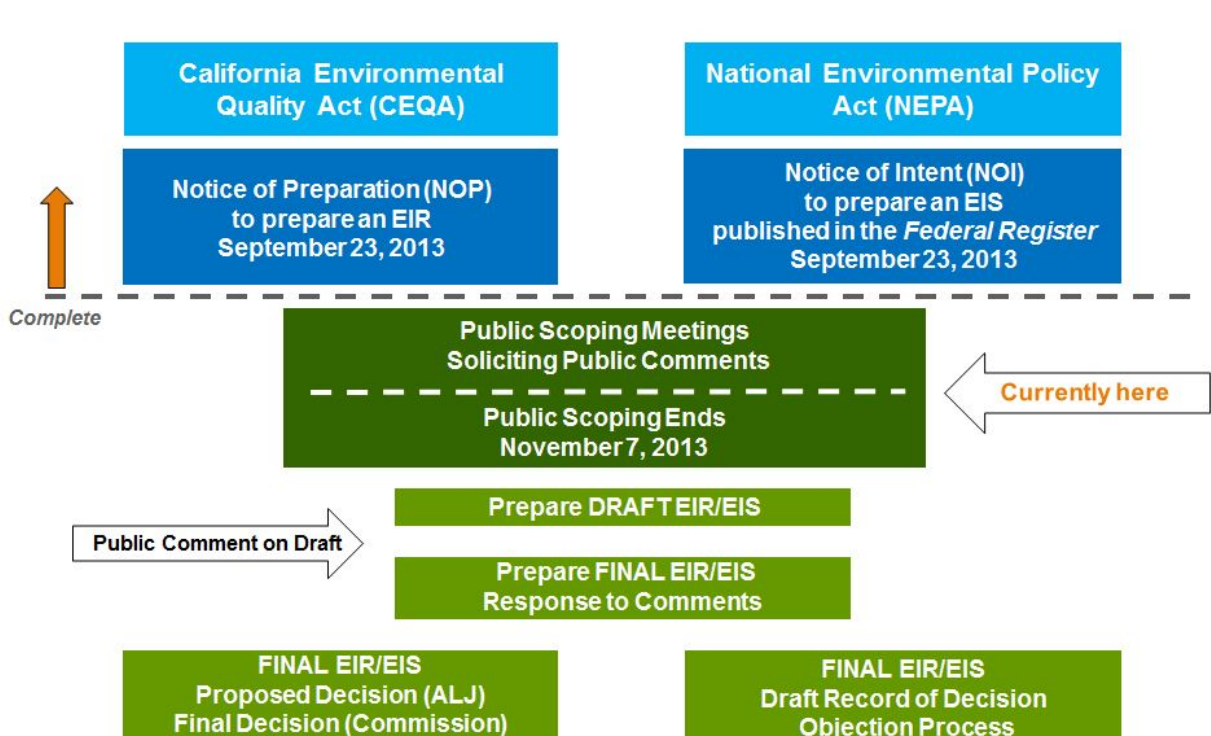
For More Information

Project email: cnfmsup@dudek.com OR Project voicemail: 866.467.4727

Comments

All comments must be received by **November 7, 2013**. Send written comments to Lisa Orsaba, California Public Utilities Commission/Will Metz, United States Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024. Comments may also be sent via e-mail to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit".

EIR/EIS Review Process - Opportunities for Public Input



APPENDIX C-2
Written Comment Form



CALIFORNIA PUBLIC UTILITIES COMMISSION / UNITED STATES FOREST SERVICE



San Diego Gas and Electric (SDG&E) Company Master Special Use Permit and Permit to Construct Power Line Replacement Projects

(please print)

Name: _____

Organization (if any): _____

Do you have authorization to represent this Organization? Yes: No:

Address: _____

City, State, Zip: _____

E-mail: _____ Telephone: _____

Would you like a copy of the environmental document? No: Yes: CD Hard Copy

Written Comments

(please print)

Lined area for written comments

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.

Written Comment Form

Please either deposit this sheet at the sign-in table before you leave today or mail to the address below. Attach additional sheets if needed. Comments can also be emailed to cnfmsup@dudek.com. Please have the subject line of emails read “SDG&E Master Permit”

Please note that your address, phone number, e-mail address, or other personal identifying information in your comment, is part of your entire comment. Including your personal identifying information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Mail comments to:

Lisa Orsaba, CPUC Project Manager /Will Metz, Forest Supervisor, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, California 92024

Public Scoping Ends: November 7, 2013

To ensure that comments will be considered during the scoping period, the CPUC/USFS must receive written comments by the close of the public scoping period (November 7, 2013). There will be additional opportunities to comment on the proposed project during the EIR/EIS public review period.

APPENDIX C-3
Scoping Meeting Presentation

San Diego Gas & Electric Company Master Special Use Permit and Permit to Construct Power Line Replacement Projects



California Public Utilities Commission
United States Forest Service
EIR/EIS
Public Scoping Meetings
October 22 and 23, 2013



Purpose of Meeting

- **To inform the public and responsible agencies about the project**
- **To inform the public about the environmental review process**
- **To solicit input on the scope of issues and alternatives to be addressed in the EIR/EIS**

Overview for SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects

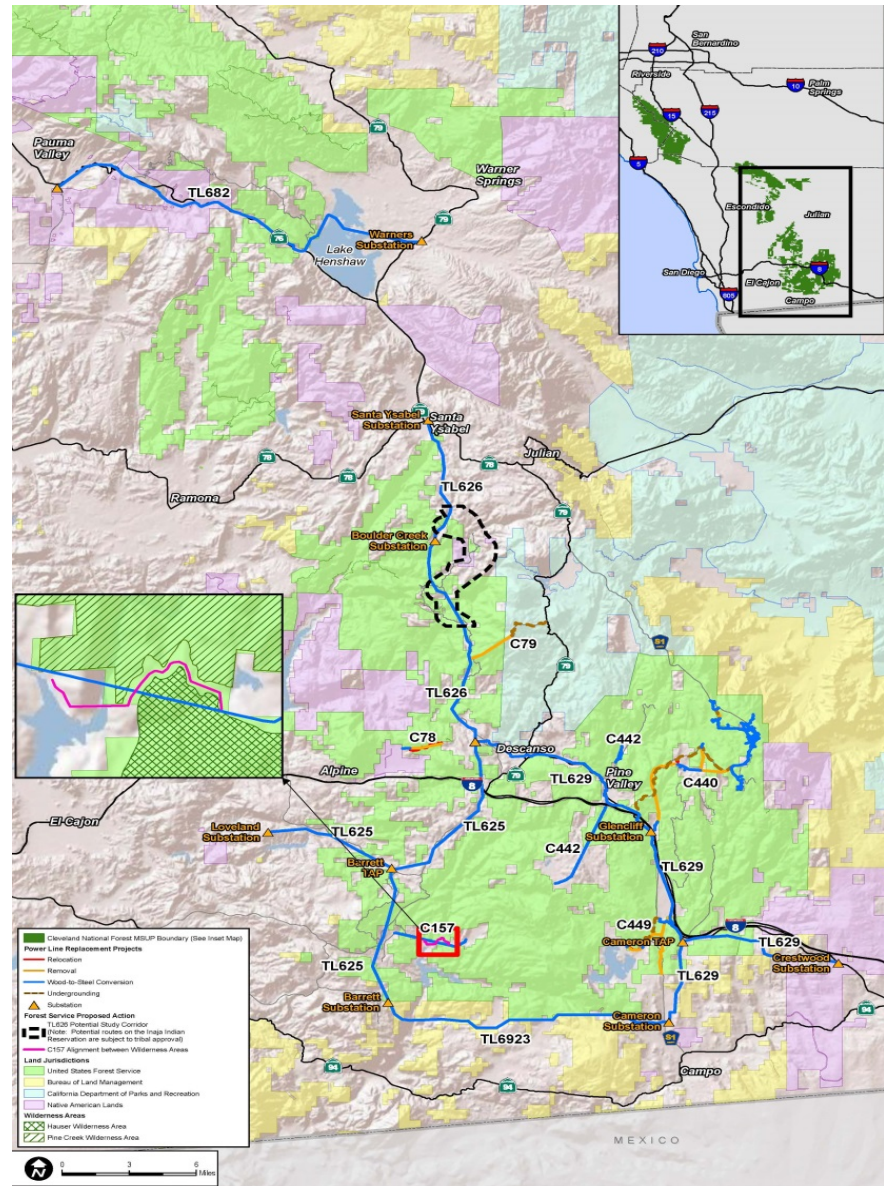
- **Background**
- **Master Special Use Permit (MSUP)**
 - Consolidate into one MSUP previously-issued permits for the continued operation of SDG&E's 69 kV and 12 kV electric lines and other ancillary facilities with the Cleveland National Forest
- **SDG&E's Power Line Replacement Projects**
 - Replace (5) existing 69 kV and (6) 12 kV electric lines by:
 - Fire hardening (wood-to-steel pole replacement)
 - Removal, relocation, undergrounding, and single to double circuit conversion along some segments
- **Forest Service Proposed Action**
 - TL626 – Relocate section out of Cedar Creek
 - C157 – Relocate section out of wilderness

Typical Wood-to-Steel Pole Replacement – 69kV



Where are the Proposed Power Line Replacement Projects?

- TL625
- TL626
- TI629
- TL682
- TL6923
- C78
- C79
- C157
- C440
- C442
- C449



USGS Topographic Overview Map

- Forest Service Proposed Action - Relocate TL626



Applicants' Project Objectives

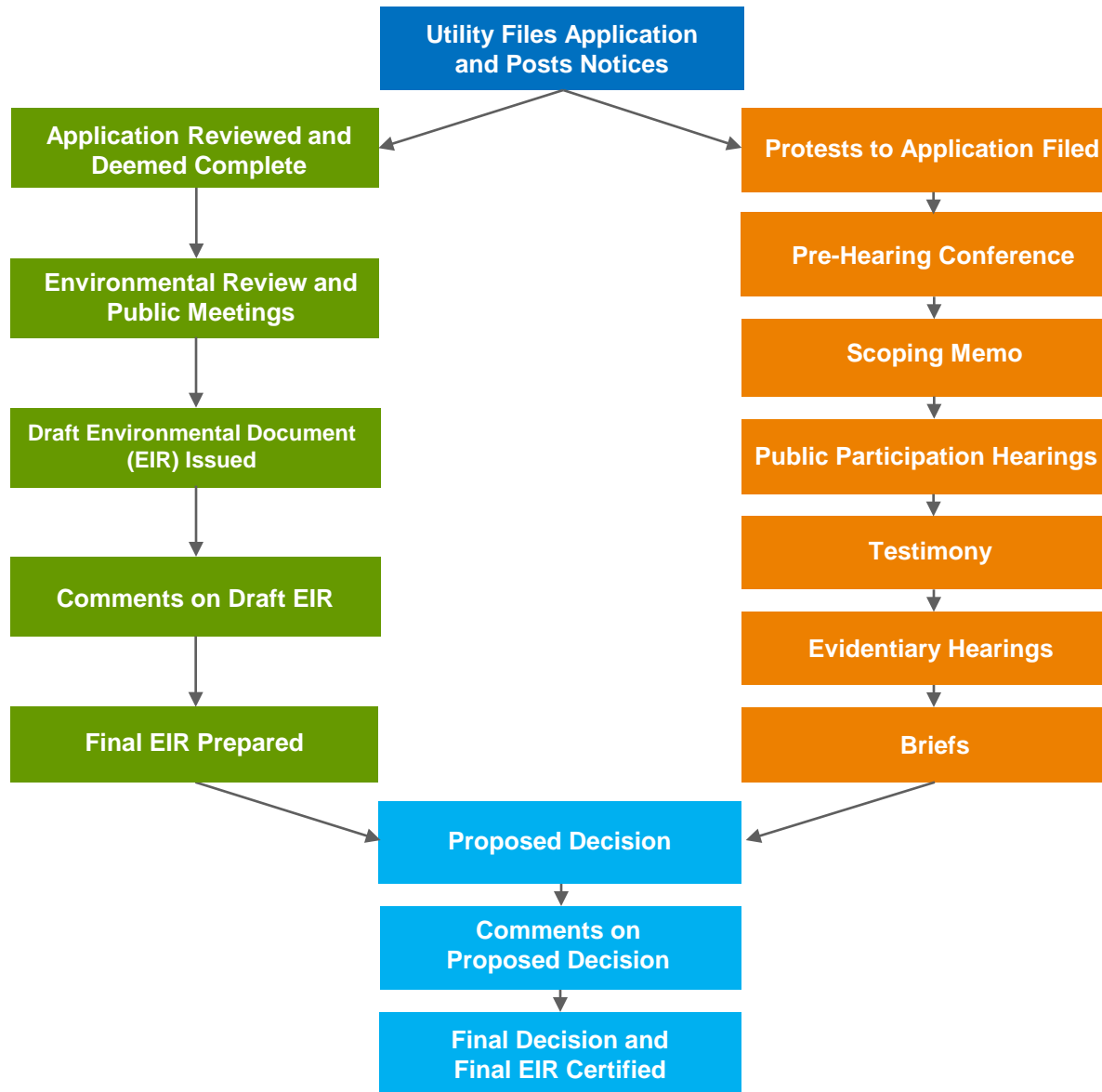
- **Secure Forest Service authorization to continue to operate and maintain existing SDG&E facilities within the CNF**
- **Increase fire safety and service reliability by replacing 5 existing 69kV power lines and 6 existing 12 kV distribution circuits**

Environmental Review

- **United States Forest Service: Lead Agency under the National Environmental Policy Act (NEPA) – MSUP authorizing SDG&E facilities within the administrative boundary of the Cleveland National Forest (CNF)**
- **Federal Cooperating Agencies under NEPA**
 - Bureau of Land Management (BLM): Power Line Replacement Projects on lands administered by the BLM
 - Bureau of Indian Affairs (BIA): Power Line Replacement Projects on tribal lands
- **California Public Utilities Commission (CPUC): Lead Agency under the California Environmental Quality Act (CEQA) – Permit to construct Power Line Replacement Projects within and outside the CNF**
- **Responsible Agencies under CEQA**
 - California State Parks (CSP): Power Line Replacement Projects within lands administered by CSP

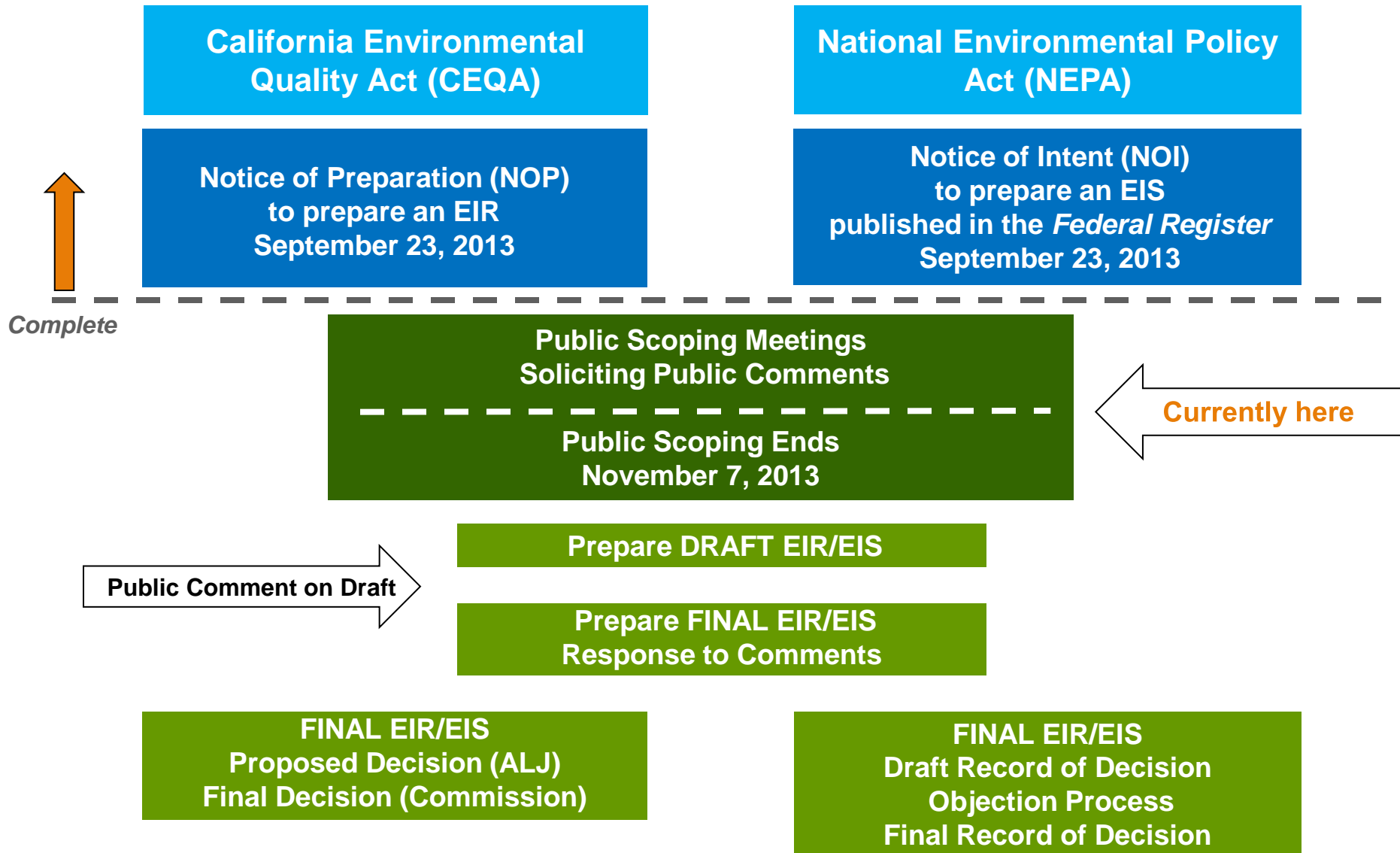
CPUC Review Process

Process per Public Resources Code Section 21000 et. seq.,
the California Environmental Quality Act (CEQA) and CEQA Guidelines



Process per Public Utilities Code and CPUC Rules of Practice and Procedure

Environmental Review Process – Opportunities for Public Input



Purpose of the EIR/EIS

- **Disclose the effects of the proposed action and alternatives, and identify measures to reduce, avoid, and minimize those effects**
- **Consider a reasonable range of alternatives**
- **Provide opportunity for public participation in the planning and decision-making process**
- **Ensure that decision makers have a solid basis to make a decision**

Environmental Topics Identified in the NOP to be Included in the EIR/EIS

- **Aesthetics/Visual Resources**
- **Air Quality**
- **Biological Resources**
- **Cultural and Paleontological Resources**
- **Greenhouse Gas Emissions**
- **Public Health and Safety**
- **Fire and Fuels Management**
- **Hydrology and Water Quality**
- **Land Use and Planning**
- **Noise**
- **Public Services and Utilities**
- **Wilderness and Recreation**
- **Transportation and Traffic**
- **Cumulative Impacts**

Alternatives Analysis

- **No project/no action alternative**
- **Reasonable range of alternatives determined by:**
 - **Consistency with most project objectives**
 - Meeting all objectives is not required
 - Must meet the agency purpose and need
 - **Ability to reduce or avoid impacts of project**
 - Scoping comments will help to identify impacts
 - **Feasibility**
 - Technical concerns (Can it be built?)
 - Regulatory feasibility (Could it be permitted?)
 - Legal issues (Would it be allowed under law?)

Public Input in Defining the EIR/EIS Scope

- **The most useful scoping comments:**
 - 1. Identify the location and extent of environmental impacts of the proposed project.**
 - 2. Identify measures that would reduce environmental impacts.**
 - 3. Recommend alternatives that would avoid or reduce impacts of the proposed project.**

Written Comments

Please send comments to:

California Public Utilities Commission/U.S. Forest Service

Attn: Lisa Orsaba, CPUC Project Manager

Will Metz, Forest Supervisor, Cleveland National Forest

c/o Dudek

605 Third Street

Encinitas, California 92024

Email: cnfmsup@dudek.com

**Public Scoping Ends:
November 7, 2013**

Please be sure to include your name, address, and phone number on all comments.

For More Information

- **Check CPUC internet websites:**

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

- **Information Repositories: 7 area libraries have project information**

Alpine Branch Library
2130 Arnold Way
Alpine, California 91901

**Campo-Morena Village
Branch Library**
31356 Highway 94
Campo, California 91906

Descanso Branch Library
9545 River Drive
Descanso, California 91916

Pine Valley Branch Library
28804 Old Highway 80
Pine Valley, California 91962

Julian Branch Library
1850 Highway 78
Julian, California 92036

Ramona Branch Library
1275 Main Street
Ramona, California 92065

San Diego Public Library
330 Park Boulevard
San Diego, California 92101

APPENDIX D
Scoping Meeting Sign-in Sheets

APPENDIX D-1

*October 22, 2013 Julian Elementary School
Scoping Meeting Sign-in Sheet*

CPUC and USFS
 Proposed SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
 Public Scoping Meeting – Julian Elementary School

October 22, 2013 from 5:00 PM to 7:00 PM
 Sign-in Sheet (Please Print)

Name	Address	Email Address	Organization	Do you have authorization to represent this organization?	Would you like a copy of the environmental document?
Kelly Fuller		Kelly@kellyfuller.net	Protect Our Communities Foundation	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Rebecca Gils		rgils@sempwrutilities.com	SDGE	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Todd Voorhees		TVOORHEES@SEMPWRUTILITIES.COM	SDG&E	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Martha Velarde		MVelarde@sempwrutilities.com	SDGE	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
FRED BRAUERMEISTER		FBAUERMEISTER@INSIGNIAENV.COM	INSIGNIA	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Karen Kuntz		Karen999K@gmail.com		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>

APPENDIX D-2
October 23, 2013
Alpine Community Center Sign-in Sheet

CPUC and USFS
 Proposed SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
 Public Scoping Meeting – Alpine Community Center

October 23, 2013 from 5:00 PM to 7:00 PM
 Sign-in Sheet (Please Print)

Name	Address	Email Address	Organization	Do you have authorization to represent this organization?	Would you like a copy of the environmental document?
BILL & SHANNON DAVIS	1185 EAST LAKE IMPERIAL BEACH CA 91932	williamedavisjr@gmail.com	—	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Nathan Welfen	13725 Boulder Creek Rd Descanso CA 91916	NWEFFLEN@yahoo.com		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
DONNA TISDALE	PO BOX 1275 BOULEVARD, CA 91905	tisdale.donna@gmail.com	BOULEVARD PLANNING GROUP + INDIVIDUAL	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Sandra Wilson	25280 Manzanita Ln Descanso	swilsondescanso@gmail.com	—	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Olin & Collen Elliott	P.O. Box 189 Mt. Laguna, CA 91948	celliot+3657@gmail.com		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Joyce Peterson Merigan Rand	P.O. BOX 362 DESCANSO 91916 and 8675 Nottingham Pl CA Jolla 92037	jpeters1@sar.rv.com		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>

CPUC and USFS
Proposed SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
Public Scoping Meeting – Alpine Community Center

October 23, 2013 from 5:00 PM to 7:00 PM
Sign-in Sheet (Please Print)

Name	Address	Email Address	Organization	Do you have authorization to represent this organization?	Would you like a copy of the environmental document?
Skip Miller	31675 Tule Springs Tr. Descanso / Julian P.O. Box 394 Descanso, CA 91916			Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Charles Gouge	1615 Chocolate Bell Trail Alpine			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
GENNA TORDER	2696 Via Uper Alpine, CA			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Patricia Reedy mailing address:	13838 Boulder Creek Rd Julian CA 92036 PO Box 392	patryreedy@rocketmail.com		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Robert McCoy mailing address:	15787 Boulder Creek Rd Julian CA 92036 Po Box 1091			Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Kay Stewart	PO Box 121390 San Diego CA 92112-1390	fieldtrips@cnpsd.org	CA Native Plant Society	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> link online No: <input type="checkbox"/>

CPUC and USFS
 Proposed SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
 Public Scoping Meeting – Alpine Community Center

October 23, 2013 from 5:00 PM to 7:00 PM
 Sign-in Sheet (Please Print)

Name	Address	Email Address	Organization	Do you have authorization to represent this organization?	Would you like a copy of the environmental document?
CHARLES D FERGUSON	15681 CAMEL HILLS RD RECAJON, CA 92021			Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Kelly Fuller		kelly@kellyfuller.net	Protect Our Communities Foundation	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
CINDY BUXTON	541 SPRUCE ST IMPERIAL BEACH, CA 91932	I0KUOK2@HOTMAIL.COM	SIERRA CLUB	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Rebecca Jels		rjels@sepautilities.com	SDGE	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
				Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
				Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>

CPUC and USFS
 Proposed SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects
 Public Scoping Meeting – Alpine Community Center

October 23, 2013 from 5:00 PM to 7:00 PM
 Sign-in Sheet (Please Print)

Name	Address	Email Address	Organization	Do you have authorization to represent this organization?	Would you like a copy of the environmental document?
Tom & Judy Myers	1523 Montecito Vista Alpine CA 91901	tomandjudy@rcn.com		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input checked="" type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
Louis Russo	1524 MONTECITO VISTA, ALPINE, CA 91901	louisfrasso@gmail.com	San Diego Rural Fire District	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Randy Rusch	1375 Montecito Vista Alpine CA 91901	rrusch@bop.gov		Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input checked="" type="checkbox"/> No: <input type="checkbox"/>
				Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
				Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>
				Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: CD <input type="checkbox"/> Hard Copy <input type="checkbox"/> No: <input type="checkbox"/>

APPENDIX E

*Comments Received During Scoping Period
(September 23, 2013 - November 7, 2013)*

APPENDIX E-1
Federal Agencies



DEPARTMENT OF THE ARMY

Los Angeles District Corps of Engineers
Regulatory Division-Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008

September 30, 2013

REPLY TO
ATTENTION OF

Office of the Chief
Regulatory Division

Ms. Lisa Orsaba
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102-3298

SUBJECT: Information regarding requirement for Department of the Army Permit

Dear Ms. Orsaba:

This is in response to information received regarding SDG&E Master Permit and Permit to Construct Power Line Replacement Projects. Based on the information you have provided, we are unable to determine if the proposed work would be regulated under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please review your project and determine if you need a permit.

Applications and additional information are available on our website <http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx>. If you have any questions, please contact Shari Johnson of my staff at 760-602-4829 or via e-mail at Shari.Johnson@usace.army.mil.

Sincerely,

A handwritten signature in cursive script that reads "Therese O. Bradford".

Therese O. Bradford
Chief, South Coast Branch

cc: Mr. Will Metz, Forest Supervisor, Cleveland National Forest

From: [Sysum, Scott](#)
To: [CNFMSUP](#)
Cc: [McPherson, Ann](#)
Subject: EPA R9 Scoping Comments - SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Project Notice of Intent
Date: Wednesday, November 06, 2013 1:29:05 PM
Attachments: [SDG&E CNF Power Line Upgrade-EPA R9 Scoping Comments.11.6.2013.pdf](#)

Dear Mr. Metz

I have been assigned as the lead reviewer for the U.S. EPA Region 9 for the San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Project Notice of Intent. I have attached a pdf file of our scoping comment letter regarding this project. The signed letter was mailed today to Mr. Will Metz.

Thank you for providing us the opportunity to review this interesting project. Please feel free to contact us if you have any questions, seek clarifications or if we can help in any other way.

v/r
Scott Sysum

National Older Worker Career Center
Energy Specialist
U.S. EPA Region IX
Environmental Review Office
75 Hawthorne Street CED-2
San Francisco, CA 94105
voice-415-972-3742; fax-415-947-3562
Email: sysum.scott@epa.gov

APPENDIX E-2
State Agencies



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

September 23, 2013

To: Reviewing Agencies

Re: SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects
SCH# 2013091070

Attached for your review and comment is the Notice of Preparation (NOP) for the SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Lisa Orsaba
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013091070
Project Title SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement
Lead Agency Projects
 Public Utilities Commission

Type **NOP** Notice of Preparation
Description SDG&E's proposed MSUP/PTC Power Line Replacement Projects would consolidate over 70 previously issued special use permits for SDG&E facilities with the U.S. Forest Service (Forest Service) administrative boundary of the Cleveland National Forest (CNF) into one MSUP. The MSUP would allow the continued operation and maintenance of SDG&E's existing 69 kV transmission line (TL) also referred to as power lines, 12 kV circuits (C) also referred to as distribution lines and ancillary facilities, as well as approximately 45 miles of existing access roads require to maintain and operate SDG&E electric facilities within the CNF, specifically with the Trabuco Ranger District in Southern Orange County, CA, and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, CA.

Lead Agency Contact

Name Lisa Orsaba
Agency California Public Utilities Commission
Phone 415 703 1966 **Fax**
email
Address 505 Van Ness Avenue
City San Francisco **State** CA **Zip** 94102-3298

Project Location

County San Diego, Orange
City Pauma Valley
Region
Cross Streets Multiple
Lat / Long
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways I-8, SR-76, 78, 79
Airports
Railways
Waterways Various
Schools Various
Land Use Various

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; California Energy Commission; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Caltrans, District 12; Regional Water Quality Control Board, Region 9

Date Received 09/23/2013 **Start of Review** 09/23/2013 **End of Review** 10/22/2013

Notice of Completion & Environmental Document Transmittal

SCH # **2013091070**

Mail to State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects
Lead Agency: California Public Utilities Commission Contact Person: Lisa Orsaba
Street Address: 505 Van Ness Avenue Phone: (415) 703-1966
City: San Francisco Zip: 94102 County: San Francisco

Project Location:

County: Unincorporated San Diego, Orange City/Nearest Community: Unincorporated communities of Pauma Valley, Warner Springs, Santa Ysabel, Descanso, Pine Valley, and Campo Cross Streets: Multiple Zip Code: N/A Total Acres: N/A
Assessor's Parcel No. Multiple Section: Multiple Twp: Multiple Range: Multiple Base: Multiple
Within 2 Miles State Hwy # I-8, SR-76, SR-78, SR-79 Waterways: San Luis Rey River, Sweetwater River, Cottonwood Creek, Pine Valley Creek, San Ysabel Creek, San Diego River, Tecate Creek and Cedar Creek
Airports: N/A Railways: N/A Schools: Denver C. Fox Outdoor Education School, Descanso Elementary School, Mountain Empire High School

RECEIVED

Document Type:

CEQA: NOP Supplement/Subsequent EIR (Prior SCH No.) Other
 Early Cons NEPA: NOI Joint Document
 Neg Dec EA Final Document
 Draft EIR Draft EIS Other

SEP 23 2008

STATE CLEARING HOUSE

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other:
CPUC: Permit to Construct
USFS: Master Special Use Permit

Development Type:

Residential: Units _____ Acres: _____
 Office: Sq.ft. _____ Acres: _____ Employees _____
 Commercial: Sq.ft. _____ Acres: _____ Employees _____
 Industrial: Sq.ft. _____ Acres: _____ Employees _____
 Educational: _____
 Recreational: _____
 Water Facilities: Type _____ MDG _____
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____
 Waste Treatment: Type _____
 Hazardous Waste Type _____
 Other: Power line fire hardening within and surrounding the CNF. Continued operation and maintenance of SDG&E electric facilities within the CNF (through issuance of the MSUP) and authorization of the replacement of certain existing power lines on and off CNF lands (through issuance of the MSUP and PTC).

Funding (approx.): Federal \$ 0.00 State \$ 0.00 Total \$ 0.00

Project Issues Discussed in Document:

Aesthetic/visual Flood Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian
 Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wildlife
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Land Use
 Economic/Jobs Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation Other Greenhouse Gas Emissions

Present Land Use/Zoning/General Plan Designation:

Present Land Use: Rural Residential, Residential, Commercial, Agriculture, Recreation, Water, Substation, School, Manufactured/Mobile Home Park, Undeveloped Lands, Transportation, Public Facility/Utility, Government Facility, Pine Creek Wilderness, King Creek Research Natural Area, Cuyamaca Rancho State Park, Cuyamaca Mountain State Wilderness.

Reviewing Agencies Checklist

continued

KEY
 S = Document sent by lead agency
 X = Document sent by SCH
 V = Suggested distribution

Resources Agency

- Boating & Waterways
- Coastal Commission
- Coastal Conservancy
- Colorado River Board
- S Conservation
- S Fish & Wildlife
- S Forestry & Fire Protection
- S Office of Historic Preservation
- S Parks & Recreation
- Reclamation Board
- S.F. Bay conservation & Development Commission
- S Water Resources (DWR)

Business, Transportation & Housing

- Aeronautics
- S California Highway Patrol
- S CALTRANS District # 11
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture

Health & Welfare

Health Services _____

Sate & Consumer Services

- General Services
- OLA (Schools)

Environmental Protection Agency

- S Air Resources Board
- S APCD/AQMD
- California Waste Management board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- S SWRCB: Water Quality
- SWRCB: Water Rights
- S Regional WQCB # 9

Youth & Adult Corrections

Corrections

Independent Commissions & Offices

- S Energy commission
- S Native American Heritage Commission
- S Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency
- Other _____

Public Review Period (to be filled in by lead agency)

Note: 45-day public review period.

Starting Date 9/23/2013

Ending Date 11/7/13

Signature 

Date: 9/20/2013

Lead Agency (Complete if applicable):

Consulting Firm: Dudek

Address: 605 Third Street

City/State/Zip: Encinitas, CA 92024

Contact: Rica Nitka

Phone: (760) 479-4294

Applicant: Same as above

Address: _____

City/State/Zip: _____

Phone: _____

For SCH Use Only:

Date Received at SCH _____

Date Review Starts _____

Date to Agencies _____

Date to SCH _____

Clearance Date _____

Notes:

County: San Diego County

NOP Distribution List

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document
Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- Airport/Energy Projects
- Jim Lerner
- Transportation Projects
- Jon Taylor
- Industrial Projects
- Mike Tollstrup
- State Water Resources Control
Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control
Board
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality
- State Water Resources Control
Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances
Control
CEQA Tracking Center
- Department of Pesticide
Regulation
CEQA Coordinator

Native American Heritage Comm.

- Debbie Treadway
- Public Utilities Commission
Leo Wong

Santa Monica Bay Restoration

- Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Phillip Crimmins
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- Housing & Community Development
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Gary Arnold
- Caltrans, District 4
Erik Alm
- Caltrans, District 5
David Murray
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

Fish & Wildlife Region 1E

- Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Charles Amorr
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Gabrina Gatchel
Habitat Conservation Program
- Fish & Wildlife Region 6 /M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Dept. of General Services
Public School Construction
- Dept. of General Services
Anna Garbeff
Environmental Services Section
- Dept. of Public Health
Jeffery Worth
Dept. of Health/Drinking Water
- Delta Stewardship Council
Kevan Samsam

Independent Commissions, Boards

- Delta Protection Commission
Michael Machado
- Cal EMA (Emergency Management Agency)
Dennis Castrillo

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Nicole Wong
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Tamyra Trujillo
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herola
- Office of Historic Preservation
Ron Parsons
- Dept. of Parks & Recreation
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources
Agency
Nadell Gayou

Fish and Game

- Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Donald Koch

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST., M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov

*Flex your power!
Be energy efficient!*

October 15, 2013

11-SD-VAR
PM VARSDG&E MSUP & PTC Power Line Replacement
NOP / SCH #2013091070

Ms. Lisa Orsaba
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Ms. Orsaba:

The California Department of Transportation (Caltrans) received a copy of the Notice of Preparation (NOP) for the proposed SDG&E MSUP and PTC Power Line Replacement Projects (SCH #2013091070) Draft Environmental Impact Report (DEIR). Caltrans has the following comments:

The NOP identifies that the project is proposing to replace certain existing power and distribution lines. If any work is performed within Caltrans right-of-way (R/W) an encroachment permit will be required. Please refer to Caltrans Encroachment Permits Manual (http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html) for guidance on utility encroachment.

Guidance for utility encroachment is contained in Chapter 600, Table 6.7 (page 6-35) of the Encroachment Permit Manual. Line supports for overhead lines crossing Caltrans R/W must comply with these requirements.

Any traffic control for utility work will need to be addressed as part of Caltrans permit approval. Stoppage of traffic for placement of aerial lines, installation or removal of overhead conductors crossing a highway requires traffic control in accordance with policy shown in the Caltrans Standard Plans and the California Manual on Uniform Traffic Control Devices (MUTCD).

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

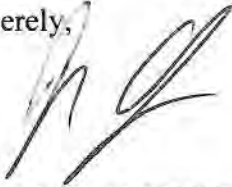
As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary

Ms. Lisa Orsaba, CPUC
October 15, 2013
Page 2

regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

If you have any questions on the comments Caltrans has provided, please contact Leila Ibrahim of the Development Review Branch at (619) 688-6802.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Armstrong', written over a light blue horizontal line.

JACOB M. ARMSTRONG, Chief
Development Review Branch

APPENDIX E-3
Local Agencies

From: [Andy Parr](#)
To: [CNFMSUP](#)
Subject: "SDG&E Master Permit"
Date: Monday, October 14, 2013 11:23:11 AM
Attachments: [20131014111256419.pdf](#)

To whom it may concern,

The availability of modern infrastructure is a critical component of life in rural areas of California. Roadways, utilities, communications and supply purveyors allow for abundant human life miles beyond the local fast food restaurant or corner convenience store. The availability of electric power is quite possibly the most important of all of these pieces of infrastructure. Therefore, long runs of electric lines traverse our rural and forested areas on poles which keep the electrical lines high above most human and wildlife interaction. But when fire strikes and the trees and electric poles burn with equal intensity; the lines suspended above fall to near ground level causing a serious danger to responding firefighters and/or evacuating citizens. Compounding the danger of these fallen lines is the obscured visibility of smoke and dust and the most dangerous of all, darkness.

A project such as SDG&E's Cleveland National Forest Power Line Replacement Project is designed to keep electric lines high on poles, high above contact with humans and wildlife, high above ground level during dangerous wind and fire conditions.

I am confident that routine Forest Practices and other required safety precautions will be employed by the electrical workers who will be performing this work, and moreover, I believe that this project will leave behind "miles and miles" of work areas that are far safer for the generations of firefighters to come.

Please count this letter as support for this project and if we're going to do it, let's get it done as soon as possible, for safety's sake.

Andy Parr, Fire Chief

Lakeside Fire Protection District/CSA-69 EMS District

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Andy Parr, Fire Chief
Lakeside Fire Protection District/CSA-69 EMS District (CA-LKS)
Office 619.390.2350 - aparr@lakesidefire.org
www.lakesidefire.org

Celebrating 50 Years of Service



Lakeside Fire Protection District

12216 Lakeside Avenue
Lakeside, CA 92040
Business (619)390-2350
Fax (619)443-1568

Andy Parr
Fire Chief

Monday, October 14, 2013

To whom it may concern,

The availability of modern infrastructure is a critical component of life in rural areas of California. Roadways, utilities, communications and supply purveyors allow for abundant human life miles beyond the local fast food restaurant or corner convenience store. The availability of electric power is quite possibly the most important of all of these pieces of infrastructure. Therefore, long runs of electric lines traverse our rural and forested areas on poles which keep the electrical lines high above most human and wildlife interaction. But when fire strikes and the trees and electric poles burn with equal intensity; the lines suspended above fall to near ground level causing a serious danger to responding firefighters and/or evacuating citizens. Compounding the danger of these fallen lines is the obscured visibility of smoke and dust and the most dangerous of all, darkness.

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Andy Parr, Fire Chief
Lakeside Fire Protection District/CSA-69 EMS District



**CALIFORNIA PUBLIC UTILITIES COMMISSION / -
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

(please print)

Name: Louis Russo

Organization (if any): SAN DIEGO RURAL FIRE DISTRICT

Do you have authorization to represent this Organization? Yes: No:

Address: 1524 MONTECITO VISTA

City, State, Zip: ALPINE, CA 91901

E-mail: louisfrusso@gmail.com Telephone: 619 320-0866

Would you like a copy of the environmental document? No: Yes: CD Hard Copy

Written Comments

(please print)

NUMEROUS CONCERNS MUST BE ADDRESSED.

- ① WHAT HABITAT AND ENVIRONMENTAL ISSUES WILL SDGE ADDRESS, AND HOW? FOR EXAMPLE, DURING SUNRISE POWERLINE CONSTRUCTION, EAGLE NESTING AREAS WERE VIOLATED ON NUMEROUS OCCASIONS BY HELOS, NO KNOWN CONSEQUENCES FOR SDG&E, NO CONSEQUENCES, SDG&E WILL NOT COMPLY.
- ② INDEPENDENT ANALYSIS OF HABITATS IN AREAS OF RELOCATION ONTO PRIVATE PARCELS IS MANDATORY. OTHERWISE PRIVATE PARCEL OWNER WILL INFLATE EASEMENT COSTS WITH FINAL DETRIMENT TO RATE PAYERS, AS SDG&E WILL PASS COSTS ON.
- ③ ALL - REGARD - ALL. SDG&E AGREEMENTS MUST BE DETAILED, IRON CLAD AND ENFORCEABLE. OUR AGENCY HAD TO BRING ACTION BEFORE PUC TO ENFORCE AGREEMENT BY SDG&E IN SUNRISE POWERLINE, IF A PROACTIVE PROCESS IS NOT PURSUED VIS-A-VIS SDG&E AND THEIR AGREEMENTS, THE TRACK RECORD OF THIS UTILITY IS THAT U.S. LAWYERS WILL FIND A WAY AROUND ANY AGREEMENTS.

Louis Russo

Please note: Comments, including personal information, become public information and may be released to interested parties if requested

From: [Neville Connell](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Monday, November 04, 2013 9:55:48 AM
Attachments: [Doc1 .docx](#)

Please find my comments on SDGE Master Permit attached.

Sincerely,

Neville Connell
President, Greater Alpine Fire Safe Council



CALIFORNIA PUBLIC UTILITIES COMMISSION / UNITED STATES
FOREST SERVICE



San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects

Written Comments

(please print)

Name: G. A. Neville Connell

Organization (if any): Greater Alpine Fire Safe Council

Do you have authorization to represent this Organization? Yes: No:

Address: City, State, Zip: 2641 Firebrand Way, Alpine, CA 91901

E-mail: president@greateralpinefsc.org

Telephone: 619-659-0458

Would you like a copy of the environmental document? No: Yes: CD Hard Copy

My name is Neville Connell and I am President of the Greater Alpine Fire Safe Council ("GAFSC"). As such, along with two others, I represented the Fire Safe Councils of San Diego County at the Stakeholder Meetings with SDG&E. The full Stakeholder Report was provided to the CPUC previously. One focus of these meetings was the safer delivery of electric power to SDG&E's customers by making the ignition of wild fires less likely in areas where power lines cross highly flammable wild land vegetation. Of these areas, those that experience the highest Santa Ana winds are of special concern. The Stakeholders and SDG&E reached the following agreement regarding these issues:

SDG&E will:

- (1) install weather stations throughout the backcountry to provide automated wind, temperature, and humidity readings 24/7;
- (2) use these data to establish the areas with highly flammable wild land vegetation that also experience the highest wind speeds ("special concern areas") and focus infrastructure hardening in these areas;
- (3) Hardening techniques to include:
 - a. replacement of wooden poles by steel poles,
 - b. replacement of wires with thicker wires,
 - c. and replacement of "old-style" transmission line reclosures with "modern smart" reclosures.

I understand that SDG&E intends to comply with this agreement when hardening the Power Line Replacement Projects in the special concern areas now before you. Unfortunately, I have noticed in local meetings that some local residents are opposed to the work. I strongly urge you to reject their complaints and to support the Stakeholder's and SDG&E's safety plan, both for the safety of these local residents themselves as well as the safety of San Diego County residents as a whole.

The GAFSC does not take a position on the specific routes themselves, only that they are implemented according the Stakeholder's and SDG&E's agreement.

From: [Cibit, Cathy](#)
To: [CNFMSUP](#)
Cc: [Pasek, Jeffery](#); [McGinnis, Nicole](#); [Nguyen, Tim](#); [Wehinger, Kim](#); [Martens, David](#); porteus@dudek.com; Tknowd@semprautilities.com; RJiles@semprautilities.com; MDana@semprautilities.com
Subject: NOP Comment Letter: SDG&E Master Permit; Application No. A.12-10-009
Date: Wednesday, November 06, 2013 11:51:39 AM
Attachments: [NOP Letter_11.05.2014.pdf](#)

Please see attached comment letter from the City of San Diego regarding “SDG&E Master Permit” project.

If you have any questions, please see additional contact information below. A hard copy is in the mail.

Thank you,
Cathy Cibit

Cathy Cibit
Project Officer
Watershed & Resources Protection Team
City of San Diego, Public Utilities Department
525 B Street, 3rd Floor
San Diego, CA 92101-4506

(619) 533-4149 (Office)
(619) 533-5325 (Fax)

Please consider the environment before printing this message.



THE CITY OF SAN DIEGO

November 5, 2013

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

Dear Ms. Orsaba and Mr. Metz:

SUBJECT: Notice of Preparation, SDG&E Master Permit; Application No. A.12-10-009

We have reviewed the Notice of Preparation dated, September 23, 2013, and appreciate the opportunity to comment. Our comments are briefly discussed below:

The City of San Diego owns and operates nine drinking source water reservoirs. Two of these reservoirs (Barrett and Morena), and City-owned property north of Barrett Reservoir, are traversed by the project's corridors and related facilities. These areas will be affected by project implementation.

The three project areas that cross City-owned properties are: T625 (north of Barrett Reservoir) C-157 (Barrett Reservoir) and C449 (Morena Reservoir). These areas already have existing structures, access roads, and corresponding city-issued easements. Any modification to these alignments may require amendments to these easements or preparation of new easement documents, if a new alignment is needed. Modification of an easement is a discretionary action under CEQA. The City of San Diego would be a Responsible Agency for this project.

In addition, T625 (Maps 23-26), crosses an area where the Sunrise Powerlink (SRPL) was constructed on city-owned property. Habitat restoration and non-native and invasive plant removal activities are currently underway in this area. The proposed project should coordinate with SDG&E staff to avoid additional impacts and this coordination with the SRPL project should be disclosed in the Draft Environmental Impact Report (DEIR) and Draft Environmental Impact Statement (DEIS).

Also, the City is concerned about the project component identified as Barrett Reservoir Site # C-157. It appears that an alternate route is proposed along an existing access route in the bottom of the canyon between the Pine Creek and Hauser Wilderness areas. This area is ranked "Highest Priority" for Conservation in the draft City Public Utilities Department's Land Management Plan. The City would prefer another alternative.

Public Utilities Department

525 B Street, Suite 300, MS 906 • San Diego, CA 92101-4409

Tel (619) 533-7595



Page 2

Dear Ms. Orsaba and Mr. Metz

November 5, 2013

Lastly, the DEIR/DEIS should identify city-owned property on the pertinent project maps. Please note that in Attachment B.11, C449 Map Overview (Morena Reservoir) incorrectly identifies San Diego County Department of Parks and Recreation as a land owner. Please revise to reflect that the City of San Diego, Public Utilities Department, is the land owner. The County has a long-term lease with the City for recreational uses.

The City requests that you address the above comments in the forthcoming DEIR/DEIS. Please send a copy of this document to our office for review and comment.

If you have any questions, please contact me at jpasek@sandiego.gov or at (619) 533-7599.

Sincerely,



for Jeff Pasek
Watershed Manager

cc: Dave Martens, Property Agent, Real Estate Assets Department
John Porteus, Project Manager, Dudek and Associates
Rebecca Jiles, Regulatory Specialist, SDG&E
Molly Dana, Property Agent, SDG&E
Megan Hamilton, Group Program Manager, County Department of Parks and Recreation

From: [Sysum, Scott](#)
To: [CNFMSUP](#)
Subject: EPA R9 Scoping Comments - SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Project Notice of Intent
Date: Wednesday, November 06, 2013 1:31:02 PM
Attachments: [SDG&E CNF Power Line Upgrade-EPA R9 Scoping Comments.11.6.2013.pdf](#)

Dear Ms. Orsaba

I have been assigned as the lead reviewer for the U.S. EPA Region 9 for the San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Project Notice of Intent. I have attached a pdf file of our scoping comment letter regarding this project. A copy of the signed letter was mailed today to Ms. Lisa Orsaba.

Thank you for providing us the opportunity to review this interesting project. Please feel free to contact us if you have any questions, seek clarifications or if we can help in any other way.

v/r
Scott Sysum

National Older Worker Career Center
Energy Specialist
U.S. EPA Region IX
Environmental Review Office
75 Hawthorne Street CED-2
San Francisco, CA 94105
voice-415-972-3742; fax-415-947-3562
Email: sysum.scott@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

NOV 06 2013

Mr. Will Metz
c/o Dudek
605 Third Street
Encinitas, California 92024

Subject: Notice of Intent to Prepare a Joint Environmental Impact Report/Environmental Impact Statement for the Proposed San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Projects, Orange and San Diego Counties, California

Dear Mr. Metz:

The U.S. Environmental Protection Agency has reviewed the September 23, 2013 Notice of Intent to prepare a joint Environmental Impact Report/Environmental Impact Statement for the proposed San Diego Gas and Electric Master Special Use Permit and Permit to Construct Power Line Replacement Projects, Orange and San Diego Counties, California. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and § 309 of the Clean Air Act.

To assist in the scoping process for this project, we have identified several issues for your attention in the preparation of the EIS. We are most concerned about the following issues: impacts to water and air, impacts to biological resources, invasive species management, and habitat protection.

We appreciate the opportunity to review this NOI and are available to discuss our comments. Please send one hard copy of the Draft EIS and one CD ROM copy to this office at the same time it is officially filed with our Washington D.C. Office. If you have any questions, please contact me at (415) 972-3545, or contact Scott Sysum, the lead reviewer for this project. Scott can be reached at (415) 972-3742 or sysum.scott@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann McPherson".

Ann McPherson
Environmental Review Office
Communities and Ecosystems Division

Enclosures: EPA's Detailed Comments

cc: Lisa Orsaba
California Public Utility Commission

US EPA DETAILED COMMENTS ON THE NOTICE OF INTENT TO PREPARE A JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED SAN DIEGO GAS AND ELECTRIC MASTER SPECIAL USE PERMIT AND PERMIT TO CONSTRUCT POWER LINE REPLACEMENT PROJECTS, ORANGE and SAN DIEGO COUNTIES, CALIFORNIA, NOVEMBER 6, 2013

Statement of Purpose and Need

The Draft Environmental Impact Statement should clearly identify the underlying purpose and need to which the U.S. Forest Service is responding in proposing the alternatives (40 CFR 1502.13). The *purpose* of the proposed action is typically the specific objectives of the activity, while the *need* for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.

Recommendation:

The purpose and need should be a clear, objective statement of the rationale for the proposed project. The DEIS should discuss the proposed project in the context of the electric power system reliability, fire risk reduction, power line undergrounding and power line relocation.

Alternatives Analysis

The National Environmental Policy Act requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). A robust range of alternatives will include options for avoiding significant environmental impacts. The DEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail. The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of forest impacted, tons per year of emissions produced).

The alternatives analysis should describe the approach used to identify the alternative routes and the criteria used to select the different routes. The analysis should include the identification of environmentally preferable routes, as well as alternative sites and configurations for access roads. The DEIS should evaluate the feasibility of using helicopters for project construction in order to minimize land disturbance.

Recommendations:

The DEIS should describe how each alternative was developed, how it addresses each project objective, and how it will be implemented. The alternatives analysis should include a discussion of the various alternatives, including the environmentally preferable routes for the transmission line and access roads, alternative methods of construction such as using heavy-lift helicopters to transport and set towers, and use of underground cables versus overhead wires.

The DEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. The DEIS should describe the methodology and criteria used for determining the transmission line route and alternative routes. Thresholds of significance should be determined by considering the context and intensity of an action and its effects (40 CFR 1508.27).

Water Resources

Water Supply and Water Quality

Public drinking water supplies and/or their source areas often exist in many watersheds. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect sources of drinking water for communities. Therefore, the EPA recommends that the DEIS identify:

- The amount of water needed for the proposed project and where this water will be obtained;
- The availability of GW within the basin and annual recharge rates;
- A description of the water rights permitting process and the status of water rights within the basin, including an analysis of whether water rights have been over-allocated;
- Cumulative impacts to GW supply within the hydrographic basin;
- Different types of technology that can be used to minimize or recycle water;
- Whether it would be feasible to use other sources of water, including potable;
- The potential for alternatives to cause adverse aquatic impacts, including impacts to water quality and aquatic habitats.

Recommendations:

The DEIS should describe surface water features, including unnamed, intermittent, and ephemeral drainages in the project area, and address the potential effects of project construction on hydrologic features in the project study area.

The DEIS should address the potential effects of project discharges, if any, on surface water quality. Specific discharges should be identified and potential effects of discharges on designated beneficial uses of affected waters should be analyzed.

The DEIS should quantify the amount of water needed and describe water reliability for the proposed project.

Geographic Extent of Waters of the United States

The project applicant should coordinate with the U.S. Army Corps of Engineers to determine if the proposed project requires a Section 404 permit under the Clean Water Act. Section 404 regulates the discharge of dredged or fill material into waters of the United States, including wetlands and other *special aquatic sites*. The DEIS should quantify all WOUS that could be affected by the project alternatives, and include maps that clearly identify such waters within the project area.

If a Section 404 permit is required, the DEIS should discuss compliance with *Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials* (40 CFR 230), promulgated pursuant to Section 404(b)(1) of the CWA. Pursuant to 40 CFR 230, any permitted discharge into WOUS must be the *Least Environmentally Damaging Practicable Alternative* available to achieve the project purpose. If dredged or fill material would be discharged into WOUS, the DEIS should discuss alternatives to avoid those discharges.

Recommendations:

The DEIS should include a jurisdictional delineation for all WOUS, including ephemeral drainages, in accordance with the 1987 *Corps of Engineers Wetlands Delineation Manual*, the

Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (Regional Supplement USACE, 2008) and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States: A Delineation Manual (USACE, 2008).

The DEIS should quantify all WOUS that could be affected by the project alternatives and include maps that clearly identify all WOUS within the project area. The discussion should include acreages and channel lengths, habitat types, values, and functions of these WOUS.

Clean Water Act Section 303(d)

The CWA requires States to develop a list of impaired waters that do not meet water quality standards, establish priority rankings, and develop action plans, called Total Maximum Daily Loads, to improve water quality.

Recommendation:

The DEIS should provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise TMDLs. The DEIS should describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Construction Stormwater Discharge Permit

The California State Water Resources Control board requires owner/operators to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity if the project will disturb more than one acre of soil. Given the disturbance area for this project, a Construction General Permit (Order 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ) may be required. Additionally, a Stormwater Pollution Prevention Plan that includes erosion control measures would need to be generated for the project and implemented on-site.

The SWPPP should include the elements described in the Construction General Permit, including a site map(s) showing the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP also would list Best Management Practices, including erosion control BMPs that would be used to protect stormwater runoff, and include a description of required monitoring programs.

Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP. Guidance from other documents, such as the EPA document entitled "Developing Your Stormwater Pollution Prevention Plan: A Guide for Construction Sites" also could be used in the development of the SWPPP.¹

Recommendation:

The EPA recommends that the applicant determine the need for a California State Water Resources Control Board General Permit associated with construction activity. If such a permit is required,

¹ United States Environmental Protection Agency, Developing Your Stormwater Pollution Prevention Plan, A Guide for Construction Sites, EPA 833- R-06-004. May 2007. http://www.epa.gov/npdes/pubs/sw_swppp_guide.pdf

include a description of the proposed stormwater pollution control and mitigation measures in the DEIS.

The DEIS should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality and aquatic resources.

Biological Resources, Habitat and Wildlife

The DEIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. The document should identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act. Transmission line rights-of-way are anthropogenic disturbances which alter the spatial structure of habitat elements, creating linear patches or line corridors which in turn impact ecological integrity by modifying ecological processes (abiotic & biotic) at various scales. Transmission line ROWs result in habitat fragmentation and increased habitat edge effects, affecting individual species with different intensity.

Recommendations:

Identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. Identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative.

Discuss how the proposed action would comply with ESA requirements, including any Section 7 consultation efforts with the U.S. Fish and Wildlife Service. Any relevant documents associated with the ESA Section 7 consultation process, including Biological Assessments and Biological Opinions, should be summarized and included in an appendix in the EIS.

Coordinate across USFS field offices and with USFWS and California Department of Fish and Wildlife to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Analysis of impacts and mitigation on covered species should include:

- Baseline conditions of habitats and populations of the covered species.
- A clear description of how avoidance, mitigation and conservation measures will protect and encourage the recovery of the covered species and their habitats in the project area.
- Monitoring, reporting and adaptive management efforts to ensure species and habitat conservation effectiveness.

If the applicant is to acquire compensation lands, the location(s) and management plans for these lands should be discussed in the DEIS.

Incorporate, into the DEIS, information on the compensatory mitigation proposals (including quantification of acreages, estimates of species protected, costs to acquire compensatory lands, etc.) for unavoidable impacts to waters of the State and biological resources.

Identify compensatory mitigation lands or quantify, in the DEIS, available lands for compensatory habitat mitigation for this project, as well as reasonably foreseeable projects in the area. Specify, in

the DEIS, provisions that will ensure habitat selected for compensatory mitigation will be protected in perpetuity.

Incorporate, into the DEIS, mitigation, monitoring, and reporting measures that result from consultation with the USFWS and CDFW, and that incorporate lessons learned from other transmission line projects and recently released guidance to avoid and minimize adverse effects to sensitive biological resources.

The DEIS should describe the potential for habitat fragmentation and obstructions for wildlife movement from the construction of this project and other projects in the area.

Discuss the need for monitoring, mitigation, and if applicable, translocation management plans for the sensitive biological resources, approved by the USFS and the biological resource management agencies. This could include, but is not limited to, a Bird and Bat Conservation Strategy, a Raven Monitoring, Management, and Control Plan, and Special Status Plant Impact Avoidance and Mitigation Plan.

The DEIS should include assurances that the design of the transmission line would be in compliance with current standards and practices that reduce the potential for raptor fatalities and injuries. The commonly referenced source of such design practices is found within the Avian Power Line Interaction Committee documents: *Suggested Practices for Avian Protection on Power Lines: State of the Art in 2006* manual and *Mitigating Bird Collisions with Power Lines: The State of the Art in 2012*. Also, in consultation with the USFWS, determine the need for a Bird and Bat Conservation Strategy to be developed using the 2005 Avian Power Line Interaction Committee and U.S. Fish and Wildlife Service Avian Protection Plan Guidelines or the need for an Eagle Conservation Plan following the U.S. Fish and Wildlife Service April 2013 Eagle Conservation Plan Guidance.

The EPA is also concerned about the potential impact of construction, installation, and maintenance activities on habitat. We encourage habitat conservation alternatives that avoid and protect high value habitat and create or preserve linkages between habitat areas to better conserve the covered species. We are also concerned with management of the ROWs, specifically vegetation management in order to prevent natural forest succession. ROW management is usually practiced to protect the system from windfall, contact with trees and branches, and other potential hazards. Additionally access roads are maintained in order to ensure access for maintenance and upkeep of the system components.

Recommendations:

The DEIS should describe the extent of potential impacts to habitat from construction, installation, and maintenance activities.

The DEIS should describe the ROW vegetation management techniques to be used and potential associated environmental impacts, especially if mechanical methods or herbicides are to be used.

The DEIS should indicate the location of important wildlife habitat areas. The DEIS should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.

The DEIS should provide detailed information on any proposed fencing design and placement, and its potential effects on drainage systems on the project site. Fencing proposed for this project should meet appropriate hydrologic, wildlife protection and movement, and security performance standards. Those standards should be described in the DEIS.

Air Quality

The DEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). Such an evaluation is necessary to assure compliance with State and Federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.

The DEIS should describe and estimate air emissions from potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. The EPA recommends an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics).

Recommendations:

- *Existing Conditions* – The DEIS should provide a detailed discussion of ambient air conditions, NAAQS, and criteria pollutant nonattainment areas in the vicinity of the project.
- *Quantify Emissions* – The DEIS should estimate emissions of criteria pollutants from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project. The DEIS should describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions.
- *Specify Emission Sources* – The DEIS should specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.
- *Construction Emissions Mitigation Plan* – The DEIS should include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record of Decision. In addition to all applicable local, state, or federal requirements, we recommend the following control measures (Fugitive Dust, Mobile and Stationary Source and Administrative) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities:
 - Fugitive Dust Source Controls: The DEIS should identify the need for a Fugitive Dust Control Plan to reduce Particulate Matter 10 and Fine Particulate Matter 2.5 emissions during construction and operations. We recommend that the plan include these general commitments:
 - Stabilize heavily used unpaved construction roads with a non-toxic soil stabilizer or soil weighting agent that will not result in loss of vegetation, or increase other environmental impacts.
 - During grading, use water, as necessary, on disturbed areas in construction sites to control visible plumes.

- Vehicle Speed
 - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
 - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on un-stabilized (and unpaved) roads.
 - Post visible speed limit signs at construction site entrances.
 - Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
 - Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
 - Use sandbags or equivalent effective measures to prevent run-off to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project
 - Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
 - Stabilize disturbed soils (after active construction activities are completed) with a non-toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.
 - Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.
 - Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.
- Mobile and Stationary Source Controls:
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal² or State Standards³. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible⁴.
 - Where Tier 4 engines are not available, use construction diesel engines with a rating of 50 hp or higher that meet, at a minimum, the Tier 3 California

² EPA's website for nonroad mobile sources is <http://www.epa.gov/nonroad/>.

³ For California, see ARB emissions standards, see: <http://www.arb.ca.gov/msprog/offroad/offroad.htm>.

⁴ Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and ≥ 750 hp 2011- 2015).

Emission Standards for Off-Road Compression-Ignition Engines⁵, unless such engines are not available.

- Where Tier 3 engine is not available for off-road equipment larger than 100 hp, use a Tier 2 engine, or an engine equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 2 levels.
 - Consider using electric vehicles, natural gas, biodiesel, or other alternative fuels during construction and operation phases to reduce the project's criteria and greenhouse gas emissions.
 - Plan construction scheduling to minimize vehicle trips.
 - Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections.
 - Maintain and tune engines per manufacturer's specifications to perform at CARB and/or EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.
- Administrative controls:
- Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
 - Identify any sensitive receptors in the project area, such as children, elderly, and the infirm, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).
 - Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

Invasive Species

Human actions are the primary means of invasive species introductions. Transmission line construction causes disturbance of ROW soils and vegetation through the movement of people and vehicles along the ROW, access roads, and laydown areas. These activities can contribute to the spread of invasive species. Parts of plants, seeds, and root stocks can contaminate construction equipment and essentially "seed" invasive species wherever the vehicle travels. Invasive species infestations can also occur during periodic transmission ROW maintenance activities especially if these activities include mowing and clearing of vegetation. Once introduced, invasive species will likely spread and impact adjacent properties with the appropriate habitat.

Executive Order 13112, *Invasive Species* (February 3, 1999), mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. Executive Order 13112 also calls for the restoration of native plants and tree species.

We encourage alternative management practices that limit herbicide use, focusing instead on other methods to limit invasive species vegetation and decrease fire risk. Possible alternatives include mowing and weed control fabric.

⁵ as specified in California Code of Regulations, Title 13, Section 2423(b)(1)

Recommendations:

The DEIS should describe the invasive plant management plan used to monitor and control noxious weeds. If herbicides or pesticides will be used to manage vegetation, the DEIS should disclose the projected quantities and types of chemicals. The invasive plant management plan should identify methods that can be used to limit the introduction and spread of invasive species during and post-construction. These measures can include marking and avoidance of invasives, timing construction activities during periods that would minimize their spread, proper cleaning of equipment, and proper disposal of woody material removed from the ROW.

Because construction measures may not be completely effective in controlling the introduction and spread of invasives, the DEIS should describe post-construction activities that will be required such as surveying for invasive species following restoration of the construction site and measures that will be taken if infestations are found.

Climate Change

Scientific evidence supports the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Global warming is caused by emissions of carbon dioxide and other heat-trapping gases. On December 7, 2009, the EPA determined that emissions of GHGs contribute to air pollution that “endangers public health and welfare” within the context of the Clean Air Act. A report⁶ by the California Energy Commission states that observed changes over the last several decades across the western United States reveal clear signals of climate change. Substantially higher temperatures, more extreme wildfires, and rising sea levels are just some of the direct impacts experienced in California that can be attributed, at least partially, to climate change.

Recommendation:

The DEIS should consider how climate change could potentially influence the study area, and how implementation of the proposed project could lessen or potentially mitigate for these impacts. Conversely, the DEIS should assess how the projected impacts could be exacerbated by climate change.

Hazardous Materials/Hazardous Waste/Solid Waste

The DEIS should address potential direct, indirect and cumulative impacts of hazardous waste from construction and operation of the proposed transmission line and other facilities. The document should identify projected hazardous waste types and volumes, and expected storage, disposal, and management plans. It should address the applicability of state and federal hazardous waste requirements. Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste (i.e., hazardous waste minimization). Alternate industrial processes using less toxic materials should be evaluated as mitigation since such processes could reduce the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste.

Cumulative and Indirect Impacts

The cumulative impacts analysis should identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the

⁶ Moser, Susie, Ekstrom, Julia and Guido, Franco. 2012. Our Changing Climate 2012, A Summary Report on the Third Assessment from the California Climate Change California Energy Commission, CEC-500-2012-007.

project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. Trends data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components.

Recommendations:

The cumulative impacts analysis should focus on resources of concern or resources that are “at risk” and/or are significantly impacted by the proposed project, before mitigation. For this project, we recommend focusing on aquatic and biological resources, habitat, and cultural resources.

Coordination with Tribal Governments

Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes.

Recommendation:

The DEIS should describe the process and outcome of government-to-government consultation between the USFS and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

National Historic Preservation Act and Executive Order 13007

Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act. Historic properties under the NHPA are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800.

Executive Order 13007, *Indian Sacred Sites* (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.

Recommendation:

The DEIS should address the existence of Indian sacred sites in the project areas. It should address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how the USFS will avoid adversely affecting the physical integrity, accessibility, or use of sacred sites, if they exist. The DEIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan.

Environmental Justice and Impacted Communities

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994) and the *Interagency Memorandum of Understanding on Environmental Justice* (August 4, 2011) direct federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process. Guidance⁷ by CEQ clarifies the terms low-income and minority population (which includes Native Americans) and describes the factors to consider when evaluating disproportionately high and adverse human health effects.

Recommendations:

The DEIS should include an evaluation of environmental justice populations within the geographic scope of the projects. If such populations exist, the DEIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of the projects impact on minority and low-income populations should reflect coordination with those affected populations.

The DEIS should describe outreach conducted to all other communities that could be affected by the project, since rural communities may be among the most vulnerable to health risks associated with the project.

Coordination with Land Use Planning Activities

The DEIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the project areas. The term “land use plans” includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. Proposed plans not yet developed should also be addressed if they have been formally proposed by the appropriate government body in a written form (CEQ’s Forty Questions, #23b).

Implementation of Adaptive Management Techniques for Mitigation Measures

Adaptive management is an iterative process that requires selecting and implementing management actions, monitoring, comparing results with management and project objectives, and using feedback to make future management decisions. The process recognizes the importance of continually improving management techniques through flexibility and adaptation instead of adhering rigidly to a standard set of management actions. Although adaptive management is not a new concept, it may be relatively new in its application to specific projects. The effectiveness of adaptive management monitoring depends on a variety of factors including:

- The ability to establish clear monitoring objectives.
- Agreement on the impact thresholds being monitored.
- The existence of a baseline or the ability to develop a baseline for the resources being monitored.
- The ability to see the effects within an appropriate time frame after the action is taken.

⁷ Environmental Justice Guidance under the National Environmental Policy Act, Appendix A (Guidance for Federal Agencies on Key Terms in Executive Order 12898), CEQ, December 10, 1997.

- The technical capabilities of the procedures and equipment used to identify and measure changes in the affected resources and the ability to analyze the changes.
- The resources needed to perform the monitoring and respond to the results.

Recommendation:

Consider adopting a formal adaptive management plan to evaluate and monitor impacted resources and ensure the successful implementation of mitigation measures. Review the specific discussion on adaptive management in the NEPA Task Force Report to the Council on Environmental Quality on *Modernizing NEPA*.⁸

⁸ CEQ, The NEPA Task Force Report to the Council on Environmental Quality: Modernizing NEPA Implementation (Sept. 2003), available at <http://ceq.hss.doe.gov/ntf/report/totaldoc.html>.

From: [Domeier, Jennifer](#)
To: [CNFMSUP](#)
Cc: [Wilson, Adam](#); [Sprecco, Edward](#); [Jones, Megan](#); [Snyder, Todd](#); [Schneider, Matthew](#)
Subject: County of San Diego comments on the SDGE Master Special Use Permit NOP
Date: Thursday, November 07, 2013 1:21:58 PM
Attachments: [County of SD cmts - SDGE Master Special Use Permit 11.7.13.pdf](#)

Ms. Orsaba,

Attached are comments from the County of San Diego on the SDGE Master Special Use Permit NOP.

Feel free to contact me with any questions.

Jennifer Domeier

Land Use Environmental Planner, County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310 San Diego, CA 92123
T 858.495.5204

Website: <http://www.sdcounty.ca.gov/dplu/index.html>

Property Information: <http://gis.co.san-diego.ca.us/>



County of San Diego
PLANNING & DEVELOPMENT SERVICES

MARK WARDLAW
Director

DARREN GRETLER
Assistant Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdccounty.ca.gov/pds

November 7, 2013

Lisa Orsaba
California Public Utilities Commission c/o Dudek
605 Third Street
Encinitas, California 92024
Via email to cnfmsup@dudek.com

**COMMENTS ON THE SDG&E MASTER SPECIAL USE PERMIT AND PERMIT TO
CONSTRUCT POWERLINE REPLACEMENT PROJECTS NOTICE OF
PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL
IMPACT STATEMENT; APPLICATION NO. A.12-10-009**

Dear Ms. Orsaba:

The County of San Diego (County) has received and reviewed the Notice of Preparation (NOP) and Notice of Public Scoping Meeting for a SDG&E Master Special Use Permit (MSUP) and Permit to Construct Powerline Replacement Projects Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) dated September 23, 2013, and appreciates this opportunity to comment. The County has comments that identify potentially significant environmental issues that may have an effect on the unincorporated lands of San Diego County.

SDG&E is proposing to combine over 70 previously issued use permits for 69 kilovolt (kV) power line and 12 kV distribution line facilities, as well as ancillary and appurtenant facilities within the California National Forest (CNF), into one MSUP. The project would also replace over 150 miles of existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would include fire hardening (wood to steel pole replacement), along with removal, relocation, undergrounding, and single to double circuit conversion along certain segments. Roughly 83 miles of these lines are located in unincorporated portions of the County.

GENERAL COMMENTS

1. Based on a review of the MSUP and the NOP, 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.
2. The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the County. Project impacts that could have potentially significant adverse effects to the unincorporated County or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: <http://www.sdcountry.ca.gov/dplu/procguid.html#guide>.
3. The EIR/EIS should identify impacts to any County facilities, including preserves and park lands.
4. The EIR/EIS should include a detailed project description that includes phasing plans for specific projects and limitations on the hours of operations and duration of construction activities.
5. The EIR/EIS should include requirements for adequate property owner notifications; generally 50 feet would not be an adequate notification distance. The results of a noise analysis would be needed to determine appropriate notification distances to ensure all affected residents are notified.

NOISE

6. The NOP indicates that project construction will produce short-term noise (from helicopters, vehicles, and construction equipment) and may violate noise standards during construction. A technical noise report should be prepared to document the noise levels resulting from the project and should include an evaluation of conformance with the County's Noise Ordinance and General Plan Noise Element requirements where noise would affect unincorporated County lands.

The County appreciates the opportunity to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any

Ms. Orsaba
November 7, 2013

Page 3

questions regarding these comments, please contact Jennifer Domeier, Land Use Environmental Planner, at (858) 495-5204, or via email at jennifer.domeier@sdcounty.ca.gov.

Sincerely,



TODD SNYDER, Chief
Advance Planning Division

e-mail cc:

Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Eddie Sprecco, Policy Advisor, Board of Supervisors, District 5
Megan Jones, Group Program Manager, LUEG
Alpine Community Planning Group
Boulevard Community Planning Group
Campo/Lake Morena Community Planning Group
Cuyamaca Community Sponsor Group
Descanso Community Planning Group
Jamul-Dulzura Community Planning Group
Julian Community Planning Group
Pala-Pauma Community Sponsor Group
Pine Valley Community Planning Group
Potrero Community Planning Group
Jennifer Domeier, Land Use Environmental Planner, Planning & Development Services

- a. Refer to budget deliberations the establishment of appropriations of \$820,000 in the Department of Planning & Development Services for services and supplies to fund the acquisition of 16 remaining top ranked PACE properties, due to _____, based on Fiscal Year 2013-2014 General Fund fund balance.

APPENDIX E-4
Organizations

From: [Cindy Buxton](#)
To: [Will Metz](#); [Joan Friedlander](#); [Bjorn Fredrickson](#); [Don Christiansen](#); public.advisor@cpuc.ca.gov; [CNFMSUP](#)
Cc: [donna_tisdate1](#); [Kelly Fuller](#); [Bill Powers](#); [Nathan Weflen](#); pattyreedy@rocketmail.com; [skip skip](#); [conscom](#); [allen greenwood](#); [Alan Hatcher](#); [Robert Hawkins](#); [Rob Hutsel](#); [Robert Scheid](#); [Jim Conrad](#); [Jim Conrad](#); [John Elliot](#); [Duncan Hunter](#); [Congresswoman Susan Davis](#); [kay taff](#); [Richard Halsey](#)
Subject: SDG&E Master Permit
Date: Friday, October 11, 2013 9:42:17 AM
Attachments: [USGS7.5RoughDraft.png](#)
[USFSVersion.png](#)

The exact mapping of this proposed alternate scoping/study area for your Master Permit plans is fundamental to understanding and writing comments. It is obvious that there is more than just a quick penciling as some areas appear to be deliberately included. As you know the cornerstone of the NEPA process dictates that enough information is provided to make an informed decision. I can not do that from the ultra poor quality of the map provided. I know these areas well. I spent better than four hours trying to move your map onto a quality USGS 7.5 minute map and as you can see it is an estimate at best, especially the upper quarter of the map.

Please provide a map that is legible; this one is unacceptable by NEPA standards. If I know these areas well and I do, and I'm willing to spend that much time with this on my own time, yet I can still not definitively make out the details of this map; I am confident that the majority of interested parties are not able to effectively decipher them either.

However the basic thread I think as you can tell from my first attempt at this attached above is not favorable. I can think of alternatives to the "do nothing" alternative but the "do nothing" alternative is geometrically superior to what is being suggested here, vague that it is. I will add and elaborate later and / or in the coming days.

I realize there is considerable difference between the persons that

- design an alternative,
- their original core intentions,
- the persons that actually direct that onto explicit details on a map,
- and the persons that do the actual drawing of the map onto the page or web.

Please understand that I have and will be taking a very close look at those differences and speculating on the intentions of all three as it is obvious to me that none of the three had the same idea in mind nor in congruence with the reasons supplied in the public scoping notice. Please revisit starting with some clear statement of **intention** and the criteria that that intention needs to satisfy and only then followed by the **content**. So far the notice for public review is not satisfactorily making these core intentions and requirement criteria clear enough to do this effectively. I will proceed with what I have but it is not necessarily going to reflect positively on you and your better intentions until this is made clear. - about 180

degrees the contrary I'm afraid.

Make it very clear I will not represent an organization that intends to "take" private-reservation land for this project. There are alternatives that would be superior to the do Nothing alternative , but even if there were not, I do not see the reasons supplied as sufficient to take lands from the locals, nor in any way compromise a single square inch of private property. I will recommend supporting legal action if that proves to be the case as an unwarranted and inappropriate potentially illegal stealing of land, the one exception being to underground this line most especially directly under Boulder Creek Road as it proceeds through the Inaja Reservation, but only directly under Boulder Creek Road there.

This too has superior alternatives. There will be much more and many photos to validate. Make it very clear that the perceived "Deliverance like" perception of some of the locals may be what it is, I know them well and would change nothing about a single one of them if it were possible; and their company I'll keep and cherish with respect and pride any moment of any day. As a person that has not only spent enough time to speak both on specifics but on the whole geography of that entire region , but also as one of the few that has gotten to know the locals very well over the last decade I can confidently say that your forest is in much, much better shape having them in residence than loosing any single one of them, indeed I don't care what any energy infrastructure is prepared to pay in contract fees, you cannot afford to loose your locals if you have even the first sense for appropriately managing these lands. Indeed way too often this resource has been severely under respected.

This goes out as MY number one criteria. I knew this area very well even before I met any of them; I can adequately speak to this point.

The notion of putting cameras on power poles out in a forest just 'cause? On the US border, yea I get it. Out in the woods, most definitely not. I'm sorry some are unruly enough to destroy utility property, expensive I'm sure. However this does not stack up to the undermining of constitutional freedoms. I'll gladly pledge to turn in anyone trying to shoot down SDG&E property in exchange for maintaining our Constitutional freedoms . (yes Mr Hunter that includes the 2nd amendment as well) It seems barbaric at best I should even have to barter for what I should rely on with confidence.

The recipients are encouraged to forward liberally.

We can do this.

Sincerely,

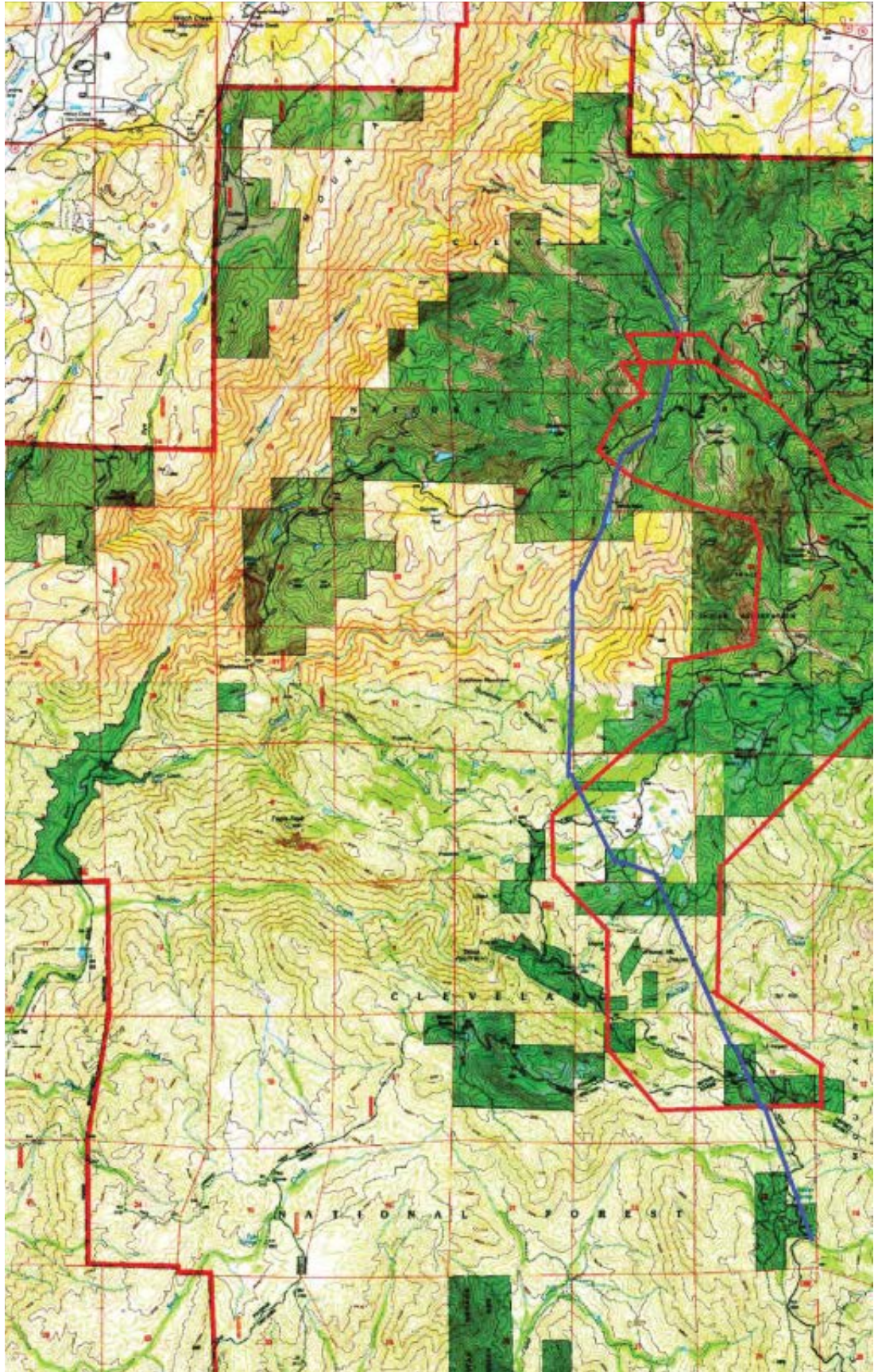
Cindy Buxton chair of the Forest Committee, San Diego Chapter of the Sierra Club

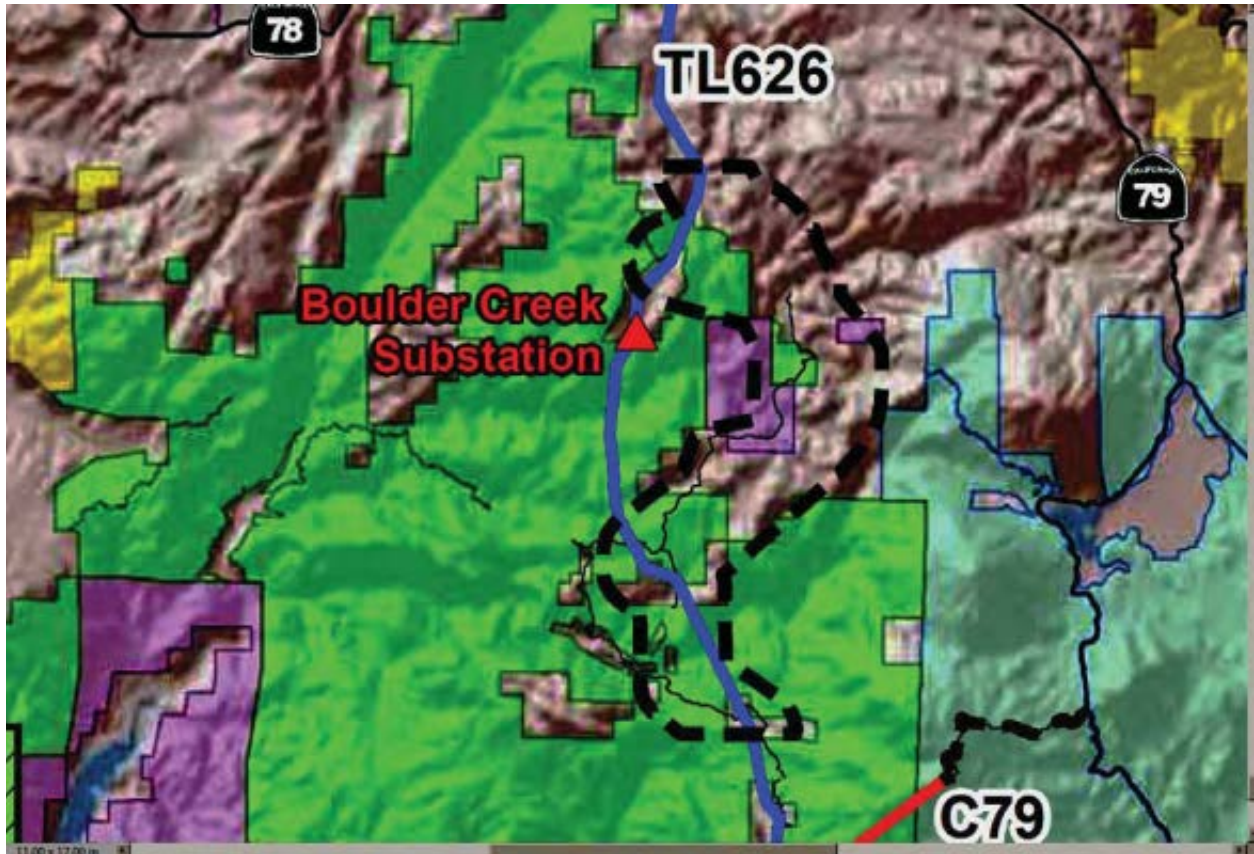
1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

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From: [Cindy Buxton](#)
To: [Rica Nitka](#); rhawkins@fs.fed.us
Subject: RE: SDG&E Master Permit
Date: Thursday, October 17, 2013 5:30:51 PM

Wow! many thanks for the response. could you tell me what the current wattage is of the 626 line? I know the voltage is 69kv but I would like the wattage.

Thanks again for the map!

Cindy

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Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

From: rnitka@dudek.com
To: iokuok2@hotmail.com
CC: lisa.orsaba@cpuc.ca.gov; rhawkins@fs.fed.us
Date: Wed, 16 Oct 2013 16:19:01 -0700
Subject: RE: SDG&E Master Permit

Ms. Buxton:

Thank you for your comments. Per your request for additional information, provided attached is the TL 626 shown on a USGS topographic map for your use. This map will also be added to the public website.

Regards,
Rica Nitka
Project Manager

From: Cindy Buxton [mailto:iokuok2@hotmail.com]
Sent: Friday, October 11, 2013 9:40 AM
To: Will Metz; Joan Friedlander; Bjorn Fredrickson; Don Christiansen; public.advisor@cpuc.ca.gov; CNFMSUP
Cc: donna tisdale1; Kelly Fuller; Bill Powers; Nathan Weflen; pattyreedy@rocketmail.com; skip skip; conscom; allen greenwood; Alan Hatcher; Robert Hawkins; Rob Hutzel; Robert Scheid; Jim Conrad; Jim Conrad; John Elliot; Duncan Hunter; Congresswoman Susan Davis; kay taff; Richard Halsey
Subject: SDG&E Master Permit

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Cindy Buxton chair of the Forest Committee, San Diego Chapter of the Sierra Club

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

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OCT 24 2013

October 17, 2013

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

Subject: Support for SDG&E's Master Special Use Permit and Permit to Construct

Dear Ms. Orsaba and Supervisor Metz:

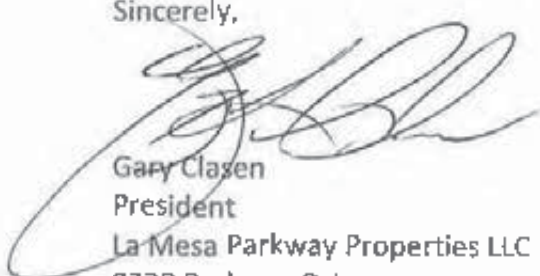
San Diego Gas & Electric's (SDG&E) proposed Power Line Replacement Projects in Cleveland National Forest (CNF) are crucial to the region's reliability, the integrity of our electric system and fire safety. On behalf of the East County Convention and Visitor's Bureau, I would like to express my full support for SDG&E's request for a Master Special Use Permit and Permit to Construct these improvements.

The CNF Power Line Replacement Projects will increase safety and reliability by replacing electric infrastructure that currently serves the CNF and surrounding areas. As an organization that promotes the wilderness and outdoor activities in one of the most diverse areas in the county, we appreciate SDG&E's effort to help improve the reliability and integrity of the electric system by replacing more than 1,800 wood poles with fire resistant, weatherized steel, as well as 12 kilovolt (kV) and 69 kV electric facilities.

We also support these proposed infrastructure improvements because they will increase safety for local residents and visitors who enjoy the outdoor recreational activities that East County has to offer. The stronger, taller and fire-resistant poles will bolster safety during high-risk weather conditions and require less maintenance. Wildfires are a very serious issue for East County, and we appreciate the steps SDG&E is taking to help prevent them in our region.

As a result of these benefits, we urge you to approve SDG&E's Master Special Use Permit and Permit to Construct for the CNF Power Line Replacement Projects. Thank you very much for your consideration.

Sincerely,



Gary Clasen
President
La Mesa Parkway Properties LLC
8238 Parkway Drive
La Mesa Ca. 91942

From: [Miriam Raftery](#)
To: "[Cindy Buxton](#)"; [Rica Nitka](#); "[Harris, Brian D -FS](#)"; wmetz@fs.fed.us
Cc: rhawkins@fs.fed.us; lisa.orsaba@cpuc.ca.gov; "[Will Metz](#)"; lisa.rsaba@cpuc.ca.gov
Subject: RE: SDG&E Master Permit - meeting hearing delay requested due to Brown Act violation of notice required to media on your mailing list
Date: Monday, October 21, 2013 7:58:29 AM

I am the editor of East County Magazine. The only notice we got was from a reader. Why was I not sent one directly? I am supposed to be on the media release list for the USFS, having interviewed Will Metz, Cleveland National Forest Service director, and dealt with his media person, Brian Harris, several times in the past. I have previously asked to be added to your media list and in fact I have received many press releases on issues such as the Cedar Creek Falls closures so clearly I had reason to believe I'd receive press releases on anything proposed in that area that impacts the public. I have also previously requested to receive news releases from the CPUC.

This appears to be a glaring omission. I have seen no story in any local media so presume it was not sent, moreover there should be a mention of PUBLIC MEETINGS in the title – they are buried far down at the bottom of the release.

Pursuant to the Brown Act, I request that this meeting be postponed to provide adequate notice to the press and public and that the public notice be revised, sent to local media, and provide clear and prominent notification of meetings coming up in the title or top paragraph of the release. Also please be sure that links in the release work and that all information on this project is accessible to the press and public.

Thank you for your consideration.

Miriam Raftery, Editor
www.EastCountyMagazine.org

From: Cindy Buxton [mailto:iokuok2@hotmail.com]
Sent: Monday, October 21, 2013 1:10 AM
To: Rica Nitka
Cc: rhawkins@fs.fed.us; lisa.orsaba@cpuc.ca.gov; Will Metz; Miriam Raftery
Subject: RE: SDG&E Master Permit

I've looked over the map sent. I know these are tedious to prepare. Unfortunately the topo maps provided even though a lot more detailed do not have the inholdings marked. The ability to see the relationship of this project to the private inholdings is fundamental to understanding this proposal and the issues it presents.

Now that the US Government is back in business is there any chance of getting the map on a USFS 7.5 min map? These are downloaded for free from the USGS web site. In the mean time I'm preparing my own.

Thanks in advance, I do appreciate the effort so far.

I'm having trouble getting to a link to the US Forest Service announcement. The only links I can find are to the CPUC site which has so many releases of this that by now the general public is not going to readily know what is going on. There is no announcement that is available to the general public. This is disconcerting because the Federal NEPA Policy requires that it is available for public comment. The East County Time editor requested some edits to an editorial she also requested with links to the announcement. I was not able to provide one on an official location.

The reliable notification to commenters of record and others who requested to be included in announcements has plagued this project since it was first released. The map on the CPUC site is old and doesn't include the study area. For the general public seeing this information for the first time the CPUC site info is complicated. This process has had a laborious history, so the path to the most pertinent information on that site is not clear. The USFS published the project on their SOPA but there are no links to the announcement. These should be there as they are for most of the projects on the project site. The only link is to the CPUC site.

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

.....

From: [Cindy Buxton](#)
To: [Robert Hawkins](#); [Miriam Raferty](#); [CNFMSUP](#)
Subject: Re: Cleveland Master Permit
Date: Tuesday, October 22, 2013 1:10:49 AM
Attachments: [MSUP_PTC_NOP_9.23.13_\(1\).pdf](#)
[MSUP_PTC_Public_Notice_9.23.13.pdf](#)
[CNF Power Line Overview Map 5 Projects.pdf](#)

Hi Bob, Miriam,

I noticed that Miriam had edited my editorial that the link was now on the Cleveland site. The link Miriam provided is to the CPUC site, the link to the USFS site is as follows:

<http://www.fs.fed.us/nepa/fs-usda-pop.php/?project=310>

This has the notice of public scoping but not the notice of the public scoping meeting. The USFS link is on the far right of the CPUC site provided.

I'm attaching the two "Forest-Announcements-for-Dummies" that I like better. The Second one is on your web site but the first one is not. The first one is good because it contains the list of suggestions for commenting and the map. (The map could be better)

SDG&E is now saying thirteen miles underground. Where is that occurring? SDG&E has a video now of this project. They demonstrate the undergrounding with a 2 by 5 foot trench. The cost would be offset by the reduced cost of expediting this project and maybe the lower cost of doing it in bulk? If they went underground not many would be arguing and this would begin right away. They should put this all underground. Their demo even shows it can go on winding roads

more to come.

Thanks!

Cindy Buxton, chair of the Forest Committee San Diego Chapter of the Sierra Club
541 Spuce Street
Imperial Beach, Ca 91932

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

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STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102-3298
Edmund G. Brown Jr. *Governor*



USDA FOREST SERVICE
CLEVELAND NATIONAL FOREST
18045 Ranch Bernardo Rd
San Diego, CA 92127-2107
Will Metz, *Forest Supervisor*



**Notice of Preparation
Notice of Public Scoping Meeting
For
SDG&E Master Special Use Permit and Permit to Construct
Power Line Replacement Projects
Environmental Impact Report / Environmental Impact Statement**

Application No. A.12-10-009

To: All Interested Parties

A. Introduction

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. As shown in Figure 1, the CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action described in more detail in Section D.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily include fire hardening along with relocation and undergrounding of certain facilities which will require a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC). As shown in

Figure 1, the power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a PTC the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD. The Revised POD is available on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/DR3Response.htm>.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR”. The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, this Notice of Preparation (NOP) is being sent to interested agencies and members of the public. The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with this NOP for preparation of a joint EIS/EIR. Similar to this NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency. This NOP,

prepared jointly with the Forest Service, provides additional information that supplements the NOI.

This NOP includes background information on the project, a description of the applicant's proposal, the Forest Service Proposed Action, a summary of potential project impacts, time and location of the public scoping meeting, and information on how to provide comments to the CPUC and Forest Service. This NOP and the NOI can be viewed on the project website at the following link:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

B. Background

In 2005, in consultation with the Forest Service, SDG&E submitted an initial application to obtain an MSUP. The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the CNF. As part of the NEPA review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in 2009. In response to public comments received on that EA, the Forest Service determined that additional fire risk reduction measures within the CNF (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required. SDG&E has expanded the scope of the proposed MSUP to include fire hardening, undergrounding and relocation as proposed in the power line replacement projects discussed in this NOP.

C. Applicant's Proposal

C.1 Applicant's Purpose and Objectives

According to SDG&E, the objectives of the MSUP and PTC are to (1) secure Forest Service authorization to continue to operate and maintain existing SDG&E facilities within National Forest System lands; and (2) increase the fire safety and service reliability of these facilities by replacing five existing 69 kV power line facilities and six existing 12 kV distribution line facilities. SDG&E's stated objectives also include undertaking these activities consistent with CPUC General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission (NERC/FERC) requirements and SDG&E standards; and minimizing potential environmental impacts by locating facilities within previously-disturbed areas where feasible.

C.2 Description of the Applicant's Proposed Project

Master Special Use Permit

SDG&E proposes to combine into one MSUP over 70 previously-issued use permits for 69 kV power line and 12 kV distribution line facilities as well as ancillary and appurtenant facilities within the CNF. The MSUP, if approved, would allow the continued maintenance and operation of SDG&E's existing 69 kV power lines, 12 kV distribution lines, ancillary, and appurtenant facilities as well as approximately 45 miles of existing exclusive use access roads required to operate and maintain SDG&E's existing electric facilities within the administrative boundary of the CNF.

Wood-to-Steel Pole Replacements

The Project would also replace the following existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would include fire hardening (wood to steel pole replacement), along with removal, relocation, undergrounding and single to double circuit conversion along certain segments.

- The existing 69 kV Power Line (TL) 625 – is approximately 22.5 miles in total length and generally runs from Loveland Substation east to Barrett Tap, from Barrett Tap east to Descanso Substation, and from Barrett Tap south to Barrett Substation. Proposed replacement includes wood to steel pole conversion along with single circuit to double circuit conversion.
- The existing TL626 – is approximately 18.8 miles in total length and generally runs from Santa Ysabel Substation south to Descanso Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL629 – is approximately 29.8 miles in total length and generally runs from Descanso Substation east to Glenclyff Substation, from Glenclyff Substation southeast to Cameron Tap, from Cameron Tap south to Cameron Substation, and from Cameron Tap east to Crestwood Substation. Proposed replacement includes wood to steel pole conversion, undergrounding and single to double circuit conversion.
- The existing TL682 – is approximately 20.2 miles in total length and generally runs from Rincon Substation east to Warners Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL6923 – is approximately 13.4 miles in total length and generally runs from Barrett Substation east to Cameron Substation. Proposed replacement includes wood to steel pole conversion.

- The existing 12 kV Distribution Line or Circuit (C) 78 – is approximately 1.8 miles in total length and generally runs from east of Viejas Reservation, east along Viejas Grade Road, to Via Arturo Road. Proposed replacement includes wood to steel pole conversion and overhead relocation.
- The existing C79 – is approximately 2.2 miles in total length and generally runs from Boulder Creek Road east to the Cuyamaca Peak communication site. Proposed replacement includes removal of existing overhead line and replacement with new undergrounding through Cuyamaca Rancho State Park.
- The existing C157 – is approximately 3.5 miles in total length and generally runs from Skye Valley Road, near Lyons Valley Road, east to Skye Valley Ranch. Proposed replacement includes wood to steel pole conversion. The Applicant’s proposal includes replacement and motorized use in the congressionally designated Hauser and Pine Creek Wilderness areas. The Forest Service has determined that this aspect of the Applicant’s proposal conflicts with the requirements of the Wilderness Act. The Applicant has requested the Forest Service to include an alternative whereby the Forest Service seeks authority from Congress to approve the fire safety work within the wilderness areas.
- The existing C440 – is approximately 24.0 miles in total length and generally runs from Glencliff Substation northeast to Mount Laguna along Sunrise Highway. Proposed replacement includes wood to steel pole conversion with some line removal, undergrounding and overhead relocation.
- The existing C442 – is approximately 6.2 miles in total length and generally runs south from Pine Valley Road to Los Pinos Peak Forest Station and along Pine Creek Road south toward the community of Pine Valley. Proposed replacement includes wood to steel pole conversion.
- The existing C449 – is approximately 6.7 miles in total length and generally runs from Old Highway 80 south along Buckman Springs Road to Oak Drive and southwest along Morena Stokes Valley Road to Camp Morena. Proposed replacement includes wood to steel pole conversion with some line removal and undergrounding.

The Applicant also proposes to install appurtenant facilities on poles and within the right-of-way as needed to continue to operate and maintain the electric system. These appurtenances may include electrical switches, smart grid control devices, weather stations, surveillance cameras, and other equipment necessary or prudent to ensure safe and reliable operation of its electric system.

D. Forest Service Proposed Action

As described in the introduction, the Forest Service reviewed and accepted the application with modifications to certain actions on National Forest System lands. This modified proposal is the federal proposed action that will be evaluated in the EIS/EIR.

D.1 Forest Service Purpose and Need

The Forest Service purpose is to authorize the powerlines and associated facilities needed to continue electric service to a variety of users within and adjacent to the Cleveland National Forest through a Master Special Use Permit in a manner that is consistent with the CNF Land Management Plan (LMP). This action is needed because the 70 individual permits or easements for the existing facilities have expired, and a permit is required for the continued occupancy and use of National Forest System lands.

Permits issued by the Forest Service are required by law to be consistent with the LMP. The LMP identifies suitable uses within various land use zones, describes desired conditions based on the LMP goals and objectives, and sets resource management standards. The Forest Service proposed action is designed to be consistent with the LMP requirements. The Forest Service purpose and need will guide the development of alternatives considered on National Forest System lands.

D.2 Forest Service Proposed Action

The Forest Service proposed action modifies the applicant's proposal in the following areas:

- TL 626 – The Forest Service proposed action is to relocate a section of TL 626 out of the Cedar Creek publically proposed undeveloped area and into a location within the study corridor shown in Figure 1. The section of line that is replaced will be removed and the affected area restored. The relocated section of line would be constructed to the same standard described by the applicant. Construction of access roads will depend on the final location identified in the study corridor. A more detailed location including alignments both on and off of the Inaja Indian Reservation will be identified based on input during scoping and analyzed in the Draft EIS/EIR.

The existing powerline access roads are impacting the Cedar Creek riparian area in conflict with the LMP. The steep road gradients prevent effective implementation of erosion control treatments. This area is also being evaluated for recommended wilderness zoning in the LMP. Relocation of the line will avoid riparian impacts and restore the undeveloped character of the landscape.

- C157 – The Forest Service proposed action would relocate the section of C157 out of the Hauser Wilderness and into the area between the Hauser and Pine Creek Wilderness areas as shown in Figure 1. The section of line that is replaced will be removed and the affected area restored consistent with wilderness objectives. The relocated section of line would be constructed to the same standard described by the applicant. Construction in the area between the two designated wilderness areas is consistent with the LMP and the Wilderness Act.
- Appurtenant Facilities – The Forest Service proposes to authorize electrical control devices and weather stations not otherwise specified in the permit, subject to Forest Service review and approval of final design and location. The Forest Service is not proposing to authorize surveillance cameras on National Forest System lands.

The facilities would be authorized by a special use permit. The permit has standard resource protection conditions, along with requirements for various plans to implement those conditions. A sample Master Special Use Permit, draft Operation and Maintenance Plan, and draft Fire Plan are available on the project website.

E. Affected Jurisdictions

As shown in Figure 1, the MSUP/PTC Power line Replacement Projects study area not only traverses National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverses public lands managed by the BLM; tribal lands of the La Jolla, Campo, Inaja, and Viejas Indian Reservations managed by the respective tribes and held in trust by the BIA; Cuyamaca Rancho State Park lands managed by CSP; and private holdings within unincorporated San Diego County amongst others.

F. Potential Environmental Effects

The joint EIS/EIR will evaluate potential environmental effects of the proposed MSUP/PTC Powerline Replacement Projects. The CPUC and Forest Service will propose mitigation measures to reduce or offset any significant or adverse effects identified in the analysis. The EIS/EIR will identify reasonable alternatives, compare the environmental impacts of the alternatives to the proposed action, and propose mitigation to reduce or avoid their effects.

Based on preliminary analysis, the proposed action may have a number of environmental effects. Potential issues and impacts to the existing environment to be analyzed in the EIS/EIR include those listed in Attachment 1. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered

thoroughly. To assist the reader in understanding the range of impacts that could be considered, and to provide a guide for scoping comments, Attachment 2 includes CEQA checklist questions that typically would be evaluated in an EIR.

The EIS/EIR will also address the cumulative environmental consequences of the proposed MSUP/PTC Powerline Replacement Projects in combination with other past, present, and reasonably foreseeable projects in the area, including known renewable energy and utility projects. This will serve to satisfy CEQA/NEPA requirements regarding regional cumulative effect concerns.

Mitigation Measures

SDG&E has proposed measures that could reduce or eliminate potential impacts of the proposed MSUP/PTC Powerline Replacement Projects. The effectiveness of these measures (called applicant proposed measures or APMs) will be evaluated in the EIR/EIS, and additional measures (mitigation or avoidance measures) will be developed to further reduce or avoid impacts, if required. When the CPUC and Forest Service make their final decision on the proposed project, they will define the mitigation measures to be adopted if the project or an alternative is approved, and the CPUC and Forest Service will require implementation of a mitigation monitoring and reporting program.

G. Alternatives

In compliance with CEQA and NEPA, the EIS/EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the Forest Service proposed action and associated MSUP/PTC Powerline Replacement Projects proposed on private lands. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. Reasonable alternatives also attain all or most of the purpose and need and avoid or lessen any of the significant environmental impacts of the proposed project.

Alternatives to be analyzed in the EIR/EIS will be developed during the environmental review process and will consider input received during public scoping.

As required by CEQA and NEPA the EIS/EIR will also evaluate the No Project/No Action Alternative. Under the No Project/Action Alternative, no MSUP or PTC would be issued. SDG&E would not be allowed to continue to operate and maintain its facilities on National Forest System lands as the current permits are expired. The permits require SDG&E to remove the facilities upon expiration of the permits. In

addition, the proposed power line replacement projects including fire hardening for fire prevention would not occur.

H. Public Scoping Meeting

The CPUC and Forest Service will conduct two public scoping meetings in the project area, as shown in Table 1. The purpose of these scoping meetings is to present information about the proposed project and the CPUC and Forest Service's decision-making process, and to listen to the views of the public on the range of issues relevant to the scope and content of the EIS/EIR.

Everyone is encouraged to attend one of these meetings to express their concerns about the project and to offer suggestions regarding the project as proposed, including alternatives.

**Table 1
Public Scoping Meeting**

Location	Day, Date, Time	Directions
Julian Elementary School 1704 Cape Horn Julian, CA 92036	Tuesday, October 22, 2013 5:00 p.m.	<p>From the west: take Highway 78 through Julian. Turn right on 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the east: take Highway 78 west towards Julian. Turn left on 2nd Street (across from the Post Office and after the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the south: take Highway 79 north to Highway 78 in Julian. Turn right onto Highway 78. Take the next left onto 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p>
Alpine Community Center 1830 Alpine Boulevard Alpine, CA 91901	Wednesday, October 23, 2013 5:00 p.m.	<p>From the west, take I-8 east and take exit 30 Tavern Road. Turn right onto Tavern Road (south). Turn left onto Alpine Boulevard. Alpine Community Highland Center will be on the left-hand side.</p> <p>From the east, take I-8 west and take exit 30 Tavern Road. Turn left (south) onto Tavern Road. Turn left onto Alpine Boulevard. Alpine Community Center will be on the left-hand side.</p>

I. Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. Suggestions for submitting scoping comments are presented at the end of this section. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. All scoping comments must be received by November 7, 2013. You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (e-mail), or (3) by attending the public scoping meeting (see time and location in Table 1) and handing in written comments at the scoping meeting.

By Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to:

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

By Electronic Mail: E-mail communications are welcome; however, please remember to include your name and return address in the e-mail message. E-mail messages should be sent to cnfmsup@dudek.com, with a subject line “SDG&E Master Permit”.

A **Scoping Report** will be prepared, summarizing all comments received. This report will be posted on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>;

and copies will be placed in local document repository sites listed in Table 2. In addition, a limited number of copies will be available upon request to the CPUC or Forest Service project managers.

Suggestions for Effective Participation in Scoping

Following are some suggestions for preparing and providing the most useful information for the EIS/EIR scoping process.

- 1. Review the description of the project** (see Sections C and D of this Notice of Preparation and the maps provided). Additional detail on the project description from SDG&E’s POD is available on the project website where the POD may be viewed.

- 2. Review the CEQA impact assessment questions** (see Attachment 2).
- 3. Attend the scoping meeting** to get more information on the project and the environmental review process (see time and date in Table 1).
- 4. Submit written comments** or attend the scoping meeting and **ask questions during the informational meeting**. Explain important issues that the EIS/EIR should cover in written comments.
- 5. Suggest mitigation measures** that could reduce the potential impacts associated with SDG&E’s proposed project.
- 6. Suggest alternatives** to SDG&E’s proposed project that could avoid or reduce the impacts of the proposed project.

J. For Additional Project Information

Internet Website. Information about this application and the environmental review process will be posted on the Internet at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

This site will be used to post all public documents during the environmental review process and to announce upcoming public meetings. In addition, a copy of SDG&E’s POD may be found at this site, and the Draft EIS/EIR will be posted at the site after it is published.

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the proposed project and the EIS/EIR will be made available at the locations listed in Table 2.

K. Issuance of Notice of Preparation

The CPUC hereby issues this NOP of an EIS/EIR, which can be found at the repository sites listed in Table 2.

**Table 2
Repository Sites**

Site	Address	Telephone
Alpine Branch Library	2130 Arnold Way Alpine, California 91901	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94 Campo, California 91906	619.478.5945
Descanso Branch Library	9545 River Drive Descanso, California 91916	619.445-5279

**Table 2
Repository Sites**

Site	Address	Telephone
Pine Valley Branch Library	28804 Old Hwy. 80 Pine Valley, California 91962	619.473.8022
Julian Branch Library	1850 Highway 78 Julian, California 92036	760.765.0370
Ramona Branch Library	1275 Main Street Ramona, California 92065	760.788.5270
Dudek	605 Third Street Encinitas, California 92024	760.942.5147

Attachment 1

Summary of Potential Impacts: MSUP/PTC Powerline Replacement Projects

The CPUC and Forest Service have determined that the following potential issues and impacts to the existing environment require a detailed analysis in the EIS/EIR. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered thoroughly. This overview is presented to assist the public and agencies in preparing written scoping comments.

Environmental Issue Area	Potential Issues or Impacts
Aesthetics	<ul style="list-style-type: none"> • Construction-related activities would result in the temporary degradation of existing visual character and quality in the project study area, including scenic vistas and other designated scenic resources. • Nighttime construction lighting may be used during project construction that could affect the nighttime view. • There may be potential conflicts associated with proposed wood to steel pole replacement with federal, state, and local plans; regulations; or standards applicable to the protection of visual resources.
Air Quality	<ul style="list-style-type: none"> • Project construction will produce short-term air emissions (fugitive dust and vehicle equipment exhaust) and may violate air quality standards during construction.
Biological Resources	<ul style="list-style-type: none"> • Project construction and vegetation management activities could result in temporary and permanent loss of native wildlife and/or their habitat. • Loss of habitat for sensitive species designated by state and federal resource agencies. • Conflict with federal, state, or local policies or ordinances protecting biological resources.
Cultural and Paleontological Resources	<ul style="list-style-type: none"> • Construction and operation could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources. • Temporary use of staging areas and conductor pull sites could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources.
Greenhouse Gas Emissions	<ul style="list-style-type: none"> • Construction activities would result in greenhouse gas emissions.
Hazards, Hazardous Materials, Fire	<ul style="list-style-type: none"> • Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater. • Fire hazard during construction and operation.
Hydrology and Water Quality	<ul style="list-style-type: none"> • Project construction and operation and maintenance could affect surface water flow and erosion rates causing subsequent downstream sedimentation and reduced surface water quality.
Land Use and Planning	<ul style="list-style-type: none"> • Construction would temporarily disturb ongoing or traditional land uses within the project study area. • Possible conflicts with pending land management plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

*Notice of Preparation – Notice of Public Scoping Meeting
SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects*

Environmental Issue Area	Potential Issues or Impacts
Noise	<ul style="list-style-type: none"> • Project construction will produce short-term noise (from helicopters, vehicles and construction equipment) and may violate noise standards during construction.
Public Services and Utilities	<ul style="list-style-type: none"> • Construction activities could result in increased generation of waste and disposal needs. • Fire and emergency services may be required to service the proposed project and project study area during construction and operation.
Wilderness and Recreation	<ul style="list-style-type: none"> • Construction or operation could cause conflicts with ongoing or traditional recreation uses in the project study area. • Construction or operation could cause conflicts with the Wilderness Act of 1964.
Transportation and Traffic	<ul style="list-style-type: none"> • Traffic would be generated by construction worker commute trips and equipment deliveries. Hauling materials, such as poles, concrete, conductor, and excavation spoils, would temporarily increase existing traffic volumes in the project study area. Access roads could increase vehicle trespass into areas where vehicles are not authorized.
Socioeconomics/Environmental Justice	<ul style="list-style-type: none"> • The relocation of certain transmission facilities may result in social and economic effects as well as have disproportionately high or adverse effects on minority or low-income populations.

Environmental resources areas preliminarily determined to have a less than significant impact as a result of the proposed project and to not require further analysis include:

- **Agriculture and Forestry Resources:** Since no land use changes are proposed with the replacement and fire hardening of the existing transmission and distribution lines, the proposed project would not convert existing agriculture or forestry lands to non-agricultural or non-forest uses.
- **Geology, Soils, and Seismicity:** The proposed new steel power line structures would be more structurally sound than the existing wood poles due to improved engineering characteristics, increased material strength, and improved design safety requirements. The proposed project would be built to existing SDG&E design standards. Soil erosion will be addressed under Hydrology and Water Quality.
- **Population and Housing:** The proposed project would not result in population growth in the area because no new homes or businesses are proposed, and no new infrastructure related to population growth is proposed. In addition, no new housing is needed because non-local construction workers would use available temporary housing throughout San Diego County. Further, the workers would be in the area only during construction and are not expected to become permanent residents.
- **Electric Magnetic Field (EMF):** While the proposed project would relocate and underground certain transmission facilities, there will be no increase in the voltage used; therefore, there would be no significant change to EMF.

Attachment 2

Environmental Checklist

Following are the questions included in Appendix G of the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form (California Public Resources Code, Section 21000 et seq.). These are issues that may be evaluated in an environmental impact report (EIR), if they are determined to be relevant to the project. This list is provided only to provide the reader with a general idea of the types of impacts that will be considered for the proposed project.

I. AESTHETICS. Would the project:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- Result in the loss of forest land or conversion of forest land to non-forest use?
- Involve other changes in the existing environmental which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

IV. BIOLOGICAL RESOURCES. Would the project:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

V. CULTURAL RESOURCES. Would the project:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

VI. GEOLOGY AND SOILS. Would the project:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to the California Division of Mines and Geology Spec. Pub. 42)
 - Strong seismic groundshaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-

existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- Otherwise substantially degrade water quality?
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Inundation by seiche, tsunami, or mudflow?

X. LAND USE AND PLANNING. Would the project:

- Physically divide an established community?
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

XI. MINERAL RESOURCES. Would the project:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

XII. NOISE. Would the project result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

XIII. POPULATION AND HOUSING. Would the project:

- Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extensions of roads or other infrastructure)?
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES AND UTILITIES.

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire protection?
 - Police Protection?
 - Schools?
 - Parks?
 - Other public facilities?

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

XV. RECREATION. Would the project:

- Increase the use of existing neighborhood, and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

MANDATORY FINDINGS OF SIGNIFICANCE:

- Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?
- Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

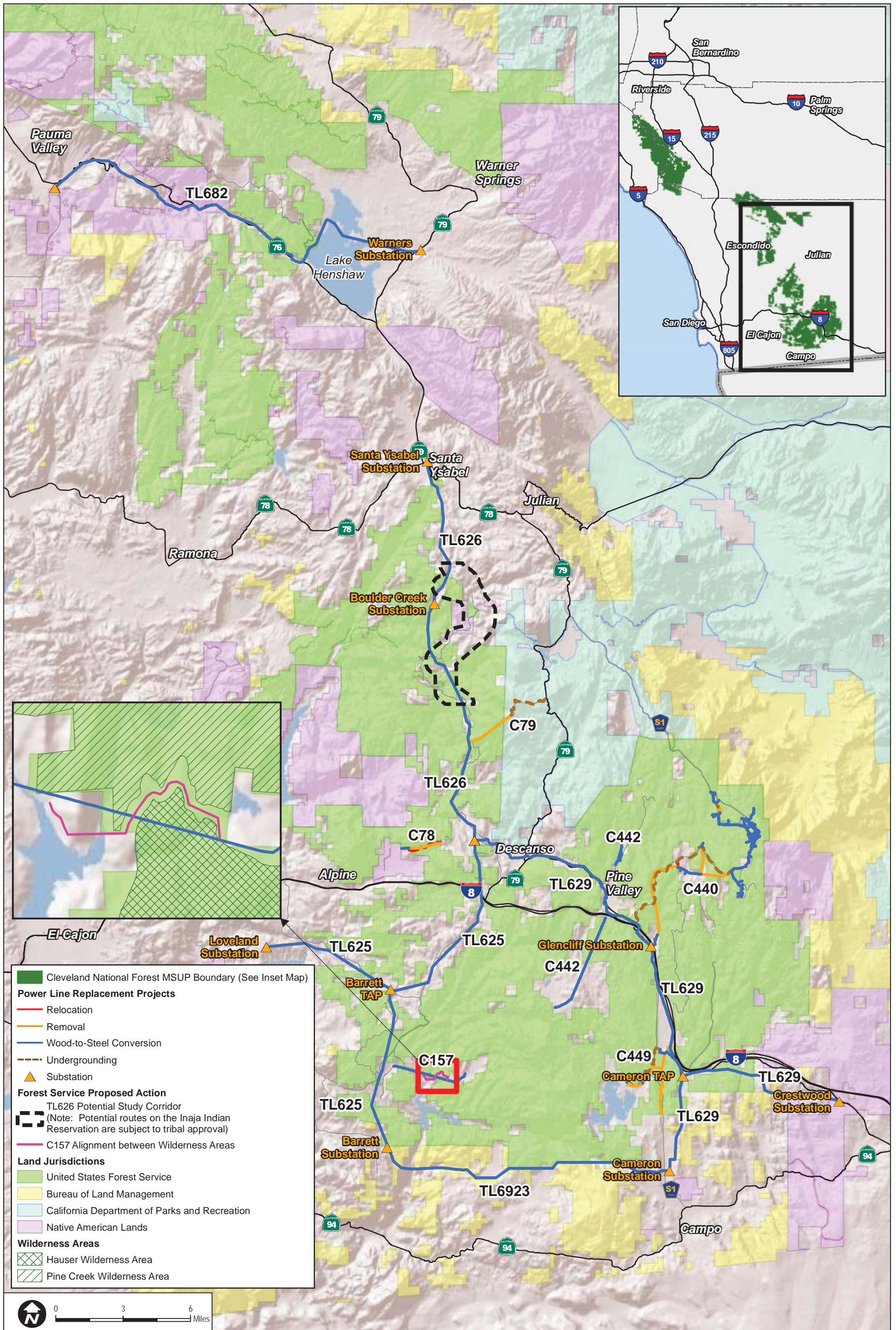


FIGURE 1
Vicinity Overview Map



Public Notice SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects Public Scoping

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. The CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily consist of fire hardening, relocation and undergrounding of certain facilities which will require a Permit To Construct (PTC) from the California Public Utilities Commission (CPUC). The power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a Permit to Construct (PTC) the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR.” The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, the CPUC has prepared a Notice of Preparation (NOP). The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with the NOP for preparation of a joint EIS/EIR. Similar to the NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency.

The NOP includes background information on the project, a description of the applicant’s proposal, the Forest Service Proposed Action, and a summary of potential project impacts. The NOP and the NOI can be viewed on the project website at the following link: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Public Scoping Meetings

The CPUC and Forest Service are holding two public scoping meetings to provide an opportunity for the public to learn about the project and to share any concerns or comments they may have. Please join us on either day or location listed below. Your attendance at one of these meetings will provide you with additional opportunities to learn more about the projects and to comment on the scope and content of the environmental information to be included in the Draft EIS/EIR.

Tuesday, October 22, 2013
Julian Elementary School
1704 Cape Horn
Julian, California 92036
5:00 p.m. to 7:00 p.m.

Wednesday, October 23, 2013
Alpine Community Center
1830 Alpine Boulevard
Alpine, California 91901
5:00 p.m. to 7:00 p.m.

Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. **All scoping comments must be received by November 7, 2013.** You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (email), or (3) by attending one of the public scoping meetings and handing in written comments at the scoping meeting.

By U.S. Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to: Lisa Orsaba, California Public Utilities Commission/Will Metz, United States Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024.

By Electronic Mail: Email communications are welcome; however, please remember to include your name and return address in the email message. Email messages should be sent to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit".

Additional Project Information

Internet Website. The NOP and information about this application and the environmental review process will be posted on the Internet at:

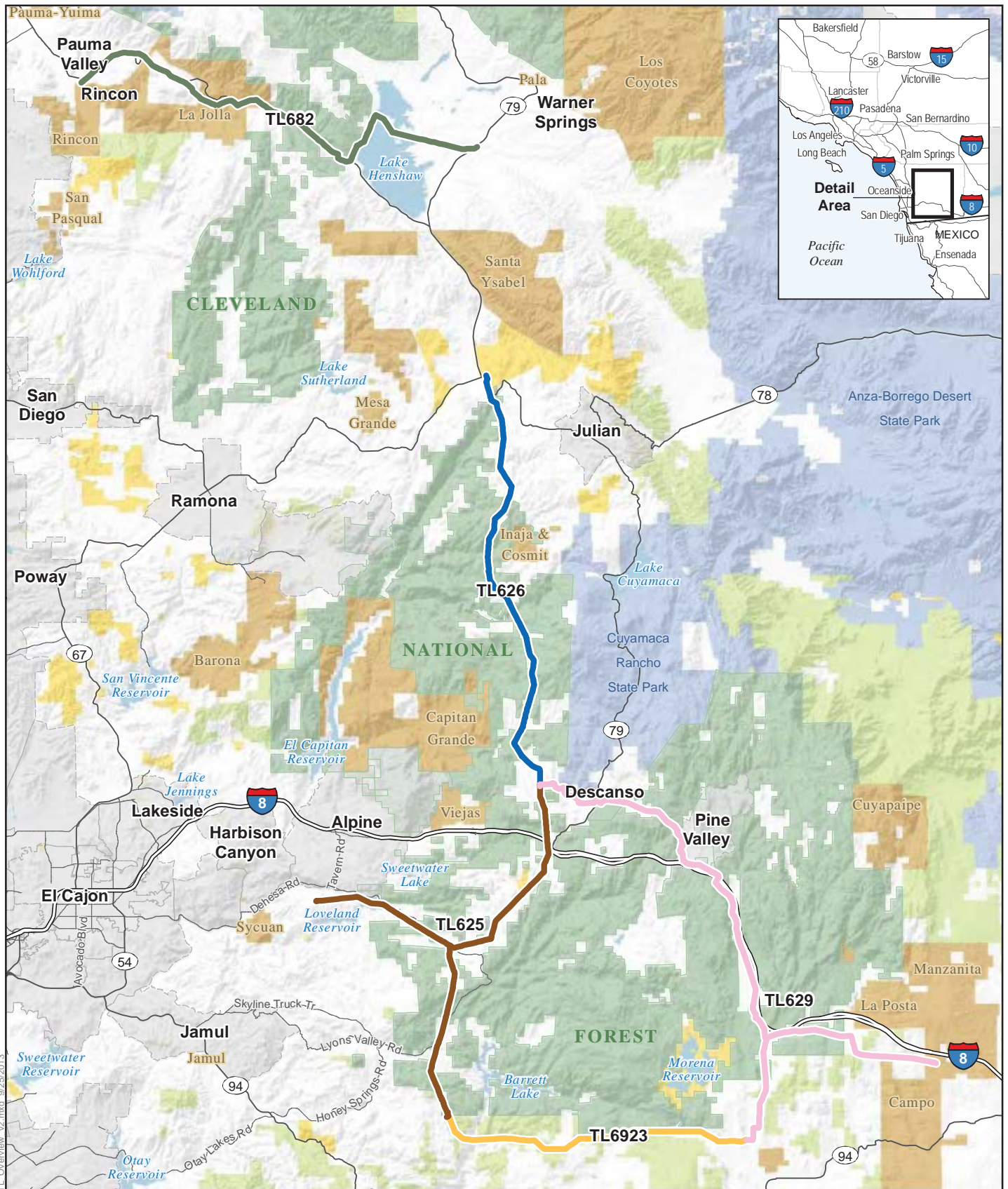
<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the MSUP/PTC Power Line Replacement Projects and the EIS/EIR will be made available in the repositories listed below.

Environmental Document Repositories

Location	Address	Telephone
Alpine Branch Library	2130 Arnold Way, Alpine, California	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94, Campo, California	619.478.5945
Descanso Branch Library	9545 River Drive, Descanso, California	619.445.5279
Pine Valley Branch Library	28804 Old Hwy. 80, Pine Valley, California	619.473.8022
Julian Branch Library	1850 Highway 78, Julian, California	760.765.0370
Ramona Branch Library	1275 Main Street, Ramona, California	760.788.5270
Dudek	605 Third Street, Encinitas, California	760.942.5147



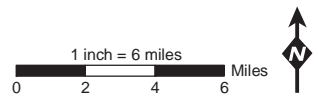
Z:\Projects\SDGE_CNF_ESRR\MXD\Public\TL_Overview_v2.mxd 9/25/2013

Power Line Overview

Power Lines	Land Administration
TL625	United States Forest Service
TL626	Bureau of Land Management
TL629	Bureau of Indian Affairs
TL682	California Department of Parks and Recreation
TL6923	San Diego County Department of Parks and Recreation

Cleveland National Forest Power Line Replacement Projects

	City Limits
	Interstate
	State Highway
	Lake/Reservoir



From: [Cindy Buxton](#)
To: [CNFMSUP](#); [Robert Hawkins](#)
Subject: FW: SDG&E Master Permit
Date: Tuesday, October 22, 2013 9:59:30 AM

Cindy Buxton,
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

I added the address per your rules. The body is the same. I'll resend the others. The Cleveland has my home address on file as well.

The following in some edited version is likely going to the East County Times. I would like to enter it into the record with the understanding that the original audience addressed the public but the questions asked should go in the record for response by the permitting team handling this public scoping. I will be writing more and likely there will be some duplications. I would also like to enter into the record the items in the links below, the photos on my public SkyDrive folder referenced below, in a word document there, as they contain photos of the study area and some comments, others will likely be added. There are also two videos referenced below on YouTube taken yesterday. These show the lower half of the study area in question. There will likely be more photos coming. I took many yesterday that need to be "panned" with panning software and clearly demonstrate the character of much of this area as it is today. This is not entirely accurate though as by spring much of it will be very green and "flowing" consistent with our Mediterranean Ecosystem.

The USFS sent out their request for scoping on their SDG&E Master Permit renewal. I could not find a direct link to this announcement so I uploaded mine to a Hotmail public SkyDrive where you can access this announcement and some other relevant materials including a more lengthy opinion so far. Maybe we will see it appear on their site soon! The comment period is through November 7th. The bulk of the official information is on the CPUC web site though not as user friendly as the typical US Forest (USFS) site announcements are by quit a bit.

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

My SkyDrive public folder:

<https://skydrive.live.com/?>

[cid=55fc0c81fdffb540#cid=55FC0C81FDFFB540&id=55FC0C81FDFFB540%21118](https://skydrive.live.com/?cid=55fc0c81fdffb540#cid=55FC0C81FDFFB540&id=55FC0C81FDFFB540%21118)

ON the sky drive is the two announcements, some photos of their new study areas and some maps, one of which is my first draft and moving a vague one onto a USGS topo map that actually shows the relationship of this project to the private inholdings.

Additionally, here are two very recent videos of the lower half of the study area suggested for the 626 transmission line.

<http://www.youtube.com/watch?v=2bQnCMrIGd4>

<http://www.youtube.com/watch?v=5MYAQzpDBcU>

The Forest Service in an attempt to consistently and effectively manage wilderness and wilderness-like portions of their Forest recommends moving the 626 69kV line

that runs up Boulder Creek Road out of these fragile areas and makes this suggestion along with a mile-ish wide corridor for study where portions of the line could be moved.

As the Chair of the Forest Committee of the San Diego Chapter of the Sierra Club, I have a few things to say about this. I may post a lengthier more details and opinion on the above SkyDrive.

This is the general "neck of the woods" of the famous Cedar Creek Falls and Three Sisters Waterfall getting as many as a thousand visitors in a weekend and more if the USFS for safety reasons didn't limit the crowds. Given that deer season begins this week it bares mention that it is also the general area of one of the most popular hunting areas around. All deer tags were sold this year!

The lines cross the streams flowing into these two popular hiking destinations upstream of them in, extraordinarily scenic, wild, rugged, and remote canyons. The consequential over grading from power line access roads, has resulted in serious silting issue and access road beds over six feet below grade and grades in excess of 40 %, chronically in excess of 30 %, making runoff inappropriately ineffective and difficult to mitigate. These two streams are a significant component of the Greater San Diego River Watershed. For these reasons and a host of others, I do not dispute the given reasons by the USFS for wanting to move the lines away from the gorges. In fact I would applaud at long last a courageous stand taken. - With some caveats. Namely, we need to assure a fair and significantly improved alternative.

The purpose of a Federal "Scoping" request on a project as dictated by the National Environmental Policy Act or NEPA, (not to be confused with its California distant cousin, CEQA), is to establish some alternatives that would be worthy for an already massively overburdened and thinly stretched local Forest Service (all snickers about some of their recent early Christmas "vacation" aside- many of these guys were up and working) to narrow down for more time, money, and effectively used resources to study in detail. Once this is accomplished these alternatives will receive a more thorough environmental review also out for public comment, called a Draft environmental impact statement or DEIS, before yet another period to publish a final. But that's not all... If you comment, and provide "substantive" loosely determined depending on the opinion of your attorney -we hope only in jest- you are then a commenter of record meaning you have "standing" and can challenge that final EIS or FEIS if you can Wow the forces that be with a really good argument for doing so.

Generally the US of A has made it this far because, (oh no) "at the end of the day" our government works, seriously, and this is without questions its finest hour- your ability to weigh in to agency "stuff". With all of this public participation democracy is a great thing. To me honestly, this is likely the biggest area of government that the average guy can make a monumental impact. It's not just on the forest. If you want entertainment on a rainy Friday night explore the comments to other agency projects, from the IRS to the SEC and sub agencies as well (if you consider the Forest Service is under the Dept of Agriculture) and You'll see many times where one knowledgeable, or even less than knowledgeable but impassioned person on weighing in on a government management decision made a difference. I know it's hard to believe but it isn't all congress. You can get yourself right in there by commenting and way faster too!

We are in a scoping period and looking for alternatives to explore further. Do you know that saying, "the meeting before the meeting" -the one that takes place on the golf course or the men's room, women's room, between mom's at little league or between innings at a baseball game? Well folks, here it is. Get in now, during scoping, to have the most say so "err hm, upstream as it is. An "alternative" is not intact. Parts of one could concatenate with parts of others before it's over. This insures the most significant building blocks of a plan make their way into consideration. That can also matter who is doing the considering. In the case of the Cleveland I'm very optimistic that they will do their best to consider the public's concerns. Some of the mysterious state players that have wormed their way into land decisions way down here in San Diego it is much more difficult to tell. The larger of the two docs I posted have some detailed suggestion for effectively approaching your comments. However even if you just like or don't like, making that known is a positive. The beauty of this little corner of our democracy is that it really is for once, about us. Just do it. Back to the plan at hand.

I'm attending the open houses for more clarity. This is a very convoluted project interfacing all kinds of junky history and other projects and other addenda's. Maybe they will completely change my mind tomorrow. Could happen, but don't count on it! The better outcome of course is that we all team up and find a community win win no matter what a politician light years from here thinks. Since the Sunrise Powerlink we've used this tool to turn the tide several times and made interesting collaborations along the way where we surprised others thinking it was not possible.

Here are mine so far.

1) First and foremost we do not support using private lands for this mitigation. Not a nanometer. The intention is honorable but it does not call for this drastic measure. Nor would it really help for most of the stated issue. We are appalled at any suggestion, from the given and rather general map provided that the line would be moved onto private or reservation lands as a means of improving this line. There are other viable alternatives but this one is most unacceptable. We have seen too much of fixing a problem only by moving it.

2) Given already so far a very thorough review of the geography, foot to the ground as it were, I see no above ground alternative that is an improvement. The stated study corridor may result in bringing power where it doesn't currently exist but even though this would be the time to make that change to route for a particular coverage it should be stated as being for that purpose. Such is the case in the suggestion of taking this through the Inaja Reservation. If they have requested that alignment for energy purposes, who could blame them? I do know the geography of Cedar Gorge passing through the Inaja Reservation. It is every bit as breathtaking and remote wilderness-like character, sensitive and critical habitat as in the forest. It is their sovereign nation; they decide if it is their goal. I know of no reason for an above ground alignment there of an urgency that would warrant forcing this there. There is the underground one however I'm getting to.

2) The threat of fire could be reviewed as that qualifying urgency. By far and large the time has come to put an end to the fire and environmental issues created by locating these lines in close association to extreme fire hazards in our back country. The issues with maintaining corridors and vegetation management are as problematic as the lines themselves. It is time to put them underground in total and this is the best opportunity to make that investment as a community once and for all.

One caveat-that would be under or directly beside a road where the access is viable-NOT going cross country. Cross country undergrounding has serious environmental issues of its own. This means getting them under or next to public county roads. What does this mean for forest management? A lot as it still affects the easement and impact to the forest. It is not a sure in but should be seen as an alternative that warrants much more consideration than the current scoping request gives it. The original plan came from SDG&E and much influence by the state upon them-not from us here locally who live with this deal. In 2004 SDG&E made an offer to combine a 69kV and a 128 kv and UNDERGROUND it near Jamul for less money per mile than they are suggesting that this will cost above ground. I think that accounting needs more study as well! They seem to mention with spunk and enthusiasm the undergrounding possibility when it is to their benefit. Well natch, ok? But we need to insist that we have spunk and enthusiasm too! It IS our forest, ok? Remember how much they wanted the Northern route of the Sunrise Powerlink? Remember one of their alternatives was to underground for many miles out in the desert? So if they can there with ease, and in Jamul even easier, why all of a sudden is it so impossible to remove the threat of fire and a host of annoying and controversial environmental issues once and for all for this master permit?

That would have to be the predominating and central appeal for a community uprising. Get'er done and be done. -because we are sooo done....

The inevitable threat by fire, the impedance to fire response, the constant erosion into our watershed, the blight upon scenic integrity, and maybe the worst of all, the constant controversy among our people in having to keep one eye on these projects needs to come to an end. Undergrounding - more precisely undergrounding under county roads, not cross country is THE way to end this nightmare once and for all. We are hoping for universal out cry to insist that all parties, SDG&E, the CPUC, and the USFS will embrace this as the golden opportunity to evolve community safety and environmental integrity forward.

3) Some of the lines are lightly used and should receive as an alternative conscientious study to be removed completely. The 69kV that runs the face of Cuyamaca, -only the most visible force of nature on our skyline from down town, has one local distribution line running to one local user all the way from Descanso to Santa Ysabel. In the meantime there have been numerous upgrades to the local grid on both sides of this remote, unique, and very sensitive, while highly and growing popular Forest corridor. For our number one suggested alternative for the 626 line specifically up Boulder Creek road is that rather than ANY new study of yet another cut and impact where the whole idea is to preserve a particularly wild and scenic and rather small corner of the Cleveland Forest, why add more if you don't have to? What we have paid for maintenance in rugged areas would pay for undergrounding many of the other areas.

A clarification, there should be no one left without power. Anyone who has it now should have it when they are done. Not everyone is on the grid. The 69kv line runs the top of the current power lines. Under it is a simple 12kv line. This is a distribution line that servers local users. I'm suggesting that they remove the 626 69kV line. I'm also suggesting that they put the remaining 12 kv distribution line underground. Done.

There are two or three ranches North of the areas of sensitive impact. These should without question be provided a solar alternative for reasonable perpetuity. Much cheaper than what we are doing now. One is the oldest ranches in San Diego, lets give 'em a break, they are the living voice of our history and they should be honored for their place in it and the value they give to our forest and community by still having that voice and living presence and not over sanitizing the colorful character of the past.

4) Did you know that the 12 kv is the only line turned off in high winds? Apparently the 69 kV above is still on. These HAVE broken in the past and they HAVE started fires in the past. The most inexpensive thing is to remove the ones we don't really need. This brings me to the final point about this process for now.

5) These lines are being replaced with lines that have as much as five fold capacity as the ones they replace. They are replacing a ½ inch wire with a whole inch wire. The stated purpose is fire hardening. Well if they go underground this is no longer the case, huh? However, if there is another purpose that requires more capacity – five-fold more in fact- it must also be stated according to the NEPA rules of disclosure, (which state you don't have to make a smart decision but you do have to provide enough information for an informed one.) I must clarify as SUCH, if there is an additional reason for beefing up the amperage and wattage-IT MUST BE DISCLOSED or removed from the issue for good!

No more double talk, we need this done once and for all!

Anything else is pushing the boundary of abusive for the years we've endured this string of energy projects.

My concern is with an increase in amperage, voltage remaining the same, the wattage must be increasing fivefold. What are the ramifications of this? Aren't they supposed to be explaining in detail? This also creates a much higher capacity for this line. They have not disclosed this, to the contrary they maintain they don't need to because of the static voltage. If this is going up because they anticipate ANYTHING more making use of that considerable added wattage, how is that **not** information I would need to make an informed decision? - Or more precisely the Forest Supervisor to make an informed decision?

I would beg to differ that it most definitely is. I'll elaborate:

The cross sectional area of a wire is directly proportional to the increase in amperage. Voltage x Amperage = Wattage

Doing the math (by all means correct me if necessary) ½ in for the pi r² rules = .785, 1 inch = 3.14 and 3.14 divided by .785 is 4. THEN the engineer for SDG&E also with the right questions disclosed that the temperature of the line goes from 190 to 270 or an additional increase of 42% on top of 4 is 5.86. soooo if we have a constant 69 kv (volts) but the amperage is now 5.68 times as great than the wattage. That is WITHOUT changing the voltage which SDG&E has stated in their notice of intent that they are ardently insisting will not change. Ok 69 it is. But then please explain how in the laws of science this could imply anything less than the potential fivefold increase in wattage capacity. If the voltage were to change 5.68 times instead of the amperage the wattage would still be increasing by 5.68 times as much. That is to say that the new lines will be getting the bump in electricity that would be the EQUIVALENT of increasing the voltage to 391 kV. The two lines that came off of the Sunrise Power link and taken underground into

Alpine were both 230. The one going from the desert, through the “south route” and up to Bell Bluff was 500kv. This is in-between just with higher amperage and lower voltage. Is it as efficient as using higher voltage? I’m inclined to doubt it. But we should ask! That is what we do in a scoping. I seem to recall there is significant drop in power with the length of the wire. The type of wire being used is more commonly used for 230kv. They have suggested using it for 12 kv as well. If this is underground that may not be necessary.

But wait that is not all! The new permit calls for more of these lines on one larger pole between three more on single circuit PLUS several more 12 kv’s also one inch. And the new permit says that some lines will be double circuit. So they will have 6 of these 5 fold wattage busters for 69 kv and 6 with a 5 fold wattage busters for the 12 kv. There is a lesser used line , a 340 kv. If we suggest they may be going to that which they are required to disclose, this would then be 6 times 340 PLUS 6 times 5 times the 12 in added capacity of a double circuit. A whopping increase in the equivalent of a 2400 kv line!! Someone with some physics of these things need to step in and explain! Obviously this opens a can of worms of technical issues that I’m sure could not be right.

That one I can give a temporary answer to: I asked the project manager who asked them. Recall in December of 2012 Miriam interviewed the Forest Supervisor who said they would not be expanding up Boulder Creek Road and hence the miracle new Land Management Plan would reflect the protection of our backcountry in this area from this potential expansion. Clearly the January 2012 MOU between SDG&E and the USFS does not indicate any disclosure to our Forest Supervisor that they were planning to sneak in a 15 to 31 fold increase in capacity. -Hence I , me, the writer, MUST be “spreading rumors.” He’s lucky I like ‘em for that miracle LMP... welllll apparently they took another look at the numbers. “Cindy, you were right. (yea , I love it when that happens!) but SDG&E doesn’t believe they should have to disclose because the current substation cannot handle an increase in voltage.”

Well somewhere in there I did mention that this was increasing amperage and SDG&E insisted that the voltage would be the same.

Ok so if you get something from this, find an open house and go ask A LOT of Questions!

While you are at it, please ask, if this is a “programmatic “ catch all- all sizes fit all- project plan which included the state authority and CEQA as wel; -does this now mean that if they have a current single circuit such as the 626 69kv route, it can “turn into “ a double circuit without further public disclosure and commenting process? That would be seriously pivotal and something that HAS TO be made clear now in order to make that “informed decision. “

What is the ultimate difference in the experience of “wattage by amperage” vs “wattage by voltage”?

I don’t know.

Without question SDG&E must be explaining this much more. Lower voltage sounds a tad safer but it doesn’t sound efficient.

That brings up one other point. Aren’t we supposed to be developing our energy infrastructure on the roof, in town, not slipping in as much as 15 to 30 times the capacity across the backcountry? Gee where is all of that going when the county is not letting us subdivide –likely a very good thing, too! ?

Thank you for reading and caring about our backcountry!

Sincerely,

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

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

.....

From: [Cindy Buxton](#)
To: [Robert Hawkins](#); [CNFMSUP](#)
Subject: FW: SDG&E Master Permit
Date: Tuesday, October 22, 2013 10:04:14 AM

Cindy Buxton,
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

Per your guidelines I'm resending with an address. The Cleveland has my home address on file as well. The content below is the same.

From: iokuok2@hotmail.com
To: rhhawkins@fs.fed.us; rnitka@dudek.com
CC: lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us; jfriedlander@fs.fed.us;
bfredrickson@fs.fed.us; dchristiansen@fs.fed.us; donnatisdale@hughes.net;
kelly@kellyfuller.net; billp@borderpowerplants.org; cmbigger@cox.net;
karaliederman@gmail.com; kaytaff@sbcglobal.net; rwh@californiachaparral.org;
rhutsel@sandiegoriver.org; jax1936@msn.com; renee@wildlifezone.net
Subject: RE: SDG&E Master Permit
Date: Mon, 21 Oct 2013 12:36:59 -0700

Hi Bob, Will and all...

though informal this is one of several comment letters on the SDG&E master Permit project.

I've started comments about 15 times now, ok may 10, I AM calming down some , simplifying because nobody can follow it all. I DO get that. I start out with the simple list of alternatives, and then just can't help myself for the details. There are many.

In my opinion in one of my proverbial letters not sent (I think) I elaborated on this more; I think that is part of the problem I'm having with the dual agency model for this in the first place. The information on the CPUC site is most definitely appropriate and useful . However for walking into this cold as most of the public and land owners do, it would likely be difficult for the public to follow it all from looking on the CPUC site page. It had a lengthy

history well before we got to this point and much of that is there. A good thing to be available, but not helping the newcomer.

Please understand that for most of the public the USFS scoping announcement is the starting place for project involvement.

There is little way the average person in a workaday life would be bumping into this before that announcement. Granted there were physical pieces of laminated paper that were plastered alllll over both private and public objects (mostly gates and poles) out there in and around the Cleveland Forest but at this point they've served in adding to the confusion as some think its done and others can't place that with where we are now , much less the addition of the USFS additional study requests which make those physical postings out of date.

When at last I read the request deep in the CPUC site for "at least one alternative" by Will months and months ago there is a bit of a different spin than reading the scoping doc and seeing that study corridor on a high level map. Enter the state that insisted on extra wires also uncovered deep within the CPUC site. -and we thought this was all coming from SDG&E? Why did they do that?

This detailed information is right to be on a site where the public can get to it but we are not seeing it from the same angle as you experienced it I'm sure. Additionally, for example, is some explanation by Molly Dana, SDG&E rep-on-the backcountry in putting that signage up there. I've actually talked to her as a real person and once again it gives the matter a bit of a different spin. There must have been over a hundred of them for the entire project. When I see them on many poles well, lets just say the human factor was not present. My hats off to her for the go getter gumption. Understand. I hope. the paradox that I think it would be outstanding to go hiking with this person for her get- up- and- go-out of the box-disposition but at the same time I so hate those signs as being premature and presumptive. If she made it this far hopeful she gets that and hopefully you do to. It was a prime example so I thought I'd throw it out there. Whatayou know.

At any rate I can not follow a lot of the CPUC site without more digging than most of the public has the time and patience for and usually the USFS public sites have presented this directed more for the general public-in-the -forest audience.

There is a lot that went on that I did not know in the last year and would not, had I not started picking through that link. There is a lot I still do not know that is likely pertinent, for the complexity of finding the information. I did not know that a commenter of record is apparently not given the same status in the state as it does in the Federal process. Apparently in the State CPUC process one can also "apply" to be a "stakeholder "

and then they can appear before the CPUC hearings. Without this status commenters were not given any more information. I've had to complain like crazy just to get them to keep sending me the main announcements even though I commented on the first round of this permit process and was told then I would be on the mailing list. We spoke at a number of CPUC public hearings but apparently again this is not the same thing. If it sounds like I don't exactly know what I'm talking about you are absolutely right. Please explain the whole stakeholder thing, who is and who is not and what special privileges that gives.

Again you live it from a different perspective. What can I say when I've photographed every major part of this and walked over most if it many times but someone with "stakeholder" status that has not been there or has only been there a limited amount to the main areas but not "deep into the woods" gets more apparent respect and credibility than I? Given the pending LMP that was a miracle, I don't let myself forget either, -- but It would be honest to say after the last six months I'm feeling very much that way. Your "stakeholders" may know CEQA and NEPA laws and processes better than I, I'm well aware and dependent and appreciative of them, some are much superior biologists and other relevant experts, some can cite the case law to go with them, also much depended upon them . Nevertheless, I have seen the issues from the ground that are sometimes every bit as critical -wouldn't you think? I have asked all of them numerous times where they have actually gone- which does grow with time, and I still have the geographical edge for details over a wide area and over time.

What good does a formula do if you do not have an accurate set of data to apply it to?

Wouldn't it make far more sense to pull the components together as a team? It would be honest to say I do not think that happened most particularly since about June. There were fires and the USFS is understaffed, tragically so. Nevertheless, I know of local leadership that has received audience and dialogue a number of times on this project where I was not able to get a response for weeks and months and only what I perceive a superficial one, without going the distance to complain. I have the photos to back up the things I've seen and over a decade of emails and in many cases second opinion and others who have been these places too. It isn't everything I know, but it is quite a bit and it is core information that I can not confirm you have otherwise. I find it frustrating to hear statements like "well lets just at least STUDY Inaja" . Ok , Whatever, go for it. --but I HAVE studied INAJA quite thoroughly and I kept you in that loop and sent you those pictures. If you want a tour I know the way . There are videos and photos out on youtube and facebook -many of them under iokuok2, and www.facebook.com/eaglepeak respectively, including most of your study area already. You would have known that had you returned a call or considered a brownie scout representing the Sierra Club , a "stakeholder"; never mind also the Sierra Club representative for the Cleveland on the four forest LMP SEIS.

Perhaps Lisa can supply a write up on how that really works in interfacing with the state. In looking for it I found out that the Stakeholder class also can apply to be paid for participating. Oh my that does explain a few things. You would not believe how much I've lost since 2006 for spending time on these issues. However even though I think I could justify it as much as many who do, I'm inclined not to ask for money at this late date as I can honestly say without hesitation that I don't have any monetary conflicts and the opinions are objective as I know how to make them and if it comes down to it I will be able to keep the integrity of that claim. I walked into the whole process originally not knowing anyone or anything especially in light of the usual crowd that use to do this basically all leaving for one reason or another. It pretty much left the brownie on the ground. Working with a browning scout instead of a person that knows every case law by name could be a lot more fun, for what its worth; I can lead a hike for attorneys if you want to organize one. At this point I may no longer want to be rich and famous I just want to stay a brownie as long as possible, but I need the forest to do that. But by the same token even though I found out they can be paid which seems to be the more important issue on every one's mind given the availability of that form on line, I could NOT find the form that they filled out to get there in the first place, and what is implied by that.

Step one, you can be paid to be a stakeholder. Step 2, there IS such a thing as a stakeholder. Isn't this backwards? Could you fill in the gaps? Being a stakeholder without money could still be a possibility albeit the gas to get to a hearing in the first place.

I know the POC leadership has applied for this mysterious status and I can't think of a better group to have it. They have my vote for leveraging an effective and worthwhile position; but most of the public doesn't even know yet that this project exists. How will that then interface with the USFS process?

In the world of Federal laws, how is it that a private organization is given power over a government process before the project is on the federal register? I'm dubious. If say, this was not the POC but maybe off roaders with an agenda for building more roads contrary to the stated energy issues, or even an investing group, given the publically traded status of SDG&E, would that not be actually a conflict of interest by providing them a head start and a special status to engage and be notified outside of the rest of the public? Doesn't the Federal Government have to review for adherence to federal laws as well? In most Federal Government procurements the persons engaged in the procuring would be separated from being involved in any activity that would affect the objectivity of that preparation as would the people and contractors hired to be part of it. Where is the dividing line between Stakeholder and Contractor in the state and then how does that interface to the Federal component in a Programmatic process?

I'm sorry if I opened the can of worms on the meetings as I'm looking forward to being there whatever the issues. I agree that the wires (no pun intended) are getting somewhat crossed on this one. Please attach your announcement to the project as it seems you do for most. Case in point is the noxious weed abatement project out there which seems to have a viable link to more info. By contrast this one doesn't seem to. Granted I'm running like the chicken with its head cut off as are most of you and could easily have missed a link--not to mention you all got your Christmas vacation early without much notice. It may be a bit of a backhanded compliment, but consider that we usually find the forest site helpful in getting started with the information on one of these projects and quite disorienting without it.

The master permit is coming from the USFS for crossing USFS land. Within that land are inholdings, mostly under 40 acres, 10, 20 acres. There are a few that are quite a bit bigger. Nevertheless what occurs on private land, surrounded by forest, has every influence on the forest itself. Given that the majority of the corridor for 626 is within the forest and actually runs adjacent to proposed wilderness and other very unspoiled areas I'm of the opinion that this management should be far and away at the decision by the Forest Service and not the state and the programmatic component is not the most effective or appropriate way to approach this at all. It does not matter that the MOU of 2012 decided to do it that way. The public was not provided that information at all until last October, mostly by far THIS October if even yet, and not through a Federal Process nor one that necessarily reached the federal audience.

The public was never given the option of commenting upon whether they wanted the state to have the share of the influence they do over this process which occurs for many of these routes, far and away, largely in the forest.

The Forest Service is local and actually drives out there everyday. In my opinion not nearly deep into the woods often enough but by contrast to state CPUC and other decision makers influencing this project they are exponentially in better position to review what is impacting the forest. Even when they don't know they at least have far the agility in knowing where to start looking. I have suggested that if modifications are actually to happen one alternative might be for small moves INTO the forest where the 626 line for prime example, is placed then entirely under their jurisdiction. I would argue that the reason this is complicated is more because of the dual agency interfacing bureaucracy than the number of permits being consolidated. I'm suspicious that the USFS knows exactly what is on those 70 or so permits and how they fit together even without "simplifying". That consolidation is not a simplification without their ability to stream line "like ecologies" and circumstances

where it can be done in accordance to ecological standards, much less the FLMPA, with the leverage to segregate unique issues for special permitting and their direct criteria. The one size fits all character of this programmatic model is overkill, over simplification and wishfull thinking of people who know square, flat, smooth, "Urbana" but not the amorphousness of complex ecologies, the critical necessity of species diversity, or the immersion experience of being off the matrix and the criticality of being a temporary and minority player there.

The programmatic component of this master permit is growing increasingly worrisome. There is a reason why states and the federal government have separation. Beyond that is it just common sense that the agency, where ever they originate, tasked with managing the forest is allowed to manage the forest. While the state that is tasked with managing state forest surely may collaborate on that interface and its individuals may be excellent consultants, why would you expect anyone to believe that they would be in a position to direct and override the USFS on USFS land? It seems from this programmatic EIR/EIS that that is what they are trying to do and it is adding money and time to the already overburdened Forest Service , as well as us in commenting, to just get out there and do their thing, much less what it does to the relationship between the two for eight years of brokering energy deals where the SEC becomes a serious concern. It wears thin on the free trust and communication with the public.

I do not think the public as a whole sees this as a welcome marriage but one that energy investors want as a way to leverage their investment goals to the compromises upon compromises in an already very small , unique and sensitive forest. For the NEPA component of this marriage please provide more clarity on what this implies and why this is really seen as an improvement. Please provide a review of the alternative of letting the USFS just take total authority over it. What is the justification for having the state direction? How do you ensure the integrity of that decision? What justifies it if is only over sporadic and scattered small inholdings where the vast majority of the review is Federal Forest. Why would a permit that crosses federal forest on lands that are Ag designations some of them, not apply there as well, considering given easements and juxtaposition to the forest? What would be the consequences of making the permit uniform by USFS standards?

It seems to me that in saying that the inholdings have state jurisdiction on that easement it is really just saying the state wants a way to usurp forest management.

Specific to the new onslaught of energy project proposals, with the current energy issues at hand for energy projects far more impacting than the power line itself, this becomes a very serious issue and a foreseeable future action. The future possibility of energy projects must be made very clear or their potential future must be declared or henceforth taken off of the table **for perpetuity**, once and for all.

With moving the 626 study area to a different location does the future of potential larger scale energy projects change? Exactly in what way? This question absolutely MUST be brought out in the open, clarified in full or forever gone from this region as a possibility.

It is not fair to any of us to wonder and wait with each new project, dreaded as a new threat to culture, home, recreation, and way of life, how someone may be trying to exploit an honorable suggestion such as wilderness projection with an underhanded possibility of using that mitigation to move the wires into new close range for industrial energy projects we were told were inappropriate to the sensitive region such as the 626. Even if they are all to be placed underground, this question continues at the forefront of concerns all the way around. No more chain of rationales, "maybe a little here and there possibly kinda sorta review" ; It needs a candid "once and for all". It should not be coming from the state where the state is hundreds of miles away and horribly not in any close proximity to understand or care for the enormous influence of monetary projects and politics over lands they neither see nor moreover "live". Moreover, to go so far as to label anyone who loves their home and land as "environmentalists" -with derogatory connotation, and threaten us for doing so that we "deserve a lesson" never mind we've already given hundreds of square miles of our local home to their endeavors, the threat is beyond the level of decency. I have no love for allowing that mindset to play in this decision. Even at times the local SDG&E has spoken with dubious allusion of it.

They lost my trust; I doubt I'm alone, and for "some" I was their biggest fan for decades.

Given that concern, at long last, please provide a detailed explanation of the STATE RETI group whose plan was moved to the BLM and then to the county for management and what that means here. Please explain how ANYTHING that group did has any legitimacy or relevance here on this project, how they could claim with reasonable knowledge of our local lands to influence in the trusted capacity of elected public servant. or appointed by elected public servants.

Please explain how the process that originated with RETI and then was forwarded on to the BLM and then the county of San Diego in what ways is influencing this project and explain how that process was given authority to do so without any reasonable public notification to public commenting ,nepa posting, county planning groups or to the Forest Supervisor. I want all of the RETI "cards", the components of RETI even though RETI itself may be gone , the components and decisions that originated in that body, to be disclosed in complete detail where they interface with any decisions on this project.

The cat and mouse under the radar perception must end as each project finds another way to skirt the process with creative definitions, (such as confusing voltage and wattage) as it is neither fair to the forest in getting on with forest business for the constant demands on their attention from energy , but also to the land owners and public for their reasonable

time and health and stress factor for the constant uncertainty of project over project to finally decide once and for all the future there. It affects whole lives , it has affected our whole community adversely, and most of that has been the affect of the state energy investors butting into forest management from far far away where they have no passion for our local lands, economy, or culture. Please do comment.

What prevents an investor as seeing a state component as a vulnerable target and compromising objectivity that then has influence over a project that occurs largely on USFS land? Clearly over the last 8 years I've been very concerned that this has happened.

The programmatic component to this project plan is not well explained to date. The critical question is if you had a global permit for 112 or so miles and one of those lines is a double circuit with 6 69 kv wires consisting each of a five fold increase in wattage, and then 6 more 12 kv wires also with a five fold increase in wattage given the 1/2 to 1 inch wire diameter increase, does this mean that that can happen for any of the wires without more public input even though it runs through Federal Forest where NEPA would normally require this disclosure and a new process? What parts of this are being decided globally that would not be revisited in the general public eye as a result of being a programmatic process over the NEPA or CEQA one. How is it that a 10 acre inholding is a connected action and not part of the same action? You could not do one without the other unless you move the line so I can not see how they could be considered a different project. Please enter these project comments into the record. I will follow with more commenting and questions on the specific areas it could impact.

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

From: rhhawkins@fs.fed.us
To: iokuok2@hotmail.com; rnitka@dudek.com
CC: lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us
Subject: RE: SDG&E Master Permit
Date: Mon, 21 Oct 2013 14:06:54 +0000

Thanks for the feedback Cindy. I'll bring a map to the meetings that uses the FS 7.5 minute quads as the base map.

Since this is a jointly prepared NEPA/CEQA document, the CPUC is hosting the project web page at: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

This page has the most current information, including the FS Notice of Intent and the jointly prepared scoping notice. See you later this week.

Bob Hawkins
Consulting Natural Resource Planner
for the US Forest Service

rhhawkins@fs.fed.us

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Mail Address:

154 Sherwood Ct.

Vacaville, CA 95687

From: Cindy Buxton [mailto:iokuok2@hotmail.com]

Sent: Monday, October 21, 2013 1:10 AM

To: Rica Nitka

Cc: Hawkins, Robert H -FS; lisa.orsaba@cpuc.ca.gov; Metz, William -FS; Miriam Raferty

Subject: RE: SDG&E Master Permit

I've looked over the map sent. I know these are tedious to prepare. Unfortunately the topo maps provided even though a lot more detailed do not have the inholdings marked. The ability to see the relationship of this project to the private inholdings is fundamental to understanding this proposal and the issues it presents.

Now that the US Government is back in business is there any chance of getting the map on a USFS 7.5 min map? These are downloaded for free from the USGS web site. In the mean time I'm preparing my own.

Thanks in advance, I do appreciate the effort so far.

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Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

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From: rnitka@dudek.com
To: iokuok2@hotmail.com; rhhawkins@fs.fed.us
CC: lisa.orsaba@cpuc.ca.gov
Date: Fri, 18 Oct 2013 13:46:25 -0700
Subject: RE: SDG&E Master Permit
Hi Ms. Buxton,

SDG&E will need to answer the wattage question for TL 626. They will be present at the two project scoping meetings being held next week in Julian (10.22.13) and Alpine (10.23.13).

Regards,
Rica Nitka

From: Cindy Buxton [<mailto:iokuok2@hotmail.com>]
Sent: Thursday, October 17, 2013 5:31 PM
To: Rica Nitka; rhhawkins@fs.fed.us
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DUDEK

From: Cindy Buxton [<mailto:iokuok2@hotmail.com>]
Sent: Friday, October 11, 2013 9:40 AM

To: Will Metz; Joan Friedlander; Bjorn Fredrickson; Don Christiansen; public.advisor@cpuc.ca.gov; CNFMSUP

Cc: donna tisdale1; Kelly Fuller; Bill Powers; Nathan Weflen; pattyreedy@rocketmail.com; skip skip; conscom; allen greenwood; Alan Hatcher; Robert Hawkins; Rob Hutsel; Robert Scheid; Jim Conrad; Jim Conrad; John Elliot; Duncan Hunter; Congresswoman Susan Davis; kay taff; Richard Halsey

Subject: SDG&E Master Permit

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Please understand that I have and will be taking a very close look at those differences and speculating on the intentions of all three as it is obvious to me that none of the three had the same idea in mind nor in congruence with the reasons supplied in the public scoping notice. Please revisit starting with some clear statement of **intention** and the criteria that that intention needs to satisfy and only then followed by the **content**. So far the notice for public review is not satisfactorily making these core intentions and requirement criteria clear enough to do this effectively. I will proceed with what I have but it is not necessarily going to reflect positively on you and your better intentions until this is made clear. - about 180 degrees the contrary I'm afraid.

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Sincerely,

Cindy Buxton chair of the Forest Committee, San Diego Chapter of the Sierra Club

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This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Cindy Buxton](#)
To: [CNFMSUP](#); [Robert Hawkins](#)
Subject: FW: SDG&E Master Permit
Date: Tuesday, October 22, 2013 10:05:13 AM

Cindy Buxton,
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

Per your guidelines I'm resending with an address. The Cleveland has my home address on file as well.

From: iokuok2@hotmail.com
To: rnitka@dudek.com
CC: rhhawkins@fs.fed.us; lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us;
editor@eastcountymagazine.org
Subject: RE: SDG&E Master Permit
Date: Mon, 21 Oct 2013 01:10:29 -0700

I've looked over the map sent. I know these are tedious to prepare. Unfortunately the topo maps provided even though a lot more detailed do not have the inholdings marked. The ability to see the relationship of this project to the private inholdings is fundamental to understanding this proposal and the issues it presents.

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From: [Cindy Buxton](#)
To: [Robert Hawkins](#); [CNFMSUP](#)
Subject: FW: SDG&E Master Permit
Date: Tuesday, October 22, 2013 10:07:46 AM
Attachments: [MSUP PTC NOP 9.23.13 \(1\).pdf](#)
[MSUP PTC Public Notice 9.23.13.pdf](#)

Cindy Buxton,
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

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From: iokuok2@hotmail.com
To: frbrown@viejas-nsn.gov; cnfmsup@dudek.com
CC: wmetz@fs.fed.us; nweflen@yahoo.com; pattyreedy@rocketmail.com;
billp@borderpowerplants.org; k.d.fuller@sbcglobal.net; kaytaff@sbcglobal.net;
naturalist@californiachaparral.com; cmbigger@cox.net; lori@lorisaldana.com;
editor@eastcountymagazine.org; ca52dhima@mail.house.gov; susan.davis@mail.house.gov;
conscom@lists.sierrasd.org; jax1936@msn.com; phasapopoulos@hotmail.com;
peugh@cox.net; rhutsel@sandiegoriver.org; renee@wildlifezone.net; bfredrickson@fs.fed.us;
jfriedlander@fs.fed.us; jfisher760@aol.com
Subject: SDG&E Master Permit
Date: Fri, 11 Oct 2013 18:02:42 -0700

Absolutely/can I call you as well? I'm at 619 823-3620 or work: 619 817-3804 Do you live on the res?

I'm attaching SDG&E's request via the USFS. I might as well give the brain dump now, but this will not be the last of the comments.

I'm providing a link to a photo essay in progress via Hotmail's sky drive function (too big to attach) that is about 15 % documented so there will be more explanation in a couple of

days. The open houses are in a week and a half in Julian and Alpine. see the bottom of the 2nd announcement attached.

Frank I've walked the Cedar Gorge through the Inaja Reservation, yes I did call the res office and told them years ago when I was worried the Sea to Sea trail would be impacting the res. (the good 'ol days in hindsight) There is no difference from the USFS portion in the caliber of this stream, and the reservation from the standpoint of exceptional quality and lack of human impacts. It is breathtakingly spectacular. Anything that happens upstream will affect us both. Indeed a few years ago some genius near the William Heise County park decided to clean out a large pond releasing silt and damaging seven miles of stream. It has recovered but there are places where you can see some of the affects.

This route is beyond anything I could have imagined and I've been in many conversations with the two Palomar district rangers a part of this and I'm confident they are not the type that would do this, nor is the forest Supervisor as he has already rejected all of the components in the past-but here it is. The soon to be final of their Land Management planning was both courageous and unprecedented. This by contrast is beyond odd. Something is really wrong.

The only upshot I could throw in there, however, is that it could make some beautiful sense if it was directly **under** Boulder Creek Road. We could rally the troops to suggest this **by all means**, a 2nd place choice for me; however, **let me suggest something better:**

The 69 kV portion of this line only breaks off and serves one house between Descanso and Santa Ysabel. What on earth? And we the rate payers have been paying for the maintenance of this line-through very rugged and environmentally ultra sensitive turf no, less for years. There is also a local distribution line up to the McCoy ranch but no further. To get there the line crosses Boulder Creek and is, thanks to chronic sloppy grading, problematically silting Boulder Creek- as well as Cedar Gorge. I suggest as my first choice alternative that they remove the 69 kV strands all together. They can then bury the 12 kv as they do routinely all over town and as a matter of fact have been charging us for their burial for years.

By no means should we support leaving anyone without power or taking their land as a result of this project.

This leaves just two ranches off of the grid, the McCoy Ranch and the Gibbs Ranch that aren't already off of the grid on Eagle peak Road. They would need full on solar about 6-10 kw of it with battery backup and a reliable fund in escrow to maintenance for a significant time. (you could potentially ask as much for Inaja), That removes the threat not only to Boulder Creek but a near identical one -if not worse - to Cedar Creek the whole point in the first place.

Not only that it removes the fire issues in total for good.

It may sound expensive but consider this is less than the filing fee-only the filing fee-- that SDG&E paid the USFS for this process. Everyone else along this line is getting their power from the grid above and down from Santa Ysabel, not from the 626 out of Descanso- they couldn't be. There is no trunk off of the substation erroneously labeled Boulder Creek station in the PEIS-at the Gibbs Ranch off of Eagle Peak road and the county has nixed any subdividing of properties under about 300 acres, not too many of them. There won't be demand for new power without the presumed under the radar dealings for energy projects.

They have proven themselves, both SDG&E and their buddies in the energy biz to be no one appropriate to do business with in that region of rare, sensitive, and wild county in the first place. In eight years their added dynamic to an already complicated workload of responsibilities in the USFS has made and changed the approachability, the ability to communicate effectively with our USFS personnel given the SEC (securities and exchange - publically traded stock) issues prohibitively difficult. If corporate America wishes to be considered "citizens" with the rights and privileges therein, then they can start shouldering the responsibility and accountability of citizens as well.

I'll try to provide a link to the photo essay a 2nd time; when I get the added comments in there as to what they are, see attached reference to Hotmail's "skydrive". One of my favorites is a photo of me standing on "the McCoy Hill" with the "big 12" waterfall in the background. You can't miss it. You'll notice a photo of a ring of rocks up there close by that I suspect is a rite of passage or something else "indian" in nature. There are many of these in this proposed ROW. (right of way) The gorge below is so unspoiled that there are grinding stones still in the morteros there. A couple of the photos are taken pre Cedar Fire showing the real Sierra like character of upper Boulder Gorge, from being ON the waterfall series, looking back at the suggested ROW on the Marston Ranch. This shows the clearly highly inappropriate locating of industry next to "wilderness". I've had a number of conversations with the USFS about these things so it is beyond shocking that they would suggest an infrastructure there. -but is it really coming from them? I'm beginning to question the origins of this in a big way.

And By infrastructure let me emphasize that what I think they-err someone- has in mind with this is a series of wind or solar installations along this unbelievably horrible route. -to clarify the intentions are NOT just about the wilderness bill from what I'm seeing on their less than clear map. The implications from looking at it in detail juxtapose the history of the last eight years are far reaching and shockingly nefarious. I've studied the maps and they are following a combination of the rejected county wind ordinance in the USFS, and some significant deltas that were also included in a state think tank plan called RETI (by all means google, esp the convention discussions of this area- they failed to disclose to both

the USFS and the many county planning groups. The ONLY USFS representative was from Oregon of all places.) that the county had rejected. Apparently they are back. Even though our county has at least general knowledge of the back country it would appear that the state investors (at the time yet to be elected governor) failed to be bothered that the whole shin dig would go over top of a Girl Scout Camp! -never mind the legacy sized trees in the area or the USFS fire station right down the road.

SDG&E will tell you that they are not changing the voltage, 69kV of this line. This is very deceptive as they are increasing the diameter of the wire from 1/2 inch to an inch. If you are like me and have long forgotten all of those formulas we had to memorize in Physics class, a brief refresher, Volts x amps = watts. additionally the amperage increases with the diameter of the wire. Add in that other pesky math formula we had to remember back in the day: pi (about 3.14) X radius squared = the area of a circle, and applying that to the 1/2 to 1 inch issue the area increases over 4 fold.

plug that in and it means even though the voltage doesn't change the carrying capacity of the line, the wattage increases at least 4 fold.

However the engineer from SDG&E told me along with the diameter they could increase the temperature of the line by 40 % to 270 degrees which hence adds another increment of amperage to fully five times the carrying capacity. Along with this is another concern. Traditionally until recently fires were mitigated by planting rye grass as it "greened up" quickly. The flash point for rye grass is one of the lowest at 300 degrees, seriously close to that 270 considering. These appear to be the general upgrades going in all over the place, i.e. near Frys off of Aero drive in town, not the marketed fire hardening.

Having brought all of this to SDG&E's attention three times now, SDG&E told the project manager that they did not have to disclose this since their substation can't increase the voltage. (Not surprisingly even though I'm a commenter of record back to the original master permit request they conveniently left me off of their list of notifications for the first two announcements.)... Well it's not the voltage but the wattage and if they are planning to increase the diameter of the wire they are obviously planning to accommodate that diameter wouldn't you think? At any rate the National Environmental policy Act or NEPA , says that you have to provide enough information to make an informed decision (albeit an intelligent one) and I should think that is a piece of information that is critical to weighing out the issues with this permit.

Recall there is a massive substation lurking overhead up on Bell Bluff waiting to be exploited in your direction and mine. They are also supposed to disclose future connected actions. This along with the nearly 300 square miles of energy , solar and wind projects, seems to have slipped their minds or they didn't think you'd mind. Solar of this scale is

thought to have risks of stray voltage being released into the ground and the statistics from impaired livestock and animal breeding and other serious medical issues are beginning to bear this out. There are ways to reduce the threat, but not to zero, as well as recycle it back into the system; but to date they seem to be reducing costs at the expense of anyone in proximity. Donna Tisdale from the POC (protect our communities) has been following the progress of the ongoing research.

Hope to meet you at the open houses, I will be at both.

thanks for asking!
Many Blessings,
Cindy Buxton

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Oh great spirit whose voice I hear in the wind... may I walk in beauty...

Cindy has a file to share with you on SkyDrive. To view it, click the link below.

 [photoessayIn Opposition to Master PermitnewRow.docx](#)

From: frbrown@viejas-nsn.gov
To: iokuok2@hotmail.com
Date: Fri, 11 Oct 2013 14:51:49 -0700
Subject: SDG&E Master Permit

Cindy can you send me more info on this project please thank you!

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102-3298
Edmund G. Brown Jr. *Governor*



USDA FOREST SERVICE
CLEVELAND NATIONAL FOREST
18045 Ranch Bernardo Rd
San Diego, CA 92127-2107
Will Metz, *Forest Supervisor*



**Notice of Preparation
Notice of Public Scoping Meeting
For
SDG&E Master Special Use Permit and Permit to Construct
Power Line Replacement Projects
Environmental Impact Report / Environmental Impact Statement**

Application No. A.12-10-009

To: All Interested Parties

A. Introduction

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. As shown in Figure 1, the CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action described in more detail in Section D.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily include fire hardening along with relocation and undergrounding of certain facilities which will require a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC). As shown in

Figure 1, the power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a PTC the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD. The Revised POD is available on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/DR3Response.htm>.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR”. The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, this Notice of Preparation (NOP) is being sent to interested agencies and members of the public. The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with this NOP for preparation of a joint EIS/EIR. Similar to this NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency. This NOP,

prepared jointly with the Forest Service, provides additional information that supplements the NOI.

This NOP includes background information on the project, a description of the applicant's proposal, the Forest Service Proposed Action, a summary of potential project impacts, time and location of the public scoping meeting, and information on how to provide comments to the CPUC and Forest Service. This NOP and the NOI can be viewed on the project website at the following link:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

B. Background

In 2005, in consultation with the Forest Service, SDG&E submitted an initial application to obtain an MSUP. The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the CNF. As part of the NEPA review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in 2009. In response to public comments received on that EA, the Forest Service determined that additional fire risk reduction measures within the CNF (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required. SDG&E has expanded the scope of the proposed MSUP to include fire hardening, undergrounding and relocation as proposed in the power line replacement projects discussed in this NOP.

C. Applicant's Proposal

C.1 Applicant's Purpose and Objectives

According to SDG&E, the objectives of the MSUP and PTC are to (1) secure Forest Service authorization to continue to operate and maintain existing SDG&E facilities within National Forest System lands; and (2) increase the fire safety and service reliability of these facilities by replacing five existing 69 kV power line facilities and six existing 12 kV distribution line facilities. SDG&E's stated objectives also include undertaking these activities consistent with CPUC General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission (NERC/FERC) requirements and SDG&E standards; and minimizing potential environmental impacts by locating facilities within previously-disturbed areas where feasible.

C.2 Description of the Applicant's Proposed Project

Master Special Use Permit

SDG&E proposes to combine into one MSUP over 70 previously-issued use permits for 69 kV power line and 12 kV distribution line facilities as well as ancillary and appurtenant facilities within the CNF. The MSUP, if approved, would allow the continued maintenance and operation of SDG&E's existing 69 kV power lines, 12 kV distribution lines, ancillary, and appurtenant facilities as well as approximately 45 miles of existing exclusive use access roads required to operate and maintain SDG&E's existing electric facilities within the administrative boundary of the CNF.

Wood-to-Steel Pole Replacements

The Project would also replace the following existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would include fire hardening (wood to steel pole replacement), along with removal, relocation, undergrounding and single to double circuit conversion along certain segments.

- The existing 69 kV Power Line (TL) 625 – is approximately 22.5 miles in total length and generally runs from Loveland Substation east to Barrett Tap, from Barrett Tap east to Descanso Substation, and from Barrett Tap south to Barrett Substation. Proposed replacement includes wood to steel pole conversion along with single circuit to double circuit conversion.
- The existing TL626 – is approximately 18.8 miles in total length and generally runs from Santa Ysabel Substation south to Descanso Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL629 – is approximately 29.8 miles in total length and generally runs from Descanso Substation east to Glenclyff Substation, from Glenclyff Substation southeast to Cameron Tap, from Cameron Tap south to Cameron Substation, and from Cameron Tap east to Crestwood Substation. Proposed replacement includes wood to steel pole conversion, undergrounding and single to double circuit conversion.
- The existing TL682 – is approximately 20.2 miles in total length and generally runs from Rincon Substation east to Warners Substation. Proposed replacement includes wood to steel pole conversion.
- The existing TL6923 – is approximately 13.4 miles in total length and generally runs from Barrett Substation east to Cameron Substation. Proposed replacement includes wood to steel pole conversion.

- The existing 12 kV Distribution Line or Circuit (C) 78 – is approximately 1.8 miles in total length and generally runs from east of Viejas Reservation, east along Viejas Grade Road, to Via Arturo Road. Proposed replacement includes wood to steel pole conversion and overhead relocation.
- The existing C79 – is approximately 2.2 miles in total length and generally runs from Boulder Creek Road east to the Cuyamaca Peak communication site. Proposed replacement includes removal of existing overhead line and replacement with new undergrounding through Cuyamaca Rancho State Park.
- The existing C157 – is approximately 3.5 miles in total length and generally runs from Skye Valley Road, near Lyons Valley Road, east to Skye Valley Ranch. Proposed replacement includes wood to steel pole conversion. The Applicant’s proposal includes replacement and motorized use in the congressionally designated Hauser and Pine Creek Wilderness areas. The Forest Service has determined that this aspect of the Applicant’s proposal conflicts with the requirements of the Wilderness Act. The Applicant has requested the Forest Service to include an alternative whereby the Forest Service seeks authority from Congress to approve the fire safety work within the wilderness areas.
- The existing C440 – is approximately 24.0 miles in total length and generally runs from Glencliff Substation northeast to Mount Laguna along Sunrise Highway. Proposed replacement includes wood to steel pole conversion with some line removal, undergrounding and overhead relocation.
- The existing C442 – is approximately 6.2 miles in total length and generally runs south from Pine Valley Road to Los Pinos Peak Forest Station and along Pine Creek Road south toward the community of Pine Valley. Proposed replacement includes wood to steel pole conversion.
- The existing C449 – is approximately 6.7 miles in total length and generally runs from Old Highway 80 south along Buckman Springs Road to Oak Drive and southwest along Morena Stokes Valley Road to Camp Morena. Proposed replacement includes wood to steel pole conversion with some line removal and undergrounding.

The Applicant also proposes to install appurtenant facilities on poles and within the right-of-way as needed to continue to operate and maintain the electric system. These appurtenances may include electrical switches, smart grid control devices, weather stations, surveillance cameras, and other equipment necessary or prudent to ensure safe and reliable operation of its electric system.

D. Forest Service Proposed Action

As described in the introduction, the Forest Service reviewed and accepted the application with modifications to certain actions on National Forest System lands. This modified proposal is the federal proposed action that will be evaluated in the EIS/EIR.

D.1 Forest Service Purpose and Need

The Forest Service purpose is to authorize the powerlines and associated facilities needed to continue electric service to a variety of users within and adjacent to the Cleveland National Forest through a Master Special Use Permit in a manner that is consistent with the CNF Land Management Plan (LMP). This action is needed because the 70 individual permits or easements for the existing facilities have expired, and a permit is required for the continued occupancy and use of National Forest System lands.

Permits issued by the Forest Service are required by law to be consistent with the LMP. The LMP identifies suitable uses within various land use zones, describes desired conditions based on the LMP goals and objectives, and sets resource management standards. The Forest Service proposed action is designed to be consistent with the LMP requirements. The Forest Service purpose and need will guide the development of alternatives considered on National Forest System lands.

D.2 Forest Service Proposed Action

The Forest Service proposed action modifies the applicant's proposal in the following areas:

- TL 626 – The Forest Service proposed action is to relocate a section of TL 626 out of the Cedar Creek publically proposed undeveloped area and into a location within the study corridor shown in Figure 1. The section of line that is replaced will be removed and the affected area restored. The relocated section of line would be constructed to the same standard described by the applicant. Construction of access roads will depend on the final location identified in the study corridor. A more detailed location including alignments both on and off of the Inaja Indian Reservation will be identified based on input during scoping and analyzed in the Draft EIS/EIR.

The existing powerline access roads are impacting the Cedar Creek riparian area in conflict with the LMP. The steep road gradients prevent effective implementation of erosion control treatments. This area is also being evaluated for recommended wilderness zoning in the LMP. Relocation of the line will avoid riparian impacts and restore the undeveloped character of the landscape.

- C157 – The Forest Service proposed action would relocate the section of C157 out of the Hauser Wilderness and into the area between the Hauser and Pine Creek Wilderness areas as shown in Figure 1. The section of line that is replaced will be removed and the affected area restored consistent with wilderness objectives. The relocated section of line would be constructed to the same standard described by the applicant. Construction in the area between the two designated wilderness areas is consistent with the LMP and the Wilderness Act.
- Appurtenant Facilities – The Forest Service proposes to authorize electrical control devices and weather stations not otherwise specified in the permit, subject to Forest Service review and approval of final design and location. The Forest Service is not proposing to authorize surveillance cameras on National Forest System lands.

The facilities would be authorized by a special use permit. The permit has standard resource protection conditions, along with requirements for various plans to implement those conditions. A sample Master Special Use Permit, draft Operation and Maintenance Plan, and draft Fire Plan are available on the project website.

E. Affected Jurisdictions

As shown in Figure 1, the MSUP/PTC Power line Replacement Projects study area not only traverses National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverses public lands managed by the BLM; tribal lands of the La Jolla, Campo, Inaja, and Viejas Indian Reservations managed by the respective tribes and held in trust by the BIA; Cuyamaca Rancho State Park lands managed by CSP; and private holdings within unincorporated San Diego County amongst others.

F. Potential Environmental Effects

The joint EIS/EIR will evaluate potential environmental effects of the proposed MSUP/PTC Powerline Replacement Projects. The CPUC and Forest Service will propose mitigation measures to reduce or offset any significant or adverse effects identified in the analysis. The EIS/EIR will identify reasonable alternatives, compare the environmental impacts of the alternatives to the proposed action, and propose mitigation to reduce or avoid their effects.

Based on preliminary analysis, the proposed action may have a number of environmental effects. Potential issues and impacts to the existing environment to be analyzed in the EIS/EIR include those listed in Attachment 1. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered

thoroughly. To assist the reader in understanding the range of impacts that could be considered, and to provide a guide for scoping comments, Attachment 2 includes CEQA checklist questions that typically would be evaluated in an EIR.

The EIS/EIR will also address the cumulative environmental consequences of the proposed MSUP/PTC Powerline Replacement Projects in combination with other past, present, and reasonably foreseeable projects in the area, including known renewable energy and utility projects. This will serve to satisfy CEQA/NEPA requirements regarding regional cumulative effect concerns.

Mitigation Measures

SDG&E has proposed measures that could reduce or eliminate potential impacts of the proposed MSUP/PTC Powerline Replacement Projects. The effectiveness of these measures (called applicant proposed measures or APMs) will be evaluated in the EIR/EIS, and additional measures (mitigation or avoidance measures) will be developed to further reduce or avoid impacts, if required. When the CPUC and Forest Service make their final decision on the proposed project, they will define the mitigation measures to be adopted if the project or an alternative is approved, and the CPUC and Forest Service will require implementation of a mitigation monitoring and reporting program.

G. Alternatives

In compliance with CEQA and NEPA, the EIS/EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the Forest Service proposed action and associated MSUP/PTC Powerline Replacement Projects proposed on private lands. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. Reasonable alternatives also attain all or most of the purpose and need and avoid or lessen any of the significant environmental impacts of the proposed project.

Alternatives to be analyzed in the EIR/EIS will be developed during the environmental review process and will consider input received during public scoping.

As required by CEQA and NEPA the EIS/EIR will also evaluate the No Project/No Action Alternative. Under the No Project/Action Alternative, no MSUP or PTC would be issued. SDG&E would not be allowed to continue to operate and maintain its facilities on National Forest System lands as the current permits are expired. The permits require SDG&E to remove the facilities upon expiration of the permits. In

addition, the proposed power line replacement projects including fire hardening for fire prevention would not occur.

H. Public Scoping Meeting

The CPUC and Forest Service will conduct two public scoping meetings in the project area, as shown in Table 1. The purpose of these scoping meetings is to present information about the proposed project and the CPUC and Forest Service's decision-making process, and to listen to the views of the public on the range of issues relevant to the scope and content of the EIS/EIR.

Everyone is encouraged to attend one of these meetings to express their concerns about the project and to offer suggestions regarding the project as proposed, including alternatives.

**Table 1
Public Scoping Meeting**

Location	Day, Date, Time	Directions
Julian Elementary School 1704 Cape Horn Julian, CA 92036	Tuesday, October 22, 2013 5:00 p.m.	<p>From the west: take Highway 78 through Julian. Turn right on 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the east: take Highway 78 west towards Julian. Turn left on 2nd Street (across from the Post Office and after the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p> <p>From the south: take Highway 79 north to Highway 78 in Julian. Turn right onto Highway 78. Take the next left onto 2nd Street (across from the Post Office and before the library). Turn right onto Cape Horn. The Julian Elementary School is on Cape Horn behind the library and high school.</p>
Alpine Community Center 1830 Alpine Boulevard Alpine, CA 91901	Wednesday, October 23, 2013 5:00 p.m.	<p>From the west, take I-8 east and take exit 30 Tavern Road. Turn right onto Tavern Road (south). Turn left onto Alpine Boulevard. Alpine Community Highland Center will be on the left-hand side.</p> <p>From the east, take I-8 west and take exit 30 Tavern Road. Turn left (south) onto Tavern Road. Turn left onto Alpine Boulevard. Alpine Community Center will be on the left-hand side.</p>

I. Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. Suggestions for submitting scoping comments are presented at the end of this section. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. All scoping comments must be received by November 7, 2013. You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (e-mail), or (3) by attending the public scoping meeting (see time and location in Table 1) and handing in written comments at the scoping meeting.

By Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to:

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

By Electronic Mail: E-mail communications are welcome; however, please remember to include your name and return address in the e-mail message. E-mail messages should be sent to cnfmsup@dudek.com, with a subject line “SDG&E Master Permit”.

A **Scoping Report** will be prepared, summarizing all comments received. This report will be posted on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>;

and copies will be placed in local document repository sites listed in Table 2. In addition, a limited number of copies will be available upon request to the CPUC or Forest Service project managers.

Suggestions for Effective Participation in Scoping

Following are some suggestions for preparing and providing the most useful information for the EIS/EIR scoping process.

- 1. Review the description of the project** (see Sections C and D of this Notice of Preparation and the maps provided). Additional detail on the project description from SDG&E’s POD is available on the project website where the POD may be viewed.

2. **Review the CEQA impact assessment questions** (see Attachment 2).
3. **Attend the scoping meeting** to get more information on the project and the environmental review process (see time and date in Table 1).
4. **Submit written comments** or attend the scoping meeting and **ask questions during the informational meeting**. Explain important issues that the EIS/EIR should cover in written comments.
5. **Suggest mitigation measures** that could reduce the potential impacts associated with SDG&E’s proposed project.
6. **Suggest alternatives** to SDG&E’s proposed project that could avoid or reduce the impacts of the proposed project.

J. For Additional Project Information

Internet Website. Information about this application and the environmental review process will be posted on the Internet at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

This site will be used to post all public documents during the environmental review process and to announce upcoming public meetings. In addition, a copy of SDG&E’s POD may be found at this site, and the Draft EIS/EIR will be posted at the site after it is published.

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the proposed project and the EIS/EIR will be made available at the locations listed in Table 2.

K. Issuance of Notice of Preparation

The CPUC hereby issues this NOP of an EIS/EIR, which can be found at the repository sites listed in Table 2.

**Table 2
Repository Sites**

Site	Address	Telephone
Alpine Branch Library	2130 Arnold Way Alpine, California 91901	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94 Campo, California 91906	619.478.5945
Descanso Branch Library	9545 River Drive Descanso, California 91916	619.445-5279

**Table 2
Repository Sites**

Site	Address	Telephone
Pine Valley Branch Library	28804 Old Hwy. 80 Pine Valley, California 91962	619.473.8022
Julian Branch Library	1850 Highway 78 Julian, California 92036	760.765.0370
Ramona Branch Library	1275 Main Street Ramona, California 92065	760.788.5270
Dudek	605 Third Street Encinitas, California 92024	760.942.5147

Attachment 1

Summary of Potential Impacts: MSUP/PTC Powerline Replacement Projects

The CPUC and Forest Service have determined that the following potential issues and impacts to the existing environment require a detailed analysis in the EIS/EIR. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIS/EIR after the issues are considered thoroughly. This overview is presented to assist the public and agencies in preparing written scoping comments.

Environmental Issue Area	Potential Issues or Impacts
Aesthetics	<ul style="list-style-type: none"> • Construction-related activities would result in the temporary degradation of existing visual character and quality in the project study area, including scenic vistas and other designated scenic resources. • Nighttime construction lighting may be used during project construction that could affect the nighttime view. • There may be potential conflicts associated with proposed wood to steel pole replacement with federal, state, and local plans; regulations; or standards applicable to the protection of visual resources.
Air Quality	<ul style="list-style-type: none"> • Project construction will produce short-term air emissions (fugitive dust and vehicle equipment exhaust) and may violate air quality standards during construction.
Biological Resources	<ul style="list-style-type: none"> • Project construction and vegetation management activities could result in temporary and permanent loss of native wildlife and/or their habitat. • Loss of habitat for sensitive species designated by state and federal resource agencies. • Conflict with federal, state, or local policies or ordinances protecting biological resources.
Cultural and Paleontological Resources	<ul style="list-style-type: none"> • Construction and operation could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources. • Temporary use of staging areas and conductor pull sites could damage or destroy historic and archaeological sites, traditional cultural properties, or areas containing paleontological resources.
Greenhouse Gas Emissions	<ul style="list-style-type: none"> • Construction activities would result in greenhouse gas emissions.
Hazards, Hazardous Materials, Fire	<ul style="list-style-type: none"> • Leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance could contaminate soils, surface waters, or groundwater. • Fire hazard during construction and operation.
Hydrology and Water Quality	<ul style="list-style-type: none"> • Project construction and operation and maintenance could affect surface water flow and erosion rates causing subsequent downstream sedimentation and reduced surface water quality.
Land Use and Planning	<ul style="list-style-type: none"> • Construction would temporarily disturb ongoing or traditional land uses within the project study area. • Possible conflicts with pending land management plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Environmental Issue Area	Potential Issues or Impacts
Noise	<ul style="list-style-type: none"> • Project construction will produce short-term noise (from helicopters, vehicles and construction equipment) and may violate noise standards during construction.
Public Services and Utilities	<ul style="list-style-type: none"> • Construction activities could result in increased generation of waste and disposal needs. • Fire and emergency services may be required to service the proposed project and project study area during construction and operation.
Wilderness and Recreation	<ul style="list-style-type: none"> • Construction or operation could cause conflicts with ongoing or traditional recreation uses in the project study area. • Construction or operation could cause conflicts with the Wilderness Act of 1964.
Transportation and Traffic	<ul style="list-style-type: none"> • Traffic would be generated by construction worker commute trips and equipment deliveries. Hauling materials, such as poles, concrete, conductor, and excavation spoils, would temporarily increase existing traffic volumes in the project study area. Access roads could increase vehicle trespass into areas where vehicles are not authorized.
Socioeconomics/Environmental Justice	<ul style="list-style-type: none"> • The relocation of certain transmission facilities may result in social and economic effects as well as have disproportionately high or adverse effects on minority or low-income populations.

Environmental resources areas preliminarily determined to have a less than significant impact as a result of the proposed project and to not require further analysis include:

- **Agriculture and Forestry Resources:** Since no land use changes are proposed with the replacement and fire hardening of the existing transmission and distribution lines, the proposed project would not convert existing agriculture or forestry lands to non-agricultural or non-forest uses.
- **Geology, Soils, and Seismicity:** The proposed new steel power line structures would be more structurally sound than the existing wood poles due to improved engineering characteristics, increased material strength, and improved design safety requirements. The proposed project would be built to existing SDG&E design standards. Soil erosion will be addressed under Hydrology and Water Quality.
- **Population and Housing:** The proposed project would not result in population growth in the area because no new homes or businesses are proposed, and no new infrastructure related to population growth is proposed. In addition, no new housing is needed because non-local construction workers would use available temporary housing throughout San Diego County. Further, the workers would be in the area only during construction and are not expected to become permanent residents.
- **Electric Magnetic Field (EMF):** While the proposed project would relocate and underground certain transmission facilities, there will be no increase in the voltage used; therefore, there would be no significant change to EMF.

Attachment 2

Environmental Checklist

Following are the questions included in Appendix G of the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form (California Public Resources Code, Section 21000 et seq.). These are issues that may be evaluated in an environmental impact report (EIR), if they are determined to be relevant to the project. This list is provided only to provide the reader with a general idea of the types of impacts that will be considered for the proposed project.

I. AESTHETICS. Would the project:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- Result in the loss of forest land or conversion of forest land to non-forest use?
- Involve other changes in the existing environmental which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

IV. BIOLOGICAL RESOURCES. Would the project:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

V. CULTURAL RESOURCES. Would the project:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

VI. GEOLOGY AND SOILS. Would the project:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to the California Division of Mines and Geology Spec. Pub. 42)
 - Strong seismic groundshaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-

existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- Otherwise substantially degrade water quality?
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Inundation by seiche, tsunami, or mudflow?

X. LAND USE AND PLANNING. Would the project:

- Physically divide an established community?
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

XI. MINERAL RESOURCES. Would the project:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

XII. NOISE. Would the project result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

XIII. POPULATION AND HOUSING. Would the project:

- Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extensions of roads or other infrastructure)?
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES AND UTILITIES.

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire protection?
 - Police Protection?
 - Schools?
 - Parks?
 - Other public facilities?

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Comply with federal, state, and local statutes and regulations related to solid waste?

XV. RECREATION. Would the project:

- Increase the use of existing neighborhood, and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

MANDATORY FINDINGS OF SIGNIFICANCE:

- Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?
- Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

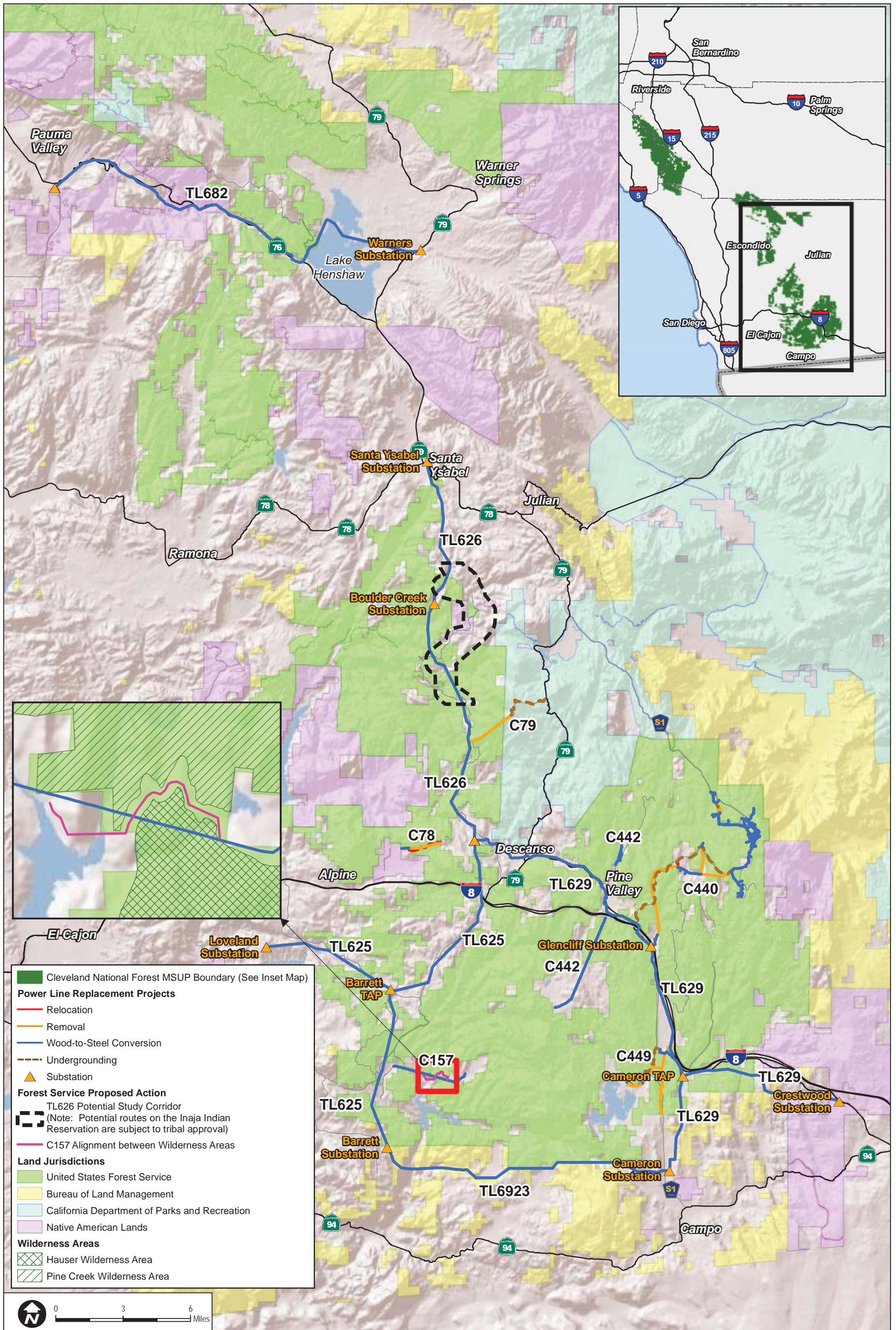


FIGURE 1
Vicinity Overview Map



Public Notice SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects Public Scoping

San Diego Gas & Electric Company (SDG&E or applicant) is proposing to combine over 70 existing special use permits for SDG&E electric facilities within the Cleveland National Forest (CNF) into one Master Special Use Permit (MSUP) to be issued by the United States Forest Service (Forest Service). SDG&E filed a Standard Form (SF) 299 Application for Transportation and Utilities Systems and Facilities on Federal lands along with a Plan of Development (POD) to initiate this action. The CNF MSUP study area is located within the Trabuco Ranger District in Orange County, California and the Palomar and Descanso Ranger Districts in unincorporated areas of San Diego County, California.

The Forest Service has reviewed the application and accepted the proposal with modifications to certain actions on National Forest System lands. SDG&E revised the POD in April 2013 to include modifications as requested by the Forest Service. This modified proposal is the Forest Service proposed action.

In addition to requesting Forest Service authorization of the MSUP, SDG&E is proposing to replace certain existing 69 kV power lines and 12 kV distribution lines located within and outside of the CNF. Replacement would primarily consist of fire hardening, relocation and undergrounding of certain facilities which will require a Permit To Construct (PTC) from the California Public Utilities Commission (CPUC). The power line and distribution facilities proposed to be replaced are located within the central portion of San Diego County approximately 4.5 miles north of the US Mexico Border, 14 miles east of the City of El Cajon, in the vicinity of the unincorporated communities of Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs.

On October 17, 2012 SDG&E filed an application (A.12-10-009) along with the Preliminary POD for a Permit to Construct (PTC) the proposed Power Line Replacement Projects with the CPUC. On June 26, 2013, SDG&E filed an amended PTC application which included modifications to certain actions on National Forest System lands as requested by the Forest Service and described in the Revised POD.

The CPUC and Forest Service have independent jurisdiction and approval authority for the project. In addition, the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), and California State Parks (CSP) have independent jurisdiction and approval authority for project segments within their areas of jurisdiction. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. As joint lead agencies, the CPUC and Forest Service have developed and signed a Memorandum of Understanding (January 2012) that will direct the preparation of a joint Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA) and an Environmental Impact Statement (EIS) to comply with the National Environmental Policy Act (NEPA). The joint document will be called the “SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIS/EIR.” The BIA and BLM are joining the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA.

As required by CEQA, the CPUC has prepared a Notice of Preparation (NOP). The purpose of the NOP is to inform recipients that the CPUC is beginning the joint preparation of the EIS/EIR with the Forest Service, and to solicit information that will be helpful in the environmental review process. Information that will be most useful at this time would be descriptions of concerns about the impacts of the proposed project and suggestions for alternatives that should be considered.

As required by NEPA, the Forest Service will publish a Notice of Intent (NOI) in the Federal Register in conjunction with the NOP for preparation of a joint EIS/EIR. Similar to the NOP, the intent of the NOI is to initiate the public scoping for the EIS/EIR, provide information about the proposed project, and to solicit comments on the scope and content of the EIS/EIR. The NOI also serves as an invitation for other federal agencies or tribes with jurisdiction or special expertise to join as a cooperating agency.

The NOP includes background information on the project, a description of the applicant’s proposal, the Forest Service Proposed Action, and a summary of potential project impacts. The NOP and the NOI can be viewed on the project website at the following link: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Public Scoping Meetings

The CPUC and Forest Service are holding two public scoping meetings to provide an opportunity for the public to learn about the project and to share any concerns or comments they may have. Please join us on either day or location listed below. Your attendance at one of these meetings will provide you with additional opportunities to learn more about the projects and to comment on the scope and content of the environmental information to be included in the Draft EIS/EIR.

Tuesday, October 22, 2013
Julian Elementary School
1704 Cape Horn
Julian, California 92036
5:00 p.m. to 7:00 p.m.

Wednesday, October 23, 2013
Alpine Community Center
1830 Alpine Boulevard
Alpine, California 91901
5:00 p.m. to 7:00 p.m.

Scoping Comments

At this time, the CPUC and Forest Service are soliciting information regarding the topics and alternatives that should be included in the EIS/EIR. The NOP will have an extended public review period (45 days) from September 23, 2013 to November 7, 2013. **All scoping comments must be received by November 7, 2013.** You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail (email), or (3) by attending one of the public scoping meetings and handing in written comments at the scoping meeting.

By U.S. Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIS/EIR to: Lisa Orsaba, California Public Utilities Commission/Will Metz, United States Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024.

By Electronic Mail: Email communications are welcome; however, please remember to include your name and return address in the email message. Email messages should be sent to cnfmsup@dudek.com, with a subject line "SDG&E Master Permit".

Additional Project Information

Internet Website. The NOP and information about this application and the environmental review process will be posted on the Internet at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

Project Information Hotline. You may request project information by leaving a voice message at 866.467.4727.

Document Repositories. Documents related to the MSUP/PTC Power Line Replacement Projects and the EIS/EIR will be made available in the repositories listed below.

Environmental Document Repositories

Location	Address	Telephone
Alpine Branch Library	2130 Arnold Way, Alpine, California	619.445.4221
Campo-Morena Village Branch Library	31356 Highway 94, Campo, California	619.478.5945
Descanso Branch Library	9545 River Drive, Descanso, California	619.445.5279
Pine Valley Branch Library	28804 Old Hwy. 80, Pine Valley, California	619.473.8022
Julian Branch Library	1850 Highway 78, Julian, California	760.765.0370
Ramona Branch Library	1275 Main Street, Ramona, California	760.788.5270
Dudek	605 Third Street, Encinitas, California	760.942.5147

California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O Box 121390
San Diego CA 92112-1390
info@cnpssd.org | www.cnpssd.org

October 23, 2013

Comments to USDA Forest Service and CA PUC

Re: Application No. A.12-10-009

SDG&E Master Special Use Permit to Construct Power Line Replacement Projects

Dear Agency Representatives:

I am speaking both as a private citizen and as a representative of the San Diego Chapter of the California Native Plant Society (CNPSSD). Thank you for this opportunity to comment on this application. In particular, we are concerned about SDG&E's proposals for altering the approximately 20-mile segment of 69kV Transmission Line 626 (TL) between the Inaja Memorial Picnic Site and areas north of Descanso.

Two years ago the USFS asked that SDG&E propose alternatives to this TL and others in the 2010 Master Permit application. During the intervening years, the USFS Cleveland National Forest (CNF) has purchased in-holdings within the National Forest Boundaries with the intended purpose of consolidating lands to create more ecologically sound boundaries for the proposed wilderness designation of these lands in the CNF's updated Plan, which is in the final stages of approval.

This land ownership change, and likely future land use, needs to be reflected in the configuration of TL626. There are even fewer users of TL 626 than before, while the risks of it causing a fire now would have even greater consequences to the CNF land. The presence of TL 626 as an overhead system is clearly undesirable for wilderness. It is also undesirable for the remaining ranch owners whose lives and livelihood are also at risk from wildfires caused by overhead lines.

Wilderness status is intended to protect animal and plant species that are being extirpated by development throughout San Diego County, and this powerline threatens the proposed wilderness. These lands are so inaccessible that thousands of acres have not even been surveyed by qualified botanists or zoologists. The actual species living in the lands that TL626 presently traverses are not even known. The presence of overhead transmission lines would be a perpetual threat to the survival of these plants, and their dependent animals.

For this reason the best place for the 69kV TL626 would be buried underground. A 69kV power line is relatively low-cost to place underground, compared to the costs to rate-payers for perpetual maintenance of overhead lines and liability if a wildfire is caused. It would continue to provide service to the very few customers still served by this powerline, reduce the long term



Dedicated to the preservation of California native flora

California Native Plant Society

liability of ratepayers for fire damage from overhead lines, and remove the damage to the watershed and vegetation that is being caused by maintenance of this line in very precipitous terrain.

SDG&E's alternative proposal, to re-route part of this transmission line out of proposed wilderness and onto private lands, is also undesirable. This would require more road-building and pad construction which the ratepayers would have to pay for, and that construction would further harm watersheds and vegetation. This route would also compromise exceptional lands that are not presently in the proposed wilderness designation because of private land ownership adjacent. One egregious outcome, if the alternative is accepted, would place poles on previously untouched land with extraordinary views and relics of ancient Native Peoples, who clearly treasured this site for that very reason. Re-routing TL626 would not alleviate the risk of fire from the powerlines. Re-routing TL626 to avoid public wilderness land conflicts doesn't solve anything, so this proposed alternative should be dismissed.

I also wish to notify the USFS and the CA PUC of a problem with SDG&E's current activities regarding TL626. Over the past few years CNPS members have visited proposed wilderness lands. In April 2013 on a field trip to view Cedar Creek, we witnessed grading related to TL626 by SDG&E. SDG&E had widened and lengthened existing maintenance access roads extensively. As a landscape architect I am competent to make the judgment that long stretches of road had grossly inadequate engineering to manage stormwater. Parts had even had been graded right across streambeds, including Cedar Creek. New spur access roads were graded to poles that previously were maintained from a footpath. Non-native invasive plant species, many of them highly flammable when dry, were flourishing all along the roads we visited, demonstrating further carelessness by SDG&E's failure to wash off equipment after work was done in weed-infested areas. In short, SDG&E has already proceeded modifying TL626 absent your approval, and done so with disregard for the land and natural resources in the public trust, creating consequences that are already damaging to the natural environment.

We hope to see all overhead segments TL626 that are currently over proposed wilderness lands placed underground in the footprint of Boulder Creek Road the near future, and all easements for the existing TL626 access roads and pads in those proposed wilderness lands terminated. The land that has already been graded should be restored to non-erosive conditions and revegetated. We hope that in the near future all this land will become parts of a chain of gem-like wilderness units for this and all future generations of people to treasure and protect.

Thank you for taking my input.

Sincerely,



Kay Stewart,

Board Member,

San Diego Chapter of the California Native Plant Society

Soitec Solar Projects Programmatic EIR (3910 120005 ER): Boulevard, 12-18-12
Scoping hearing: Rugged Solar; Tierra Del Sol Solar; LanWest Solar & LanEast Solar

Preliminary and incomplete list of concerns /issues / objections presented by Donna Tisdale: property owner; Chair, Boulevard Planning Group; Secretary, The Protect Our Communities Foundation; President, Backcountry Against Dumps: 619-766-4170; tisdale.donna@gmail.com; PO Box 1275, Boulevard, CA 91905

- Request 30 extension of the January 7th comment deadline.
- Just these 4 industrial scale export energy projects represent 8,938,000 sq ft of 30 feet tall view blocking dual axis tracking Concentrating PV super modules--equivalent to approximately 48.32 Walmart Supercenters that average 185,000 sq ft.
- They are inconsistent and in conflict with Boulevard's vision, goals and policies as documented in Boulevard Community Plan that was approved on August 3, 2011 by the Board of Supervisors with the General Plan Update—after over a decade of hard work on a region wide level.
- Plan Amendments made to benefit commercial interests at the expense of resident and other non-participating land owners and resources is biased, unnecessary, and unjustified.
- Adverse impacts to Historic Route 80, scenic and open viewsheds, bucolic views of grazing livestock, abundant wildlife, and overall appealing rural community character.
- Conversion of over 1,400 acres land zoned for agriculture and residential uses that will reduce future land use opportunities that are more compatible with community character, including vineyards, and large lot residential subdivisions (LanWest site had previous subdivision map)
- Additional subject areas that must be added to County's current list to be analyzed in this PEIR: Lack of Need for project; point of use alternatives; environmental justice issues including disproportionate adverse and cumulative impacts; noise, low frequency noise and vibrations; seismic impacts including historic 7.8 Laguna Salada Earthquake in 1892¹ that created land ruptures in McCain Valley and soil liquefaction and rock slides in Jewel Valley and throughout the backcountry; health and safety; electrical pollution, increased ground currents, and trespass including through the air, common utility and/or ground connections and; increased risk of electrical sparked wildfires; need to change fire fighting tactics, suppression medium, and overall services; amounts and location of storage of transformer oil that can fuel fires and impact ground water quality (including mineral oil); safe setbacks; glint and glare; heat radiation / heat island effects and potential to impact microclimates, change storm / weather patterns, divert or deny groundwater recharge; socio-economic impacts on impacted residents and unwilling host community; increased insurance fire and property insurance rates; recreation
- Connected and Indirect Action projects including new gen-tie lines and off-site substation upgrades. Some project right of ways are not yet fully secured or disclosed.
- All Cumulative impact projects must be addressed including SolOrchard's newly proposed solar project at Tule Jim Road and Historic Rt 80 (PDS2012-MUP-12-025).
- Disclosure and clarification of liabilities of participating land owners in the event of off-site damages, nuisance, loss of property value, use and enjoyment; and how does non-profit/ charity land ownership impact liability for damages and nuisance?
- Full disclosure of all tax and rate payer funded incentives, sales and use tax exclusions, green energy credits, refunds, reduced or waiver of fees, regulations or requirements.
- Full disclosure of proposed Community Service District and potential renewable energy zone overlay; and proposed Renewable Energy Infrastructure Zone meant to further benefit and enrich applicants at the expense of non-participating property owners.
- Need for independent 3rd party applicant funded documentation of pre-and post-construction ambient noise, ground currents, groundwater levels at adjacent non-participating property lines at existing residences and other occupied structures, livestock grazing and watering areas, within public access areas, and all wells on adjacent properties. Electrical Magnetic Interference can damage living beings and sensitive equipment including well pumps.

¹ http://earthquake.usgs.gov/earthquakes/states/events/1892_02_24.php

From: Cindy Buxton <iokuok2@hotmail.com>
Sent: Wednesday, October 23, 2013 2:23 PM
To: jaheys@fs.fed.us; Bjorn Fredrickson; Joan Friedlander; Will Metz; CNFMSUP
Subject: re SDG&E Master Permit
Attachments: AntMtSunset.JPG; AntSpringCanyon1.jpg; AntSpringCanyon2.jpg;
AntSpringCanyoncloser1.jpg; AntSpringCanyoncp.jpg; AntSpringCanyoncp1.jpg;
AntSpringCanyonForestBoundary.jpg; AntSpringCanyonForestBoundary2.jpg;
AntSpringCanyonForestBoundarycp.jpg; BurnedPineForestnearInaja.jpg;
CuyamacaSunsetfromInaja.JPG; EaglePeakandSunshine.jpg;
EaglePeakandSunshine2.jpg; flintpitincanyon.JPG; MiddlePeakastSunset.JPG;
panNearMarston.jpg; USSurveyMarkerMarkspinktriangle (2).JPG

Please include with my comments so far. These were taken about two-three years ago showing the area of Cedar Gorge where the USFS meets the lower end of the Inaja Reservation. I have more pics down in the gorge as I can find them. There are some additional photos taken from the side of the mountain on the eastern edge of the USFS. I think if you observe upstream into Inaja you can see the continuity of the character of Cedar Gorge as it continues especially unspoiled into the reservation. If the reservation wants power and this is the ideal time then they could be accommodated; but I do not think crossing Cedar Gorge in the remote canyon is either acceptable or warranted. Anything in Inaja needs to stick very close to Boulder Creek road with exceptional care, most preferably in that potential would seem to be underground.

The study area as it leads north from Inaja Reservation seems to come close to another line leading in from the north. (?) We have observed pairs of large raptures, presumably Golden Eagles throughout the upper Cedar Gorge as recently as two weeks ago. I would speculate on at least 3-4 nests being cycled in the area by a pair. There is another golden eagle more or less confirmed seen from time to time soaring near the Green Ranch that was in the videos I'll link again here. The Green Ranch is on the western end of the McCoy Ranch. I couldn't find Debra Hobb's email, if someone could please forward.

<http://www.youtube.com/watch?v=2bQnCMrIGd4>

<http://www.youtube.com/watch?v=5MYAQzpDBcU>

Thank you for reviewing.

Cindy Buxton
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

Cindy has a file to share with you on SkyDrive. To view it, click the link below.



[photoessayIn Opposition to Master PermitnewRow.docx](#)



AntMtSunset.JPG



AntSpringCanyon1.jpg



AntSpringCanyon2.jpg



AntSpringCanyoncp.jpg



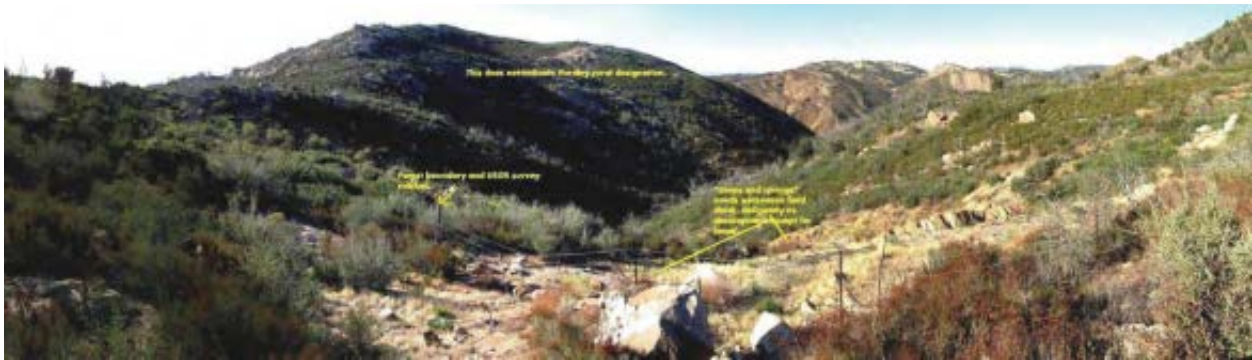
AntSpringCanyoncloser1.jpg



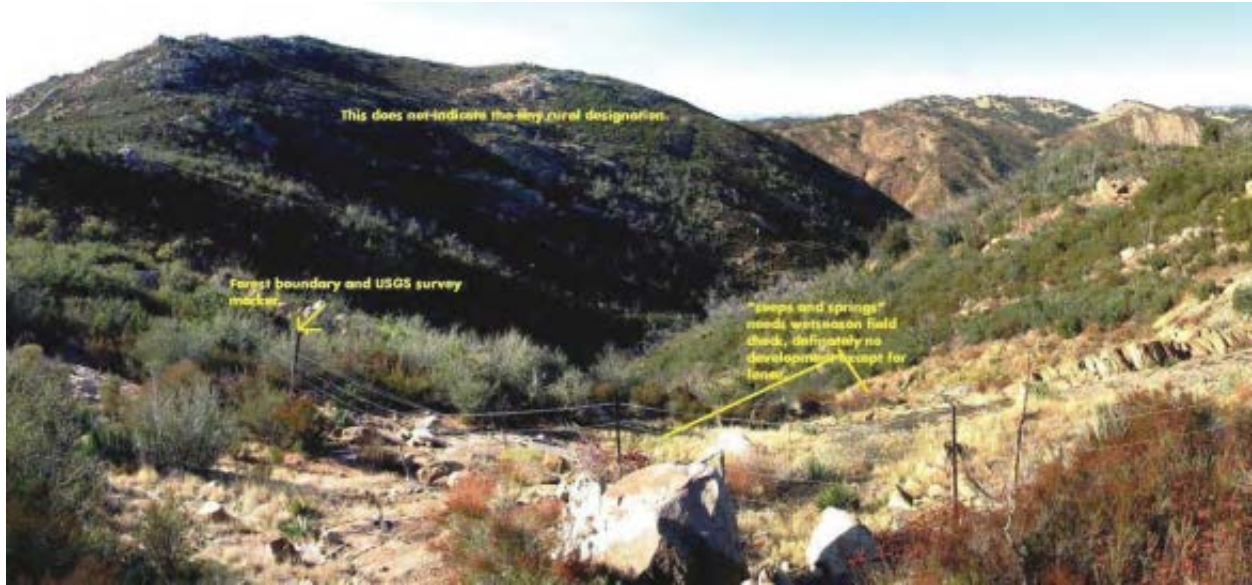
AntSpringCanyoncp1.jpg



AntSpringCanyonForestBoundary.jpg



AntSpringCanyonForestBoundary2.jpg



AntSpringCanyonForestBoundarycp.jpg



BurnedPineForestnearInaja.jpg



CuyamacaSunsetfromInaja.JPG



EaglePeakandSunshine.jpg



EaglePeakandSunshine2.jpg



flintpitincanyon.JPG



MiddlePeakasSunset.JPG



panNearMarston.jpg



USSurveyMarkerMarkspinktriangle (2).JPG

From: [Cindy Buxton](#)
To: jaheys@fs.fed.us; [Bjorn Fredrickson](#); [Joan Friedlander](#); [Will Metz](#); [CNFMSUP](#)
Cc: kelly@kellyfuller.net; [Molly Bigger](#); [kay taff](#)
Subject: RE: re SDG&E Master Permit
Date: Wednesday, October 23, 2013 3:07:49 PM
Attachments: [CuyamacaPanFromWestMineralHillsm.jpg](#)
[PanGreenandMcCoyRanchfromMineralHillsm.jpg](#)

Please include with my comments so far on this project. These are photos of the same area as the former video sent today.

The Green Ranch contains a "woods" a waterfall and some historical areas that should not be disturbed. There is a "woods" of enormous oak trees and very old rock wall, given the history I think it is possible the woods has not been cut before, aka a small virgin "forest", and serves as a small remnant of what the fully unspoiled condition can achieve. You DON't want anything happening to this. There are several small streams, one in particular, that come together to form Johnson Creek . It has some interesting and rather sad history. I don't know how you acquire a satisfactory ROW in the area, the current one is not particularly great either it just is already there. If one exists it would be very close to Boulder Creek Road to avoid bot ecological features as well as considerable historical ones. There is a lot going on in this area even though it may not be obvious at first. On up is an old school house ruins , the Anahuac School house where ranch and indian children when to school in a one room school house.

Of the given "evils" this is a hair better than going to the east. Considering that our county is the size of three states it seems ridiculous that this is the only thing that could be done. I'm still firm that the best by far is to remove this line.

As mentioned prior there are nesting Golden Eagles in the area. The entire study area is very popular with hikers, hunters and the public for many reasons. Scenic Integrity should be considered carefully. I have larger formats if requested.

Thank you for reviewing.

Cindy Buxton
Chair Forest Committee, San Diego Sierra Club
8304 Clairemont Mesa Blvd, #101
San Diego, CA 92111

Cindy has a file to share with you on SkyDrive. To view it, click the link below.

 photoessayIn Opposition to Master PermitnewRow.docx



CuyamacaPanFromWestMineralHillsm.jpg



PanGreenandMcCoyRanchfromMineralHillsm.jpg

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov
Cc: [CNFMSUP](#)
Subject: CPUC regulations and power pole height
Date: Thursday, October 24, 2013 4:15:44 PM

Dear Ms. Orsaba,

At a public meeting for SDG&E's Master Special Use Permit project, I mentioned that I am trying to find out if the CPUC has published regulations that result in replacement power line poles needing to be taller than the poles they are replacing, due to a regulatory change the Commission made related to fire safety.

It was suggested by SDG&E staff during the TL-637 wood-to-steel public meeting in Ramona that they were building taller replacement poles because of such a rule change. The SDG&E staff thought that this had to do with separation between phases. Such a regulation would presumably also apply to A.12-10-009, which is also proposed to have taller poles. Lon Payne very kindly sent me GO-95 so that I could look up the regulation, but I have been unable to find such a regulation in it. At 588 pages, it is also possible the regulation is in GO-95 but I missed it, since I didn't know precisely what to look for.

My intent is to find out if complying with CPUC regulation would indeed require taller poles than the ones currently in use, and that is why I am trying to find the regulation. Is there someone at the CPUC who could answer whether taller replacement poles are required and if so, also point out the specific regulation?

Many thanks,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

OCT 31 2013



October 29, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Master Special Use Permit and Permit to Construct

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of CONNECT to express my support for SDG&E's request for a Master Special Use Permit and Permit to Construct for Power Line Replacement Projects in Cleveland National Forest (CNF). We believe these projects are needed to help improve the reliability and integrity of the electric system within CNF and the surrounding areas, and to enhance safety during fire season.

CONNECT is a regional program that promotes the creation of innovative technology and life sciences products in the San Diego region by linking inventors and entrepreneurs with the resources they need to succeed. As such, electric reliability is extremely important to our organization. SDG&E's proposed Power Line Replacement Projects will help enhance reliability by replacing more than 1,800 wood poles with fire resistant, weatherized steel, as well as 12 kilovolt (kV) and 69 kV electric facilities throughout eastern San Diego County.

SDG&E's proposed infrastructure improvements will also enhance safety during fire season by using taller steel poles and placing them farther apart than the existing wood structures. This wider distance will bolster safety during high wind conditions and require less maintenance. Additionally, increasing the number of state-of-the-art weather stations in the area will help SDG&E track weather patterns during high-risk conditions. Fire season is a very serious issue for CONNECT and for the region as a whole. We support any and all steps that can be taken to prevent wildfires from occurring.

Thank you very much for the opportunity to express our support for SDG&E's Power Line Replacement Projects in CNF. We urge you to approve these important projects to ensure safety and reliability for our region.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyler Orion", written over a light blue circular stamp.

Tyler Orion
Interim President

NOV 04 2013



Delivering Renewable Power

October 29, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

RE: Support a Safe Electric Transmission System through Cleveland National Forest

Dear Ms. Orsaba and Mr. Metz:

I am writing to share my support for San Diego Gas and Electric's (SDG&E's) request for a Master Special Use Permit and Permit to Construct for Power Line Replacement Projects (Projects) in Cleveland National Forest (CNF). As you know, these Projects will improve the safety and reliability of the existing electric transmission system in East County, particularly CNF.

I am the Vice President of Resource & Real Estate Assets at EnergySource, LLC. We develop, construct, own and operate utility scale geothermal power plants near the Salton Sea in California's Imperial Valley. Protecting San Diego's East County is crucial to our business and the residents that we serve. These Projects are critical for the quality of life for nearby residents and businesses, as well as for the well-being of visitors that travel to CNF for recreation.

The Projects will replace an estimated 1,800 wood power poles with fire-resistant weatherized brown steel poles that look similar to the existing poles, but will be much stronger and fire resistant in the case of a wildfire. Additionally, SDG&E will rebuild five power lines and six existing distribution lines and make necessary safety improvements. Together, the proposed Projects and some planned operational changes will enhance the delivery of electricity within and near CNF.

Safety is a primary goal in areas of high-risk weather conditions, and I am pleased that SDG&E is investing in updated technologies that will increase the safety and reliability of the electric transmission system. I encourage you to review these proposals and for your timely approval these important Projects

Sincerely,

A handwritten signature in blue ink, appearing to read "Vincent J. Signorotti".

Vincent J. Signorotti

Vice President, Resource & Real Estate Assets

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us; [CNFMSUP](#)
Cc: [Donna Tisdale](#); [Bill Powers](#)
Subject: SDG&E Special Use Master Permit: document access and comment deadline
Date: Tuesday, October 29, 2013 11:04:14 AM
Attachments: [A.12-10-009_POC_2013-10-29.pdf](#)

Dear Ms. Orsaba and Mr. Metz:

The attached letter from The Protect Our Communities Foundation (POC) describes a serious problem with public access to hard copy documents for SDG&E's Master Special Use Permit project and a proposed solution. POC also respectfully requests that the scoping comment deadline be extended by three weeks due to this access problem and an additional noticing problem described in the letter.

The hard copy access issue explained in the letter is not hypothetical. POC is directly affected by it and it is influencing our ability to write scoping comments within the scoping comment deadline. For example, I personally am on satellite internet and have data access restrictions.

If there are any problems opening the letter or if you have questions, please contact me.

Thank you for your consideration of POC's requests.

Sincerely,

Kelly Fuller
Consultant to The Protect Our Communities Foundation
(619) 659-5133
(202) 641-3493 (cell)
kelly@kellyfuller.net



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

October 29, 2013

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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: SDG&E's Master Special Use Permit – Document Access and Scoping Comment Deadline

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of The Protect Our Communities Foundation (POC) regarding problems with public access to documents about SDG&E's proposed Master Special Use Permit project and the due date for scoping comments. **POC requests that hard copies of the project's revised Plan of Development (including maps and all appendices) be placed in the project's repository libraries immediately, that an expanded list of communities in the project's vicinity be published, and that the scoping comment period be extended by three weeks.**

At the joint California Public Utilities Commission (CPUC)-Forest Service public meetings last week, members of the public were directed to local libraries if they wanted to see project maps and other Plan of Development documents in hard copy. In addition, the project's Public Notice and Notice of Preparation state that documents related to the project will be made available at a list of repositories (certain San Diego County libraries and Dudek's Encinitas office). However, POC has since learned that SDG&E's Plan of Development was never delivered to those libraries, and only the 23-page Notice of Preparation is available there.

This poses a serious problem for local residents who are trying to access the project's revised Plan of Development. The project study area is not in the City of San Diego, where residents can access the internet at home via fast broadband services, but in the County's rural area, much of which is served by satellite or dialup internet services only. Typically satellite internet services are expensive, slow, and do not allow unlimited data access. Dialup internet is less expensive, but even slower. As a result, many people in rural areas simply do not use the internet, if they are fortunate enough to have it in their homes, which many people do not, in the same way that people in city areas do. Due to speed limitations and costs, they try to avoid file downloads. In the case of the Master Special Use Permit, the full Plan of Development and its maps and appendices comprise 33 files to be downloaded.

In addition, this lack of hard copy Plans of Development in the designated library repositories means that residents who are not computer literate have been excluded from access, except for the few hours

that the revised Plan of Development notebooks and map boards were available for public inspection during the two scoping meetings last week.

The fact that hard copy Plans of Development are not available in the repository libraries appears to have been an inadvertent oversight. POC would like to see this corrected and the public given more time to comment once those documents are in the libraries, in order to ensure a robust public process.

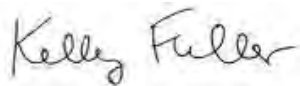
Doing so would also give the CPUC and the Forest Service the chance to correct a problem with the noticing of this project. The list of communities in the vicinity of the project in the Public Notice, Scoping Notice, and presentation given during last week's public meetings left out many communities that will be impacted. The abbreviated list of nearby communities will likely decrease public participation in scoping because some affected members of the public will not see their community listed, thus will not know they are be affected, and are as a result are less likely to submit scoping comments. The current written list of communities only includes Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs. However, at a minimum, the following communities should be added: Alpine, Boulevard, Guatay, Lake Morena, Mt. Laguna, and Pine Valley. There may be others as well, given the size of the affected area and the fact that some local communities extend well beyond the central "village" that is marked on maps.

POC would like to see as much public involvement as possible at this early stage because of a lesson learned during the Sunrise Powerlink. Project routes changed, and as a result, many members of the public did not learn they would be affected until late in the process, when there were fewer opportunities for involvement. During the public meetings for the Master Special Use Permit project last week, both the CPUC and the Forest Service acknowledged that aspects of this project too may change.

In conclusion, POC respectfully requests that the barriers to public involvement that we have identified in this letter be corrected immediately and that the public be given an additional three weeks to comment, in order to improve the outcome of this project by increasing the inclusiveness of public participation. We also request that you provide an answer to our letter.

Thank you very much for your consideration of our requests.

Sincerely yours,



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

NOV 04 2013

S.O.R.E.
(Save Our Rural Economy)
P.O. Box 455
Campo, CA 91906
(619) 478-1023

October 29, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

RE: Support SDG&E's Efforts for a Safer Electric Transmission System in Cleveland National Forest

Dear Ms. Orsaba and Mr. Metz:

Thank you for this opportunity to share my strong support for San Diego Gas and Electric's (SDG&E) plans to improve the safety and delivery of electricity to people, like myself, working and living near the Cleveland National Forest (CNF). I understand that the USFS and the CPUC will be reviewing the project's environmental documents for approval, and I appreciate your important work to ensure the transmission lines through CNF are safe and reliable.

Not only am I a property owner in the nearby Campo area, I am also the head of a non-profit called Save Our Rural Economy (S.O.R.E.). We support projects that increase property values and protect population growth, housing, farming and industry, and the environment.

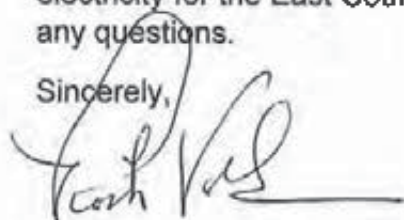
SDG&E's projects will rebuild our area's power and distribution lines and replace 1,800 wood power poles with fire-resistant brown steel poles that will increase safety and electric reliability for families and businesses by helping protect us from large wildfires that can occur in the arid East County climate.

I am also pleased the projects include community outreach, new fire prevention measures and enhanced emergency response. I am hopeful this work will generate local jobs and put our friends, neighbors, and family members to work.

Thank you very much for the opportunity to comment on SDG&E's critical projects in CNF. I encourage you to approve these important projects to ensure safe and reliable

electricity for the East County community. Please contact me at (619) 299-6091 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Volker", with a long horizontal flourish extending to the right.

Rich Volker

Chairman, S.O.R.E

From: [Cindy Buxton](#)
To: kelly@kellyfuller.net; lisa.orsaba@cpuc.ca.gov; [Will Metz](#); [CNFMSUP](#); [donna.tisdale](#); [Bill Powers](#); [Molly Bigger](#); [kara.liederman](#)
Subject: RE: SDG&E Special Use Master Permit: document access and comment deadline
Date: Tuesday, October 29, 2013 11:57:15 AM

I had been concerned about the same general issue, Thank you, Kelly for speaking up. On Behalf of the Forest Committee for the San Diego Chapter of the Sierra Club, as authorized to speak on this and other forest issues, we support this request.

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

1964 - 2014 Civil Rights 50 ~ Wilderness 50

From: kelly@kellyfuller.net
To: iokuok2@hotmail.com
Subject: FW: SDG&E Special Use Master Permit: document access and comment deadline
Date: Tue, 29 Oct 2013 11:04:42 -0700

fyi

From: Kelly Fuller [mailto:kelly@kellyfuller.net]
Sent: Tuesday, October 29, 2013 11:04 AM
To: 'lisa.orsaba@cpuc.ca.gov'; 'wmetz@fs.fed.us'; 'cnfmsup@dudek.com'
Cc: Donna Tisdale (tisdale.donna@gmail.com); Bill Powers (bpowers@powersengineering.com)
Subject: SDG&E Special Use Master Permit: document access and comment deadline

Dear Ms. Orsaba and Mr. Metz:

The attached letter from The Protect Our Communities Foundation (POC) describes a serious problem with public access to hard copy documents for SDG&E's Master Special Use Permit project and a proposed solution. POC also respectfully requests that the scoping comment

deadline be extended by three weeks due to this access problem and an additional noticing problem described in the letter.

The hard copy access issue explained in the letter is not hypothetical. POC is directly affected by it and it is influencing our ability to write scoping comments within the scoping comment deadline. For example, I personally am on satellite internet and have data access restrictions.

If there are any problems opening the letter or if you have questions, please contact me.

Thank you for your consideration of POC's requests.

Sincerely,

Kelly Fuller
Consultant to The Protect Our Communities Foundation
(619) 659-5133
(202) 641-3493 (cell)
kelly@kellyfuller.net

From: [Cindy Buxton](#)
To: [CNFMSUP](#); [Robert Hawkins](#); [Will Metz](#); lisa.orsaba@cpuc.ca.gov
Subject: Re: SDG&E Master Permit
Date: Thursday, October 31, 2013 5:41:24 PM

Hi Bob, Lisa, Will , Dudek, Ritka,

1) Do you have an electronic copy of the USGS version of the 626 routing map-the one you gave me at the Alpine Scoping?

Many thanks for checking. I am wanting to provide my photos with numbers on that map as to where they are and how they face.

2) I'm looking over the thread from Kelly Fuller concerning availability of information in the libraries and offices. Can you confirm that everything in the libraries are also on the CPUC web site, or can you identify if there is additional information in hard copy at these locations not published on the CPUC site?

3) Is there an opportunity to consolidate the line around Barrett Lake with portions of the Sunrise infrastructure thus removing the line in places altogether? That would include in McAlmond Canyon , up towards Lake Morena, and up through Deer Horn Valley and Lyons Valley. Can you explain?

4) what is the Sparking mitigation for the double circuit, How far off of the ground required and separation?

5) Do you have a map that is sharable of the infrastructure showing all of the public lines in the project area?

6) I forget what I send and what I haven't, somethings get half started only to be redone before they ever get to the send button. Not sure if I mentioned this or not, Are you aware that the wind currents around Cuyamaca and the Boulder Creek Road area create small "tornado" phenomenon. More precisely mega dust devils, large enough to lift a 20 pound object for a couple hundred yards, and covering up to 5 acres? I just heard about them too, but the fact is the winds dropping off of Cuyamaca are not steady they are erratic and whip in all directions at times, obviously the point is it is not a quality place for construction. Trailers that are not tied down always end up going over out there, it is a given.

7) Can you explain what a lightning arrestor is? Is it different than just the insulator or the

ground? Where do you use these?

8) Can you provide more information on the efficiency of the proposal. How does it operate under light load, heavy load, at optimal temperature around *270, what is the energy loss?

9) Can you reconfirm the temperature?

More to come..

thanks!

Cindy Buxton

From: [Cindy Buxton](#)
To: [Rica Nitka](#); [CNFMSUP](#); [Robert Hawkins](#); [Will Metz](#); lisa.orsaba@cpuc.ca.gov
Subject: RE: SDG&E Master Permit
Date: Friday, November 01, 2013 5:37:07 PM

Thank you for the information below containing the current USFS topo map version. Please note there remain several questions outstanding.

In reviewing the proposal at Viejas, Attachment B.6, for line C78 Map overview, I'm noticing that you are changing the ROW of his line from a straight line to one that runs back and forth across the existing one. Could you explain why this is?

Thank you for answering this question.

Cindy Buxton
Chair Forest Committee, San Diego Sierra Club

From: rnitka@dudek.com
To: iokuok2@hotmail.com; CNFMSUP@dudek.com; rhawkins@fs.fed.us; wmetz@fs.fed.us; lisa.orsaba@cpuc.ca.gov
Date: Fri, 1 Nov 2013 12:24:07 -0700
Subject: RE: SDG&E Master Permit

Hi Cindy,

Thank you for your email and numbering your questions.

The CPUC [project website](#) includes the maps that were available at the MSUP/PTC Power Line Replacement Projects scoping meetings last week (please click on the links provided in the Background paragraph – the USGS map you requested is in the link titled “USGS topographic map”). In addition, the website identifies the locations of where the Notice of Preparation (NOP) and SDG&E’s Permit to Construction Application and Plan of Development ([POD](#)) are available.

Your questions and previous submittals received during the scoping period (September 23 – November 7, 2013) will become part of the scoping administrative record and considered in identifying the environmental issues and alternatives to be addressed in the Draft EIR/EIS.

Thank you,

Rica Nitka

Project Manager

DUDEK

605 Third Street

Encinitas, CA 92024

Office: 760.479.4294 | Mobile: 760.420.2820

www.dudek.com / www.facebook.com/dudeknews

From: Cindy Buxton [mailto:iokuok2@hotmail.com]

Sent: Thursday, October 31, 2013 5:41 PM

To: CNFMSUP; Robert Hawkins; Will Metz; lisa.orsaba@cpuc.ca.gov

Subject: Re: SDG&E Master Permit

Hi Bob, Lisa, Will , Dudek, Ritka,

1) Do you have an electronic copy of the USGS version of the 626 routing map-the one you gave me at the Alpine Scoping?

Many thanks for checking. I am wanting to provide my photos with numbers on that map as to where they are and how they face.

2) I'm looking over the thread from Kelly Fuller concerning availability of information in the libraries and offices. Can you confirm that everything in the libraries are also on the CPUC web site, or can you identify if there is additional information in hard copy at these locations not published on the CPUC site?

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Are you aware that the wind currents around Cuyamaca and the Boulder Creek Road area

create small "tornado" phenomenon. More precisely mega dust devils, large enough to lift a 20 pound object for a couple hundred yards, and covering up to 5 acres? I just heard about them too, but the fact is the winds dropping off of Cuyamaca are not steady they are erratic and whip in all directions at times, obviously the point is it is not a quality place for construction. Trailers that are not tied down always end up going over out there, it is a given.

7) Can you explain what a lightning arrestor is? Is it different than just the insulator or the ground? Where do you use these?

8) Can you provide more information on the efficiency of the proposal. How does it operate under light load, heavy load, at optimal temperature around *270, what is the energy loss?

9) Can you reconfirm the temperature?

More to come..

thanks!

Cindy Buxton



MOUNTAIN HEALTH

Locations

Mountain Empire Family Medicine

Campo
31115 Highway 94
Campo, CA 91906
(619) 478-3111
Fax (619) 478-2267

Alpine Family Medicine

Alpine
1620 Alpine Boulevard
Alpine, CA 91901
(619) 445-6200
Fax: (619) 320-3343

Escondido Family Medicine

Escondido
255 N. Ash Street, Ste. 101
Escondido, Ca 92027
(760) 745-5832
Fax (760) 745-7847

25TH Street Family Medicine

San Diego
316 25th Street
San Diego, Ca 92102
(619) 238-5551
(619) 238-3807

Mountain Empire Community Center

Campo
976 Sheridan Rd.
Campo, CA 91906
(619) 478-2384
Fax: (619) 9473

November 1, 2013

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

Subject: Support for SDG&E's Power Line Replacement Projects

Dear Last Name:

Mountain Health & Community Services, Inc. (MHCS) is pleased to announce our support for San Diego Gas & Electric's (SDG&E) Master Special Use Permit and Permit to Construct for Power Line Replacement Projects in and adjacent to the Cleveland National Forest.

MHCS supports these projects because they provide direct benefits to the region's residents, businesses, and recreational enthusiasts within the Cleveland National Forest and surrounding communities by enhancing public safety, improving the integrity of the electric system and limiting environmental impacts.

MHCS is eager for the U.S. Forest Service and the California Public Utilities Commission to approve the projects so SDG&E can begin the vital task of replacing wood poles with new steel poles.

Please feel free to contact me if you would like to discuss further at (619) 445-6200 ext. 160.

Regards,

Judith Shaplin, CEO/President
Mountain Health & Community Services, Inc.



CALIFORNIA PUBLIC UTILITIES COMMISSION / UNITED STATES FOREST SERVICE



**San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

(please print)

Name: Judith Shaplin, CEO

Organization (if any): Mountain Health & Community Services, Inc

Do you have authorization to represent this Organization? Yes: No:

Address: 31115 Hwy 94

City, State, Zip: Campo, CA 91906

E-mail: assistant@mtwhealth.org Telephone: 619-445-6200 x160

Would you like a copy of the environmental document? No: Yes: CD Hard Copy

Written Comments

(please print)

Multiple horizontal lines for writing comments.

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; [CNFMSUP](#)
Cc: ["Hawkins, Robert H -FS"](#)
Subject: MSUP scoping comment period
Date: Monday, November 04, 2013 7:48:19 PM

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

The Protect Our Communities Foundation continues to be very concerned that the scoping period for SDG&E's Master Special Use Permit has been not extended, for the following reasons:

1. There are going to be significant impacts on communities that are not even listed in the CPUC/Forest Service public outreach materials and who therefore don't know that they should be participating in the process
 - For example, once I was able to look at the hard copy maps, I saw that the rural part of Alpine will have three helicopter fly yards, yet Alpine was not a listed community. Rural Alpiners commonly have cattle, horses, and goats. Helicopter flights are something they are going to want to know about, so they can ask questions about the flight routes and see if they and their animals will be affected. There was community suffering, especially in the El Monte area, from helicopter construction during the Sunrise Powerlink. It appears from the revised Plan of Development that SDG&E plans to ask for the same helicopter use conditions that it did during Sunrise, and that is of concern.
 - There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.

- The Sunrise Powerlink is very much a living memory in the southern San Diego back country. There is a great deal of distrust of SDG&E because of what happened during the Sunrise Powerlink process. People still talk about it and are still upset by it. They are not going to take a “just trust us” attitude toward this project, no matter how noble the goal. They need a real chance to be honestly engaged if they are going to have any trust in the process.
 - These southern back country communities are getting bombarded by energy projects and that is also increasing their distrust. Boulevard has at least five renewable energy projects proposed in and around it, plus another wood to steel power pole project (TL 6931, A.12-12-007). Boulevard will be affected by the Master Special Use Permit project, but wasn't listed in the outreach materials. The nearest repository to Boulevard with a hard copy of the revised Plan of Development is 35 miles away.
3. Now is the most critical time for communities to give the agencies comments, while you are still shaping the project alternatives for the EIR/EIS:
- If the communities come up with any large, constructive changes that they – and you -- want analyzed, that can be accommodated most easily now, during scoping. It's much harder to accommodate a great idea that would improve the project during the draft EIR/EIS comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.
 - The comment period has only been the Forest Service's ***minimum*** 45 day period under NEPA for EIS scoping, so we haven't maxed out on time yet.

In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; CNFMSUP
Cc: "Hawkins, Robert H -FS"
Subject: RE: MSUP scoping comment period
Date: Tuesday, November 05, 2013 8:05:56 AM

Lisa,

I need to amend one statement in the email below. The statement about the processes for notifying the public about scoping having met legal requirements was meant as a reference to what The Protect Our Communities Foundation knows about where the scoping notices were made public and who was notified. It was not intended as a blanket statement certifying that everything about the way scoping has been noticed has met all legal requirements. It would have been better expressed as "appear to have met legal requirements based on what The Protect Our Communities Foundation knows at this time."

Sometimes these details matter later on, so I want to be clear.

Thank you,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: Kelly Fuller [mailto:kelly@kellyfuller.net]
Sent: Monday, November 04, 2013 7:48 PM
To: lisa.orsaba@cpuc.ca.gov; Master Special Use Permit email (CNFMSUP@dudek.com)
Cc: 'Hawkins, Robert H -FS'
Subject: MSUP scoping comment period

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

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1. There are going to be significant impacts on communities that are not even listed in the CPUC/Forest Service public outreach materials and who therefore don't know that they should be participating in the process
 - For example, once I was able to look at the hard copy maps, I saw that the rural part of Alpine will have three helicopter fly yards, yet Alpine was not a listed community. Rural

Alpiners commonly have cattle, horses, and goats. Helicopter flights are something they are going to want to know about, so they can ask questions about the flight routes and see if they and their animals will be affected. There was community suffering, especially in the El Monte area, from helicopter construction during the Sunrise Powerlink. It appears from the revised Plan of Development that SDG&E plans to ask for the same helicopter use conditions that it did during Sunrise, and that is of concern.

- There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.
 - The Sunrise Powerlink is very much a living memory in the southern San Diego back country. There is a great deal of distrust of SDG&E because of what happened during the Sunrise Powerlink process. People still talk about it and are still upset by it. They are not going to take a "just trust us" attitude toward this project, no matter how noble the goal. They need a real chance to be honestly engaged if they are going to have any trust in the process.
 - These southern back country communities are getting bombarded by energy projects and that is also increasing their distrust. Boulevard has at least five renewable energy projects proposed in and around it, plus another wood to steel power pole project (TL 6931, A.12-12-007). Boulevard will be affected by the Master Special Use Permit project, but wasn't listed in the outreach materials. The nearest repository to Boulevard with a hard copy of the revised Plan of Development is 35 miles away.
 3. Now is the most critical time for communities to give the agencies comments, while you are still shaping the project alternatives for the EIR/EIS:
 - If the communities come up with any large, constructive changes that they – and you -- want analyzed, that can be accommodated most easily now, during scoping. It's much harder to accommodate a great idea that would improve the project during the draft EIR/EIS

comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.

- The comment period has only been the Forest Service's ***minimum*** 45 day period under NEPA for EIS scoping, so we haven't maxed out on time yet.

In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: [Donna Tisdale](#)
To: lisa.orsaba@cpuc.ca.gov; rhhawkins@fs.fed.us
Cc: [CNFMSUP](#); [Jacob, Dianne](#); [Wardlaw, Mark](#)
Subject: Request to extend comment period PTC No. 12.10.009 MSUP
Date: Tuesday, November 05, 2013 11:17:35 AM
Attachments: [Kumeyaay Wind County to SDGE 3-15-11.pdf](#)
[Kumeyaay Wind non-op June-Aug 2012.pdf](#)

Hello Ms Orsaba and Mr Hawkins,

Please consider this a formal request for a 2-4 week public comment extension of SDG&E's PTC Application No. 12.10.009 and USFS Master Special Use Permit to allow impacted rural communities, that were not disclosed in the notice, to have time to better review and comment on "the whole" of this major project and the perceived segmentation of related / connected action projects.

Our communities are still raw from SDG&E's construction of the Sunrise Powerlink through and over our neighborhoods and business districts and current controversial use of precious groundwater resources from our federally designated sole source aquifer for construction of their \$435 M ECO Substation project.

As I stated at the public meeting in Alpine, the Boulevard Planning Area was left out of the public notices for SDG&E's project even though SDG&E's project lines run through the Boulevard Planning Area to the west and east of the Crestwood Substation that is located on Campo tribal lands adjacent to Historic Route 80. Helicopter fly yards and undisclosed travel routes will also impact many residences and sensitive habitat.

Due to the failure by the CPUC and Forest Service to include Boulevard as an impacted community, we were late to realize that our community will be subjected to the disruption created by this project, potentially related SDG&E projects, and numerous proposed energy projects that appear to be undisclosed connected action projects with direct, indirect and cumulative impacts along TL629 between Descanso and Boulevard.

Please note the attached 2005 San Diego County letter to SDG&E regarding failure to disclose all the impacts from the reconductoring project of the same TL629 E for the Kumeyaay Wind project--including noise from the two 1.6MW generators that would be used while our community was taken off-grid for 3-4 months!

How many days will service be cut to residents during this project?

We watched as TL629 was reconductered last year. According to an employee of the 50MW Kumeyaay Wind facility that I spoke with, that SDG&E project resulted in several weeks of partial /full shutdown of those 25-2MW turbines between June and August 2012.

Why was TL629 reconductered in 2012 and why is additional reconductoring needed now?

SDG&E has a very bad reputation for failure to fully or honestly disclose significant and cumulative impacts to our most low-income rural communities.

Regards

Donna Tisdale, Chair
Boulevard Planning Group
619-766-4170



GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ • SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. • SIXTH FLOOR
EL CAJON, CA 92020-3912

(619) 441-4030

March 15, 2005

Mr. Dashiell Meeks
San Diego Gas and Electric
8315 Century Park Court
San Diego, California 92123

Dear Mr. Meeks:

The County of San Diego has learned of a San Diego Gas & Electric (SDG&E) project that could impact County residents and County lands and is writing to present our concerns. The project, the Crestwood-Boulevard Tap 69kV Reconductor TL629 E, is proposed to increase the carrying capacity of the existing electrical transmission facilities to accommodate the electricity to be generated by the Kumeyaay Wind Energy Facility proposed on the Campo Indian Reservation. A draft Environmental Assessment (EA) was prepared for the Kumeyaay Wind Energy Facility, but the SDG&E reconductoring project was never mentioned in the draft EA. This substantial addition to the project was added to the Final EA and the County was never given the opportunity to understand the whole of the project and to make fully informed comments on potential impacts to off-Reservation land. The County is troubled by the process used to make this substantial addition to the project and hopes that our concerns will be addressed. The County's concerns are focused on the use of temporary generators at the Boulevard Substation and are as follows:

Noise

Appendix D of the Final EA describes the SDG&E reconductoring project for upgrading the power lines to accommodate the power generated by the new facility. Two 1.6 MW generators in the Boulevard area will supply power for this portion of East County over the three to four months that the line is being upgraded. The Appendix does not include any schedule for the power outages or the expected usage of the generators to meet local demands up to 4 MW. County staff has confirmed with SDG&E that these two temporary generators will be located at the Boulevard Substation (APN 612-092-12-00). County staff has assumed that the generator operation may be continuous for

nearest residence and approximately 170 feet from an open Coast Live Oak woodland habitat to the southeast. County staff was able to get additional manufacturer information from Caterpillar about the noise performance specifications of this proposed equipment. Appendix D included no noise specifications about this equipment.

The County finds that this project will exceed the property line sound level limits of the County Noise Ordinance (County Code Section 36.404). The project site and the adjacent land are zoned S-92, General Rural, a zone that allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels (dBA) from 10 p.m. to 7 a.m. County staff examined information about an open generator installation and an enclosed unit for this application. The open installation has three major noise sources, including the exhaust, the engine (mechanical), and the radiator fans. It is assumed that the radiator fans produce as much noise as the engine. Based on the Caterpillar specifications, the exhaust will generate 95 decibels at 49 feet and the engine will generate 92 decibels at the same distance. Estimates indicate that the combined levels for the open installation will be 98 decibels at 49 feet. If exhaust controls such as silencers were used for the open installation, a single generator would still generate 95 decibels at 49 feet. For the closed or packaged generator with sound attenuation, Caterpillar claims that a large generator of this size would generate no more than 74 decibels (A) at 50 feet. For either generator package, the proposed temporary installation would not be able to comply with the sound level limits of the County Noise Ordinance at any adjacent property line of the substation (day or night).

For the nearest residence, the 24-hour operation of these temporary generators exceeds the 60 decibel (A) CNEL exterior noise standard of the County Noise Element by more than 10 decibels. Other neighboring residences within 800 feet of the site may also experience significant noise impacts depending on the existing noise environment of the area. The environmental initial study concluded that the area is largely uninhabited and therefore construction noise impacts are less than significant. The area is inhabited and therefore the basis for the conclusion is incorrect.

For the adjacent Coast Live Oak Woodland habitat, the continuous hourly operation of these temporary generators would exceed the 60-decibel (A) threshold of the United States Fish and Wildlife Service for the noise sensitive habitat of migratory birds. The EA was not clear that noise generator noise impacts were considered and it may be necessary to consider additional mitigation measures.

Staff concludes that the reconductoring portion of the EA would generate significant noise impacts to neighboring properties, residents, and habitat from the use of these temporary generators. A more detailed analysis is required of these issues with suitable mitigation measures implemented to reduce these impacts to acceptable levels. The County strongly suggests that any future study include an analysis of the temporary impacts associated with the construction of the 69 KV line through the

County jurisdiction.

Thank you for your consideration of the County's concerns. Should you have questions, please contact Lory Nagem of my staff at (858) 694-3823.

Sincerely,

ERIC GIBSON, Deputy Director

cc: Donna Tisdale, P.O. Box 1275, Boulevard, CA 91905-1275
Robert R. Copper, Deputy Chief Administrative Officer, M.S. A6
Candis Compton, CAO Staff Officer, M.S. A6
Joe Farace, Department of Planning and Land Use, M.S. O650
John Bennett, Department of Planning and Land Use, M.S. O650

BOULEVARD SPONSOR GROUP

March 16, 2005

VIA FAX AND US MAIL

J. C. Thomas, Public Affairs Manager
San Diego Gas & Electric
Mail loc. CP 31D
8330 Century Park Court
San Diego, CA 92123

RE: KUMEYAAY WIND FACILITY RECONDUCTORING / 3,000 HP GENERATORS

Dear Mr. Thomas,

At our regular meeting, held on March 3, 2005, our community planning group voted to send this letter, stating our concerns, and requesting information on impacts from SDG& E's reconductoring work on the electrical lines serving our rural community of Boulevard. Which other communities will be impacted? Some of this work appears to have already started, on the Campo Reservation, south of the Golden Acorn Casino by the Crestwood substation.


When contacted with questions on this project, the County of San Diego seemed to be unaware of the off-reservation reconductoring work being done. Since they have become involved, some of our concerns are now being addressed through risk assessment, including: noise, diesel exhaust, emissions, and potential fuel spills from the two proposed 3,000 HP diesel generators

However, serious concerns remain regarding negative impacts from the use of those temporary generators to provide electricity to our rural communities while our community is off-line during the proposed 3-4 months in the 2nd and 3rd quarters of this year. As you know, most of the backcountry was without power for 10 days, or more, during the firestorms. Relying on temporary generators for 3-4 months seems rather iffy. We are especially concerned due to the fact that we need power to pump water from our wells. There are real concerns that the potential disruption of electrical service, as a result of switching back and forth to generators, and the potential for power surges and brown outs, can result in damages to our sensitive electrical appliances and equipment. Will we be reimbursed for damages? Independent monitoring of our power should be conducted during this project to protect our equipment.

During one of our meetings, public comments were made that this reconductoring work was reportedly not mentioned in the Draft EA for Kumeyaay Wind, or at the PUC hearings, it simply appeared in the Final EA. There were also allegations regarding the difficulty this project had getting through the PUC and whether or not this project went through the proper RFO process. While these last two issues may seem beyond our scope we are nevertheless interested in SDG& E's answer because the resultant project does impact our community. It seems that our rights to public participation and comment were not fully considered or honored. Has the ISO granted permission yet for construction outages? Will there be more turbines installed later? I thought over 100 were mentioned previously. To date, we are extremely disappointed in SDG& E's lack of consideration and disclosure.


Please advise us of SDG& E's plans to protect our community, and our sensitive equipment, during this project. Perhaps a bulk mailing should be sent out notifying your customers of the upcoming work and how to prepare for any possible impacts. Independent monitoring of our power is also requested. If SDG&E would like to make a presentation at one of our meetings, I will be glad to put it on our agenda. We also request to be included on the mailing list for this project along with contact information for the NEPA process for the BLM. Thank you in advance for your prompt reply.

Sincerely,


Donna Tisdale, Chair

cc: Interested Parties



A  Sempra Energy utility™

February 22, 2005

Dear Property Owner/Resident:

San Diego Gas & Electric (SDG&E) will soon be upgrading an existing transmission line connecting our Crestwood substation near the Golden Acorn Casino to approximately 7 miles west to the Boulevard Tap in San Diego County.

This important transmission upgrade is needed to deliver electricity from the new Superior Wind Farm on the Kumeyaay Campo Indian Reservation to SDG&E customers. Superior is building a wind farm consisting of 25 two-megawatt wind turbines that will generate a renewable source of electricity. In anticipation of this new wind farm, an upgrade to the existing transmission system is necessary to provide customers with safe and reliable energy.

This project includes upgrading our Crestwood substation to accept the new Superior transmission line, the removal and replacement of seven miles of existing overhead wire "conductor" located within SDG&E's easement, the replacement of 23 overhead utility poles and installation of approximately 20 wind anchors on existing poles. Construction is estimated to begin the first week of March 2005 and take approximately six months to complete.

To help ensure reliable electric service to customers, temporary portable generation will be placed at our Boulevard substation and operate during the daytime while construction crews complete the transmission upgrades.

Attached for your information is a project map showing the location of SDG&E's transmission line that will be enhanced. Should you have any questions, please contact me at 858-654-6402. Thank you in advance for your patience and understanding during construction.

Sincerely,

A handwritten signature in black ink that reads "J.C. Thomas". The signature is written in a cursive, flowing style.

JC Thomas
Public Affairs Manager

Attachment

Donna Tisdale

From: "Matthew Freedman" <freedman@turn.org>
To: "Donna Tisdale" <tisdale@aabol.com>
Sent: Thursday, April 28, 2005 2:08 PM
Attach: Petition_to_Intervene_(X524.DOC
Subject: Re: SDG&E

Donna,

It is not difficult to file an intervention but you will need to conform to certain protocols and should be prepared to file both a petition to intervene and a motion seeking certain relief from the Commission. I've attached a sample petition to intervene.

You should probably intervene in Investigation 00-11-001 which deals generally with transmission issues. The following page on the CPUC website shows all the filings and decisions to date in this docket:

<http://www.cpuc.ca.gov/proceedings/10011001.htm>

I'd be happy to review any draft filings before they are submitted to the CPUC.

Matt Freedman
 TURN

--

>Thanks, Matt, How difficult is it to file an intervention at the PUC. Can I do it as an individual? I have several other people interested in joining me. Let me know what you think would work best for us. Donna

>

>

>----- Original Message ----- From: "Matthew Freedman" <freedman@turn.org>

>To: "Donna Tisdale" <tisdale@aabol.com>

>Sent: Wednesday, April 27, 2005 10:10 AM

>Subject: Re: SDG&E

>

>>Donna,

>>

>>Thanks for keeping me in the loop. Let me know if your group wants to pursue any of the recommendations we discussed.

>>

>>Matt Freedman

>>TURN

>>

>>>Content-Type: text/plain;

>>>format=flowed;

>>>reply-type=original

>>>Content-Transfer-Encoding: 7bit

>>>

>>>Lory, Prior to the meeting, I had been in touch with several consumer groups that deal with utilities. Several recommendations were made on how we could deal with the situation. JC Thomas was there from SDG& E along with the construction supervisor and several engineers that deal with the generators. About 40-50 local showed up and got all over SDG& E. I am attaching a copy of our meeting minutes.

>>>

>>>The bottom line was SDG& E did a real sales pitch (I don't trust them) and I could not get any support to force SDG&E to committ to monitoring their generator output during reconductoring and providing us with that data for review by a third party. SDG& E says we can use their claims dept if we get damage. It is hard to show damage is not an "act of nature" without the data I was asking for. Even their own employees tell me that is the case. The County could ask for that data. I have been told that a simple device can be rented and attached to a line and it will monitor the power and even provide a print out.

>>>

>>>Here are the recommendations that were provided to me:

>>>

>>>Get SDG&E committment to monitor service quality , track and report any service interruptions, power surges, or

5/2/2005

brownouts, during the entire reconductoring process.

>>>

>>>Get commitment that SDG& E will provide monitoring data , along with historical data for comparison to our group or the PUC

>>>

>>>There are three ways to measure quality of service and deviation from historical service: SAIDI, SAIFI and MAIFI

>>>

>>>Inform SDG& E that we plan an intervention at the PUC to make sure they provide adequate data to ensure that our quality of service is not degraded during this project

>>>

>>>Report any service problems to SDG& E and the PUC

>>>

>>>Ask PUC Turn or other consumer group to help us with the data.

>>>

>>>Do you have any suggestions from here? Thanks for your help. Donna

>>>----- Original Message ----- From: "Nagem, Lory " <Lory.Nagem@sdcounty.ca.gov>

>>>To: <tisdale@aabol.com>

>>>Sent: Monday, April 25, 2005 2:01 PM

>>>Subject: SDG&E

>>>

>>>

>>>Ms. Tisdale,

>>>

>>>I have been following up on the SDG&E reconductoring project in Campo/Boulevard. I understand SDG&E attended the Sponsor Group meeting and I am curious how the meeting went. I would appreciate any information you can give me.

>>>

>>>Lory Nagem

>>>San Diego County

>>>Department of Planning and Land Use

>>>5201 Ruffin Road, Suite B

>>>San Diego, CA 92123-1666

>>>Ph: 858.694.3823

>>>Fx: 858.694-3373

>>>

>>>

>>>Attachment converted: Matthew.Minutes 4-7-05 wpd.wpd (.WP6/WPC2) (0043FF16)

Donna Tisdale

From: "Matthew Freedman" <freedman@turn.org>
To: <tisdale@aabol.com>
Cc: <mflorio@turn.org>; <shlomit@turn.org>
Sent: Monday, March 21, 2005 5:56 PM
Subject: SDG&E Kumeyaay Wind Facility

Donna,

Your note was forwarded to me by our consumer advocate, Shlomit Gorin, and I have briefly reviewed my materials on this contract. I serve on SDG&E's Procurement Review Group and do recall discussions on this contract and the need for minor transmission upgrades to accommodate the facility. Unfortunately, I cannot find the actual proposal as submitted to the CPUC last year but will ask SDG&E for a replacement copy. To the extent that significant service interruptions for retail customers were anticipated by SDG&E, I do not recall any substantive discussions on that point.

TURN supported SDG&E's contract for the Kumeyaay project on the basis that it was reasonably-priced and will add the renewable portfolio used to serve its customers. SDG&E needs to comply with state law requiring that 20% of its power purchase come from renewable resources by 2010. Since SDG&E started with purchases equaling about 1% of its total sales, there is plenty of need for new clean energy projects, especially those located within the SDG&E service territory. The Kumeyaay project requires a relatively small amount of transmission upgrade work relative to other renewable energy projects under consideration.

I am disturbed to hear about the potential for interruptions or brownouts and will be happy to offer our support for monitoring of service quality during this time period. I will communicate this concern to SDG&E and let you know how they respond.

In the meantime, feel free to contact me if you have specific questions or concerns.

Matt Freedman
Staff Attorney, TURN
415-929-8876 x314

3/22/2005



San Diego Gas & Electric
8330 Century Park Court
San Diego, CA 92123-1530



May 3, 2005

Donna Tisdale
Chair
Boulevard Sponsor Group
P.O. Box 1272
Boulevard, CA 91905

Dear Ms. Tisdale:

Thank you for providing San Diego Gas & Electric (SDG&E) an opportunity to present an overview of our reconductor project to the Boulevard Sponsor Group. SDG&E appreciates the feedback and supportive comments for delivering additional renewable energy to our customers.

Please be assured that SDG&E will continue working with the Boulevard Sponsor Group and all of our customers in the area should any issues arise during construction. I have followed up with the fire department auxiliary as you suggested and will provide project information in the monthly newsletter. I am hopeful that this letter will address the concerns the group raised at the April 7 meeting.

Background

SDG&E has proposed an upgrade to an existing 69 kV transmission line connecting the Crestwood substation near the Golden Acorn Casino to approximately 7 miles west to the Boulevard Tap, just south of Kitchen Creek Road. This important transmission upgrade is needed to deliver electricity from the new Kumeyaay wind energy project to SDG&E customers. SDG&E received approval from the California Public Utilities Commission last October to purchase electricity from the Kumeyaay wind farm, which consists of 25 two-megawatt wind turbines that will generate a renewable source of electricity.

Project Description

The reconductor project includes minor upgrades at the Crestwood substation to accommodate the electricity generated by the wind farm, the removal and replacement of seven miles of existing overhead wire "conductor" located within SDG&E's easement, the replacement of approximately 23 existing overhead wood utility poles and installation of approximately 20 wind anchors on existing poles to provide additional support.

Use of Generators

To maintain reliability during construction, SDG&E will place two, 1.6 megawatt generators at the Boulevard substation. These temporary generators will make it possible to de-energize the existing 69 kV transmission line so construction crews can upgrade the conductors (wires) without interruption of service to our customers. Each construction day, crews will de-energize the line, perform their construction activities for that day and re-connect the transmission line. At the end of each work day, crews will re-energize the line. Once the entire reconductor project has been completed, SDG&E will remove the portable generators and receive the new electrical load from the wind energy project. The generators will be operating one at a time during normal conditions. However, there may be a need to operate both at the same time, but not continuously. Lastly, no outages are planned for this project to be completed. The switching from the transmission line to the temporary generators is intended to be "transparent" to our customers.

May 3, 2005

Page Two

Project Schedule

The reconductor work is estimated to begin mid-May and will take approximately 10-12 weeks to complete. Construction work will take place Monday through Saturday from 7AM to 7PM, or perhaps less. It is during this time that the generators will be used to provide local reliability as discussed above.

Environmental Review

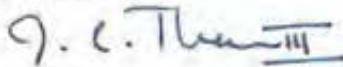
SDG&E responded as part of the public record to the November 15th Notice of Availability for the draft Environmental Assessment (EA) for the proposed Kumeyaay Wind Energy Facility (Proposed Action) prepared by the Bureau of Indian Affairs (BIA) pursuant to the National Environmental Policy Act. SDG&E will comply with all state and local noise and emission standards for use of the temporary generators during construction. SDG&E consulted with both the United States Fish & Wildlife Service and the California Department of Fish & Game about its construction plan. In addition, SDG&E consulted with the Cleveland National Forest and the BLM who further consulted with the USFWS regarding SDG&E's activities on this project.

Although he was out of town for our presentation in early April, Stuart Wells is the Public Affairs Manager for the eastern portion of the county, and will be the lead Public Affairs Manager on this project. Should you have questions about the project in general, please contact him at 619-441-3895. Should you have any questions during the construction phase of the project, please contact our Mountain Empire office at 619-260-5755. If you feel you have experienced any damage to your property as a result of an event caused by this project, please contact SDG&E's 24-hour customer service line at 1-800-411-SDGE (7343) and a representative will contact you within one (1) business day to discuss your claim. I have also attached information concerning the use of private portable generators and facts about unplanned power outages.

I am hopeful that this letter adequately addresses the concerns the Boulevard Sponsor Group has expressed. This project will enhance SDG&E's transmission system in the area and help deliver much-needed renewable energy to our customers.

Thank you again for your consideration and patience during the construction.

Sincerely,

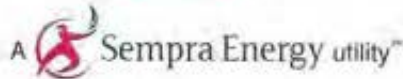


JC Thomas

Attachments



San Diego Gas & Electric
PO Box 129831
San Diego, CA 92112



June 24, 2005

Joe Tisdale
PO Box 1275
Boulevard, CA 91905-0375

Dear Customer:

Recently, SDG&E began upgrading the electric transmission line and substation that serves the Boulevard area. The project includes the removal and replacement of seven miles of existing overhead wires; the replacement of wood utility poles; and the installation of wind anchors on existing poles to provide additional safety, reliability and support of the transmission line.

To help provide electric service during this time, stand-by generators were brought in while the work was taking place. Unfortunately, the generators failed on June 18 and 20, resulting in outages to the area. We apologize for any inconvenience these outages may have caused.

The generators have been repaired, and no further outages are planned for the work. While we do not anticipate additional outages during the remainder of construction, we are prepared to respond immediately should any problems occur. However, you should always be ready for an outage with a flashlight and battery operated radio, as well as other basic supplies. If someone in your home requires electricity for medical needs, please have a plan in place in case of an outage and contact us in advance to let us know about this special need.

The project will take approximately eight weeks to complete. Construction hours are Monday through Saturday from 7AM to 7PM.

Once again we apologize for the recent outages. If you have any service problems or questions, please call SDG&E's 24-hour customer service center at 1-800-411-SDGE (7343).

Sincerely,

Paul Rockwell
Customer Contact Center Manager

CAISO's webpage shows all curtailed and non-operational generation facilities: see links documenting Kumeyaay Wind (CRSTWD 6 KUMYAY) planned/unplanned outages starting on June 18, 2012:

June 18 unplanned 25MW: <http://content.caiso.com/unitstatus/data/unitstatus201206181515.html>

June 19: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206191515.html>

June 20: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206201515.html>

June 21: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206211515.html>

June 22: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206221515.html>

June 23: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206231515.html>

June 24: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206241515.html>

June 25: unplanned 25 MW: <http://content.caiso.com/unitstatus/data/unitstatus201206251515.html>

June 26: Planned /unplanned 25 MW:
<http://content.caiso.com/unitstatus/data/unitstatus201206261515.html>

June 27: Planned/unplanned 25 MW:
<http://content.caiso.com/unitstatus/data/unitstatus201206271515.html>

June 28: Planned unplanned 25 MW:
<http://content.caiso.com/unitstatus/data/unitstatus201206271515.html>

June 29: Planned/unplanned 25 MW:
<http://content.caiso.com/unitstatus/data/unitstatus201206291515.html>

June 30/25 MW planned/unplanned:
<http://content.caiso.com/unitstatus/data/unitstatus201206301515.html>

July 3/25MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201207031515.html>

July 15: 25 MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201207151515.html>

July 28/25 MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201207281515.html>

July 29: / 25 MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201207291515.html>

July 30/25 MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201207301515.html>

July 31/25 MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201207311515.html>

August 1/25MW planned/unplanned:
<http://content.caiso.com/unitstatus/data/unitstatus201208011515.html>

August 2/ 25 MW : <http://content.caiso.com/unitstatus/data/unitstatus201208021515.html>

August 3/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208031515.html>

August 4/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208051515.html>

August 5/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208051515.html>

August 6/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208081515.html>

August 7/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208081515.html>

August 8/25MW: <http://content.caiso.com/unitstatus/data/unitstatus201208081515.html>

August 9/25Mw : <http://content.caiso.com/unitstatus/data/unitstatus201208091515.html>

August 10/25MW : <http://content.caiso.com/unitstatus/data/unitstatus201208101515.html>

August 11/25MW : <http://content.caiso.com/unitstatus/data/unitstatus201208111515.html>

August 12/ 25MW : <http://content.caiso.com/unitstatus/data/unitstatus201208121515.html>

August 13/50MW planned /unplanned:

<http://content.caiso.com/unitstatus/data/unitstatus201208131515.html>

August 14/50MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201208141515.html>

August 15/50MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201208151515.html>

August 16/50MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201208161515.html>

August 17/50MW curtailed: <http://content.caiso.com/unitstatus/data/unitstatus201208171515.html>

August 18/50 MW planned/unplanned:

<http://content.caiso.com/unitstatus/data/unitstatus201208181515.html>

August 19/ 50MW planned/unplanned:

<http://content.caiso.com/unitstatus/data/unitstatus201208191515.html>

August 20/50 MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208201515.html>

August 21/50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208211515.html>

August 22/50 MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208221515.html>

August 23/50 MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208231515.html>

August 24/50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208241515.html>

August 25/50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208251515.html>

August 26/50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208261515.html>

August 27/50 MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208271515.html>

August 28/50MW planned/unplanned:

<http://content.caiso.com/unitstatus/data/unitstatus201208281515.html>

August 29/ 50 MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208291515.html>

August 30/50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208301515.html>

August 31: /50MW unplanned: <http://content.caiso.com/unitstatus/data/unitstatus201208311515.html>

From: [Donna Tisdale](mailto:Donna.Tisdale)
To: lisa.orsaba@cpuc.ca.gov; rhhawkins@fs.fed.us; [CNFMSUP](#)
Subject: PTC A1210009 - MSUP Comment extension request
Date: Tuesday, November 05, 2013 11:24:44 AM
Attachments: [Kumeyaay Wind County to SDGE 3-15-11.pdf](#)

Hello Ms Orsaba and Mr Hawkins,

Please consider this a formal request for a 2-4 week public comment extension of SDG&E's PTC Application No. 12.10.009 and USFS Master Special Use Permit to allow impacted rural communities, that were not disclosed in the notice, to have time to better review and comment on "the whole" of this major project and the perceived segmentation of related / connected action projects.

Our communities are still raw from SDG&E's construction of the Sunrise Powerlink through and over our neighborhoods and business districts and current controversial use of precious groundwater resources from our federally designated sole source aquifer for construction of their \$435 M ECO Substation project.

As I stated at the public meeting in Alpine, the Boulevard Planning Area was left out of the public notices for SDG&E's project even though SDG&E's project lines run through the Boulevard Planning Area to the west and east of the Crestwood Substation that is located on Campo tribal lands adjacent to Historic Route 80. Helicopter fly yards and undisclosed travel routes will also impact many residences and sensitive habitat.

Due to the failure by the CPUC and Forest Service to include Boulevard as an impacted community, we were late to realize that our community will be subjected to the disruption created by this project, potentially related SDG&E projects, and numerous proposed energy projects that appear to be undisclosed connected action projects with direct, indirect and cumulative impacts along TL629 between Descanso and Boulevard.

Please note the attached 2005 San Diego County letter to SDG&E regarding failure to disclose all the impacts from the reconductoring project of the same TL629 E for the Kumeyaay Wind project--including noise from the two 1.6MW generators that would be used while our community was taken off-grid for 3-4 months!

How many days will service be cut to residents during this project?

We watched as TL629 was reconducted last year. According to an employee of the 50MW Kumeyaay Wind facility that I spoke with, that SDG&E project resulted in several weeks of partial /full shutdown of those 25-2MW turbines between June and August 2012 (CAISO non-op documentation available)

Why was TL629 reconducted in 2012 and why is additional reconductoring needed now?

SDG&E has a very bad reputation for failure to fully or honestly disclose significant and cumulative impacts to our most low-income rural communities.

Regards

Donna Tisdale, Chair
Boulevard Planning Group
[619-766-4170](tel:619-766-4170)



GARY L. PRYOR
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
338 VIA VERA CRUZ • SUITE 201
SAN MARCOS, CA 92069-2620
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. • SIXTH FLOOR
EL CAJON, CA 92020-3912

(619) 441-4030

March 15, 2005

Mr. Dashiell Meeks
San Diego Gas and Electric
8315 Century Park Court
San Diego, California 92123

Dear Mr. Meeks:

The County of San Diego has learned of a San Diego Gas & Electric (SDG&E) project that could impact County residents and County lands and is writing to present our concerns. The project, the Crestwood-Boulevard Tap 69kV Reconductor TL629 E, is proposed to increase the carrying capacity of the existing electrical transmission facilities to accommodate the electricity to be generated by the Kumeyaay Wind Energy Facility proposed on the Campo Indian Reservation. A draft Environmental Assessment (EA) was prepared for the Kumeyaay Wind Energy Facility, but the SDG&E reconductoring project was never mentioned in the draft EA. This substantial addition to the project was added to the Final EA and the County was never given the opportunity to understand the whole of the project and to make fully informed comments on potential impacts to off-Reservation land. The County is troubled by the process used to make this substantial addition to the project and hopes that our concerns will be addressed. The County's concerns are focused on the use of temporary generators at the Boulevard Substation and are as follows:

Noise

Appendix D of the Final EA describes the SDG&E reconductoring project for upgrading the power lines to accommodate the power generated by the new facility. Two 1.6 MW generators in the Boulevard area will supply power for this portion of East County over the three to four months that the line is being upgraded. The Appendix does not include any schedule for the power outages or the expected usage of the generators to meet local demands up to 4 MW. County staff has confirmed with SDG&E that these two temporary generators will be located at the Boulevard Substation (APN 612-092-12-00). County staff has assumed that the generator operation may be continuous for

nearest residence and approximately 170 feet from an open Coast Live Oak woodland habitat to the southeast. County staff was able to get additional manufacturer information from Caterpillar about the noise performance specifications of this proposed equipment. Appendix D included no noise specifications about this equipment.

The County finds that this project will exceed the property line sound level limits of the County Noise Ordinance (County Code Section 36.404). The project site and the adjacent land are zoned S-92, General Rural, a zone that allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels (dBA) from 10 p.m. to 7 a.m. County staff examined information about an open generator installation and an enclosed unit for this application. The open installation has three major noise sources, including the exhaust, the engine (mechanical), and the radiator fans. It is assumed that the radiator fans produce as much noise as the engine. Based on the Caterpillar specifications, the exhaust will generate 95 decibels at 49 feet and the engine will generate 92 decibels at the same distance. Estimates indicate that the combined levels for the open installation will be 98 decibels at 49 feet. If exhaust controls such as silencers were used for the open installation, a single generator would still generate 95 decibels at 49 feet. For the closed or packaged generator with sound attenuation, Caterpillar claims that a large generator of this size would generate no more than 74 decibels (A) at 50 feet. For either generator package, the proposed temporary installation would not be able to comply with the sound level limits of the County Noise Ordinance at any adjacent property line of the substation (day or night).

For the nearest residence, the 24-hour operation of these temporary generators exceeds the 60 decibel (A) CNEL exterior noise standard of the County Noise Element by more than 10 decibels. Other neighboring residences within 800 feet of the site may also experience significant noise impacts depending on the existing noise environment of the area. The environmental initial study concluded that the area is largely uninhabited and therefore construction noise impacts are less than significant. The area is inhabited and therefore the basis for the conclusion is incorrect.

For the adjacent Coast Live Oak Woodland habitat, the continuous hourly operation of these temporary generators would exceed the 60-decibel (A) threshold of the United States Fish and Wildlife Service for the noise sensitive habitat of migratory birds. The EA was not clear that noise generator noise impacts were considered and it may be necessary to consider additional mitigation measures.

Staff concludes that the reconductoring portion of the EA would generate significant noise impacts to neighboring properties, residents, and habitat from the use of these temporary generators. A more detailed analysis is required of these issues with suitable mitigation measures implemented to reduce these impacts to acceptable levels. The County strongly suggests that any future study include an analysis of the temporary impacts associated with the construction of the 69 KV line through the

County jurisdiction.

Thank you for your consideration of the County's concerns. Should you have questions, please contact Lory Nagem of my staff at (858) 694-3823.

Sincerely,

ERIC GIBSON, Deputy Director

cc: Donna Tisdale, P.O. Box 1275, Boulevard, CA 91905-1275
Robert R. Copper, Deputy Chief Administrative Officer, M.S. A6
Candis Compton, CAO Staff Officer, M.S. A6
Joe Farace, Department of Planning and Land Use, M.S. O650
John Bennett, Department of Planning and Land Use, M.S. O650

BOULEVARD SPONSOR GROUP

March 16, 2005

VIA FAX AND US MAIL

J. C. Thomas, Public Affairs Manager
San Diego Gas & Electric
Mail loc. CP 31D
8330 Century Park Court
San Diego, CA 92123

RE: KUMEYAAY WIND FACILITY RECONDUCTORING / 3,000 HP GENERATORS

Dear Mr. Thomas,

At our regular meeting, held on March 3, 2005, our community planning group voted to send this letter, stating our concerns, and requesting information on impacts from SDG& E's reconductoring work on the electrical lines serving our rural community of Boulevard. Which other communities will be impacted? Some of this work appears to have already started, on the Campo Reservation, south of the Golden Acorn Casino by the Crestwood substation.


When contacted with questions on this project, the County of San Diego seemed to be unaware of the off-reservation reconductoring work being done. Since they have become involved, some of our concerns are now being addressed through risk assessment, including: noise, diesel exhaust, emissions, and potential fuel spills from the two proposed 3,000 HP diesel generators

However, serious concerns remain regarding negative impacts from the use of those temporary generators to provide electricity to our rural communities while our community is off-line during the proposed 3-4 months in the 2nd and 3rd quarters of this year. As you know, most of the backcountry was without power for 10 days, or more, during the firestorms. Relying on temporary generators for 3-4 months seems rather iffy. We are especially concerned due to the fact that we need power to pump water from our wells. There are real concerns that the potential disruption of electrical service, as a result of switching back and forth to generators, and the potential for power surges and brown outs, can result in damages to our sensitive electrical appliances and equipment. Will we be reimbursed for damages? Independent monitoring of our power should be conducted during this project to protect our equipment.

During one of our meetings, public comments were made that this reconductoring work was reportedly not mentioned in the Draft EA for Kumeyaay Wind, or at the PUC hearings, it simply appeared in the Final EA. There were also allegations regarding the difficulty this project had getting through the PUC and whether or not this project went through the proper RFO process. While these last two issues may seem beyond our scope we are nevertheless interested in SDG& E's answer because the resultant project does impact our community. It seems that our rights to public participation and comment were not fully considered or honored. Has the ISO granted permission yet for construction outages? Will there be more turbines installed later? I thought over 100 were mentioned previously. To date, we are extremely disappointed in SDG& E's lack of consideration and disclosure.


Please advise us of SDG& E's plans to protect our community, and our sensitive equipment, during this project. Perhaps a bulk mailing should be sent out notifying your customers of the upcoming work and how to prepare for any possible impacts. Independent monitoring of our power is also requested. If SDG&E would like to make a presentation at one of our meetings, I will be glad to put it on our agenda. We also request to be included on the mailing list for this project along with contact information for the NEPA process for the BLM. Thank you in advance for your prompt reply.

Sincerely,


Donna Tisdale, Chair

cc: Interested Parties



A  Sempra Energy utility™

February 22, 2005

Dear Property Owner/Resident:

San Diego Gas & Electric (SDG&E) will soon be upgrading an existing transmission line connecting our Crestwood substation near the Golden Acorn Casino to approximately 7 miles west to the Boulevard Tap in San Diego County.

This important transmission upgrade is needed to deliver electricity from the new Superior Wind Farm on the Kumeyaay Campo Indian Reservation to SDG&E customers. Superior is building a wind farm consisting of 25 two-megawatt wind turbines that will generate a renewable source of electricity. In anticipation of this new wind farm, an upgrade to the existing transmission system is necessary to provide customers with safe and reliable energy.

This project includes upgrading our Crestwood substation to accept the new Superior transmission line, the removal and replacement of seven miles of existing overhead wire "conductor" located within SDG&E's easement, the replacement of 23 overhead utility poles and installation of approximately 20 wind anchors on existing poles. Construction is estimated to begin the first week of March 2005 and take approximately six months to complete.

To help ensure reliable electric service to customers, temporary portable generation will be placed at our Boulevard substation and operate during the daytime while construction crews complete the transmission upgrades.

Attached for your information is a project map showing the location of SDG&E's transmission line that will be enhanced. Should you have any questions, please contact me at 858-654-6402. Thank you in advance for your patience and understanding during construction.

Sincerely,

A handwritten signature in black ink that reads "J.C. Thomas". The signature is written in a cursive, flowing style.

JC Thomas
Public Affairs Manager

Attachment

Donna Tisdale

From: "Matthew Freedman" <freedman@turn.org>
To: "Donna Tisdale" <tisdale@aabol.com>
Sent: Thursday, April 28, 2005 2:08 PM
Attach: Petition_to_Intervene_(X524.DOC
Subject: Re: SDG&E

Donna,

It is not difficult to file an intervention but you will need to conform to certain protocols and should be prepared to file both a petition to intervene and a motion seeking certain relief from the Commission. I've attached a sample petition to intervene.

You should probably intervene in Investigation 00-11-001 which deals generally with transmission issues. The following page on the CPUC website shows all the filings and decisions to date in this docket:

<http://www.cpuc.ca.gov/proceedings/10011001.htm>

I'd be happy to review any draft filings before they are submitted to the CPUC.

Matt Freedman
 TURN

--

>Thanks, Matt, How difficult is it to file an intervention at the PUC. Can I do it as an individual? I have several other people interested in joining me. Let me know what you think would work best for us. Donna

>

>

>----- Original Message ----- From: "Matthew Freedman" <freedman@turn.org>

>To: "Donna Tisdale" <tisdale@aabol.com>

>Sent: Wednesday, April 27, 2005 10:10 AM

>Subject: Re: SDG&E

>

>>Donna,

>>

>>Thanks for keeping me in the loop. Let me know if your group wants to pursue any of the recommendations we discussed.

>>

>>Matt Freedman

>>TURN

>>

>>>Content-Type: text/plain;

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>>>reply-type=original

>>>Content-Transfer-Encoding: 7bit

>>>

>>>Lory, Prior to the meeting, I had been in touch with several consumer groups that deal with utilities. Several recommendations were made on how we could deal with the situation. JC Thomas was there from SDG& E along with the construction supervisor and several engineers that deal with the generators. About 40-50 local showed up and got all over SDG& E. I am attaching a copy of our meeting minutes.

>>>

>>>The bottom line was SDG& E did a real sales pitch (I don't trust them) and I could not get any support to force SDG&E to committ to monitoring their generator output during reconductoring and providing us with that data for review by a third party. SDG& E says we can use their claims dept if we get damage. It is hard to show damage is not an "act of nature" without the data I was asking for. Even their own employees tell me that is the case. The County could ask for that data. I have been told that a simple device can be rented and attached to a line and it will monitor the power and even provide a print out.

>>>

>>>Here are the recommendations that were provided to me:

>>>

>>>Get SDG&E committment to monitor service quality , track and report any service interruptions, power surges, or

5/2/2005

brownouts, during the entire reconductoring process.

>>>

>>>Get commitment that SDG& E will provide monitoring data , along with historical data for comparison to our group or the PUC

>>>

>>>There are three ways to measure quality of service and deviation from historical service: SAIDI, SAIFI and MAIFI

>>>

>>>Inform SDG& E that we plan an intervention at the PUC to make sure they provide adequate data to ensure that our quality of service is not degraded during this project

>>>

>>>Report any service problems to SDG& E and the PUC

>>>

>>>Ask PUC Turn or other consumer group to help us with the data.

>>>

>>>Do you have any suggestions from here? Thanks for your help. Donna

>>>----- Original Message ----- From: "Nagem, Lory " <Lory.Nagem@sdcounty.ca.gov>

>>>To: <tisdale@aabol.com>

>>>Sent: Monday, April 25, 2005 2:01 PM

>>>Subject: SDG&E

>>>

>>>

>>>Ms. Tisdale,

>>>

>>>I have been following up on the SDG&E reconductoring project in Campo/Boulevard. I understand SDG&E attended the Sponsor Group meeting and I am curious how the meeting went. I would appreciate any information you can give me.

>>>

>>>Lory Nagem

>>>San Diego County

>>>Department of Planning and Land Use

>>>5201 Ruffin Road, Suite B

>>>San Diego, CA 92123-1666

>>>Ph: 858.694.3823

>>>Fx: 858.694-3373

>>>

>>>

>>>Attachment converted: Matthew.Minutes 4-7-05 wpd.wpd (.WP6/WPC2) (0043FF16)

Donna Tisdale

From: "Matthew Freedman" <freedman@turn.org>
To: <tisdale@aabol.com>
Cc: <mflorio@turn.org>; <shlomit@turn.org>
Sent: Monday, March 21, 2005 5:56 PM
Subject: SDG&E Kumeyaay Wind Facility

Donna,

Your note was forwarded to me by our consumer advocate, Shlomit Gorin, and I have briefly reviewed my materials on this contract. I serve on SDG&E's Procurement Review Group and do recall discussions on this contract and the need for minor transmission upgrades to accommodate the facility. Unfortunately, I cannot find the actual proposal as submitted to the CPUC last year but will ask SDG&E for a replacement copy. To the extent that significant service interruptions for retail customers were anticipated by SDG&E, I do not recall any substantive discussions on that point.

TURN supported SDG&E's contract for the Kumeyaay project on the basis that it was reasonably-priced and will add the renewable portfolio used to serve its customers. SDG&E needs to comply with state law requiring that 20% of its power purchase come from renewable resources by 2010. Since SDG&E started with purchases equaling about 1% of its total sales, there is plenty of need for new clean energy projects, especially those located within the SDG&E service territory. The Kumeyaay project requires a relatively small amount of transmission upgrade work relative to other renewable energy projects under consideration.

I am disturbed to hear about the potential for interruptions or brownouts and will be happy to offer our support for monitoring of service quality during this time period. I will communicate this concern to SDG&E and let you know how they respond.

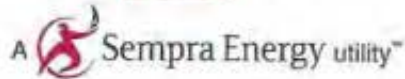
In the meantime, feel free to contact me if you have specific questions or concerns.

Matt Freedman
Staff Attorney, TURN
415-929-8876 x314

3/22/2005



San Diego Gas & Electric
8330 Century Park Court
San Diego, CA 92123-1530



May 3, 2005

Donna Tisdale
Chair
Boulevard Sponsor Group
P.O. Box 1272
Boulevard, CA 91905

Dear Ms. Tisdale:

Thank you for providing San Diego Gas & Electric (SDG&E) an opportunity to present an overview of our reconductor project to the Boulevard Sponsor Group. SDG&E appreciates the feedback and supportive comments for delivering additional renewable energy to our customers.

Please be assured that SDG&E will continue working with the Boulevard Sponsor Group and all of our customers in the area should any issues arise during construction. I have followed up with the fire department auxiliary as you suggested and will provide project information in the monthly newsletter. I am hopeful that this letter will address the concerns the group raised at the April 7 meeting.

Background

SDG&E has proposed an upgrade to an existing 69 kV transmission line connecting the Crestwood substation near the Golden Acorn Casino to approximately 7 miles west to the Boulevard Tap, just south of Kitchen Creek Road. This important transmission upgrade is needed to deliver electricity from the new Kumeyaay wind energy project to SDG&E customers. SDG&E received approval from the California Public Utilities Commission last October to purchase electricity from the Kumeyaay wind farm, which consists of 25 two-megawatt wind turbines that will generate a renewable source of electricity.

Project Description

The reconductor project includes minor upgrades at the Crestwood substation to accommodate the electricity generated by the wind farm, the removal and replacement of seven miles of existing overhead wire "conductor" located within SDG&E's easement, the replacement of approximately 23 existing overhead wood utility poles and installation of approximately 20 wind anchors on existing poles to provide additional support.

Use of Generators

To maintain reliability during construction, SDG&E will place two, 1.6 megawatt generators at the Boulevard substation. These temporary generators will make it possible to de-energize the existing 69 kV transmission line so construction crews can upgrade the conductors (wires) without interruption of service to our customers. Each construction day, crews will de-energize the line, perform their construction activities for that day and re-connect the transmission line. At the end of each work day, crews will re-energize the line. Once the entire reconductor project has been completed, SDG&E will remove the portable generators and receive the new electrical load from the wind energy project. The generators will be operating one at a time during normal conditions. However, there may be a need to operate both at the same time, but not continuously. Lastly, no outages are planned for this project to be completed. The switching from the transmission line to the temporary generators is intended to be "transparent" to our customers.

May 3, 2005

Page Two

Project Schedule

The reconductor work is estimated to begin mid-May and will take approximately 10-12 weeks to complete. Construction work will take place Monday through Saturday from 7AM to 7PM, or perhaps less. It is during this time that the generators will be used to provide local reliability as discussed above.

Environmental Review

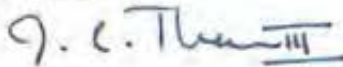
SDG&E responded as part of the public record to the November 15th Notice of Availability for the draft Environmental Assessment (EA) for the proposed Kumeyaay Wind Energy Facility (Proposed Action) prepared by the Bureau of Indian Affairs (BIA) pursuant to the National Environmental Policy Act. SDG&E will comply with all state and local noise and emission standards for use of the temporary generators during construction. SDG&E consulted with both the United States Fish & Wildlife Service and the California Department of Fish & Game about its construction plan. In addition, SDG&E consulted with the Cleveland National Forest and the BLM who further consulted with the USFWS regarding SDG&E's activities on this project.

Although he was out of town for our presentation in early April, Stuart Wells is the Public Affairs Manager for the eastern portion of the county, and will be the lead Public Affairs Manager on this project. Should you have questions about the project in general, please contact him at 619-441-3895. Should you have any questions during the construction phase of the project, please contact our Mountain Empire office at 619-260-5755. If you feel you have experienced any damage to your property as a result of an event caused by this project, please contact SDG&E's 24-hour customer service line at 1-800-411-SDGE (7343) and a representative will contact you within one (1) business day to discuss your claim. I have also attached information concerning the use of private portable generators and facts about unplanned power outages.

I am hopeful that this letter adequately addresses the concerns the Boulevard Sponsor Group has expressed. This project will enhance SDG&E's transmission system in the area and help deliver much-needed renewable energy to our customers.

Thank you again for your consideration and patience during the construction.

Sincerely,

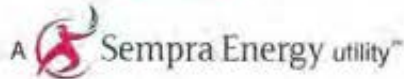


JC Thomas

Attachments



San Diego Gas & Electric
PO Box 129831
San Diego, CA 92112



June 24, 2005

Joe Tisdale
PO Box 1275
Boulevard, CA 91905-0375

Dear Customer:

Recently, SDG&E began upgrading the electric transmission line and substation that serves the Boulevard area. The project includes the removal and replacement of seven miles of existing overhead wires; the replacement of wood utility poles; and the installation of wind anchors on existing poles to provide additional safety, reliability and support of the transmission line.

To help provide electric service during this time, stand-by generators were brought in while the work was taking place. Unfortunately, the generators failed on June 18 and 20, resulting in outages to the area. We apologize for any inconvenience these outages may have caused.

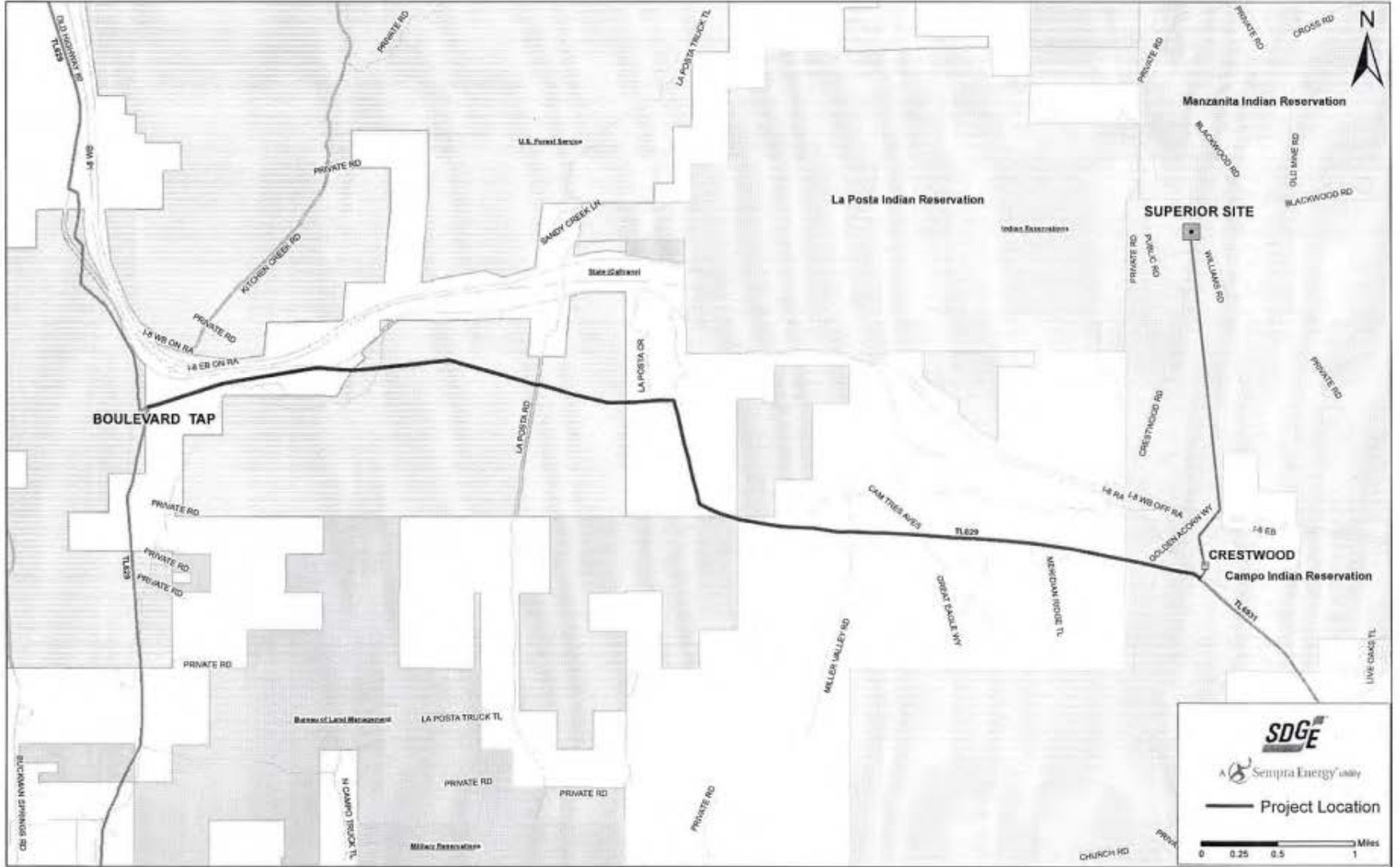
The generators have been repaired, and no further outages are planned for the work. While we do not anticipate additional outages during the remainder of construction, we are prepared to respond immediately should any problems occur. However, you should always be ready for an outage with a flashlight and battery operated radio, as well as other basic supplies. If someone in your home requires electricity for medical needs, please have a plan in place in case of an outage and contact us in advance to let us know about this special need.

The project will take approximately eight weeks to complete. Construction hours are Monday through Saturday from 7AM to 7PM.

Once again we apologize for the recent outages. If you have any service problems or questions, please call SDG&E's 24-hour customer service center at 1-800-411-SDGE (7343).

Sincerely,

Paul Rockwell
Customer Contact Center Manager



BOULEVARD TAP

SUPERIOR SITE

CRESTWOOD

Campo Indian Reservation

La Posta Indian Reservation

Manzanita Indian Reservation

SDGE

A Sempra Energy company

Project Location



From: [Donna Tisdale](mailto:Donna.Tisdale)
To: lisa.orsaba@cpuc.ca.gov; rhhawkins@fs.fed.us; [CNFMSUP](#)
Subject: A1210009 & MSUP comment extension request
Date: Tuesday, November 05, 2013 12:28:51 PM

Hello Ms Orsaba and Mr Hawkins,

My previous message with two attachments was kicked back so I am resending without attachments.

Please consider this a formal request for a 2-4 week public comment extension of SDG&E's PTC Application No. 12.10.009 and USFS Master Special Use Permit to allow impacted rural communities, that were not disclosed in the notice, to have time to better review and comment on "the whole" of this major project and the perceived segmentation of related / connected action projects.

Our communities are still raw from SDG&E's construction of the Sunrise Powerlink through and over our neighborhoods and business districts and current controversial use of precious groundwater resources from our federally designated sole source aquifer for construction of their \$435 M ECO Substation project.

As I stated at the public meeting in Alpine, the Boulevard Planning Area was left out of the public notices for SDG&E's project even though SDG&E's project lines run through the Boulevard Planning Area to the west and east of the Crestwood Substation that is located on Campo tribal lands adjacent to Historic Route 80. Helicopter fly yards and undisclosed travel routes will also impact many residences and sensitive habitat.

Due to the failure by the CPUC and Forest Service to include Boulevard as an impacted community, we were late to realize that our community will be subjected to the disruption created by this project, potentially related SDG&E projects, and numerous proposed energy projects that appear to be undisclosed connected action projects with direct, indirect and cumulative impacts along TL629 between Descanso and Boulevard.

Please note the attached 2005 San Diego County letter to SDG&E regarding failure to disclose all the impacts from the reconductoring project of the same TL629 E for the Kumeyaay Wind project--including noise from the two 1.6MW generators that would be used while our community was taken off-grid for 3-4 months!

How many days will service be cut to residents during this project?

We watched as TL629 was reconducted last year. According to an employee of the 50MW Kumeyaay Wind facility that I spoke with, that SDG&E project resulted in several weeks of partial /full shutdown of those 25-2MW turbines between June and August 2012 (CAISO non-op documentation available)

Why was TL629 reconducted in 2012 and why is additional reconductoring needed now?

SDG&E has a very bad reputation for failure to fully or honestly disclose significant and cumulative impacts to our most low-income rural communities.

Regards

Donna Tisdale, Chair
Boulevard Planning Group
[619-766-4170](tel:619-766-4170)

From: [Charles Inskip](#)
To: [CNFMSUP](#)
Subject: Support for SDG&E's Power Line Replacement Projects Cleveland National Forest
Date: Wednesday, November 06, 2013 7:12:36 PM
Attachments: [SDG&E Town Hall.pdf](#)

6 November 2013

Attached is a letter of support from the Descanso Town Hall Association for the subject project.

Judy Inskip

Descanso Town Hall Association



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.



Descanso Town Hall Association

24536 Viejas Grade Road

P.O. Box 384

Descanso, CA 91916

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Dear Ms. Orsaba and Mr. Metz,

It is our hope that you and your organizations will approve the San Diego Gas & Electric (SDG&E) Master Special use Permit to construct Power Line Replacement Projects in and adjacent to the Cleveland National Forrest. The area in which this project covers is in a high wind area as well as an area in which there have been many wild fires over the years. By replacing the existing poles with a steel pole similar to the wood poles, these poles will be stronger in adverse weather conditions especially during high winds and red flag days, and more fire resistant than the existing poles.

SDG&E has the nation's largest and most advanced utility weather sensor network, with more than 140 owned pole-mounted stations. SDG&E understands its unique environmental role. That is why they are dedicated to being a responsible caretaker of natural resources.

It is with great urgency we request the U. S. Forest Service and the California Public Utilities Commission approve this project so SDG&E can begin the important task of replacing the wood poles with new steel poles.

Please feel free to contact me if you wish to discuss this any further.

Sincerely,

Judy Inskip, Descanso Town Hall President and resident of Descanso

From: [Donna Tisdale](#)
To: [CNFMSUP](#); lisa.orsaba@cpuc.ca.gov; rhawkins@fs.fed.us
Subject: SDGE MSUP-PTC- BAD scoping comments
Date: Thursday, November 07, 2013 4:47:54 PM
Attachments: [MSUP-PTC scoping comments BAD 11-7-13.pdf](#)

Please find the attached MSUP-PTC scoping comments from Backcountry Against Dumps.

Thank you

Donna Tisdale, President
619-766-4170

BACKCOUNTRY AGAINST DUMPS

PO Box 1275, BOULEVARD, CA 91905

SDG&E Master Special Use Permit (#310) and Permit to Construct (A.12-10-009) Power Line Replacement Projects—scoping comments

November 7, 2013

To: CPUC via CNFMSUP@dudek.com & lisa.orsaba@cpuc.ca.gov; USFS via rhhawkins@fs.fed.us

For the record, our non-profit group endorses and incorporates by reference the comments submitted on this project by The Protect Our Communities Foundation and those submitted for the Boulevard Planning Group.

Please contact me with any questions or new information at 619-766-4170 or tisdale.donna@gmail.com

Thank you

Donna Tisdale, President

From: [Donna Tisdale](#)
To: [CNFMSUP](#); lisa.orsaba@cpuc.ca.gov; rhawkins@fs.fed.us
Subject: SDGE MSUP-PTC
Date: Thursday, November 07, 2013 4:45:05 PM
Attachments: [SDGE MSUP BPG comments 10-23-13.pdf](#)

Please find the attached comments that I am submitting as the Chair of the Boulevard Planning Group as an individual.

Thank you,

Donna Tisdale
PO Box 1272
Boulevard, CA 91905
619-766-4170

SDG&E Master Special Use Permit (#310) and Permit to Construct (A.12-10-009) Power Line Replacement Projects—scoping comments

Date: November 7, 2013

To: CPUC via CNFMSUP@dudek.com & lisa.orsaba@cpuc.ca.gov; USFS via rhhawkins@fs.fed.us

From: Donna Tisdale, as Chair the Boulevard Planning Group; *and as an individual:* PO Box 1275, Boulevard, CA 91905; 619-766-4170; tisdale.donna@gmail.com

1. Second request to extend comment deadline beyond Nov 7th :

- Due to the failure to include Boulevard in the Public Notice as an impacted community, and the significant number of projects we are already burdened with, I did not include it on our October 3rd agenda for a vote.
- The Nov 7th comment deadline is the same date as our monthly meeting which does not allow for time for a public group discussion and action.
- According to calls made to the libraries, listed in the Public Notice and NOP as project information repositories, no project documents or map books were reported to be on hand or available to the public at any of them as indicated in the notices.
- Several libraries confirmed they did have copies of the Public Notice and NOP.
- Librarians at the Ramona and Julian Libraries reported having copies of a different SDG&E Transmission Line project that does not help the public comment on this project, and seemed confused between the two projects.
- Not all backcountry residents, who may be impacted by this project, have computers or internet access without having to drive miles to a library.
- *Belated delivery of SDG&E's Plan of Development to several libraries and scattered SDG&E offices (that are only open during business hours) are insufficient to allow adequate public review to meet the November 7th deadline.*

2. Impacted community of Boulevard and others were inexplicably left out of public notices, maps, documents:

- The eastern end of TL629E impacts the Boulevard Planning Area between Miller Valley and SDG&E's Crestwood Substation located on tribal land at the Golden Acorn Casino.
- Boulevard residents driving along Historic Route 80, through the section of Campo Reservation that hosts the Crestwood Substation, will also be impacted during construction and potential road closure and the increased industrial nature and appearance of local electrical infrastructure.
- However, Boulevard was not named as an impacted community in the public notices¹ or documents giving a false impression to our residents that there are no local impacts.

¹ Public Notice: http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP_PTC_Public%20Notice_final.pdf

- Alpine and other impacted communities were also not identified which may have misled planning groups and residents to believe their neighborhoods were not involved.
- **Community Planning Groups should have more time to review and consider project compliance with their Community Plans and community character.**

3. Are steel poles really more fire resistant and reliable than wooden poles or other poles?

- The Fire Performance of Steel Utility Poles – Literature Review and Evaluation (August 2013) produced by Stephan T. Smith, PE², states the following (emphasis added):
“Because such steel poles still represent only a small fraction of all utility poles, with most installed relatively recently, and their performance in resisting damage from wildfires has little documentation, we really don’t know whether steel poles resist fire damage better than wood poles”.
- **Smith’s conclusion:** *“While the literature reviewed does not definitively indicate how well galvanized steel poles would resist wildfire conditions, it provides sufficient evidence to indicate that utilities should not **assume** that galvanized thin-wall steel utility poles will perform better than preserved wood poles under wildfire exposure conditions. Wildfire temperatures may heat the steel of poles to over 500oC, leading to failure by buckling during the fire due to loss of bending strength and elasticity or later due to corrosion exacerbated by damage to galvanizing. Further study of galvanized steel poles subjected to actual wildfires and laboratory testing that includes pole heating with simultaneous applied loads would help to understand and better predict performance”.*

4. Will steel poles attract more lighting? Do they prevent transformer fires?

- Do steel poles attract more lightning strikes in our fire-prone backcountry?
- Do they create more dangerous conditions for workers and residents during electrical storms?
- December 26, 2012: news report from Waco Texas stated as many as 30 electrical fires started around 4 AM at the top of power poles, including transformers. The cause was suspected to be dust buildup on transformers which caused them to short out due to low-lying fog³.
- May 17, 2013: Similar cause was reported by PG&E as the source of 9 transformer fires at the top of power poles in San Francisco on the same night⁴.

5. Single to Double Circuit increase for TL629E is not needed for Reliability -- but will increase carrying capacity of the lines:

- SDG&E representatives state that increasing the single circuit line to double circuit between the Cameron /Boulevard Tap at Kitchen Creek Road and Crestwood Substation is needed for reliability to prevent outages to customers—and they disingenuously downplay and deny that it will increase carrying capacity of the lines.

² http://www.woodpoles.org/documents/SteelPoleFirePerformanceLiteratureReview_16Aug2013.pdf

³ Waco transformer fires: <http://www.kwtx.com/home/headlines/Authorities-Checking-On-Series-Of-Thursday-Morning-Power-Pole-Fires-182344131.html>

⁴ San Francisco transformer fires: <http://abclocal.go.com/kgo/story?id=9116843>

- SDG&E managed to convince the CPUC that their \$435M 138kV/230kV/500kV ECO Substation and 138kV/69kV/12kV Boulevard Substation rebuild, with 14 miles of new high voltage 138kV line between them, was needed for RELIABILITY FOR BOULEVARD, JACUMBA, AND THE CAMPO, LA POSTA AND MANZANITA TRIBAL COMMUNITIES⁵, by providing energy from the renewable energy projects and a new tap into the Southwest Powerlink near In-Ko-Pah.
- Is SDG&E's previous reliability claim no longer valid for ECO Substation?
- This is a typical Method of Operation for SDG&E – to make different claims for different projects.
- On April 2, 2012, SDG&E filed an ex-parte document with the CPUC for the ECO Substation Application 09-08-003 stating that 11 renewable energy projects, representing 1,500 MW, were in the queue to connect to the Boulevard Substation and ECO Substation.
- Several more energy projects have been announced since SDG&E filed those comments and some have been withdrawn.
- The following projects already exist within the Boulevard Planning Area:
 - 50MW Kumeyaay Wind facility (25-2MW turbines) located on Campo tribal land that connects to the Crestwood Substation
 - Existing solar PV at the Clover Flat Elementary school
 - Existing solar PV on the parking shades at the new \$29M Boulevard Border Patrol Station
 - Numerous existing residential scale point-of-use solar and small wind turbines.
- ***How much reliability and local generation does Boulevard need—really??***

6. 551 MW of energy projects planned for Boulevard are still listed as active in CAISO Grid Queue as of 10-25-13⁶:

- # 32: 201 MW wind / Boulevard East Substation 138kV; online date of 2/31/15
- #106A: 160 MW wind/ Boulevard East Substation 138kV;online date of 5/1/16
- #653 ED: 20MW PV / Boulevard East Substation 69kV; online date of 10/31/14
- #789: 80MW PV / Boulevard East Substation 69kV; online date of 12/31/14
- #794: 45 MW PV/Boulevard East Substation 138kV; online date of 12/31/14
- #895: 15MW PV/ Boulevard East Substation 138kV; online date of 12/31/16
- #959: 30MW PV/Crestwood-Boulevard Substation 69kV; online date listed as 12/31/16
- Additional projects are in the Grid Queue to connect at the new ECO Substation
- Another project is in line to connect at the Barrett Substation

7. Current list of known energy projects proposed along TL629 from west (Descanso) to east (Boulevard):

- Viejas Blvd PV 1 2MW Descanso solar project is proposed by Ecoplexus on Merigan Ranch property located on APN 408-070-37-00 on Viejas Boulevard. The same property has an

⁵ <http://www.sdge.com/key-initiatives/eco-substation/eco-substation-project> ;
https://www.sdge.com/sites/default/files/documents/1534198779/ecosubstation_factsheet.pdf?nid=2370

⁶ CAISO grid queue: <http://www.aiso.com/Documents/ISOGeneratorInterconnectionQueue.pdf>

apparent existing easement for TL 629.⁷ Exoplexus has made a presentation to the Descanso Community Planning Group

- Buckman Springs PV1 2 MW DC solar project is proposed for 4227 Buckman Springs Road (APN 52-100-08-00) at the NW corner of the intersection of Buckman Springs Road and Historic Route 80, next door to SDG&E's operations center. A ROW for the existing TL 629 appears to be located on the same property or in the adjacent ROW for Historic Route 80. See map below.
- 2 MW Buckman Springs PV 2 solar project is planned by Exoplexus at the NE corner of Historic Route 80 on APN 527-080-11-00 directly across from SDG&E's operations center. See map below.⁸
- SDG&E's map 34 of 73 also shows a staging yard for the MSUP/PTC project planned on the same private land proposed for the Exoplexus Solar project
- 12.5 MW / 50 acre Kumeyaay Solar project proposed by Infigen on Campo tribal land, north of I-8, that will connect to the Crestwood Substation and TL629
- 30MW Fox Solar project proposed by Infigen on private land in Boulevard at Tierra Del Sol and Hwy 94 with stated plans to connect via existing 69kV line TL6931 that connects to the Crestwood Substation (and to TL 629?).
- Golden Acorn Casino 1 MW Wind turbine proposed adjacent to the Crestwood Substation is in the public comment period for the Environmental Assessment. Nov 8th is comment deadline.
- The EA claims the wind turbine will generate about 2/3rds of the energy consumed by the Golden Acorn Casino and Travel Center.
- Will these projects be getting a free-pass on needed transmission upgrades disguised as fire hardening?

8. INCREASED CAPACITY WILL SUPPORT NEW ENERGY GENERATION PROJECTS AND TRANSFORMATION INFRASTRUCTURE & EACH AND EVERY COMPONENT REPRESENTS NEW FIRE IGNITION SOURCES

- Around 2005, SDG&E submitted a CAT EX application for ROW #: CA-660-05-25/ case # CACA-46885⁹ "...for a 30 foot wide right-of-way grant to authorize this existing facility, involving one wood pole and 458.30 feet of 69kV electrical conductor, located on public lands within T.17S., R. 6E., Section 18 NW¼NE¼ SBM (see attached map), and to re-conductor the electrical line to allow for increased transmission capability, from 269 to 418 Amps". "The need to re-conductor the line is a result of development of a new wind energy project being located on Bureau of Indian Affairs (BIA) managed Kumeyaay tribal lands. Construction of the wind energy project is expected to begin this summer and be completed by the end of the year. This power line, approximately 7 miles in length, extends from the Crestwood substation to the Boulevard Tap facility". (emphasis added)
- Each project will include electric generation (solar PV, CPV, wind) project will include switches, gears, transformers flammable oil, inverters, substations, gen-tie lines and more.
- At build out SDG&E's ECO Substation the maximum amount of oil required for the transformers at the ECO Substation will be approximately 569,800 gallons.
- What are the cumulative numbers for these projects?

⁷ Descanso & Pine Valley solar map: <http://www.ecoplexus.com/en/projects#utility-san-diego-gas-electric>

⁸ [http://www.cpuc.ca.gov/environment/info/dudek/CNF/POD2/CNF%20Revised%20POD%20Attachment%20B-3%20TL629%20Mapbook%20\(04-19-13S\).pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/POD2/CNF%20Revised%20POD%20Attachment%20B-3%20TL629%20Mapbook%20(04-19-13S).pdf)

⁹ Undated copy of CAT EX application is available

9. **SDG&E'S FIRE HARDENING WITHDRAWAL:**

- On June 21, 2013, SDG&E withdrew A.12-12-007 TL 6931 for their \$34M TL 6931 Fire Hardening/Wind Interconnect Project, a so-called Fire Hardening project for 5 plus miles of TL 6931 and added capacity for the unapproved 160-250MW Shu'luuk Wind Gen-tie project wind – until Invenergy withdrew their gen-tie application on June 21st-- after the Campo Band voted down Invenergy's wind turbine project.
- Withdrawal of A12-12-007TL6931 has not been posted on the CPUC project website¹⁰
- Map with location of TL6931 and proximity to Crestwood Substation is posted on CPUC website¹¹ and on SDG&E's project website that is still up¹²
- SDG&E has not re-filed for an amended application for fire hardening—so how critical was it?
- SDG&E's own public documents show that Boulevard is the only area where both the Substation Generation Available Capacity¹³ and Feeder (line) generation capacity (#444-445)¹⁴ are negative numbers.

10. **Water source must be disclosed for construction and maintenance operations before public comment is closed and project is approved:**

- Where is the water source for this project?
- Is it legally and technically authorized and environmentally sustainable without off-site impacts to existing sole source wells and natural springs that serve wildlife and habitat?
- Currently, SDG&E has increased their vastly under estimated 30 Million gallons (FEIS) to 50 Million gallons and now 90 million gallons for their ECO Substation project in rural East County near Jacumba¹⁵
- They are buying legally, technically, and environmentally challenged groundwater sources from wells on tribal land and from tiny community water districts.
- Much of the proposed project is located within the federally designated Campo-Cottonwood Creek Sole Source Aquifer (SSA)¹⁶
- The water supply decisions with potentially significant and cumulative significant adverse impacts are being made by the CPUC after comment closes and projects are approved—leaving impacted residents in predominantly low-income rural areas with virtually no recourse.

11. **Impacts to riparian areas (limited list due to lack of review /comment time):**

- Staging sites shown on TL629 route map, page 38 of 73, are far too close Kitchen Creek and related riparian corridor that leads into Lake Morena and to close to adjacent oak grove and Boulder Oaks campground.

¹⁰ http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/Wind_Interconnect.htm

¹¹ http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/TL6937_WIC_ProjectLocation.pdf

¹² https://www.sdge.com/sites/default/files/regulatory/Volume%201_0.pdf

¹³ Substation generation available capacity:

<https://www.sdge.com/sites/default/files/documents/877084648/Substation%20Area%20Available%20Gen%20Capacity.pdf?nid=2557>

¹⁴ SDG&E feeder generation capacity:

<https://www.sdge.com/sites/default/files/documents/1593864627/Feeder%20Available%20Gen%20Capacity.pdf?nid=2556>

¹⁵ <http://www.cpuc.ca.gov/environment/info/dudek/ecosub/MM%20HYD-3%20Water%20Supply%20Plan.pdf>

¹⁶ Campo-Cottonwood Creek SSA map: http://www.epa.gov/safewater/sourcewater/pubs/qrg_ssamap_campocottonwood.pdf

- Fly Yards are located too close oak groves, stream beds, and other sensitive areas
- TL629 E impacts the La Posta Creek riparian corridor the Miller Valley Creek and pond near Miller Valley Road south of Historic Rt 80

12. NOISE IMPACTS:

- According to the project maps, Helicopter Fly Yards are scattered throughout numerous communities—some of whose names were not listed as impacted communities in Public Notice documents.
- However, the fly routes are not disclosed which makes it difficult for the public to comment on a potentially significant and cumulative adverse impact with noise and vibrations from low-flying helicopters rattling houses, nerves, pets, livestock and wildlife.
- During Sunrise Powerlink construction, SDG&E bragged about having up to 40 helicopters in the air at once.
- Residents complained of major disruptions to their peace and quiet and quality of life.
- Wildlife, pets, and livestock were witnessed in distress during heavy helicopter traffic
- Noise, low-frequency noise and vibrations are well-documented and recognized physical and emotional stressors for living beings.
- What are the other noise /low frequency noise/ vibration sources expected for this project? Generators? Drilling rigs?
- Cumulative noise impacts from low-flying Border Patrol and military air traffic operations
- Cumulative impacts from construction of Tule Wind, Soitec Solar or other energy projects in the Boulevard/Crestwood area/La Posta area.

13. Electric and magnetic fields:

- Attachment F: Electric and Magnetic Fields includes outdated and biased information that does not reflect the more recent studies and reports or real world impacts to current local residents who believe existing SDG&E equipment and Kumeyaay Wind turbines are associated with cancer and various tumors and other health impacts in people and pets ¹⁷

14. Segmentation under CEQA:

- SDG&E has a track record of segmenting projects
- On April 27, 2012, SDG&E filed AL2350-E with the CPUC for the Ocotillo Wind switchyard—separately from the BLM’s NEPA process for the connected action project—despite public comments and complaints
- On May 25th, the CPUC notified SDG&E that AL2350-E had been suspended to allow time for staff review.
- SDG&E requested a waiver to move the switchyard about 600-700 feet to avoid cultural resources that they had been warned about previously.
- They segmented the reconductor of TL 629 from the Kumeyaay Wind turbine EA—that did not disclose that they would be taking Boulevard off-grid for several months, and placing us on two very noisy 1.6MW diesel generators.

¹⁷[http://www.cpuc.ca.gov/environment/info/dudek/CNF/POD2/CNF%20Revised%20POD%20Attachment%20F%20Electric%20and%20Magnetic%20Fields%20\(04-19-13S\).pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/POD2/CNF%20Revised%20POD%20Attachment%20F%20Electric%20and%20Magnetic%20Fields%20(04-19-13S).pdf)

- SDG&E has segmented this MSUP/PTC from the Tie-Line 637 Wood-to-Steel Project (Application No. A. 13-03-003) fire hardening of the line through Ramona.
- SDG&E attempted to segment the following connected and indirect action projects from their ECO Substation project that resulted in a re-circulated EIR: Tule Wind, Energia Sierra Juarez Wind and 500kV cross-border transmission line, Jordan Wind (aka Jewel Valley Wind), Campo Wind (aka Shu'luuk Wind), Manzanita Wind.
- There are more examples – but not enough time to research and list them

15. Visual Impacts:

- Along with the change in visual appearance during the day, reflectors located at the top of new steel poles already installed in Boulevard have generate a strange glow that is distracting as you drive along Historic Route 80
- Will non-reflective wire be used?
- Some of the new heavier wire on transmission lines in Boulevard is much thicker, shinier, and much more visible from close up and at greater distances than previous smaller wires.
- Again, cumulative impacts to the Boulevard Planning Area and other communities from multiple projects must be considered and addressed.

15. Cost-benefit / needs analysis and alternatives:

- Billions of dollars are being spent by rate-payers and tax payers to support lucrative SDG&E projects with a guaranteed rate of return for shareholders and guaranteed misery for the impacted communities that are shown little to no respect or guaranteed mitigation funding that will stay in their neighborhoods.
- \$1.9B for Sunrise Powerlink with unmitigable fire risk; \$435 M ECO Substation with unmitigable fire risk and risk to local groundwater supplies; \$469M for just two of the four Soitec Solar CPV projects proposed in Boulevard, within 100-200 feet of existing homes.
- Power Purchase Agreements for renewable energy projects are being approved at Above Market Rates for 25 years or more.
- Is the expense of this \$418 M so-called fire hardening project justified?
- Are there better cheaper alternatives?
- Will it actually increase fire risk and change fire fighting strategies?
- Will funding be provided to increase fire coverage / equipment / staffing in the impacted communities?

16. Environmental Justice issues must also be addressed:

- Comprehensive Economic Development Strategy (CEDS) Census tracts map shows Boulevard/Jacumba area with per capita income 80 percent or less of the national per capita income of \$27,334 (2010 inflation-adjusted dollars)¹⁸
- The same map shows high unemployment and low –income in many other communities that will be impacted by this project.

¹⁸ (CEDS) map showing South and East County low-income census tracts:
http://www.southcountyledc.net/images/CEDSmap_January2013_final.pdf

- Many multi-million / billion dollar projects are located less than several hundred feet from existing homes and small ranches in an area where 58-65 % of school children qualify as socioeconomically disadvantaged¹⁹ and some seniors reportedly could not qualify for meals on wheels due to lack of required ability to keep food fresh and /or warm.
- State law requires that Environmental Justice issues for low-income communities, especially those related to disproportionate adverse impacts must be recognized, analyzed and addressed²⁰
- **May 8, 2012**, the California Attorney General’s office released a report entitled “Environmental Justice at the Local and Regional Level – Legal Background” (Report)²¹ which interprets existing law to impose environmental justice obligations that local governments must consider when approving specific projects and planning for future development
- The Report interprets the California Environmental Quality Act (CEQA) and its implementing Guidelines to require lead agencies to consider the public health burdens of a project as they relate to environmental justice for certain communities. While the Report acknowledges that there is no mention of “environmental justice” within CEQA, the Report notes that CEQA’s main purpose is to evaluate whether a project may have a significant effect on the physical environment, and asserts that “human beings are an integral part of the environment”.

###

¹⁹ Clover Flat School: : <http://meusd-ca.schoolloop.com/file/1314534050429/1315231078251/156882106380789890.pdf>

²⁰ Environmental Justice: http://oag.ca.gov/sites/all/files/pdfs/environment/ej_fact_sheet_final_050712.pdf ; <http://thomaslaw.com/attorney-general-releases-report-interpreting-ceqa-to-require-consideration-of-environmental-justice-issues-at-the-local-and-regional-levels/>

²¹ http://oag.ca.gov/sites/all/files/pdfs/environment/ej_fact_sheet_final_050712.pdf

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us; CNFMSUP
Subject: A.12-10-009: SDG&E's Master Special Use Permit
Date: Thursday, November 07, 2013 11:56:37 PM
Attachments: [POC MSUP scoping comments.pdf](#)
[A.12-10-009_POC_2013-10-29.pdf](#)
[MSUP_scoping_comment_period.msg](#)

Dear Ms. Orsaba and Mr. Metz:

Please accept The Protect Our Communities Foundation's scoping comments on SDG&E's Master Special Use Project. If you have any questions or problems opening the letter, please contact me.

Thank you for your consideration of our comments.

Sincerely yours,

Kelly Fuller



The Protect Our Communities Foundation
P.O. Box 305
Santa Ysabel, CA 92070
Send correspondence to: kelly@kellyfuller.net

November 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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: A.12-10-009: SDG&E's Master Special Use Permit – Scoping Comments

Dear Ms. Orsaba and Mr. Metz:

Thank you for the opportunity to participate in scoping on SDG&E's Master Special Use Permit (Project) under the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). These comments are provided on behalf of The Protect Our Communities Foundation (POC).

I. Project Scoping

POC values cooperative work and coordination with state and federal agencies. Unfortunately, we have to tell you that scoping for this project was fatally flawed, and it is our hope that you will be able to correct this problem quickly. The project's Notice of Intent published in the Federal Register does not follow Forest Service regulations for implementing the National Environmental Policy Act (NEPA).

According to the Forest Service's *FSH 1909.15 – National Environmental Policy Act Handbook*, Forest Service regulations require that Notices of Intent published in the Federal Register include "any permits or licenses required to implement the proposed action and the issuing authority" 36 CFR 220.5(b) (page 6).¹ However, the only permit or license identified in the project's Federal Register Notice is the Forest Service's Master Special Use Permit.² Even a single missing permit

¹ Forest Service (2011). *FSH 1909.15 – National Environmental Policy Act Handbook*. Available at http://www.fs.fed.us/emc/nepa/nepa_procedures/. The Proposed Actions listed in the Federal Register notice include authorization of work both inside and outside the Cleveland National Forest.

² Authorization actions by the U.S. Bureau of Land Management and U.S. Bureau of Indian Affairs are mentioned in the Federal Register Notice of Intent, but the required permits for those actions are not named explicitly. There are also references to an approval decision by California State Parks, but the required permit or license is not named. *Federal Register*, Vol. 78, No. 184, 9/23/13, page 58271. Available at <http://www.gpo.gov/fdsys/pkg/FR-2013-09-23/pdf/2013-22904.pdf>.

would establish that the Notice of Intent has violated Forest Service regulations regarding scoping, and SDG&E's application documents indicate that multiple permits are needed:

- Section 4.3 of the revised Plan of Development, *69 kV Undergrounding* (related to TL 629E), states, “SDG&E would secure the necessary permits to conduct these specialized construction activities and would implement standard best management practices (BMPs), including silt fencing and straw wattles, in accordance with the Proposed Action’s Storm Water Pollution Prevention Plan (SWPPP)” (page 33, emphasis added). SDG&E’s original application makes even clearer that permits are required:

This specialized construction requires 20 to 40 foot wide boring pits, 10 to 20 feet deep *which require special permits. Increasing the depth of the conduit for the transmission line would make these pits even deeper which would eliminate the possibility of permitting.* (page 91 of 125, emphasis added)³

- Section 7.2.5 of the revised Plan of Development, *Underground Duct Package and Installation*, states, “If trench water is encountered, trenches would be dewatered using a portable pump and *disposed of in accordance with applicable regulations and permits*” (page 68, emphasis added).
- Section 9 of the Revised Plan of Development, *Required Permits and Authorizations*, states, “SDG&E would obtain all required approvals for all construction activities from federal, state, and local agencies, as applicable. Table 16: Anticipated Permits and Approvals lists the potential permits and approvals that may be required for these construction activities” (page 81). In Table 16, these include Army Corps of Engineers Clean Water Act Section 404 Nationwide or Individual Permit, FAA Permission to Fly Helicopters, SWRCB National Pollutant Discharge Elimination System – Construction Storm Water Permit, California Department of Fish and Wildlife--California Fish and Game Code Section 1600 Streambed Alteration Agreement, Regional Water Quality Control Board--Clean Water Act Section 401 Water Quality Certification, California Department of Transportation (Caltrans) Encroachment Permit, and San Diego County Encroachment Permit (page 82).

Even to members of the public, it is self-evident that one or more of these permits will be required. For example, Caltrans requires encroachment permits “for all proposed activities related to the placement of encroachments within, under, or over the State

³ SDG&E (2012). *Application of San Diego Gas & Electric Company (U 902 E) for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects*, vol. 1. Available at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/Main/SDGE%20CNF%20PTC%20Application%2010-17-12.pdf>. SDG&E’s amended application filed in 2013 incorporates by reference this original application. See page 1. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Amended%20Application.pdf.

highway rights of way.”⁴ The County of San Diego requires a similar encroachment permit regarding county roads.⁵

Because some of the construction work necessary for this project will have to be done along state highways where power poles are immediately adjacent to the road and in locations where there will not be a wide shoulder or a good place to park trucks, it seems clear that the project will have encroachments requiring a Caltrans or County permit.

Other serious problems occurred during the scoping process. Some of these issues have already been explained in writing to the Forest Service and CPUC and those communications are incorporated by reference (and attached to this letter). In addition,

- The Federal Register notice clearly states that the Forest Service, CPUC, BLM, BIA, and CSP will have their own authorizations to make regarding this project. Yet only the Forest Service and CPUC sent staff to the two scoping meetings.⁶ This meant no one from the cooperating and responsible agencies was there to explain their Proposed Actions, listen to the public’s scoping comments or to answer any questions from the public.
- According to the presentation that was given to the public at the scoping meetings, the purpose of those meetings was to “To inform the public and responsible agencies about the project; To inform the public about the environmental review process; and To solicit input on the scope of issues and alternatives to be addressed in the EIR/EIS.”⁷ But the information presented did not adequately inform the public. The slides did not include the Proposed Actions and Project Objective for the cooperating and responsible agencies (BLM, BIA, and CSP), only the Proposed Action for the Forest Service. This compounded the problem of not having any staff from those agencies present at the meeting.
- Likewise, the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting used by Dudek to notify the public of scoping described only the Forest Service Proposed Action. The BLM, BIA, and CSP Proposed Actions and Project Objective were not included. Instead, the BLM and BIA Proposed Actions were published only in the Notice of Intent in the Federal Register, which very few members of the general public read. The CSP Project Objective was not even published in the Federal Register. Again, this was not adequate to inform the public about what was happening. Excluding information about the cooperating agencies was especially unfortunate since according to the Federal Register notice, SDG&E may be operating some of its existing project facilities on BLM

⁴ See <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

⁵ See <http://www.sdcounty.ca.gov/dpw/docs/EncroachmentPermit.pdf>.

⁶ The absence of cooperating and responsible agency staff at the scoping meetings was verified in an email from Rica Nitka (Dudek Environmental) to Kelly Fuller (POC), 11/4/13.

⁷ CPUC and Forest Service (2013). *San Diego Gas & Electric Company Master Special Use Permit and Permit to Construct Power Line Replacement Projects*. Slide 2. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/msup_ptc_scoping_meeting.pdf.

land illegally; the right-of-way permits have expired or were never issued. That is information that the public has a right to know.

- In addition, comments for the TL-637 wood-to-steel proceeding were also due today, which made things difficult for members of the public trying to participate in both proceedings.
- One of the most serious problems with the scoping period was that many of the affected communities had inadequate notice that they were going to be affected and therefore should be participating in scoping. This is because the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting did not list all of the affected communities. Even some communities that are going to have helicopter fly yards, such as Alpine and Boulevard, were not listed, despite the problems that occurred with helicopter disturbance during construction of the Sunrise Powerlink. Moreover, it is not enough to send scoping notices to Planning Groups in the affected communities if those notices do not list all the affected communities. In San Diego County, all Planning Group members are volunteers, not paid staff. They have busy lives, and they receive many notices. If Planning Group members do not see their community listed on a scoping notice, it is not reasonable to expect them to read a 125-page project application just to verify their community is not involved. Instead, that scoping notice will more likely go into the trash can or be deleted without a second thought.

As a result of the problems with scoping, POC repeatedly asked the CPUC and Forest Service to extend the scoping comment period and to list all of the affected communities. The agencies said no. POC does appreciate that the agencies increased the public's access to hard copy documents about the project in response to POC's request.

Given the violation of Forest Service regulations regarding scoping and the other serious issues, POC urges the CPUC and Forest Service to reopen the formal scoping comment period with a notice that lists all the affected communities.

II. Purpose and Need/Project Objectives

The Purpose and Need of each of the three federal agencies and the Project Objectives of the two state agencies should be included in the EIR/EIS. (The Project's Federal Register notice included the federal agency Purpose and Need statements but not the state agency Project Objectives.) The narrow description in the Purpose and Need section of SDG&E's revised Plan of Development is based on the previous Environmental Assessment, and as a result it focuses only on the Cleveland National Forest and does not acknowledge the other necessary land management agency approval decisions (BLM, BIA, CSP) or the BLM regulation that require future BLM authorizations to conform to current land management plans (43 CFR 1610.5-3).⁸ However, this EIR/EIS and the parallel proceeding at the CPUC need to be broader, reflecting

⁸ See BLM (2008). *BLM National Environmental Policy Handbook H-1790-1*, page 6. Available at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_handbook.P ar.84688.File.dat/h1790-1-2008.pdf. See Revised Plan of Development, page

the fact that almost half the poles changed from wood to steel would be located outside the Cleveland National Forest.

In addition, the EIR/EIS's Introduction should include the plans, laws, policies, and Executive Orders the project will comply with, be consistent with, implement or address. At a minimum, this list should include

- Consistency with the Forest Service's current Land Management Plan;
- Conformance with the BLM's current Land Use Plans per 43 CFR 1610.5-3;
- Implementation of Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds"⁹;
- Compliance with federal laws, including the Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Clean Air Act, and Clean Water Act; and
- Consistency with the Community Plans in the San Diego County General Plan.
- Compliance with state law and local ordinances.

In a federal EIS, this list is often placed in the Purpose and Need section.

III. Alternatives to be Analyzed in the EIR/EIS

POC would like to see a variety of alternatives analyzed in the EIR/EIS.

- The EIR/EIS should analyze a new alternative of renewing and issuing permits as needed on federal lands to keep existing facilities working, and increasing vegetation management and equipment inspections. No wooden poles would be changed to steel poles. This is different than the Forest Service's proposed no action alternative in two respects: issuing the permits, and increased vegetation management and equipment inspections. POC would like to see this new alternative analyzed because of its reduced environmental and community impacts.
- Using composite poles instead of steel poles should also be analyzed in this EIR/EIS, either in particularly sensitive locations or along all of the route. Composite poles are safer for humans and birds than steel poles because they are less conductive. Examples of sensitive locations would be near campgrounds and homes or near areas used by birds for breeding, roosting, or feeding.
- Another alternative that should be analyzed in the EIR/EIS is using replacement poles (whether they are steel or composite) that are closely matched in height, and as much as possible, in diameter, to the existing wooden poles they are replacing. This would have much less visual impact on the Cleveland National Forest, BLM lands, tribal lands, and surrounding communities, than the up to 120' tall and 3' to 5' in diameter at their base 69

⁹ Both the Forest Service and the Bureau of Land Management have signed Memorandums of Understanding with the U.S. Fish and Wildlife Service regarding the implementation of Executive Order 13186.

kV steel poles and larger than existing 12 kV steel poles that SDG&E has proposed.¹⁰ If this alternative is not feasible due to CPUC or other regulation, the EIR/EIS should explain in detail exactly which regulation(s) prevent it.

- The fourth new alternative that should be analyzed is more undergrounding near popular trails and near campgrounds. For example, the Loveland Reservoir Trail in Alpine is heavily used and will likely be seriously visually impacted by the project. (It's been POC's experience that simulations provided for projects underestimate visual impacts.) The Reservoir is a favorite place in the community, where families often take their children to fish. The public's experience there would benefit from undergrounding, and the same is true for other popular trails and the campgrounds the project lines run through or are immediately adjacent to. Undergrounding might also increase public safety in these areas by reducing fire risk and risk of exposure to conductive steel poles.
- The fifth new alternative that should be analyzed concerns the Pine Creek and Hauser Creek Wilderness Areas. In this new alternative, the existing wooden poles of line C157 would be left in place where line goes through Pine Creek and Hauser Wilderness Areas, and vegetation management around those poles and equipment inspections would be increased inside the Wilderness Areas. Outside the Wilderness Areas, the rest of C157 would be changed to steel poles of a height similar to the existing wooden poles. The conductor would be changed to a heavier weight that is still compatible with the existing poles in the wilderness or if the existing poles cannot support a heavier weight of conductor, it would remain the same. This would allow the Wilderness Areas to maintain their integrity while still changing most of the line to steel poles.

IV. Impacts

The following impacts on communities and nature should be analyzed:

- Impacts of helicopters on residents, livestock, pets, and wildlife (especially eagles and other raptors), including but not limited to impacts of noise and vibration. (This will vary by model of helicopter, so all should be analyzed.) 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 problems with helicopters flying too low over homes, and helicopters flying with suspended loads over homes.¹¹ The lesson learned here from that experience is that there need to be strict conditions set for helicopter use, helicopter use needs to be monitored carefully throughout construction by the CPUC, 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 communities.

¹⁰ See the Revised Plan of Development, page 28.

¹¹ See, for instance http://www.cpuc.ca.gov/environment/info/aspen/sunrise/stop_work_order_092711.pdf, <http://www.eastcountymagazine.org/node/7651>, and <http://www.eastcountymagazine.org/node/7651>

Furthermore, it would be very helpful if the draft EIR/EIS included maps that showed not only the fly yards, but also the routes the helicopters will be flying. It is difficult for residents to know if they and their animals will be impacted when maps only show the fly yards. It would also be helpful to have all the fly yards marked on an additional single overview map so that people can see at once where the fly yards are located rather than having to page through every single map to find out.

- The impacts on landowners with private easements should be analyzed in the EIR/EIS. Does SDG&E have all the easements necessary on private land for this project? Will any private land easements have to be amended to allow for the cross beams on these steel poles, access road improvements, or other issues? If so, are all private landowners willing to allow SDG&E to make these changes? Is there any possibility of eminent domain being needed to obtain additional easement land for this project? We ask because in SDG&E's Pala to Monserate wood-to-steel replacement project, there was a serious issue of landowner's rights. The cross beams of the steel power poles installed on one ranch were wider than the easement (as measured by the landowners) and the landowners and SDG&E disputed the easement width at the CPUC.
- Review of the maps indicates that many of the staging areas, stringing sites, and fly yards will be sited in or near agricultural areas/fields. The EIR/EIS should thoroughly analyze the project's impacts on agriculture, including but not limited to livestock production, dairy and egg production, crop production, horse training and boarding, and beekeeping. This analysis should not be limited to commercial production facilities, but also to agriculture on a home-use scale since livestock ownership is widespread throughout the backcountry (e.g., horses, goats, chickens and other domestic fowl, cattle). Seemingly minor occurrences such as gates being left open or loud construction noises can have real impacts for people who keep animals.
- Impacts on traffic. Many of the power lines parallel roads that are major through routes for their communities and there are not many or in some cases any alternate routes.
- Impacts on Rancho Cuyamaca State Park, including campgrounds and trails, and all types of recreational users there.
- Impacts on campgrounds and trails outside of Rancho Cuyamaca State Park
- Impacts on raptors, including eagles, and other birds, during construction, operation, and maintenance of the line. Applicable federal laws are the Endangered Species Act, Bald and Golden Eagle Act, and Migratory Bird Treaty Act. The EIR/EIS should analyze whether eagle "take" as defined in the Bald and Golden Eagle Protection Act will occur.
- The EIR/EIS should analyze SDG&E's designs for power poles to determine how much collision and electrocution risk they pose to birds and then suggest modifications to reduce that risk. Unless carefully designed and installed, steel power poles can present greater risk of electrocution to birds than wooden power poles because of steel's conductivity.¹² Although the Revised Plan of Development states, "SDG&E will

¹² See Harness, Rick (2000). *Raptor Electrocutions and Distribution Pole Types*. Available at http://www.woodpoles.org/PDFDocuments/TechBulletin_Oct_00.pdf. The Avian Power Line Interaction

design and install all new structures in compliance with the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee (APLIC)” (page 28), APLIC guidelines are just that: general guidelines. To truly protect birds, it is best for an experienced expert with specialized knowledge of the extra risk steel poles pose to birds to review the equipment designs. POC strongly suggests contacting Rick Harness at EDM International. He is a national expert on this subject and can look at equipment drawings and assess if they are actually going to be safe for birds: (970) 204-4001, rharness@edmlink.com. In addition, the Forest Service is not a member of APLIC and so does not have a liaison to the committee, but Al Manville, the U.S. Fish and Wildlife Service’s liaison to APLIC, is a national expert in anthropogenic bird mortality, including from transmission lines, and may be helpful to the analysis of this project: Albert_Manville@fws.gov, (703) 358-1963. POC recognizes that SDG&E’s parent company, Sempra Energy, is an APLIC member, but it would be good to have multiple people with this specialized experience looking at the proposed designs.

By taking further steps to make its equipment truly as bird safe as possible, SDG&E can lower its risk of federal prosecution for violations of the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Endangered Species Act. While there are permits available that allow utilities to kill or harm eagles and birds protected by the Endangered Species Act, there are currently no permits available to utilities for birds protected by the Migratory Bird Treaty Act.

- The EIR/EIS should analyze the impacts of all equipment that SDG&E wishes to install on these lines and the final approval decisions of all the agencies should be only for the equipment analyzed in the EIR/EIS. This may seem self-evident, but the Draft Operating Plan included in SDG&E’s Revised Plan of Development shows that the utility is seeking a blanket approval now for future equipment. It states, “SDG&E may install appurtenant facilities—such as weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities—on steel poles within existing ROWs, *as needed*, to collect additional information to further increase fire safety and service reliability *as new technologies become available*” (Draft Operating Plan, page 12, emphases added). While fire safety and service reliability are important goals, this additional future equipment might be placed in service around people’s homes, livestock and pets; near campgrounds; near endangered wildlife; and in other sensitive locations. This future equipment must be reviewed for its environmental impacts, not

Committee added a new section on steel and concrete power poles to its 2006 guidance because of the hazard the poles can create. (Harness is credited in the introduction.) See Avian Power Line Interaction Committee (2006). *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*. Available at http://www.dodpif.org/downloads/APLIC_2006_SuggestedPractices.pdf. APLIC’s manual was updated in 2012 and is available at <http://www.aplic.org/>. It’s POC’s understanding that the 2012 update was related to collision issues rather than electrocution. Al Manville or Rick Harness will be able to explain the differences between the two versions.

simply approved now. This is especially true of new technologies that have not yet been invented.

The mention of smart-grid data collection equipment in the Draft Operating Plan is particularly relevant here. Smart-grid data collection has been highly controversial in California, and members of the public have fought to smart meters removed from their homes or never installed at all. To give SDG&E approval to install smart-grid data collection equipment in the future on these lines without having conducted full environmental review of that equipment could invite strong public controversy.

- The EIR/EIS should analyze the impact of this project on dark skies. The replacement steel poles SDG&E has been using in some locations inject night lighting into previously dark rural skies. (See, for example, two replacement steel poles on Japatul Lane in Alpine.)¹³ On the pole's cross beam, there are two rectangular areas that reflect light at night. (They appear to be the high voltage stickers.) At the location in Alpine, the existing wooden poles do not have this reflective glow. It is surprisingly bright, is not a natural experience, and detracts from the dark rural sky. These glowing rectangles would also detract from the experience of nature inside the Cleveland Natural Forest, Rancho Cuyamaca State Park, on BLM land, and or other wild places. Their impacts should be fully studied and unless SDG&E doesn't plan to use them in this project, the public needs to be made aware that they are part of the steel pole "package" so that they can comment on them. San Diego's rural residents cherish their night skies, where they can still see the Milky Way and constellations. Maintaining dark skies is also included in some of the Community Plans that are part of the San Diego County General Plan.¹⁴
- The EIR/EIS should analyze how this project will affect the ability of the communities in the study area to achieve the goals in the Community Plans that are part of the San Diego County General Plan, regardless of whether the planning groups associated with those communities submitted scoping comments or not.¹⁵ As stated earlier in this letter, all San Diego County planning group members are volunteers, and they do not always have time to respond to all notices they receive, especially when their community is not listed as an affected community on the notice.
- The project's visual impacts should be thoroughly analyzed in the EIR/EIS. Many of the visual simulations in the Revised Plan of Development are disturbing. For example, the visual simulation of SR 79 at Viejas Boulevard looking north (KVP 27) suggests that the new steel poles are going to be significantly larger than the current wooden poles. Will the poles be that much larger through Descanso, all along SR 79 and all the way through Rancho Cuyamaca State Park? If so, that will dramatically take away from the experience of wild nature that characterizes the area and that people from outside the area come to

¹³ Kelly Fuller of POC can provide precise location for the Alpine poles if desired.

¹⁴ For example, see Goal LU 1.1 of the Boulevard Planning Area Section of the Mountain Empire Subregional Plan (page 20). Available at http://www.sdcounty.ca.gov/pds/gpupdate/docs/bos_oct2010/B2.10a_boulevard.cp_102010.pdf.

¹⁵ Community plans are available at <http://www.sdcounty.ca.gov/pds/generalplan.html>.

see. However, it wouldn't even be possible to have this concern without the visual simulation. The information provided to the public so far has relied on "typical" power poles and an "average" height of 10' taller poles. The EIR/EIS will need to provide much more detailed information about many, many locations so that the public can comment in an informed way. But because of the problems described earlier with how scoping was conducted, it is highly unlikely that this comment period is going to identify all of the locations that are important to the public and need to have visual simulations in the EIR/EIS. The most effective course of action would be for the agencies to get this information directly from the public.

Other examples of disturbing changes from the visual simulations included in the Revised Plan of Development include:

- The visual simulation of TL629 at La Posta Road (KVP 37) shows an H frame being replaced by a much taller pole. The EIR/EIS should analyze why the pole is so much taller. Is this required by regulation or law? It will cause a change in the rural character of the area and therefore the EIR/EIS should also analyze its impacts on the area's rural character.
- The visual simulation of TL6923 (Hauser Mountain near Pacific Crest Trail, KVP 55) shows a significant visual change. The existing poles blend in. the new ones will stick out.
- The visual simulation of the Forest Service Volunteer Activity Center near Sunrise Highway (KVP 69), line (C440) shows much taller poles than the existing ones. They also are brighter than the existing poles. The EIR/EIS should analyze why the poles are so much taller. Is this required by regulation or law?
- The EIR/EIS should analyze how much water will be required for construction, where that water will come from, and the impacts of sourcing the water. Portions of the study area are a certified sole-source aquifer (i.e. Boulevard). Groundwater is a sensitive resource in all areas of the study region because of potential impacts on residents' wells, local water districts, agriculture and other business uses, and wildlife.
- The EIR/EIS should analyze the noise impacts of the project on humans and animals (including livestock, pets, and wildlife).
- The EIR/EIS should thoroughly describe how the wooden poles will be disposed of and the environmental impacts of that disposal. (Wooden power poles are treated with chemicals that can make their disposal problematic.)¹⁶
- The San Diego backcountry often experiences lightning strikes and occasional fires caused by lightning. The EIR/EIS should analyze what will happen when tall electricity-

¹⁶ See, for example, Beyond Pesticides/National Coalition Against the Misuse of Pesticides. *Fact Sheet on Chemically Treated Wood Utility Poles*. Available at <http://www.beyondpesticides.org/wood/resources/Fact%20Sheet%20Revised%20Treated%20Wood%202-21-03.pdf>. See also Environmental Literacy Council (2008). *Wood Utility Pole Life Cycle*. Available at www.enviroliteracy.org/article.php/1311.html.

conducting steel poles are placed throughout the backcountry.¹⁷ Will they attract lightning? What are the safety implications for the public, livestock, and wildlife anywhere near a steel power pole if lightning strikes it? What are the safety implications for campgrounds and homes that have these steel power poles near them, in terms of lightning strikes? Could lightning conducted through these steel power poles start a fire?

- Steel power poles can bend in severe wind storms. The EIR/EIS should analyze the potential impacts of San Diego backcountry winds on these power poles. If the poles do bend, can they be repaired? If they must be replaced, what are the implications in terms of service reliability and impacts to the environment? How much wind does it take to bend the poles SDG&E intends to use?
- The effects of corrosion on steel power poles, both above and below soil level should be analyzed in the EIR/EIS.
- The EIR/EIS should analyze the project's impacts related to electric and magnetic fields.

V. Fire and Reliability

The EIR/EIS should thoroughly analyze the technical aspects of SDG&E's proposed project in terms of its fire-safety features, comparing them to the causes of SDG&E's past power-line caused fires to see if the fire-hardening features of this project would have actually prevented those fires. If there is a fire, will the steel power poles have to be replaced? (How do thin-walled steel power poles respond to the extreme heat of a wildfire?) It is POC's understanding that the conductors would have to be replaced after a wildfire because soot accumulates on them and is conductive. In addition, the EIR/EIS should analyze the spring 2013 fire that was caused by the Pala to Monserate wood to steel project line after it was converted to steel power poles.¹⁸ If steel power poles prevent fires, why did that line cause a fire after it was converted? There were also power reliability problems reported in that area around the same time that appear to have been on the power line. They should be analyzed in the EIR/EIS as well since improving reliability is a goal of this project.

VI. Monitoring, Mitigation Compliance and Reporting

The EIR/EIS should clearly lay out the monitoring that will be performed to ensure that all mitigation commitments are being performed as described in the EIS/EIR and related decision documents), and whether the mitigation effort is producing the expected outcomes and resulting environmental effects. This should include the frequency at which the agencies will review this monitoring and mitigation compliance. The results of this monitoring of the mitigation efforts should be reported on a regular basis, and those reports should be published and made readily available to the public, preferably on a website. Because of the size of this project and the

¹⁷ The capacity of steel power poles to conduct lightning is acknowledged on page 11 of American Iron and Steel Institute's *Steel Distribution Poles: What Every Lineman Should Know*. Available at <http://www.smdisteel.org/~media/Files/SMDI/Construction/UPoles%20-%20Training%20-%20Marketing%20-%20Student%20Manual.pdf>.

¹⁸ See Ramsey, Debbie (5/2/13). "Fallbrook Plagued with Power Outages in April." Village News. Available at <http://www.thevillagenews.com/story/70797/>.

environmental sensitivity of many of the areas involved, this monitoring should be done by an independent third party, paid for by SDG&E but under the direction of the agencies.

Power lines are known to be a serious hazard to birds, but very little systematic mortality monitoring of them ever takes place. Because steel poles can be more hazardous than wood for birds and because more than half of these poles will be on Federal property, it would be appropriate to have a mortality monitoring program. Such a program would provide much needed information on avian mortality from steel power poles and would provide an opportunity for the Federal agencies to implement Executive Order 13186. Mortality monitoring protocols could be adapted from the U.S. Fish and Wildlife Service's Wind Energy Guidelines, in consultation with U.S. Fish and Wildlife Service staff.¹⁹

Such monitoring should be conducted by an independent third party under the supervision of the CPUC or the U.S. Fish and Wildlife Service and reports should be published and made available to the public. This would be a ground-breaking study and an opportunity for the project to distinguish itself.

VII. Implications of Heavier Conductors for Thermal Load-Carrying Capability

In its Revised Plan of Development, SDG&E states that no increase in system capacity will occur, but then quickly qualifies that statement:

No changes to the system capacity will result from the additional circuits; rather, the additional circuits will provide increased system reliability. "System capacity," as used in this context, refers to the nominal operating voltages of the transmission facilities in question. In this case, the nominal operating voltage of the electric transmission facilities affected is 69 kV, and this will not change. What may change is the thermal load-carrying capability of affected transmission lines, as their conductors are replaced and/or reconfigured. (page 32)

The EIR/EIS should analyze the implications of changes in the thermal load-carrying capability of the transmission lines, caused by changing to different or reconfigured conductors. Will this project potentially result in increased system capacity, not measured in voltage, but in another unit of measurement?

Similarly, the San Diego Sierra Club has raised related concerns in its public discussions of increased wattage and amperage related to increasing the thickness of the conductors (e.g., at the recent scoping meetings). The EIR/EIS should fully analyze the wattage and amperage issues raised by the San Diego Sierra Club.

VII. Growth-Inducing Impacts and System Capacity

Sections of two power lines in this sections of this project are proposed to be changed from single circuit to double circuit, reportedly to increase system reliability (TL625B and TL629E).

¹⁹ There is also a helpful discussion of transmission line mortality monitoring in Convention on Migratory Species (2011), *Guidelines For Mitigating Conflict Between Migratory Birds And Electricity Power Grids*. Available at http://www.cms.int/bodies/COP/cop10/docs_and_inf_docs/doc_30_electrocution_guidlines_e.pdf.

Those changes should be analyzed for their potential growth-inducing impacts in their local areas (roughly Alpine and Boulevard, respectively).

Although the Revised Plan of Development says that no increase in system capacity (as measured in voltage) will occur, POC has a number of questions we would like to see answered in the EIR/EIS: How much unused transmission capacity will be available on the double circuited lines once the work has been completed? Once the lines have been made double circuit, what is the largest system capacity they can be increased to if SDG&E comes back and reconductors them? What kind of review procedure would that require at the CPUC? What kind of substation and related equipment upgrades would also be required to get to that maximum capacity and what kind of review procedure would that require at the CPUC?

VIII. Connected Actions

There are many centralized renewable energy projects planned throughout the study area and they should be analyzed as potential connected actions. They cannot be built without transmission capacity, and from what has occurred so far in Boulevard, these types of projects appear to generally require changes and upgrades to the grid. POC is continually learning of new proposed projects, so the list of projects to be analyzed will need to be updated throughout the time that the EIR/EIS is written. Current planned projects of which POC is aware include two Ecoplexus solar projects (Pine Valley and Descanso), I-8 and Japatul Valley Road solar project (Alpine), Tule Wind (Boulevard), three Soitec solar projects (Boulevard), Chapman solar project (Boulevard), Fox solar project (Boulevard), and the Campo Reservation solar project (Boulevard).

IX. Cumulative Impacts

The EIR/EIS should analyze the cumulative impacts of the energy building boom that has been taking place and is planned to take place in the San Diego back country. These include the proposed renewable energy projects described above, the Sunrise Powerlink transmission line, other proposed wood to steel power line projects in the study area such as TL 6931 (A.12-12-007), and other completed wood to steel power line projects in the vicinity of the study area such as Warner Springs to Santa Ysabel (approved in Advice Letter 2191-E).

X. TL 637 Should Be Analyzed as Part of the Master Special Use Permit Project

TL 637 has been separated into a separate CPUC proceeding from the Master Special Use Project even though it shares 12 poles with a power line in SDG&E's Master Special Use Project, TL 626. It was going to be included in the Master Special Use Project, by order of the CPUC, but it was separated after SDG&E objected.

Analyzing the two projects separately is clearly incorrect under both NEPA and CEQA. The two lines share 12 poles, therefore they are a Connected Action under NEPA. Both projects involve removing wooden poles and replacing them with steel poles and reconductoring with heavier conductor, all described as fire hardening, both projects involving the same 12 poles. It would be piecemealing under CEQA to analyze them separately. This may be obscured by the current emphasis in the Master Special Use Project on the Forest Service permits, but that project

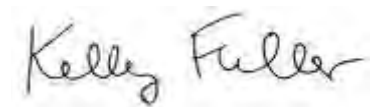
involves decisions by four other agencies besides the Forest Service, and nearly half the poles are outside the Cleveland National Forest, so it is hardly just a Forest Service project. The current description of the Master Special Use Permit project SDG&E is using is too narrow.

XI. Additional Public Engagement

POC requests that the pre-hearing conference for the Master Special Use Permit project be held in eastern San Diego County so that members of the public can attend and hear the scoping of the issues, including from SDG&E's perspective, which has not yet been heard here.

Thank you for your consideration of our comments. Please keep POC on the notification list for this project.

Sincerely,

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

Kelly Fuller
Consultant to The Protect Our Communities Foundation
kelly@kellyfuller.net



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

October 29, 2013

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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: SDG&E's Master Special Use Permit – Document Access and Scoping Comment Deadline

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of The Protect Our Communities Foundation (POC) regarding problems with public access to documents about SDG&E's proposed Master Special Use Permit project and the due date for scoping comments. **POC requests that hard copies of the project's revised Plan of Development (including maps and all appendices) be placed in the project's repository libraries immediately, that an expanded list of communities in the project's vicinity be published, and that the scoping comment period be extended by three weeks.**

At the joint California Public Utilities Commission (CPUC)-Forest Service public meetings last week, members of the public were directed to local libraries if they wanted to see project maps and other Plan of Development documents in hard copy. In addition, the project's Public Notice and Notice of Preparation state that documents related to the project will be made available at a list of repositories (certain San Diego County libraries and Dudek's Encinitas office). However, POC has since learned that SDG&E's Plan of Development was never delivered to those libraries, and only the 23-page Notice of Preparation is available there.

This poses a serious problem for local residents who are trying to access the project's revised Plan of Development. The project study area is not in the City of San Diego, where residents can access the internet at home via fast broadband services, but in the County's rural area, much of which is served by satellite or dialup internet services only. Typically satellite internet services are expensive, slow, and do not allow unlimited data access. Dialup internet is less expensive, but even slower. As a result, many people in rural areas simply do not use the internet, if they are fortunate enough to have it in their homes, which many people do not, in the same way that people in city areas do. Due to speed limitations and costs, they try to avoid file downloads. In the case of the Master Special Use Permit, the full Plan of Development and its maps and appendices comprise 33 files to be downloaded.

In addition, this lack of hard copy Plans of Development in the designated library repositories means that residents who are not computer literate have been excluded from access, except for the few hours

that the revised Plan of Development notebooks and map boards were available for public inspection during the two scoping meetings last week.

The fact that hard copy Plans of Development are not available in the repository libraries appears to have been an inadvertent oversight. POC would like to see this corrected and the public given more time to comment once those documents are in the libraries, in order to ensure a robust public process.

Doing so would also give the CPUC and the Forest Service the chance to correct a problem with the noticing of this project. The list of communities in the vicinity of the project in the Public Notice, Scoping Notice, and presentation given during last week's public meetings left out many communities that will be impacted. The abbreviated list of nearby communities will likely decrease public participation in scoping because some affected members of the public will not see their community listed, thus will not know they are be affected, and are as a result are less likely to submit scoping comments. The current written list of communities only includes Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs. However, at a minimum, the following communities should be added: Alpine, Boulevard, Guatay, Lake Morena, Mt. Laguna, and Pine Valley. There may be others as well, given the size of the affected area and the fact that some local communities extend well beyond the central "village" that is marked on maps.

POC would like to see as much public involvement as possible at this early stage because of a lesson learned during the Sunrise Powerlink. Project routes changed, and as a result, many members of the public did not learn they would be affected until late in the process, when there were fewer opportunities for involvement. During the public meetings for the Master Special Use Permit project last week, both the CPUC and the Forest Service acknowledged that aspects of this project too may change.

In conclusion, POC respectfully requests that the barriers to public involvement that we have identified in this letter be corrected immediately and that the public be given an additional three weeks to comment, in order to improve the outcome of this project by increasing the inclusiveness of public participation. We also request that you provide an answer to our letter.

Thank you very much for your consideration of our requests.

Sincerely yours,

Kelly Fuller
Consultant to The Protect Our Communities Foundation
www.kellyfuller.net

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; [CNFMSUP](#)
Cc: ["Hawkins, Robert H -FS"](#)
Subject: MSUP scoping comment period

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

The Protect Our Communities Foundation continues to be very concerned that the scoping period for SDG&E's Master Special Use Permit has been not extended, for the following reasons:

1. There are going to be significant impacts on communities that are not even listed in the CPUC/Forest Service public outreach materials and who therefore don't know that they should be participating in the process
 - For example, once I was able to look at the hard copy maps, I saw that the rural part of Alpine will have three helicopter fly yards, yet Alpine was not a listed community. Rural Alpiners commonly have cattle, horses, and goats. Helicopter flights are something they are going to want to know about, so they can ask questions about the flight routes and see if they and their animals will be affected. There was community suffering, especially in the El Monte area, from helicopter construction during the Sunrise Powerlink. It appears from the revised Plan of Development that SDG&E plans to ask for the same helicopter use conditions that it did during Sunrise, and that is of concern.
 - There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.
 - The Sunrise Powerlink is very much a living memory in the southern San Diego back country.

There is a great deal of distrust of SDG&E because of what happened during the Sunrise Powerlink process. People still talk about it and are still upset by it. They are not going to take a “just trust us” attitude toward this project, no matter how noble the goal. They need a real chance to be honestly engaged if they are going to have any trust in the process.

- These southern back country communities are getting bombarded by energy projects and that is also increasing their distrust. Boulevard has at least five renewable energy projects proposed in and around it, plus another wood to steel power pole project (TL 6931, A.12-12-007). Boulevard will be affected by the Master Special Use Permit project, but wasn't listed in the outreach materials. The nearest repository to Boulevard with a hard copy of the revised Plan of Development is 35 miles away.
3. Now is the most critical time for communities to give the agencies comments, while you are still shaping the project alternatives for the EIR/EIS:
- If the communities come up with any large, constructive changes that they – and you -- want analyzed, that can be accommodated most easily now, during scoping. It's much harder to accommodate a great idea that would improve the project during the draft EIR/EIS comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.
 - The comment period has only been the Forest Service's ***minimum*** 45 day period under NEPA for EIS scoping, so we haven't maxed out on time yet.

In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: [Cindy Buxton](#)
To: [Will Metz](#); [CNFMSUP](#); [Joan Friedlander](#); [Bjorn Fredrickson](#); jaheys@fs.fed.us; [Robert Hawkins](mailto:Robert.Hawkins@fs.fed.us); dshobbs@fs.fed.us
Cc: kelly@kellyfuller.net; [kay taff](#); [Molly Bigger](#)
Subject: FW: Comments: SDG&E Master Special Use Permit; Erosion
Date: Thursday, November 07, 2013 1:02:23 AM
Attachments: [P1010297.JPG](#)
[P1010308.JPG](#)

These are two photos from the comments in the 2009 version of the Master Permit scoping. Nevertheless they illustrate the maintenance and erosion issues on the 626 line crossing Boulder Creek. The map books for this section at the Boulder Creek crossing are misleading as they appear to not have access crossing Boulder Creek. However currently, they DO have "access" across the stream, the only thing stopping someone is the capability of their vehicle and the honor system. There is nothing to prevent workers from crossing the stream here and from time to time they still do, though it has improved. The suggested one pole back is totally insufficient as water and erosion flow from the top of the ridge all the way to the stream given the steep grade. This should be apparent in the two photos.

WE have been asking for improvement here for quite some time and even the River Park was reassured it would not be happening . I think it still does at times. The road there has only gotten worse and the grade depth has gotten a lot deeper in places.

I would like to incorporate by reference the current comments by Nate Weflen on the subject of grade. He articulates this issue accurately and concisely. On behalf of the Forest Committee for the local Sierra Club we support his observations and concerns on the grade being far too excessive to be aligned with Forest goals as well as appreciate the effort to provide quantitative data to anchor and standardize that concern. I've left his 2009 comments on the subject attached below as well. He has since updated the position as we do too that the line should go underground. Nevertheless we feel most strongly that under no circumstance should any alternative be allowed to have road access in these two locations as doing so runs counter to every policy and goal on the management of this issue.

Thank you for reading this substantive comment. More are to follow.

I have witnessed what he is describing. I was with him three weeks ago where we took similar measurements in exactly the method he describes today for the entire southern Cedar Creek maintenance road, of that watershed from Boulder Creek Road to the stream in Cedar Creek Gorge. I'll provide the data if there is time before midnight tomorrow but will subsequently if not. This will substantiate that there are many stretches well over 30 % grade even within 20 feet of the stream. Unlike Boulder Creek there is currently no order not to drive across the stream.

There is an observed reluctance to acknowledge the dynamic fluctuation in stream flow to the

result of making observations when the stream is dry. Cedar Creek does dry up many years, but not always. In the spring of the year it can also ROAR. One trip in the late summer and fall does not provide an accurate assessment of the ecological condition of the region. Suffice to say we are grateful the USFS stepped up and showed the courage to preserve these resources as we know that they do not have unanimous support and bere the burdon of opposing pressures. It has been a long path getting to this point. Thank you for acknowledging that protecting these streams as integral components of our watershed is definitely the right thing to do. The situation crossing Cedar Creek is identical to the Boulder Creek one, one but goes on for much longer . Both streams have trout, the ones in Boulder Creek are thriving more and more and we documented the successful breeding therein two years ago with photos and video that were provided to the USFS as a result of their approved stocking program.

Cindy Buxton
541 Spurce STreet
Imperial Beach, Ca. 91932

Chair of the Forest Committee of the San Diego Sierra Club.

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

> Date: Mon, 30 Mar 2009 17:06:37 -0700
> From: nweflen@yahoo.com
> Subject: Fw: Comments: SDG&E Master Special Use Permit; Erosion
> To: iokuok2@hotmail.com
>
>
>
>
> --- On Mon, 3/30/09, Nathan Weflen <nweflen@yahoo.com> wrote:
>
>> From: Nathan Weflen <nweflen@yahoo.com>
>> Subject: Comments: SDG&E Master Special Use Permit; Erosion
>> To: rhawkins@fs.fed.us, tcardoza@fs.fed.us

>> Cc: nweflen@yahoo.com

>> Date: Monday, March 30, 2009, 4:57 PM

>> Bob Hawkins,

>>

>> I would like to comment on the Environmental Assessment for
>> SDG&E Master Special Use Permit. The comments listed
>> here are erosion based issued resulting from my travels
>> along the 69kv transmission line that parallels Boulder
>> Creek Road. Current practices are un-acceptable for this
>> transmission line or any proposed line in the CNF.

>>

>> Erosion is a serious issue along SDG&E access roads in
>> the CNF. I do not believe much of an effort has been made
>> under the current permit and believe requirements should be
>> strengthened under the new permit.

>>

>>

>> The SDG&E 69kv transmission line access roads that
>> follow Boulder Creek Road through the CNF do not appear to
>> follow modern guidelines for erosion control. True, they do
>> use waterbars here and there, but they are few and far
>> between. This access road is usually graded in the fall and
>> then 20+ inches of rain fall and wash it all away. Changes
>> to the permit I believe need to be made. First, require
>> modern erosion compliance on all existing roads, not just
>> new roads on CNF lands. Require SDG&E to follow all
>> provisions of the clean water act, US Fish and Wildlife, and
>> San Diego County codes in relation to access roads. This
>> compliance needs to be checked annually. Second, require
>> SDG&E to grade in the spring after the rainy season.
>> Spring time grading will allow the road bed to stabilize and
>> not erode away. For an example of current SDG&E
>> grading, see access roads crossing Cedar Creek and Boulder
>> Creek. Both are graded yearly with no straw rolls, silt
>> fences, etc used along the route. Both travel over very
>> powdery soil.(see pictures) Both creek crossings damage
>> reintroduced native Steelhead streams. If you would like
>> photos of the Steelhead in Boulder Creek, I can supply them.
>> If a private property owner followed the erosion practices
>> of SDG&E on their own property, they would be fined and
>> shut down by multiple agencies government agencies. I noted
>> in the environmental assessment comments on Stabilization of

>> disturbed areas. Please look at the existing SDG&E
>> access roads as they cross Boulder and Cedar Creeks. The
>> slope of these roads, I plan on checking soon, but looks to
>> be a very high percentage. Powerline access roads through
>> Boulder and Cedar Creek are a mess that's kept out of
>> sight by their remote location; please add requirements to
>> monitor this. I also believe gates need to be installed
>> along access roads to keep SDG&E employees and
>> contractors out of the creeks. These gates need to be
>> installed at the last powerpole location on either side of
>> the creek. The reason for this is two-fold. One, it keeps
>> SDG&E from destroying the creek(The last two
>> years, SDG&E contractors have had a vehicle stuck in
>> Boulder Creek on the access road. A horrible mess was made
>> when a bulldozer was used to pull them out. If you'd like
>> license plate numbers of last years truck, pictures of
>> broken glass left in the CNF, and a picture of the oil stain
>> left by the damaged truck, I can supply them). Second,
>> blocking these roads at the last pole before a creek
>> prevents through travel by illegal off-roaders, limiting the
>> damage they cause. Access for SDG&E is not lost as they
>> can still reach a powerpole, but they may have to travel to
>> the other side of the creek. In summery, please change and
>> enforce modern erosion control measures on all SDG&E
>> access roads in the CNF as a condition of the permit
>> renewal.

>>

>> PS.

>>

>> Bob, I can't find my copy of the erosion pictures at
>> this time, but they are public information on the Sunrise
>> Powerlink EIR. I have included a link for these pictures and
>> comments from RDEIR/SDEIS Sunrise Powerlink Project.

>>

>> Please include these pictures and text in my comments:

>>

>>

<http://www.cpuc.ca.gov/Environment/info/aspensunrise/feir/cmts/Comment%20Sets%20H0021-H0023%20BRTC.pdf>

>>

>>

>> The pictures of the roads in the Sunrise Powerlink EIR are

> > shown last weekend after a slightly below average year of
> > rain. Please note existing erosion control practices.

> >

> > Thank You,

> > Nathan Weflen

> >

> >

> >

> >

> > Thank You,

> > Nathan Weflen

>

>

>





From: [Cindy Buxton](#)
To: [CNFMSUP](#); [Will Metz](#)
Cc: [Bjorn Fredrickson](#); dshobbs@fs.fed.us; jaheys@fs.fed.us; [Robert Hawkins](#)
Subject: Re: SDG&E Master Permit
Date: Thursday, November 07, 2013 11:56:02 PM
Attachments: [comments to sdgemasterpermit.docx](#)

Please see attached my comments to the Master Permit
links to pictures to follow, link to a series below on Sky Driver

Thank you,

Cindy Buxton

Chair of the Forest Committee of the San Diego Chapter of the Sierra Club

541 Spruce Street

Imperial Beach, Ca 91932

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

.....
.....

Cindy has a file to share with you on SkyDrive. To view it, click the link below.

 [photoessayIn Opposition to Master PermitnewRow.docx](#)

These will be the final round of scoping comments on the SDG&E Master permit on the Cleveland National Forest. They are accompanied by some photos provided with a link to my Hotmail sky drive. I can and likely will provide more photos for your convenience and clarity and can do so on an identical DVD format but I will put them on the sky drive for the record.

I chair the Forest Committee for the San Diego Chapter of the Sierra Club. I am also the "Adoptive Parent" of the proposed Eagle Peak Wilderness and assumed that role for the Hauser Proposed Wilderness Extensions though a status for Hauser seems more uncertain at present. This Adoptive parent label was acquired during the review of these lands for the California Wild Heritage Act a Wilderness Bill ongoing introduced to Congress three times over the last decade and a half and in several other smaller portions since then for a coalition that included the Sierra Club and the California Wild Heritage Coalition. Senator Boxer subsequently acknowledged the position of "her Adoptive parents for her bill as was confirmed in a newspaper article in the San Diego Union Tribune in 2008 and reconfirmed with the former local representation on the Wilderness Effort, Geoffrey Smith. Since then the Wilderness effort on the Cleveland has added some support for the Eagle Peak portion though an agreement with the San Diego River Park Foundation, the Sierra Club, and the San Diego Mountain Biking Association to collaborate on united support for a robust and compatible land management plan.

We are thrilled to be at this stage of our goals for this area and commend the farsighted thinking of the Cleveland National Forest. It has often been the turbulent display of brainstorming in action to anyone looking in.

In the spring of 2013 the USFS proposed a Draft EIS that included protection for upper Cedar Gorge for the first time since it was proposed Back Country unroaded in 2004. Rather suddenly and inexplicably it was given a new designation, Motorized Use Restricted in the first FEIS for the Cleveland land management planning. The coalition of environmentalists led by the Sierra club, BCD and members of the State of California ultimately sued the Forest Service for the sudden down classification of lands in the plan for not protecting these remaining islands of critical habitat and unspoiled ecologies. However the San Diego Chapter of the Sierra Club was not assured representation as some of the early meetings concerning our local areas with respect to this LMP Agreement. I mention this here because it became the focus of considerable misunderstanding and very much in tandem with the issues of this Master Permit. This has been the most outstanding opportunity to set these issues straight to create a cooperative plan that serves the community and wild habitats alike. It has been quite an honor to be a part of this process. I am very proud to claim this particular corner of a life time as one of the most special. I know these areas very well and it has been a major struggle and challenge to get proper representation restored to these negotiations on the Land Management plan that then serves as the template to what activities CAN occur in these areas. There is not time to go into the details of a 15 year history of Land planning that included both Wilderness focus and the Inventoried Roadless Area Focus. However I point out that much of this has occurred because of the lack of foot to ground representation and input in the early stages. Decisions were made on speculation and input that did not have field experience or minimal experience at best. The people in this decision making process are not the same as the early days for the most part. At least two critical members have made it farther into the more remote areas that have brought us to this point of trying to protect Upper Cedar Gorge as well as

accommodate the energy needs of the community for the next 20 years. To that we add new and complex challenges brought on by the two largest fires in California History both starting very near this area and the new challenges brought to everyone in Forest management by global warming.

The two fires brought in a series of maintenance activities which in turn brought considerable grading to an old access road. The road is at considerable steep grades over 30 % even close to the stream bed. These would be “fluffed” and graded and when the rains came washed into Cedar Creek. This went on for quite some time without recognition. Thanks to the LMP SEIS process it received more attention and the new management on the Palomar has gone above and beyond to bring this into proper alignment with the Wilderness act and proper management and stewardship of the land.

It would be an understatement to say this was shocking at first. It IS the right thing to do many times over. We have complained for a decade about these particular roads, some even duplicated for the same line. Some were actually created being graded open from a trail to a road just weeks before the Cedar Fire. We are very appreciative having regained some composure over the initial suggestion that this is being offered up. It is a bold and courageous move to be sure.

What made this approach not the obvious “no brainer” is what do to as an alternative? I know this region very well. Getting the Forest staff chronically on the land has been a comment and pet peeve almost from the very beginning. I still maintain it is the first tool that needs further research and development for this and all other projects to follow. It would save copious money and time if this could be accomplished. I had to think about this a while. Asking for what you want when Santa Clause is the US Government does not come so naturally. Well I want the rangers on the ground. In lieu of that I want them to call me and include me in a greater share of these discussions. If they disagree with suggestions oh well, I can still describe with photos what is there. I can do this more broadly for most of these areas than anyone I know. Yes that includes the River Park but they are very good. If I’m wrong it would additionally be most excellent if they would say so but to date I have not been able to verify that it is the case. There are many people that know part of it very well. I know most of it very well. I’m not asking for money either just a voice, because it would be easier to input from the beginning than to have to come back in month later and have to fix and negotiate decisions that are based upon maps and helicopters. These things are fine but they are not conclusive.

In Biology there is a condition called “emergent properties”. This basically says you can describe a living entity, say for example an eye. You can know the curve of the lens the tissues and the biochemical make up in complete detail, but what emergent properties theory suggest is that no amount of this information will predict “sight”, what it is to see. To see a waterfall, or for ears, to hear one, to know what it feels like to stand under one, or even more unpredictable, that humans would be hopelessly compelled to do so. But we are. You can know the physics of music, see the sine wave or square wave on an oscilloscope, but you could never be prepared for the sound of Rock and Roll. Or that humans would be hopelessly compelled to just listen. Somethings you cannot know by study alone, not that study isn’t essential or that the members of the Cleveland are not exemplary at the things they’ve

committed to such. I can honestly attest they are. But that is not the same as going there. There has to be a catalyst somewhere. No one has said that it is exclusive of SDG&E for that matter. They can go too, on foot!

You cannot know these places from a map or from the air. I've done both more than you want to know. You cannot. To adequately speak for a wilderness you have to experience one.

This is a problem when fewer and fewer wilderness opportunities are available and fewer and fewer people even know that such a world exists. I can tell you it isn't the same as the hotel lobby fountain, nor a canyon in Balboa Park. These are both very good but they are not Wilderness. Fortunately the District Ranger, the Lands Officer, and the Forest Supervisor DO know. They did something that has not happened on the Cleveland, not happened in San Diego in quite a while; they decided to protect this for perpetuity.

I'm additionally grateful, without asking no less that the Cleveland took a stand against the cameras on these. Except for particular issues of safety of law enforcement we do not need this in a place that is supposed to be "untrammelled". I do not want to know what hunting cameras I've already shown up on out there!

There is still much to be done. Most of these places have not been surveyed, certainly not in detail and they represent ecological adaptations that likely are unique and have not been seen (in the critical eyes of a biologist) before. You cannot not see something and pretend it went away. If you have not surveyed a place it is incumbent upon you to do so before suggesting to the public that could be an area for development.

Both SDG&E and the USFS stated goals that include only developing where it would not be adding to the encroachment of wild places all the worse. "on disturbed" land.

Depends upon who you ask.

I DO represent a solid portion of the environmental community on this. However I have been around long enough to know that does not mean-not unless we have a very critical problem to resolve-likely where life or fundamental quality of life is in serious jeopardy. It does not mean moving an issue onto private land to resolve the perfect details of wilderness designation. Some things can and have been grandfathered. It also doesn't mean we shouldn't try and it certainly does mean that taking a shot at it was the right thing to do, though a bit broadsiding at first.

This is the new millennium. The proposed Eagle peak wilderness is one of the most wonderful things I could have ever hoped to be a part of in a life time, but it is not Yosemite, or Yellowstone, or Bob Marshall or the Smokies. Our wilderness "units" are the units of the new millennium pockets in a Southern California rapidly expanding sea of urbania, and in so doing we did not promote removing ANY legal public access roads. Nope. It has been with compromises, and the court order to resolve the original LMP issues would have allowed us to do so but we studied carefully and with some mirical cooperation with the USFS we choose not to. The final LMP is not published but before February

maybe well before it will be. Per the representation issues mentioned above we actually had moments in this process where as San Diegans we stood together with offroaders and/or hunters to defend integrity for the community, rather than as environmentalists strictly to do battle with them. We stand up no less for the rights of our Native American presence on the land as well. Sunrise did create some odd bedfellows, so to speak, and we learned some good lessons.

We do not support making this yet another assault onto private property. We do support finding some lasting stability. We need our Forest Service back!

The best comments to date on this scoping, I predict for the 626 line will be the simple, concise and accurate ones that were submitted by a land owner in the middle of this area, and I would like to reference them on behalf of the Sierra Club for our standing on these issues as well, those by Nathan Weflen. I could not articulate them better. They too came as a surprise but I won't argue, they are well done. Our one difference would be in that the undergrounding at Boulder Oaks Road we merely acknowledge that this may be out of priority and we believe this priority should be reexamined for alignment the goals that were stated for fire and environmental and integrity reasons. If it is possible it is high time to put this infrastructure underground or consolidate and get it under ground. The core of our position is to find the plan that will most nearly do this. The issues of erosion and wind Nathan raises, we solidly support and the notion that these lines need a very different KIND of alternative we additionally support. The details of taking care of gates and notifying the USFS of activities more agilely we also can confirm and support. I may elaborate further below but Mr Weflen provided compelling details and we believe that these should all be studied and incorporated into the next Master Permit where it makes good environmental stewardship to do so. I have sent in several emails on this project and wish to have them all part of our comments. Since this is scoping they are all suggested building blocks to be researched for a stable plan for the future.

That all leads to the paradox and challenge ahead. I'm including as part of these substantive comments some pictures and maps to demonstrate our position on this alternative study area. Most of the acreage in this study area is not appropriate for development and indeed would undermine the very issues and goals the USFS is seeking to correct in this collision of opportunities that may not come again. We hope we can take this seriously enough to be a bit critical and deserving of the details before committing to a decisioning matrix too soon. Recall the thoughts above on emergent properties. To the traditional discipline in this process I would contribute that the emergent properties rational needs to be added, especially in the case of wilderness as a critical component. There comes a point beyond measurement where the yard stick gets in the way of the experiment. There is potential for this in overkill. Take enough time to be discriminating. We have invested over a decade, a week or two where needed for perfection is a small price for perpetuity. I do think the win win is at hand. Here are the building blocks for alternatives we asked to be researched for this project alternatives.

1) the TL626 contains both a 69kv on top and a 12 kv under it. I have raised the question if it could be consolidated or just plain removed from this route. The line begins in Descanso and runs to a substation on the north edge of Cedar Gorge and then to a larger substation in Santa Ysabel. At the small

substation near Cedar Gorge, there is one breakoff 12 kv line going to one resident. That is all. Everything else on Eagle peak road is either off of the grid or serviced from a line in Julian.

Can this just be removed? Then the 12 kv that runs as far as the green and McCoy ranches could be more easily placed underground. All 12 kv lines should be under ground. The comments by Nathan Weflen that these are the most dangerous line in Southern Ca. is well taken. The 12 kv line is not build strong enough even with improvements to accommodate the harsh conditions that can occur there. If this was underground the issues of environmental impact and fire hazard are done. This frees up forest Service personnel from much of this stress as well as the public , once and for all . Our first choice alternative is to get rid of the 69kv. Give the Gibbs alternative power off the grid for no more than they are paying now-more precisely adequate and then some, solar. I recommend that this is done for the McCoys and if requested the Greens. That way the 12 kv doesn't perpetuate the issues crossing Boulder Creek either. Done and gone. This is the conclusive alternative. It should also be removed all the way back to the substation. The 12 kv should be underground the whole way.

2) in light of that the whole thing should be under ground. This is expensive, the other one is far more economically practical for forest service involvement now moving into Wilderness management, as well as the cost of maintain an underground line without a paved road. I have suggested in the past that these underground facilities should be modular and created in a climate controlled factory where precision is more possible, testing more possible, standard quality control more possible, and metrics way more possible, and designed to be laid down in the field as prefab units that can be quickly concatenated in the field all components ready to go. They could also be constructed to BE the road itself. In a factory these components would be cheaper to make and vastly better to monitor. As the road they could even be a v shape or trapezoid shape for depth and strength. This was in my comment letter to the PEEVEY version of the Sunrise Powerlink. Underground everything.

3) the line at the La Jolla Indian Reservation likely HAS to be underground. This is a scenic highway and dictates undergrounding. If Boulder Creek road were paved it would be designated a scenic highway too. SDG&E passes on costs to customers, So why is this not a no brainer. Put it all under the road, not cross country but under the road and there will be no more access issues , not more headaches for the forest service, no more billion dollar lawsuits because they caught the forest on fire, and no more issues from EMfs we hope. I think the cost of undergrounding in mass should be considered and someone should also research new techniques like the one I suggested. I do not think the cost is being accurately represented. In 2004 SDG&E wanted to underground a 69 kv and a 138 into one 230 line into Jamul. The proposed cost per mile was LESS below ground that what is suggested for this project above ground. Far fewer metal poles. That cost would offset the cost of undergrounding and in "bulk" perhaps the cost goes down.

4) the unpublished alternative , until now. I noticed that the hwy 79 line was not part of this master permit. Well it should be. It is patched to death and runs along a flat and scenic highway but it does serve a lot more than one home. It will have to be services and likely soon. When it is it is likely going under ground for the scenic highway rules . There is no getting out of this; due to the law and the current condition of that line it is inevitable. Why not combine that one with the 69kv that you are

going to remove from Boulder Creek Road 626 and move the functionality to there. I observed how this line was constructed across a winding road, it is done. However that is likely moot because I suspect state and county laws will require it goes underground. Rather than rate payers paying twice it should be the one down under. This is the premier tourist route. The short term could be annoying but I think you can, I saw Sunrise go into Alpine, you're getting good at this.

There is another issues you should research for this alternative option. The CPUC site shows the substation and the 626 line not by name alone the 79 already. The substation at Cedar Gorge is called Boulder Creek Substation. This is odd because Boulder creek is quite a ways away. However the CPUC web site has the Boulder Creek Substation labeled as such at the corner of Engineers Road and hwy 79. This also happens to be Over Boulder Creek –that the very head waters as Boulder Creek comes out of lake Cuyamaca. Why is this? I think you need to research this answer. I do not think this is a mistake because of the location and the correct name applied to the correct stream but who knows. Nevertheless the CPUC site does not show a 69 kv on Boulder Creek Road at all. This makes sense because the area is so dangerous for one. Is it possible that this line got redrawn on the wrong place some time in the last decade. I think it is and you need to research how this happened. I want to do this for a couple of reasons. First because this is a better place for undergrounding this line. Second I want to make sure that this was not an attempt to redraw the 69 kv out of thin air for the purpose of having it feed undisclosed projects along Boulder Creek road. These do exist on the hypothetical maps produced by the RETI think tank and then handed over to the county wind ordinance via the BLM. This was not disclosed to the USFS Forest supervisor before the wind ordinance was published as though the forest lands were an approved part of it. They were not and they got promptly blacked out upon notification,. Suffice to say you need to disclose what happened there so it does not happen again and upon seeing this oddity on the CPUC it just completed a few of the dots.

5) If those don't pan out there are two others. This more simple is to leave the line where it is but remove the roads that service it from the Gate at the Wefflens all the way to the high spot behind the McCoys so that there is NO MORE RUNOFF into Boulder Creek. The grade into the creek is currently 42%. That would be a no. You can service on foot and I will be happy to Sherpa you in.

The same rules apply to Cedar Gorge, no more roads where the runoff goes into the stream. This will be for over a mile, the one or two poles back was a joke and the silting there was ridiculous. This however does not address the goals fully that the USFS laid out. It is the minimum I can live with, the road MUST go. Additionally SDG&E suggested an alternate that put taller poles higher up and spanned the gorge. I've seen where someone was going up on the hill and it concerned me. This is a horrible place for this impact. The scenic integrity issues of doing this are vast. I was sold on the beauty of this promontory in 2005 when we had record rains. Past this point there are no human impacts of note and in that year Cedar gorge flowed like the Kern. There were multiple waterfalls from that point that cascaded from 400 feet above. This could easily have been a showmen site, it not it should be, it was mind blowing up there. Do not industrialize the view for another half mile by putting these towers up in the air there. That was the whole point in the first place. If this alternative is still under consideration the row needs to stay the same and all the roads need to go. I like the idea that the Palomar District

has decided to be more complete about this however, It took some thought to picture at least this much of the plan.

6) If you are going to keep poles in the mile 9-11 area they need to come up to the road at the Fortune Ranch where they do south of the Fortune Ranch and hug the road the whole way. This will value the land owners as best as possible and also much improve the scenic integrity of not having to look through higher poles from the road. It means more poles to cross back and forth the road as it switches back and forth. There would be some finessing but that would need to be the general idea.

. It should not under any circumstances go to the east of Boulder Creek Road from Mile 7 to any where it currently crosses and rejoins Boulder Creek Road at mile 13.5-14. If the Forest Service embarks upon any alignment that crosses Boulder Creek east of where it does now I will pledge to do anything I can to file suit with considerable enthusiasm. Promise. Don't do this, . If this has been sprung upon us at this late date, to compromise the biggest no brainer for wilderness protection , the Sill Hill Unit for Upper Boulder Creek and including an 800 foot and another 400 foot waterfall, considering a history of trying to disseminate some very critical information east of that current Row to be undermined in what is basically absolutely the worst place you could compromise in this entire county larger than three states. I would consider this no less than flat out betrayal and I think I can document a very serious case to that affect. It is the paradox of this chapter. The removal from Cedar gorge a small miriacle. Putting it on the edge of Boulder Gorge an impact that is worse than the one it left, absolutely not. Are you suggesting this as a fire road or for some other reason? You MUST DISCLOSE THE REAL method to your madness. Frankly this is where the lecture needs to land. This was very stressful to have to even deal with as a lone voice from the public. Time and again Ive asked the forest Service to come look-since 1998 to be exact. They have not.

An alignment along the Mccoy Hill and the rim of Boulder Creek Gorge, would support an argument that this is not for fire or for wilderness at all but for the purpose of taking land for energy projects in the county wind Ordinance and Reti mappings that were withheld from the public and the Forest supervisor. There is much to that alignment that would suggest criminal – very serious criminal activity and I'm more than prepared to launch that argument if this proves to be the case. Let's say it begins with SEC violations , racketeering and insider Trading and ends with the investigation of four possible murders of four people whose collective leadership was and would have been significant opposition to this very suggestion. How about not. Right now. This would also be another primary reason for removing the 69 out of here once and for all.

On one occasion they said they did and misled the District Ranger. It was quickly uncovered. They found out the extent to which I know this area. I had the Native Plant society on the ridge lines over Boulder Creek Gorge in four days. It was an epic emergency and the turning point because this concern came to a head. I was subsequently accosted in front of the public at the Scoping meeting by some members of the planning team that said basically they had been “wanting to put the line up Boulder Creek Road” all along-an expansion to be exact so that it would not go worse places. Well this is odd because we were told by both SDG&E and the USFS Forest Supervisor that they were not expanding up Boulder Creek Road. Let the record show that there has been some very odd and directed behavior on this alignment. Of all things this also factors in the odd and untimely death of four people. We thought with exposing the deceit on the east McCoy Hill issues as there are spring time pools of water up there and what are potentially rite of passage sites and we believe at least three Golden Eagle nests in the area not to mention about the most incredible and spectacular view in Southern California –we thought this was laid to rest. I hope right wrong or indifferent the source of my anger should be quite obvious and justified. I should not have been treated this way by some. This was beyond shocking when I saw an alignment that crossed and compromised this area as we have disseminated these things to the USFS many times. The way this study area was handled has not been a good effort, nor a particularly sensitive or professional one.

If they do not like a scolding in a comment letter, too bad, you’re getting one. I cannot think of one more deserving than this one in the entire eight years since Sunrise hit the forest in 2006. This is as a result of back room deals by people who did not walk these places, surely did not “experiences” these places and were too arrogant to include us for having told them so many times I’m blue in the face there was information they needed. You dissever this scolding and you are very lucky this is all I hope. I like the ones among you more than I am disappointed in the ones a party to this horrendous, horrendous HORRENDOUS ly bad behavior!!! I’ll bet even sgd&e is going whatttt? Well you put it on the map you asked for it. You figure out whose brainiac idea it was to publish something like this without some basic research first and maybe even some considerate notification of your stakeholders. It was called for.

Since June I could not get a conversation with the Forest Service to save myself, not for rogue fires, people littering, graffiting, in heat exhaustion, lost, nothing. But if in your absence I did something about it I WAS the bad guy??? Really. Sure. And in the mean time you are taking one more go at the McCoy hill or an alignment that would compromise the oldest ranch in San Diego and the last remaining living oral history in the backcountry? –When this has been talked to death already you STILL put it up there??? Yes you asked for this one and I don’t want to disappoint you. There is one more for SDG&E , you’re in good company. Yes you should apologize if you’re an adult and not a punk. I’ve tried to reach out it wasn’t happening but this little one was inexcusable. I’m still grateful for the Cedar Creek effort. I don’t know how this all came about but I do know it needs to be fixed and not at my expense either or that of the land owners in this area, before this Master Permit is done. There is more to this but I’ve laid out enough for standing and a bigger than life insistence that this is researched and resolved. You have a problem and it isn’t a technical one but it came close to being biggest environmental impact and compromise to the land ever .

I don't know what else to call it but the USFS needs to do some research on behalf of influence upon their people and these alternatives to assure that this will NEVER happen again. I know something rather incredible had to have gone wrong, they have not said what and it is without question so far off the bell curve I'd need new math to find it. I'm applaud that someone would operate and disseminate information as critical and in error as was done at this location. Let's assume that some of this is misunderstanding. You need to understand that the careless way this has been presented, especially in this last chapter, makes some of you look like they are ***potential accessories to four counts of murder***. I'm serious about this. It no activist thang, I am not an activist by choice, it is what I have observed and at this late stage of the process what has to be said for lack of another forum to say it.

If you aren't guilty you need to grow up, because the unprofessional manner this went down is what put this here. I'm very serious about this position. It hurts the community it hurts the land. I am not the one who did these things and I'm not a bitch or a bad person for calling them out, far from it. I have been treated very badly just for caring about the land, for insisting on integrity and clarity for the duration especially as the dots grew and grew, by some who apparently had an alternate agenda.. You were told and asked yet still did not find it necessary to have a conversation many times over in other words avoided it every way possible by trying to marginalize me instead of doing the right things. It is time for the forest service to make sure all of this is put amicably to rest. It has hurt me greatly and affected my life in every way imaginable and yes you do have that responsibility to make things right, not try to hurt me worse to make me and others leave. That is cowardly, some of you behaved badly, and we do not have time for cowards any more. That concludes your lecture.

I would like to reference the comments of Nathan Weflen and have standing on these issues on behalf of the San Diego Chapter of the Sierra Club. They are accurate and concise. We deviate in that we think this entire project should be underground. Nevertheless we acknowledge the issues that the undergrounding at Boulder Oaks Road is right next to SDG&E's facility and seems to be more out of political visibility where it is also very convenient than looking at the real needs and goal of this Permit and addressing areas with the greatest priority.

Please review how these have been prioritized for undergrounding. I think fire safety should be high on this list along with environmental integrity. I'm not sure that this location qualifies for the top spots though should they underground everything and they should then we would endorse that decision.

The gates that SDG&E installed are high quality. However they are not consistent with the USFS scenic integrity standards. The USFS colors for the Lagunas include painting homes only green and brown. I think this should apply to gates as well. There is no reason for these to be shiny bright white. They have enough reflectors on them to land aircraft, they can be seen. However putting these out there in white with industrial type stripping is not only against the scenic integrity manual for blending with the surroundings, but it is perceived disrespectful of the Forest Service as it to say, "this is our turf", so our colors will look industrial. I think they should have checked in with these standards before assuming this.

There are a number of Eagle nests in the study area presented.

There are considerable more recent historical sites in the areas to the east of miles 11-12, west of the Green and McCoy Ranch that you suggest as an alternate alignment. There are eagles on Mineral hill and have been on the rocky ridges of the Green ranch and McCoy Hill. There are several in Cedar gorge, a nesting pair near where SDG&E wanted to restring higher in Cedar Gorge and two more with one nesting pair on the boundary of the USFS and INAJA and one on the top middle of Ant Mountain. There are at least three in the San Diego river Gorge, one at the mouth of Boulder gorge, one behind Mildred Falls, and one on top of SunShine Mountain. I think you should study these in determining alignments.

There is an interesting story about a Mr Steward at Johnson Creek and an old homesite upstream from there. From there to the Green Ranch is what may be virgin Mediterranean forest and most definitely should not be disturbed with construction. This means a very careful alignment near Boulder Creek Road or put it under ground.

SDG&E's treatment of their new conductor has been deceptive and they need to explain the electrical engineering of their intentions in detail. We cannot make accurate suggestions without a clearer picture of what they are doing. This is a five fold increase in capacity. I don't care if it is voltage or

amperage the capacity is going up. To say it is for fires hardening so we don't have to disclose it is just about as immature as not telling the truth about what is on the land. Yes you do have to disclose this. Calling this project a mere repermit is a mere deception. You do need to explain many things.

Please research and explain the changes in efficiency that come in using the described one inch wires with five fold amperage,

Please research the impact of combining 270 or better degrees on the conductor with 90 mile per hour winds and rye grass. I think this has high potential to undo any fire hardening.

The Hauser canyon alignment should be researched for potential consolidation onto Sunrise. Please research why there is marked roads in Hauser Canyon. This is a federally protected wilderness. These areas should not be getting traffic.

The alignment at Viejas goes over a historic old road, it still contains square nails . Any changes to this route should not compromise this historic relic.

You need to provide a discussion of the effects of high current. What is the impact to TV radio and microwave reception? We know of people living near this type of wire with brain cancer and other cancers and odd health issues. High current produces high magnetic fields different from the issues of high voltage. You need to discuss how you will prevent – not avoid, prevent harm to people near these. If you put them underground you will not have this issue either. If people can no longer get TV reception are you going to do something to provide it?

You need to research just what they mean by the other addendum items .

We are grateful to the USFS forethought not to allow camera on these lines.

They need to be particularly careful of impacts to amphibians and turtles.

You need to research the value of these metal poles that they as metal do not endanger lives with additional current.

You need to assure that the additional capacity that all it will be attached to is disclosed. When the electrical analysis is available you should release this for some interim comments that we can not make without it. Efficiency and how that impacts the supply of power would be critical.

Thank you for the effort in bringing this project to public scoping. We will be looking forward to your response.

Sincerely

Cindy Buxton

Chair of the Forest Committee of the San Diego Chapter of the Sierra Club

From: [Kelly Fuller](#)
To: "Bob Hawkins"
Cc: lisa.orsaba@cpuc.ca.gov; [CNFMSUP](#); wmetz@fs.fed.us
Subject: FW: A.12-10-009: SDG&E's Master Special Use Permit
Date: Friday, November 08, 2013 7:47:05 AM
Attachments: [POC MSUP scoping comments.pdf](#)
[A.12-10-009_POC_2013-10-29.pdf](#)
[MSUP scoping comment period.msg](#)

Dear Mr. Hawkins:

Please accept my apologies for my not including you when The Protect Our Communities Foundation's comments on SDG&E's Master Special Use Permit project were submitted yesterday (attached). It was an oversight that happened because on the website for this project, you are not listed as one of the people comments should be sent to. I realized this morning that you should also have received them.

Best wishes,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: Kelly Fuller [mailto:kelly@kellyfuller.net]
Sent: Thursday, November 07, 2013 11:56 PM
To: 'lisa.orsaba@cpuc.ca.gov'; 'wmetz@fs.fed.us'; 'cnfmsup@dudek.com'
Subject: A.12-10-009: SDG&E's Master Special Use Permit

Dear Ms. Orsaba and Mr. Metz:

Please accept The Protect Our Communities Foundation's scoping comments on SDG&E's Master Special Use Project. If you have any questions or problems opening the letter, please contact me.

Thank you for your consideration of our comments.

Sincerely yours,

Kelly Fuller



The Protect Our Communities Foundation
P.O. Box 305
Santa Ysabel, CA 92070
Send correspondence to: kelly@kellyfuller.net

November 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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: A.12-10-009: SDG&E's Master Special Use Permit – Scoping Comments

Dear Ms. Orsaba and Mr. Metz:

Thank you for the opportunity to participate in scoping on SDG&E's Master Special Use Permit (Project) under the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). These comments are provided on behalf of The Protect Our Communities Foundation (POC).

I. Project Scoping

POC values cooperative work and coordination with state and federal agencies. Unfortunately, we have to tell you that scoping for this project was fatally flawed, and it is our hope that you will be able to correct this problem quickly. The project's Notice of Intent published in the Federal Register does not follow Forest Service regulations for implementing the National Environmental Policy Act (NEPA).

According to the Forest Service's *FSH 1909.15 – National Environmental Policy Act Handbook*, Forest Service regulations require that Notices of Intent published in the Federal Register include "any permits or licenses required to implement the proposed action and the issuing authority" 36 CFR 220.5(b) (page 6).¹ However, the only permit or license identified in the project's Federal Register Notice is the Forest Service's Master Special Use Permit.² Even a single missing permit

¹ Forest Service (2011). *FSH 1909.15 – National Environmental Policy Act Handbook*. Available at http://www.fs.fed.us/emc/nepa/nepa_procedures/. The Proposed Actions listed in the Federal Register notice include authorization of work both inside and outside the Cleveland National Forest.

² Authorization actions by the U.S. Bureau of Land Management and U.S. Bureau of Indian Affairs are mentioned in the Federal Register Notice of Intent, but the required permits for those actions are not named explicitly. There are also references to an approval decision by California State Parks, but the required permit or license is not named. *Federal Register*, Vol. 78, No. 184, 9/23/13, page 58271. Available at <http://www.gpo.gov/fdsys/pkg/FR-2013-09-23/pdf/2013-22904.pdf>.

would establish that the Notice of Intent has violated Forest Service regulations regarding scoping, and SDG&E's application documents indicate that multiple permits are needed:

- Section 4.3 of the revised Plan of Development, *69 kV Undergrounding* (related to TL 629E), states, “SDG&E would secure the necessary permits to conduct these specialized construction activities and would implement standard best management practices (BMPs), including silt fencing and straw wattles, in accordance with the Proposed Action’s Storm Water Pollution Prevention Plan (SWPPP)” (page 33, emphasis added). SDG&E’s original application makes even clearer that permits are required:

This specialized construction requires 20 to 40 foot wide boring pits, 10 to 20 feet deep *which require special permits. Increasing the depth of the conduit for the transmission line would make these pits even deeper which would eliminate the possibility of permitting.* (page 91 of 125, emphasis added)³

- Section 7.2.5 of the revised Plan of Development, *Underground Duct Package and Installation*, states, “If trench water is encountered, trenches would be dewatered using a portable pump and *disposed of in accordance with applicable regulations and permits*” (page 68, emphasis added).
- Section 9 of the Revised Plan of Development, *Required Permits and Authorizations*, states, “SDG&E would obtain all required approvals for all construction activities from federal, state, and local agencies, as applicable. Table 16: Anticipated Permits and Approvals lists the potential permits and approvals that may be required for these construction activities” (page 81). In Table 16, these include Army Corps of Engineers Clean Water Act Section 404 Nationwide or Individual Permit, FAA Permission to Fly Helicopters, SWRCB National Pollutant Discharge Elimination System – Construction Storm Water Permit, California Department of Fish and Wildlife--California Fish and Game Code Section 1600 Streambed Alteration Agreement, Regional Water Quality Control Board--Clean Water Act Section 401 Water Quality Certification, California Department of Transportation (Caltrans) Encroachment Permit, and San Diego County Encroachment Permit (page 82).

Even to members of the public, it is self-evident that one or more of these permits will be required. For example, Caltrans requires encroachment permits “for all proposed activities related to the placement of encroachments within, under, or over the State

³ SDG&E (2012). *Application of San Diego Gas & Electric Company (U 902 E) for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects*, vol. 1. Available at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/Main/SDGE%20CNF%20PTC%20Application%2010-17-12.pdf>. SDG&E’s amended application filed in 2013 incorporates by reference this original application. See page 1. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Amended%20Application.pdf.

highway rights of way.”⁴ The County of San Diego requires a similar encroachment permit regarding county roads.⁵

Because some of the construction work necessary for this project will have to be done along state highways where power poles are immediately adjacent to the road and in locations where there will not be a wide shoulder or a good place to park trucks, it seems clear that the project will have encroachments requiring a Caltrans or County permit.

Other serious problems occurred during the scoping process. Some of these issues have already been explained in writing to the Forest Service and CPUC and those communications are incorporated by reference (and attached to this letter). In addition,

- The Federal Register notice clearly states that the Forest Service, CPUC, BLM, BIA, and CSP will have their own authorizations to make regarding this project. Yet only the Forest Service and CPUC sent staff to the two scoping meetings.⁶ This meant no one from the cooperating and responsible agencies was there to explain their Proposed Actions, listen to the public’s scoping comments or to answer any questions from the public.
- According to the presentation that was given to the public at the scoping meetings, the purpose of those meetings was to “To inform the public and responsible agencies about the project; To inform the public about the environmental review process; and To solicit input on the scope of issues and alternatives to be addressed in the EIR/EIS.”⁷ But the information presented did not adequately inform the public. The slides did not include the Proposed Actions and Project Objective for the cooperating and responsible agencies (BLM, BIA, and CSP), only the Proposed Action for the Forest Service. This compounded the problem of not having any staff from those agencies present at the meeting.
- Likewise, the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting used by Dudek to notify the public of scoping described only the Forest Service Proposed Action. The BLM, BIA, and CSP Proposed Actions and Project Objective were not included. Instead, the BLM and BIA Proposed Actions were published only in the Notice of Intent in the Federal Register, which very few members of the general public read. The CSP Project Objective was not even published in the Federal Register. Again, this was not adequate to inform the public about what was happening. Excluding information about the cooperating agencies was especially unfortunate since according to the Federal Register notice, SDG&E may be operating some of its existing project facilities on BLM

⁴ See <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

⁵ See <http://www.sdcounty.ca.gov/dpw/docs/EncroachmentPermit.pdf>.

⁶ The absence of cooperating and responsible agency staff at the scoping meetings was verified in an email from Rica Nitka (Dudek Environmental) to Kelly Fuller (POC), 11/4/13.

⁷ CPUC and Forest Service (2013). *San Diego Gas & Electric Company Master Special Use Permit and Permit to Construct Power Line Replacement Projects*. Slide 2. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/msup_ptc_scoping_meeting.pdf.

land illegally; the right-of-way permits have expired or were never issued. That is information that the public has a right to know.

- In addition, comments for the TL-637 wood-to-steel proceeding were also due today, which made things difficult for members of the public trying to participate in both proceedings.
- One of the most serious problems with the scoping period was that many of the affected communities had inadequate notice that they were going to be affected and therefore should be participating in scoping. This is because the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting did not list all of the affected communities. Even some communities that are going to have helicopter fly yards, such as Alpine and Boulevard, were not listed, despite the problems that occurred with helicopter disturbance during construction of the Sunrise Powerlink. Moreover, it is not enough to send scoping notices to Planning Groups in the affected communities if those notices do not list all the affected communities. In San Diego County, all Planning Group members are volunteers, not paid staff. They have busy lives, and they receive many notices. If Planning Group members do not see their community listed on a scoping notice, it is not reasonable to expect them to read a 125-page project application just to verify their community is not involved. Instead, that scoping notice will more likely go into the trash can or be deleted without a second thought.

As a result of the problems with scoping, POC repeatedly asked the CPUC and Forest Service to extend the scoping comment period and to list all of the affected communities. The agencies said no. POC does appreciate that the agencies increased the public's access to hard copy documents about the project in response to POC's request.

Given the violation of Forest Service regulations regarding scoping and the other serious issues, POC urges the CPUC and Forest Service to reopen the formal scoping comment period with a notice that lists all the affected communities.

II. Purpose and Need/Project Objectives

The Purpose and Need of each of the three federal agencies and the Project Objectives of the two state agencies should be included in the EIR/EIS. (The Project's Federal Register notice included the federal agency Purpose and Need statements but not the state agency Project Objectives.) The narrow description in the Purpose and Need section of SDG&E's revised Plan of Development is based on the previous Environmental Assessment, and as a result it focuses only on the Cleveland National Forest and does not acknowledge the other necessary land management agency approval decisions (BLM, BIA, CSP) or the BLM regulation that require future BLM authorizations to conform to current land management plans (43 CFR 1610.5-3).⁸ However, this EIR/EIS and the parallel proceeding at the CPUC need to be broader, reflecting

⁸ See BLM (2008). *BLM National Environmental Policy Handbook H-1790-1*, page 6. Available at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_handbook.P ar.84688.File.dat/h1790-1-2008.pdf. See Revised Plan of Development, page

the fact that almost half the poles changed from wood to steel would be located outside the Cleveland National Forest.

In addition, the EIR/EIS's Introduction should include the plans, laws, policies, and Executive Orders the project will comply with, be consistent with, implement or address. At a minimum, this list should include

- Consistency with the Forest Service's current Land Management Plan;
- Conformance with the BLM's current Land Use Plans per 43 CFR 1610.5-3;
- Implementation of Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds"⁹;
- Compliance with federal laws, including the Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Clean Air Act, and Clean Water Act; and
- Consistency with the Community Plans in the San Diego County General Plan.
- Compliance with state law and local ordinances.

In a federal EIS, this list is often placed in the Purpose and Need section.

III. Alternatives to be Analyzed in the EIR/EIS

POC would like to see a variety of alternatives analyzed in the EIR/EIS.

- The EIR/EIS should analyze a new alternative of renewing and issuing permits as needed on federal lands to keep existing facilities working, and increasing vegetation management and equipment inspections. No wooden poles would be changed to steel poles. This is different than the Forest Service's proposed no action alternative in two respects: issuing the permits, and increased vegetation management and equipment inspections. POC would like to see this new alternative analyzed because of its reduced environmental and community impacts.
- Using composite poles instead of steel poles should also be analyzed in this EIR/EIS, either in particularly sensitive locations or along all of the route. Composite poles are safer for humans and birds than steel poles because they are less conductive. Examples of sensitive locations would be near campgrounds and homes or near areas used by birds for breeding, roosting, or feeding.
- Another alternative that should be analyzed in the EIR/EIS is using replacement poles (whether they are steel or composite) that are closely matched in height, and as much as possible, in diameter, to the existing wooden poles they are replacing. This would have much less visual impact on the Cleveland National Forest, BLM lands, tribal lands, and surrounding communities, than the up to 120' tall and 3' to 5' in diameter at their base 69

⁹ Both the Forest Service and the Bureau of Land Management have signed Memorandums of Understanding with the U.S. Fish and Wildlife Service regarding the implementation of Executive Order 13186.

kV steel poles and larger than existing 12 kV steel poles that SDG&E has proposed.¹⁰ If this alternative is not feasible due to CPUC or other regulation, the EIR/EIS should explain in detail exactly which regulation(s) prevent it.

- The fourth new alternative that should be analyzed is more undergrounding near popular trails and near campgrounds. For example, the Loveland Reservoir Trail in Alpine is heavily used and will likely be seriously visually impacted by the project. (It's been POC's experience that simulations provided for projects underestimate visual impacts.) The Reservoir is a favorite place in the community, where families often take their children to fish. The public's experience there would benefit from undergrounding, and the same is true for other popular trails and the campgrounds the project lines run through or are immediately adjacent to. Undergrounding might also increase public safety in these areas by reducing fire risk and risk of exposure to conductive steel poles.
- The fifth new alternative that should be analyzed concerns the Pine Creek and Hauser Creek Wilderness Areas. In this new alternative, the existing wooden poles of line C157 would be left in place where line goes through Pine Creek and Hauser Wilderness Areas, and vegetation management around those poles and equipment inspections would be increased inside the Wilderness Areas. Outside the Wilderness Areas, the rest of C157 would be changed to steel poles of a height similar to the existing wooden poles. The conductor would be changed to a heavier weight that is still compatible with the existing poles in the wilderness or if the existing poles cannot support a heavier weight of conductor, it would remain the same. This would allow the Wilderness Areas to maintain their integrity while still changing most of the line to steel poles.

IV. Impacts

The following impacts on communities and nature should be analyzed:

- Impacts of helicopters on residents, livestock, pets, and wildlife (especially eagles and other raptors), including but not limited to impacts of noise and vibration. (This will vary by model of helicopter, so all should be analyzed.) 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 problems with helicopters flying too low over homes, and helicopters flying with suspended loads over homes.¹¹ The lesson learned here from that experience is that there need to be strict conditions set for helicopter use, helicopter use needs to be monitored carefully throughout construction by the CPUC, 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 communities.

¹⁰ See the Revised Plan of Development, page 28.

¹¹ See, for instance http://www.cpuc.ca.gov/environment/info/aspen/sunrise/stop_work_order_092711.pdf, <http://www.eastcountymagazine.org/node/7651>, and <http://www.eastcountymagazine.org/node/7651>

Furthermore, it would be very helpful if the draft EIR/EIS included maps that showed not only the fly yards, but also the routes the helicopters will be flying. It is difficult for residents to know if they and their animals will be impacted when maps only show the fly yards. It would also be helpful to have all the fly yards marked on an additional single overview map so that people can see at once where the fly yards are located rather than having to page through every single map to find out.

- The impacts on landowners with private easements should be analyzed in the EIR/EIS. Does SDG&E have all the easements necessary on private land for this project? Will any private land easements have to be amended to allow for the cross beams on these steel poles, access road improvements, or other issues? If so, are all private landowners willing to allow SDG&E to make these changes? Is there any possibility of eminent domain being needed to obtain additional easement land for this project? We ask because in SDG&E's Pala to Monserate wood-to-steel replacement project, there was a serious issue of landowner's rights. The cross beams of the steel power poles installed on one ranch were wider than the easement (as measured by the landowners) and the landowners and SDG&E disputed the easement width at the CPUC.
- Review of the maps indicates that many of the staging areas, stringing sites, and fly yards will be sited in or near agricultural areas/fields. The EIR/EIS should thoroughly analyze the project's impacts on agriculture, including but not limited to livestock production, dairy and egg production, crop production, horse training and boarding, and beekeeping. This analysis should not be limited to commercial production facilities, but also to agriculture on a home-use scale since livestock ownership is widespread throughout the backcountry (e.g., horses, goats, chickens and other domestic fowl, cattle). Seemingly minor occurrences such as gates being left open or loud construction noises can have real impacts for people who keep animals.
- Impacts on traffic. Many of the power lines parallel roads that are major through routes for their communities and there are not many or in some cases any alternate routes.
- Impacts on Rancho Cuyamaca State Park, including campgrounds and trails, and all types of recreational users there.
- Impacts on campgrounds and trails outside of Rancho Cuyamaca State Park
- Impacts on raptors, including eagles, and other birds, during construction, operation, and maintenance of the line. Applicable federal laws are the Endangered Species Act, Bald and Golden Eagle Act, and Migratory Bird Treaty Act. The EIR/EIS should analyze whether eagle "take" as defined in the Bald and Golden Eagle Protection Act will occur.
- The EIR/EIS should analyze SDG&E's designs for power poles to determine how much collision and electrocution risk they pose to birds and then suggest modifications to reduce that risk. Unless carefully designed and installed, steel power poles can present greater risk of electrocution to birds than wooden power poles because of steel's conductivity.¹² Although the Revised Plan of Development states, "SDG&E will

¹² See Harness, Rick (2000). *Raptor Electrocutions and Distribution Pole Types*. Available at http://www.woodpoles.org/PDFDocuments/TechBulletin_Oct_00.pdf. The Avian Power Line Interaction

design and install all new structures in compliance with the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee (APLIC)” (page 28), APLIC guidelines are just that: general guidelines. To truly protect birds, it is best for an experienced expert with specialized knowledge of the extra risk steel poles pose to birds to review the equipment designs. POC strongly suggests contacting Rick Harness at EDM International. He is a national expert on this subject and can look at equipment drawings and assess if they are actually going to be safe for birds: (970) 204-4001, rharness@edmlink.com. In addition, the Forest Service is not a member of APLIC and so does not have a liaison to the committee, but Al Manville, the U.S. Fish and Wildlife Service’s liaison to APLIC, is a national expert in anthropogenic bird mortality, including from transmission lines, and may be helpful to the analysis of this project: Albert_Manville@fws.gov, (703) 358-1963. POC recognizes that SDG&E’s parent company, Sempra Energy, is an APLIC member, but it would be good to have multiple people with this specialized experience looking at the proposed designs.

By taking further steps to make its equipment truly as bird safe as possible, SDG&E can lower its risk of federal prosecution for violations of the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Endangered Species Act. While there are permits available that allow utilities to kill or harm eagles and birds protected by the Endangered Species Act, there are currently no permits available to utilities for birds protected by the Migratory Bird Treaty Act.

- The EIR/EIS should analyze the impacts of all equipment that SDG&E wishes to install on these lines and the final approval decisions of all the agencies should be only for the equipment analyzed in the EIR/EIS. This may seem self-evident, but the Draft Operating Plan included in SDG&E’s Revised Plan of Development shows that the utility is seeking a blanket approval now for future equipment. It states, “SDG&E may install appurtenant facilities—such as weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities—on steel poles within existing ROWs, *as needed*, to collect additional information to further increase fire safety and service reliability *as new technologies become available*” (Draft Operating Plan, page 12, emphases added). While fire safety and service reliability are important goals, this additional future equipment might be placed in service around people’s homes, livestock and pets; near campgrounds; near endangered wildlife; and in other sensitive locations. This future equipment must be reviewed for its environmental impacts, not

Committee added a new section on steel and concrete power poles to its 2006 guidance because of the hazard the poles can create. (Harness is credited in the introduction.) See Avian Power Line Interaction Committee (2006). *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*. Available at http://www.dodpif.org/downloads/APLIC_2006_SuggestedPractices.pdf. APLIC’s manual was updated in 2012 and is available at <http://www.aplic.org/>. It’s POC’s understanding that the 2012 update was related to collision issues rather than electrocution. Al Manville or Rick Harness will be able to explain the differences between the two versions.

simply approved now. This is especially true of new technologies that have not yet been invented.

The mention of smart-grid data collection equipment in the Draft Operating Plan is particularly relevant here. Smart-grid data collection has been highly controversial in California, and members of the public have fought to smart meters removed from their homes or never installed at all. To give SDG&E approval to install smart-grid data collection equipment in the future on these lines without having conducted full environmental review of that equipment could invite strong public controversy.

- The EIR/EIS should analyze the impact of this project on dark skies. The replacement steel poles SDG&E has been using in some locations inject night lighting into previously dark rural skies. (See, for example, two replacement steel poles on Japatul Lane in Alpine.)¹³ On the pole's cross beam, there are two rectangular areas that reflect light at night. (They appear to be the high voltage stickers.) At the location in Alpine, the existing wooden poles do not have this reflective glow. It is surprisingly bright, is not a natural experience, and detracts from the dark rural sky. These glowing rectangles would also detract from the experience of nature inside the Cleveland Natural Forest, Rancho Cuyamaca State Park, on BLM land, and or other wild places. Their impacts should be fully studied and unless SDG&E doesn't plan to use them in this project, the public needs to be made aware that they are part of the steel pole "package" so that they can comment on them. San Diego's rural residents cherish their night skies, where they can still see the Milky Way and constellations. Maintaining dark skies is also included in some of the Community Plans that are part of the San Diego County General Plan.¹⁴
- The EIR/EIS should analyze how this project will affect the ability of the communities in the study area to achieve the goals in the Community Plans that are part of the San Diego County General Plan, regardless of whether the planning groups associated with those communities submitted scoping comments or not.¹⁵ As stated earlier in this letter, all San Diego County planning group members are volunteers, and they do not always have time to respond to all notices they receive, especially when their community is not listed as an affected community on the notice.
- The project's visual impacts should be thoroughly analyzed in the EIR/EIS. Many of the visual simulations in the Revised Plan of Development are disturbing. For example, the visual simulation of SR 79 at Viejas Boulevard looking north (KVP 27) suggests that the new steel poles are going to be significantly larger than the current wooden poles. Will the poles be that much larger through Descanso, all along SR 79 and all the way through Rancho Cuyamaca State Park? If so, that will dramatically take away from the experience of wild nature that characterizes the area and that people from outside the area come to

¹³ Kelly Fuller of POC can provide precise location for the Alpine poles if desired.

¹⁴ For example, see Goal LU 1.1 of the Boulevard Planning Area Section of the Mountain Empire Subregional Plan (page 20). Available at http://www.sdcounty.ca.gov/pds/gpupdate/docs/bos_oct2010/B2.10a_boulevard.cp_102010.pdf.

¹⁵ Community plans are available at <http://www.sdcounty.ca.gov/pds/generalplan.html>.

see. However, it wouldn't even be possible to have this concern without the visual simulation. The information provided to the public so far has relied on "typical" power poles and an "average" height of 10' taller poles. The EIR/EIS will need to provide much more detailed information about many, many locations so that the public can comment in an informed way. But because of the problems described earlier with how scoping was conducted, it is highly unlikely that this comment period is going to identify all of the locations that are important to the public and need to have visual simulations in the EIR/EIS. The most effective course of action would be for the agencies to get this information directly from the public.

Other examples of disturbing changes from the visual simulations included in the Revised Plan of Development include:

- The visual simulation of TL629 at La Posta Road (KVP 37) shows an H frame being replaced by a much taller pole. The EIR/EIS should analyze why the pole is so much taller. Is this required by regulation or law? It will cause a change in the rural character of the area and therefore the EIR/EIS should also analyze its impacts on the area's rural character.
- The visual simulation of TL6923 (Hauser Mountain near Pacific Crest Trail, KVP 55) shows a significant visual change. The existing poles blend in. the new ones will stick out.
- The visual simulation of the Forest Service Volunteer Activity Center near Sunrise Highway (KVP 69), line (C440) shows much taller poles than the existing ones. They also are brighter than the existing poles. The EIR/EIS should analyze why the poles are so much taller. Is this required by regulation or law?
- The EIR/EIS should analyze how much water will be required for construction, where that water will come from, and the impacts of sourcing the water. Portions of the study area are a certified sole-source aquifer (i.e. Boulevard). Groundwater is a sensitive resource in all areas of the study region because of potential impacts on residents' wells, local water districts, agriculture and other business uses, and wildlife.
- The EIR/EIS should analyze the noise impacts of the project on humans and animals (including livestock, pets, and wildlife).
- The EIR/EIS should thoroughly describe how the wooden poles will be disposed of and the environmental impacts of that disposal. (Wooden power poles are treated with chemicals that can make their disposal problematic.)¹⁶
- The San Diego backcountry often experiences lightning strikes and occasional fires caused by lightning. The EIR/EIS should analyze what will happen when tall electricity-

¹⁶ See, for example, Beyond Pesticides/National Coalition Against the Misuse of Pesticides. *Fact Sheet on Chemically Treated Wood Utility Poles*. Available at <http://www.beyondpesticides.org/wood/resources/Fact%20Sheet%20Revised%20Treated%20Wood%202-21-03.pdf>. See also Environmental Literacy Council (2008). *Wood Utility Pole Life Cycle*. Available at www.enviroliteracy.org/article.php/1311.html.

conducting steel poles are placed throughout the backcountry.¹⁷ Will they attract lightning? What are the safety implications for the public, livestock, and wildlife anywhere near a steel power pole if lightning strikes it? What are the safety implications for campgrounds and homes that have these steel power poles near them, in terms of lightning strikes? Could lightning conducted through these steel power poles start a fire?

- Steel power poles can bend in severe wind storms. The EIR/EIS should analyze the potential impacts of San Diego backcountry winds on these power poles. If the poles do bend, can they be repaired? If they must be replaced, what are the implications in terms of service reliability and impacts to the environment? How much wind does it take to bend the poles SDG&E intends to use?
- The effects of corrosion on steel power poles, both above and below soil level should be analyzed in the EIR/EIS.
- The EIR/EIS should analyze the project's impacts related to electric and magnetic fields.

V. Fire and Reliability

The EIR/EIS should thoroughly analyze the technical aspects of SDG&E's proposed project in terms of its fire-safety features, comparing them to the causes of SDG&E's past power-line caused fires to see if the fire-hardening features of this project would have actually prevented those fires. If there is a fire, will the steel power poles have to be replaced? (How do thin-walled steel power poles respond to the extreme heat of a wildfire?) It is POC's understanding that the conductors would have to be replaced after a wildfire because soot accumulates on them and is conductive. In addition, the EIR/EIS should analyze the spring 2013 fire that was caused by the Pala to Monserate wood to steel project line after it was converted to steel power poles.¹⁸ If steel power poles prevent fires, why did that line cause a fire after it was converted? There were also power reliability problems reported in that area around the same time that appear to have been on the power line. They should be analyzed in the EIR/EIS as well since improving reliability is a goal of this project.

VI. Monitoring, Mitigation Compliance and Reporting

The EIR/EIS should clearly lay out the monitoring that will be performed to ensure that all mitigation commitments are being performed as described in the EIS/EIR and related decision documents), and whether the mitigation effort is producing the expected outcomes and resulting environmental effects. This should include the frequency at which the agencies will review this monitoring and mitigation compliance. The results of this monitoring of the mitigation efforts should be reported on a regular basis, and those reports should be published and made readily available to the public, preferably on a website. Because of the size of this project and the

¹⁷ The capacity of steel power poles to conduct lightning is acknowledged on page 11 of American Iron and Steel Institute's *Steel Distribution Poles: What Every Lineman Should Know*. Available at <http://www.smdisteel.org/~media/Files/SMDI/Construction/UPoles%20-%20Training%20-%20Marketing%20-%20Student%20Manual.pdf>.

¹⁸ See Ramsey, Debbie (5/2/13). "Fallbrook Plagued with Power Outages in April." Village News. Available at <http://www.thevillagenews.com/story/70797/>.

environmental sensitivity of many of the areas involved, this monitoring should be done by an independent third party, paid for by SDG&E but under the direction of the agencies.

Power lines are known to be a serious hazard to birds, but very little systematic mortality monitoring of them ever takes place. Because steel poles can be more hazardous than wood for birds and because more than half of these poles will be on Federal property, it would be appropriate to have a mortality monitoring program. Such a program would provide much needed information on avian mortality from steel power poles and would provide an opportunity for the Federal agencies to implement Executive Order 13186. Mortality monitoring protocols could be adapted from the U.S. Fish and Wildlife Service's Wind Energy Guidelines, in consultation with U.S. Fish and Wildlife Service staff.¹⁹

Such monitoring should be conducted by an independent third party under the supervision of the CPUC or the U.S. Fish and Wildlife Service and reports should be published and made available to the public. This would be a ground-breaking study and an opportunity for the project to distinguish itself.

VII. Implications of Heavier Conductors for Thermal Load-Carrying Capability

In its Revised Plan of Development, SDG&E states that no increase in system capacity will occur, but then quickly qualifies that statement:

No changes to the system capacity will result from the additional circuits; rather, the additional circuits will provide increased system reliability. "System capacity," as used in this context, refers to the nominal operating voltages of the transmission facilities in question. In this case, the nominal operating voltage of the electric transmission facilities affected is 69 kV, and this will not change. What may change is the thermal load-carrying capability of affected transmission lines, as their conductors are replaced and/or reconfigured. (page 32)

The EIR/EIS should analyze the implications of changes in the thermal load-carrying capability of the transmission lines, caused by changing to different or reconfigured conductors. Will this project potentially result in increased system capacity, not measured in voltage, but in another unit of measurement?

Similarly, the San Diego Sierra Club has raised related concerns in its public discussions of increased wattage and amperage related to increasing the thickness of the conductors (e.g., at the recent scoping meetings). The EIR/EIS should fully analyze the wattage and amperage issues raised by the San Diego Sierra Club.

VII. Growth-Inducing Impacts and System Capacity

Sections of two power lines in this sections of this project are proposed to be changed from single circuit to double circuit, reportedly to increase system reliability (TL625B and TL629E).

¹⁹ There is also a helpful discussion of transmission line mortality monitoring in Convention on Migratory Species (2011), *Guidelines For Mitigating Conflict Between Migratory Birds And Electricity Power Grids*. Available at http://www.cms.int/bodies/COP/cop10/docs_and_inf_docs/doc_30_electrocution_guidlines_e.pdf.

Those changes should be analyzed for their potential growth-inducing impacts in their local areas (roughly Alpine and Boulevard, respectively).

Although the Revised Plan of Development says that no increase in system capacity (as measured in voltage) will occur, POC has a number of questions we would like to see answered in the EIR/EIS: How much unused transmission capacity will be available on the double circuited lines once the work has been completed? Once the lines have been made double circuit, what is the largest system capacity they can be increased to if SDG&E comes back and reconductors them? What kind of review procedure would that require at the CPUC? What kind of substation and related equipment upgrades would also be required to get to that maximum capacity and what kind of review procedure would that require at the CPUC?

VIII. Connected Actions

There are many centralized renewable energy projects planned throughout the study area and they should be analyzed as potential connected actions. They cannot be built without transmission capacity, and from what has occurred so far in Boulevard, these types of projects appear to generally require changes and upgrades to the grid. POC is continually learning of new proposed projects, so the list of projects to be analyzed will need to be updated throughout the time that the EIR/EIS is written. Current planned projects of which POC is aware include two Ecoplexus solar projects (Pine Valley and Descanso), I-8 and Japatul Valley Road solar project (Alpine), Tule Wind (Boulevard), three Soitec solar projects (Boulevard), Chapman solar project (Boulevard), Fox solar project (Boulevard), and the Campo Reservation solar project (Boulevard).

IX. Cumulative Impacts

The EIR/EIS should analyze the cumulative impacts of the energy building boom that has been taking place and is planned to take place in the San Diego back country. These include the proposed renewable energy projects described above, the Sunrise Powerlink transmission line, other proposed wood to steel power line projects in the study area such as TL 6931 (A.12-12-007), and other completed wood to steel power line projects in the vicinity of the study area such as Warner Springs to Santa Ysabel (approved in Advice Letter 2191-E).

X. TL 637 Should Be Analyzed as Part of the Master Special Use Permit Project

TL 637 has been separated into a separate CPUC proceeding from the Master Special Use Project even though it shares 12 poles with a power line in SDG&E's Master Special Use Project, TL 626. It was going to be included in the Master Special Use Project, by order of the CPUC, but it was separated after SDG&E objected.

Analyzing the two projects separately is clearly incorrect under both NEPA and CEQA. The two lines share 12 poles, therefore they are a Connected Action under NEPA. Both projects involve removing wooden poles and replacing them with steel poles and reconductoring with heavier conductor, all described as fire hardening, both projects involving the same 12 poles. It would be piecemealing under CEQA to analyze them separately. This may be obscured by the current emphasis in the Master Special Use Project on the Forest Service permits, but that project

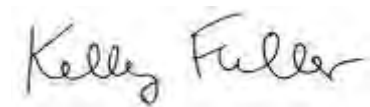
involves decisions by four other agencies besides the Forest Service, and nearly half the poles are outside the Cleveland National Forest, so it is hardly just a Forest Service project. The current description of the Master Special Use Permit project SDG&E is using is too narrow.

XI. Additional Public Engagement

POC requests that the pre-hearing conference for the Master Special Use Permit project be held in eastern San Diego County so that members of the public can attend and hear the scoping of the issues, including from SDG&E's perspective, which has not yet been heard here.

Thank you for your consideration of our comments. Please keep POC on the notification list for this project.

Sincerely,

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

Kelly Fuller
Consultant to The Protect Our Communities Foundation
kelly@kellyfuller.net



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

October 29, 2013

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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: SDG&E's Master Special Use Permit – Document Access and Scoping Comment Deadline

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of The Protect Our Communities Foundation (POC) regarding problems with public access to documents about SDG&E's proposed Master Special Use Permit project and the due date for scoping comments. **POC requests that hard copies of the project's revised Plan of Development (including maps and all appendices) be placed in the project's repository libraries immediately, that an expanded list of communities in the project's vicinity be published, and that the scoping comment period be extended by three weeks.**

At the joint California Public Utilities Commission (CPUC)-Forest Service public meetings last week, members of the public were directed to local libraries if they wanted to see project maps and other Plan of Development documents in hard copy. In addition, the project's Public Notice and Notice of Preparation state that documents related to the project will be made available at a list of repositories (certain San Diego County libraries and Dudek's Encinitas office). However, POC has since learned that SDG&E's Plan of Development was never delivered to those libraries, and only the 23-page Notice of Preparation is available there.

This poses a serious problem for local residents who are trying to access the project's revised Plan of Development. The project study area is not in the City of San Diego, where residents can access the internet at home via fast broadband services, but in the County's rural area, much of which is served by satellite or dialup internet services only. Typically satellite internet services are expensive, slow, and do not allow unlimited data access. Dialup internet is less expensive, but even slower. As a result, many people in rural areas simply do not use the internet, if they are fortunate enough to have it in their homes, which many people do not, in the same way that people in city areas do. Due to speed limitations and costs, they try to avoid file downloads. In the case of the Master Special Use Permit, the full Plan of Development and its maps and appendices comprise 33 files to be downloaded.

In addition, this lack of hard copy Plans of Development in the designated library repositories means that residents who are not computer literate have been excluded from access, except for the few hours

that the revised Plan of Development notebooks and map boards were available for public inspection during the two scoping meetings last week.

The fact that hard copy Plans of Development are not available in the repository libraries appears to have been an inadvertent oversight. POC would like to see this corrected and the public given more time to comment once those documents are in the libraries, in order to ensure a robust public process.

Doing so would also give the CPUC and the Forest Service the chance to correct a problem with the noticing of this project. The list of communities in the vicinity of the project in the Public Notice, Scoping Notice, and presentation given during last week's public meetings left out many communities that will be impacted. The abbreviated list of nearby communities will likely decrease public participation in scoping because some affected members of the public will not see their community listed, thus will not know they are be affected, and are as a result are less likely to submit scoping comments. The current written list of communities only includes Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs. However, at a minimum, the following communities should be added: Alpine, Boulevard, Guatay, Lake Morena, Mt. Laguna, and Pine Valley. There may be others as well, given the size of the affected area and the fact that some local communities extend well beyond the central "village" that is marked on maps.

POC would like to see as much public involvement as possible at this early stage because of a lesson learned during the Sunrise Powerlink. Project routes changed, and as a result, many members of the public did not learn they would be affected until late in the process, when there were fewer opportunities for involvement. During the public meetings for the Master Special Use Permit project last week, both the CPUC and the Forest Service acknowledged that aspects of this project too may change.

In conclusion, POC respectfully requests that the barriers to public involvement that we have identified in this letter be corrected immediately and that the public be given an additional three weeks to comment, in order to improve the outcome of this project by increasing the inclusiveness of public participation. We also request that you provide an answer to our letter.

Thank you very much for your consideration of our requests.

Sincerely yours,

Kelly Fuller
Consultant to The Protect Our Communities Foundation
www.kellyfuller.net

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; [CNFMSUP](#)
Cc: ["Hawkins, Robert H -FS"](#)
Subject: MSUP scoping comment period

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

The Protect Our Communities Foundation continues to be very concerned that the scoping period for SDG&E's Master Special Use Permit has been not extended, for the following reasons:

1. There are going to be significant impacts on communities that are not even listed in the CPUC/Forest Service public outreach materials and who therefore don't know that they should be participating in the process
 - For example, once I was able to look at the hard copy maps, I saw that the rural part of Alpine will have three helicopter fly yards, yet Alpine was not a listed community. Rural Alpiners commonly have cattle, horses, and goats. Helicopter flights are something they are going to want to know about, so they can ask questions about the flight routes and see if they and their animals will be affected. There was community suffering, especially in the El Monte area, from helicopter construction during the Sunrise Powerlink. It appears from the revised Plan of Development that SDG&E plans to ask for the same helicopter use conditions that it did during Sunrise, and that is of concern.
 - There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.
 - The Sunrise Powerlink is very much a living memory in the southern San Diego back country.

There is a great deal of distrust of SDG&E because of what happened during the Sunrise Powerlink process. People still talk about it and are still upset by it. They are not going to take a “just trust us” attitude toward this project, no matter how noble the goal. They need a real chance to be honestly engaged if they are going to have any trust in the process.

- These southern back country communities are getting bombarded by energy projects and that is also increasing their distrust. Boulevard has at least five renewable energy projects proposed in and around it, plus another wood to steel power pole project (TL 6931, A.12-12-007). Boulevard will be affected by the Master Special Use Permit project, but wasn't listed in the outreach materials. The nearest repository to Boulevard with a hard copy of the revised Plan of Development is 35 miles away.
3. Now is the most critical time for communities to give the agencies comments, while you are still shaping the project alternatives for the EIR/EIS:
- If the communities come up with any large, constructive changes that they – and you -- want analyzed, that can be accommodated most easily now, during scoping. It's much harder to accommodate a great idea that would improve the project during the draft EIR/EIS comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.
 - The comment period has only been the Forest Service's ***minimum*** 45 day period under NEPA for EIS scoping, so we haven't maxed out on time yet.

In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; wmetz@fs.fed.us; CNFMSUP
Cc: "Bob Hawkins"
Subject: A.12-10-009: SDG&E's Master Special Use Permit - one set documents
Date: Friday, November 08, 2013 9:06:09 AM
Attachments: [POC MSUP scoping comments.pdf](#)
[A.12-10-009_POC_2013-10-29.pdf](#)
[MSUP_scoping_comment_period.msg](#)
[RE_MSUP_scoping_comment_period.msg](#)

Dear Ms. Orsaba and Mr. Metz:

The Protect Our Communities Foundation's comment letter about SDG&E's Master Special Use permit incorporated by reference previously submitted communications with the CPUC and Forest Service regarding extending the scoping comment period (page 3). Yesterday, those communications were resubmitted as attachments to POC's comment letter, but one was inadvertently omitted. For the agencies' ease of reference, we are resending the comment letter and attachments this morning, so you will have all of documents together in one set.

In other words, the CPUC and Forest Service have already received the POC comment and scoping extension documents prior to the close of the scoping comment period, but in or as separate emails. The purpose of this email is to provide you with all the documents together in one set, for more convenient reviewing.

If you have any questions, please do not hesitate to contact me.

Thank you for your consideration of our comments.

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



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

October 29, 2013

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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: SDG&E's Master Special Use Permit – Document Access and Scoping Comment Deadline

Dear Ms. Orsaba and Mr. Metz:

I am writing on behalf of The Protect Our Communities Foundation (POC) regarding problems with public access to documents about SDG&E's proposed Master Special Use Permit project and the due date for scoping comments. **POC requests that hard copies of the project's revised Plan of Development (including maps and all appendices) be placed in the project's repository libraries immediately, that an expanded list of communities in the project's vicinity be published, and that the scoping comment period be extended by three weeks.**

At the joint California Public Utilities Commission (CPUC)-Forest Service public meetings last week, members of the public were directed to local libraries if they wanted to see project maps and other Plan of Development documents in hard copy. In addition, the project's Public Notice and Notice of Preparation state that documents related to the project will be made available at a list of repositories (certain San Diego County libraries and Dudek's Encinitas office). However, POC has since learned that SDG&E's Plan of Development was never delivered to those libraries, and only the 23-page Notice of Preparation is available there.

This poses a serious problem for local residents who are trying to access the project's revised Plan of Development. The project study area is not in the City of San Diego, where residents can access the internet at home via fast broadband services, but in the County's rural area, much of which is served by satellite or dialup internet services only. Typically satellite internet services are expensive, slow, and do not allow unlimited data access. Dialup internet is less expensive, but even slower. As a result, many people in rural areas simply do not use the internet, if they are fortunate enough to have it in their homes, which many people do not, in the same way that people in city areas do. Due to speed limitations and costs, they try to avoid file downloads. In the case of the Master Special Use Permit, the full Plan of Development and its maps and appendices comprise 33 files to be downloaded.

In addition, this lack of hard copy Plans of Development in the designated library repositories means that residents who are not computer literate have been excluded from access, except for the few hours

that the revised Plan of Development notebooks and map boards were available for public inspection during the two scoping meetings last week.

The fact that hard copy Plans of Development are not available in the repository libraries appears to have been an inadvertent oversight. POC would like to see this corrected and the public given more time to comment once those documents are in the libraries, in order to ensure a robust public process.

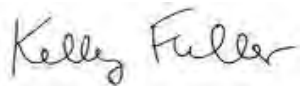
Doing so would also give the CPUC and the Forest Service the chance to correct a problem with the noticing of this project. The list of communities in the vicinity of the project in the Public Notice, Scoping Notice, and presentation given during last week's public meetings left out many communities that will be impacted. The abbreviated list of nearby communities will likely decrease public participation in scoping because some affected members of the public will not see their community listed, thus will not know they are be affected, and are as a result are less likely to submit scoping comments. The current written list of communities only includes Descanso, Campo, Pauma Valley, Santa Ysabel, and Warner Springs. However, at a minimum, the following communities should be added: Alpine, Boulevard, Guatay, Lake Morena, Mt. Laguna, and Pine Valley. There may be others as well, given the size of the affected area and the fact that some local communities extend well beyond the central "village" that is marked on maps.

POC would like to see as much public involvement as possible at this early stage because of a lesson learned during the Sunrise Powerlink. Project routes changed, and as a result, many members of the public did not learn they would be affected until late in the process, when there were fewer opportunities for involvement. During the public meetings for the Master Special Use Permit project last week, both the CPUC and the Forest Service acknowledged that aspects of this project too may change.

In conclusion, POC respectfully requests that the barriers to public involvement that we have identified in this letter be corrected immediately and that the public be given an additional three weeks to comment, in order to improve the outcome of this project by increasing the inclusiveness of public participation. We also request that you provide an answer to our letter.

Thank you very much for your consideration of our requests.

Sincerely yours,



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



The Protect Our Communities Foundation
P.O. Box 305
Santa Ysabel, CA 92070
Send correspondence to: kelly@kellyfuller.net

November 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, wmetz@fs.fed.us, cnfmsup@dudek.com

Subject: A.12-10-009: SDG&E's Master Special Use Permit – Scoping Comments

Dear Ms. Orsaba and Mr. Metz:

Thank you for the opportunity to participate in scoping on SDG&E's Master Special Use Permit (Project) under the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). These comments are provided on behalf of The Protect Our Communities Foundation (POC).

I. Project Scoping

POC values cooperative work and coordination with state and federal agencies. Unfortunately, we have to tell you that scoping for this project was fatally flawed, and it is our hope that you will be able to correct this problem quickly. The project's Notice of Intent published in the Federal Register does not follow Forest Service regulations for implementing the National Environmental Policy Act (NEPA).

According to the Forest Service's *FSH 1909.15 – National Environmental Policy Act Handbook*, Forest Service regulations require that Notices of Intent published in the Federal Register include "any permits or licenses required to implement the proposed action and the issuing authority" 36 CFR 220.5(b) (page 6).¹ However, the only permit or license identified in the project's Federal Register Notice is the Forest Service's Master Special Use Permit.² Even a single missing permit

¹ Forest Service (2011). *FSH 1909.15 – National Environmental Policy Act Handbook*. Available at http://www.fs.fed.us/emc/nepa/nepa_procedures/. The Proposed Actions listed in the Federal Register notice include authorization of work both inside and outside the Cleveland National Forest.

² Authorization actions by the U.S. Bureau of Land Management and U.S. Bureau of Indian Affairs are mentioned in the Federal Register Notice of Intent, but the required permits for those actions are not named explicitly. There are also references to an approval decision by California State Parks, but the required permit or license is not named. *Federal Register*, Vol. 78, No. 184, 9/23/13, page 58271. Available at <http://www.gpo.gov/fdsys/pkg/FR-2013-09-23/pdf/2013-22904.pdf>.

would establish that the Notice of Intent has violated Forest Service regulations regarding scoping, and SDG&E's application documents indicate that multiple permits are needed:

- Section 4.3 of the revised Plan of Development, *69 kV Undergrounding* (related to TL 629E), states, “*SDG&E would secure the necessary permits to conduct these specialized construction activities and would implement standard best management practices (BMPs), including silt fencing and straw wattles, in accordance with the Proposed Action’s Storm Water Pollution Prevention Plan (SWPPP)*” (page 33, emphasis added). SDG&E’s original application makes even clearer that permits are required:

This specialized construction requires 20 to 40 foot wide boring pits, 10 to 20 feet deep *which require special permits. Increasing the depth of the conduit for the transmission line would make these pits even deeper which would eliminate the possibility of permitting.* (page 91 of 125, emphasis added)³

- Section 7.2.5 of the revised Plan of Development, *Underground Duct Package and Installation*, states, “If trench water is encountered, trenches would be dewatered using a portable pump and *disposed of in accordance with applicable regulations and permits*” (page 68, emphasis added).
- Section 9 of the Revised Plan of Development, *Required Permits and Authorizations*, states, “SDG&E would obtain all required approvals for all construction activities from federal, state, and local agencies, as applicable. Table 16: Anticipated Permits and Approvals lists the potential permits and approvals that may be required for these construction activities” (page 81). In Table 16, these include Army Corps of Engineers Clean Water Act Section 404 Nationwide or Individual Permit, FAA Permission to Fly Helicopters, SWRCB National Pollutant Discharge Elimination System – Construction Storm Water Permit, California Department of Fish and Wildlife--California Fish and Game Code Section 1600 Streambed Alteration Agreement, Regional Water Quality Control Board--Clean Water Act Section 401 Water Quality Certification, California Department of Transportation (Caltrans) Encroachment Permit, and San Diego County Encroachment Permit (page 82).

Even to members of the public, it is self-evident that one or more of these permits will be required. For example, Caltrans requires encroachment permits “for all proposed activities related to the placement of encroachments within, under, or over the State

³ SDG&E (2012). *Application of San Diego Gas & Electric Company (U 902 E) for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects*, vol. 1. Available at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/Main/SDGE%20CNF%20PTC%20Application%2010-17-12.pdf>. SDG&E’s amended application filed in 2013 incorporates by reference this original application. See page 1. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Amended%20Application.pdf.

highway rights of way.”⁴ The County of San Diego requires a similar encroachment permit regarding county roads.⁵

Because some of the construction work necessary for this project will have to be done along state highways where power poles are immediately adjacent to the road and in locations where there will not be a wide shoulder or a good place to park trucks, it seems clear that the project will have encroachments requiring a Caltrans or County permit.

Other serious problems occurred during the scoping process. Some of these issues have already been explained in writing to the Forest Service and CPUC and those communications are incorporated by reference (and attached to this letter). In addition,

- The Federal Register notice clearly states that the Forest Service, CPUC, BLM, BIA, and CSP will have their own authorizations to make regarding this project. Yet only the Forest Service and CPUC sent staff to the two scoping meetings.⁶ This meant no one from the cooperating and responsible agencies was there to explain their Proposed Actions, listen to the public’s scoping comments or to answer any questions from the public.
- According to the presentation that was given to the public at the scoping meetings, the purpose of those meetings was to “To inform the public and responsible agencies about the project; To inform the public about the environmental review process; and To solicit input on the scope of issues and alternatives to be addressed in the EIR/EIS.”⁷ But the information presented did not adequately inform the public. The slides did not include the Proposed Actions and Project Objective for the cooperating and responsible agencies (BLM, BIA, and CSP), only the Proposed Action for the Forest Service. This compounded the problem of not having any staff from those agencies present at the meeting.
- Likewise, the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting used by Dudek to notify the public of scoping described only the Forest Service Proposed Action. The BLM, BIA, and CSP Proposed Actions and Project Objective were not included. Instead, the BLM and BIA Proposed Actions were published only in the Notice of Intent in the Federal Register, which very few members of the general public read. The CSP Project Objective was not even published in the Federal Register. Again, this was not adequate to inform the public about what was happening. Excluding information about the cooperating agencies was especially unfortunate since according to the Federal Register notice, SDG&E may be operating some of its existing project facilities on BLM

⁴ See <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

⁵ See <http://www.sdcounty.ca.gov/dpw/docs/EncroachmentPermit.pdf>.

⁶ The absence of cooperating and responsible agency staff at the scoping meetings was verified in an email from Rica Nitka (Dudek Environmental) to Kelly Fuller (POC), 11/4/13.

⁷ CPUC and Forest Service (2013). *San Diego Gas & Electric Company Master Special Use Permit and Permit to Construct Power Line Replacement Projects*. Slide 2. Available at http://www.cpuc.ca.gov/environment/info/dudek/CNF/msup_ptc_scoping_meeting.pdf.

land illegally; the right-of-way permits have expired or were never issued. That is information that the public has a right to know.

- In addition, comments for the TL-637 wood-to-steel proceeding were also due today, which made things difficult for members of the public trying to participate in both proceedings.
- One of the most serious problems with the scoping period was that many of the affected communities had inadequate notice that they were going to be affected and therefore should be participating in scoping. This is because the Notice of Public Scoping Meeting and Public Notice/Scoping Meeting did not list all of the affected communities. Even some communities that are going to have helicopter fly yards, such as Alpine and Boulevard, were not listed, despite the problems that occurred with helicopter disturbance during construction of the Sunrise Powerlink. Moreover, it is not enough to send scoping notices to Planning Groups in the affected communities if those notices do not list all the affected communities. In San Diego County, all Planning Group members are volunteers, not paid staff. They have busy lives, and they receive many notices. If Planning Group members do not see their community listed on a scoping notice, it is not reasonable to expect them to read a 125-page project application just to verify their community is not involved. Instead, that scoping notice will more likely go into the trash can or be deleted without a second thought.

As a result of the problems with scoping, POC repeatedly asked the CPUC and Forest Service to extend the scoping comment period and to list all of the affected communities. The agencies said no. POC does appreciate that the agencies increased the public's access to hard copy documents about the project in response to POC's request.

Given the violation of Forest Service regulations regarding scoping and the other serious issues, POC urges the CPUC and Forest Service to reopen the formal scoping comment period with a notice that lists all the affected communities.

II. Purpose and Need/Project Objectives

The Purpose and Need of each of the three federal agencies and the Project Objectives of the two state agencies should be included in the EIR/EIS. (The Project's Federal Register notice included the federal agency Purpose and Need statements but not the state agency Project Objectives.) The narrow description in the Purpose and Need section of SDG&E's revised Plan of Development is based on the previous Environmental Assessment, and as a result it focuses only on the Cleveland National Forest and does not acknowledge the other necessary land management agency approval decisions (BLM, BIA, CSP) or the BLM regulation that require future BLM authorizations to conform to current land management plans (43 CFR 1610.5-3).⁸ However, this EIR/EIS and the parallel proceeding at the CPUC need to be broader, reflecting

⁸ See BLM (2008). *BLM National Environmental Policy Handbook H-1790-1*, page 6. Available at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/blm_handbook.P ar.84688.File.dat/h1790-1-2008.pdf. See Revised Plan of Development, page

the fact that almost half the poles changed from wood to steel would be located outside the Cleveland National Forest.

In addition, the EIR/EIS's Introduction should include the plans, laws, policies, and Executive Orders the project will comply with, be consistent with, implement or address. At a minimum, this list should include

- Consistency with the Forest Service's current Land Management Plan;
- Conformance with the BLM's current Land Use Plans per 43 CFR 1610.5-3;
- Implementation of Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds"⁹;
- Compliance with federal laws, including the Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Clean Air Act, and Clean Water Act; and
- Consistency with the Community Plans in the San Diego County General Plan.
- Compliance with state law and local ordinances.

In a federal EIS, this list is often placed in the Purpose and Need section.

III. Alternatives to be Analyzed in the EIR/EIS

POC would like to see a variety of alternatives analyzed in the EIR/EIS.

- The EIR/EIS should analyze a new alternative of renewing and issuing permits as needed on federal lands to keep existing facilities working, and increasing vegetation management and equipment inspections. No wooden poles would be changed to steel poles. This is different than the Forest Service's proposed no action alternative in two respects: issuing the permits, and increased vegetation management and equipment inspections. POC would like to see this new alternative analyzed because of its reduced environmental and community impacts.
- Using composite poles instead of steel poles should also be analyzed in this EIR/EIS, either in particularly sensitive locations or along all of the route. Composite poles are safer for humans and birds than steel poles because they are less conductive. Examples of sensitive locations would be near campgrounds and homes or near areas used by birds for breeding, roosting, or feeding.
- Another alternative that should be analyzed in the EIR/EIS is using replacement poles (whether they are steel or composite) that are closely matched in height, and as much as possible, in diameter, to the existing wooden poles they are replacing. This would have much less visual impact on the Cleveland National Forest, BLM lands, tribal lands, and surrounding communities, than the up to 120' tall and 3' to 5' in diameter at their base 69

⁹ Both the Forest Service and the Bureau of Land Management have signed Memorandums of Understanding with the U.S. Fish and Wildlife Service regarding the implementation of Executive Order 13186.

kV steel poles and larger than existing 12 kV steel poles that SDG&E has proposed.¹⁰ If this alternative is not feasible due to CPUC or other regulation, the EIR/EIS should explain in detail exactly which regulation(s) prevent it.

- The fourth new alternative that should be analyzed is more undergrounding near popular trails and near campgrounds. For example, the Loveland Reservoir Trail in Alpine is heavily used and will likely be seriously visually impacted by the project. (It's been POC's experience that simulations provided for projects underestimate visual impacts.) The Reservoir is a favorite place in the community, where families often take their children to fish. The public's experience there would benefit from undergrounding, and the same is true for other popular trails and the campgrounds the project lines run through or are immediately adjacent to. Undergrounding might also increase public safety in these areas by reducing fire risk and risk of exposure to conductive steel poles.
- The fifth new alternative that should be analyzed concerns the Pine Creek and Hauser Creek Wilderness Areas. In this new alternative, the existing wooden poles of line C157 would be left in place where line goes through Pine Creek and Hauser Wilderness Areas, and vegetation management around those poles and equipment inspections would be increased inside the Wilderness Areas. Outside the Wilderness Areas, the rest of C157 would be changed to steel poles of a height similar to the existing wooden poles. The conductor would be changed to a heavier weight that is still compatible with the existing poles in the wilderness or if the existing poles cannot support a heavier weight of conductor, it would remain the same. This would allow the Wilderness Areas to maintain their integrity while still changing most of the line to steel poles.

IV. Impacts

The following impacts on communities and nature should be analyzed:

- Impacts of helicopters on residents, livestock, pets, and wildlife (especially eagles and other raptors), including but not limited to impacts of noise and vibration. (This will vary by model of helicopter, so all should be analyzed.) 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 problems with helicopters flying too low over homes, and helicopters flying with suspended loads over homes.¹¹ The lesson learned here from that experience is that there need to be strict conditions set for helicopter use, helicopter use needs to be monitored carefully throughout construction by the CPUC, 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 communities.

¹⁰ See the Revised Plan of Development, page 28.

¹¹ See, for instance http://www.cpuc.ca.gov/environment/info/aspen/sunrise/stop_work_order_092711.pdf, <http://www.eastcountymagazine.org/node/7651>, and <http://www.eastcountymagazine.org/node/7651>

Furthermore, it would be very helpful if the draft EIR/EIS included maps that showed not only the fly yards, but also the routes the helicopters will be flying. It is difficult for residents to know if they and their animals will be impacted when maps only show the fly yards. It would also be helpful to have all the fly yards marked on an additional single overview map so that people can see at once where the fly yards are located rather than having to page through every single map to find out.

- The impacts on landowners with private easements should be analyzed in the EIR/EIS. Does SDG&E have all the easements necessary on private land for this project? Will any private land easements have to be amended to allow for the cross beams on these steel poles, access road improvements, or other issues? If so, are all private landowners willing to allow SDG&E to make these changes? Is there any possibility of eminent domain being needed to obtain additional easement land for this project? We ask because in SDG&E's Pala to Monserate wood-to-steel replacement project, there was a serious issue of landowner's rights. The cross beams of the steel power poles installed on one ranch were wider than the easement (as measured by the landowners) and the landowners and SDG&E disputed the easement width at the CPUC.
- Review of the maps indicates that many of the staging areas, stringing sites, and fly yards will be sited in or near agricultural areas/fields. The EIR/EIS should thoroughly analyze the project's impacts on agriculture, including but not limited to livestock production, dairy and egg production, crop production, horse training and boarding, and beekeeping. This analysis should not be limited to commercial production facilities, but also to agriculture on a home-use scale since livestock ownership is widespread throughout the backcountry (e.g., horses, goats, chickens and other domestic fowl, cattle). Seemingly minor occurrences such as gates being left open or loud construction noises can have real impacts for people who keep animals.
- Impacts on traffic. Many of the power lines parallel roads that are major through routes for their communities and there are not many or in some cases any alternate routes.
- Impacts on Rancho Cuyamaca State Park, including campgrounds and trails, and all types of recreational users there.
- Impacts on campgrounds and trails outside of Rancho Cuyamaca State Park
- Impacts on raptors, including eagles, and other birds, during construction, operation, and maintenance of the line. Applicable federal laws are the Endangered Species Act, Bald and Golden Eagle Act, and Migratory Bird Treaty Act. The EIR/EIS should analyze whether eagle "take" as defined in the Bald and Golden Eagle Protection Act will occur.
- The EIR/EIS should analyze SDG&E's designs for power poles to determine how much collision and electrocution risk they pose to birds and then suggest modifications to reduce that risk. Unless carefully designed and installed, steel power poles can present greater risk of electrocution to birds than wooden power poles because of steel's conductivity.¹² Although the Revised Plan of Development states, "SDG&E will

¹² See Harness, Rick (2000). *Raptor Electrocutions and Distribution Pole Types*. Available at http://www.woodpoles.org/PDFDocuments/TechBulletin_Oct_00.pdf. The Avian Power Line Interaction

design and install all new structures in compliance with the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee (APLIC)” (page 28), APLIC guidelines are just that: general guidelines. To truly protect birds, it is best for an experienced expert with specialized knowledge of the extra risk steel poles pose to birds to review the equipment designs. POC strongly suggests contacting Rick Harness at EDM International. He is a national expert on this subject and can look at equipment drawings and assess if they are actually going to be safe for birds: (970) 204-4001, rharness@edmlink.com. In addition, the Forest Service is not a member of APLIC and so does not have a liaison to the committee, but Al Manville, the U.S. Fish and Wildlife Service’s liaison to APLIC, is a national expert in anthropogenic bird mortality, including from transmission lines, and may be helpful to the analysis of this project: Albert_Manville@fws.gov, (703) 358-1963. POC recognizes that SDG&E’s parent company, Sempra Energy, is an APLIC member, but it would be good to have multiple people with this specialized experience looking at the proposed designs.

By taking further steps to make its equipment truly as bird safe as possible, SDG&E can lower its risk of federal prosecution for violations of the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and Endangered Species Act. While there are permits available that allow utilities to kill or harm eagles and birds protected by the Endangered Species Act, there are currently no permits available to utilities for birds protected by the Migratory Bird Treaty Act.

- The EIR/EIS should analyze the impacts of all equipment that SDG&E wishes to install on these lines and the final approval decisions of all the agencies should be only for the equipment analyzed in the EIR/EIS. This may seem self-evident, but the Draft Operating Plan included in SDG&E’s Revised Plan of Development shows that the utility is seeking a blanket approval now for future equipment. It states, “SDG&E may install appurtenant facilities—such as weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities—on steel poles within existing ROWs, *as needed*, to collect additional information to further increase fire safety and service reliability *as new technologies become available*” (Draft Operating Plan, page 12, emphases added). While fire safety and service reliability are important goals, this additional future equipment might be placed in service around people’s homes, livestock and pets; near campgrounds; near endangered wildlife; and in other sensitive locations. This future equipment must be reviewed for its environmental impacts, not

Committee added a new section on steel and concrete power poles to its 2006 guidance because of the hazard the poles can create. (Harness is credited in the introduction.) See Avian Power Line Interaction Committee (2006). *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*. Available at http://www.dodpif.org/downloads/APLIC_2006_SuggestedPractices.pdf. APLIC’s manual was updated in 2012 and is available at <http://www.aplic.org/>. It’s POC’s understanding that the 2012 update was related to collision issues rather than electrocution. Al Manville or Rick Harness will be able to explain the differences between the two versions.

simply approved now. This is especially true of new technologies that have not yet been invented.

The mention of smart-grid data collection equipment in the Draft Operating Plan is particularly relevant here. Smart-grid data collection has been highly controversial in California, and members of the public have fought to smart meters removed from their homes or never installed at all. To give SDG&E approval to install smart-grid data collection equipment in the future on these lines without having conducted full environmental review of that equipment could invite strong public controversy.

- The EIR/EIS should analyze the impact of this project on dark skies. The replacement steel poles SDG&E has been using in some locations inject night lighting into previously dark rural skies. (See, for example, two replacement steel poles on Japatul Lane in Alpine.)¹³ On the pole's cross beam, there are two rectangular areas that reflect light at night. (They appear to be the high voltage stickers.) At the location in Alpine, the existing wooden poles do not have this reflective glow. It is surprisingly bright, is not a natural experience, and detracts from the dark rural sky. These glowing rectangles would also detract from the experience of nature inside the Cleveland Natural Forest, Rancho Cuyamaca State Park, on BLM land, and or other wild places. Their impacts should be fully studied and unless SDG&E doesn't plan to use them in this project, the public needs to be made aware that they are part of the steel pole "package" so that they can comment on them. San Diego's rural residents cherish their night skies, where they can still see the Milky Way and constellations. Maintaining dark skies is also included in some of the Community Plans that are part of the San Diego County General Plan.¹⁴
- The EIR/EIS should analyze how this project will affect the ability of the communities in the study area to achieve the goals in the Community Plans that are part of the San Diego County General Plan, regardless of whether the planning groups associated with those communities submitted scoping comments or not.¹⁵ As stated earlier in this letter, all San Diego County planning group members are volunteers, and they do not always have time to respond to all notices they receive, especially when their community is not listed as an affected community on the notice.
- The project's visual impacts should be thoroughly analyzed in the EIR/EIS. Many of the visual simulations in the Revised Plan of Development are disturbing. For example, the visual simulation of SR 79 at Viejas Boulevard looking north (KVP 27) suggests that the new steel poles are going to be significantly larger than the current wooden poles. Will the poles be that much larger through Descanso, all along SR 79 and all the way through Rancho Cuyamaca State Park? If so, that will dramatically take away from the experience of wild nature that characterizes the area and that people from outside the area come to

¹³ Kelly Fuller of POC can provide precise location for the Alpine poles if desired.

¹⁴ For example, see Goal LU 1.1 of the Boulevard Planning Area Section of the Mountain Empire Subregional Plan (page 20). Available at http://www.sdcounty.ca.gov/pds/gpupdate/docs/bos_oct2010/B2.10a_boulevard.cp_102010.pdf.

¹⁵ Community plans are available at <http://www.sdcounty.ca.gov/pds/generalplan.html>.

see. However, it wouldn't even be possible to have this concern without the visual simulation. The information provided to the public so far has relied on "typical" power poles and an "average" height of 10' taller poles. The EIR/EIS will need to provide much more detailed information about many, many locations so that the public can comment in an informed way. But because of the problems described earlier with how scoping was conducted, it is highly unlikely that this comment period is going to identify all of the locations that are important to the public and need to have visual simulations in the EIR/EIS. The most effective course of action would be for the agencies to get this information directly from the public.

Other examples of disturbing changes from the visual simulations included in the Revised Plan of Development include:

- The visual simulation of TL629 at La Posta Road (KVP 37) shows an H frame being replaced by a much taller pole. The EIR/EIS should analyze why the pole is so much taller. Is this required by regulation or law? It will cause a change in the rural character of the area and therefore the EIR/EIS should also analyze its impacts on the area's rural character.
- The visual simulation of TL6923 (Hauser Mountain near Pacific Crest Trail, KVP 55) shows a significant visual change. The existing poles blend in. the new ones will stick out.
- The visual simulation of the Forest Service Volunteer Activity Center near Sunrise Highway (KVP 69), line (C440) shows much taller poles than the existing ones. They also are brighter than the existing poles. The EIR/EIS should analyze why the poles are so much taller. Is this required by regulation or law?
- The EIR/EIS should analyze how much water will be required for construction, where that water will come from, and the impacts of sourcing the water. Portions of the study area are a certified sole-source aquifer (i.e. Boulevard). Groundwater is a sensitive resource in all areas of the study region because of potential impacts on residents' wells, local water districts, agriculture and other business uses, and wildlife.
- The EIR/EIS should analyze the noise impacts of the project on humans and animals (including livestock, pets, and wildlife).
- The EIR/EIS should thoroughly describe how the wooden poles will be disposed of and the environmental impacts of that disposal. (Wooden power poles are treated with chemicals that can make their disposal problematic.)¹⁶
- The San Diego backcountry often experiences lightning strikes and occasional fires caused by lightning. The EIR/EIS should analyze what will happen when tall electricity-

¹⁶ See, for example, Beyond Pesticides/National Coalition Against the Misuse of Pesticides. *Fact Sheet on Chemically Treated Wood Utility Poles*. Available at <http://www.beyondpesticides.org/wood/resources/Fact%20Sheet%20Revised%20Treated%20Wood%202-21-03.pdf>. See also Environmental Literacy Council (2008). *Wood Utility Pole Life Cycle*. Available at www.enviroliteracy.org/article.php/1311.html.

conducting steel poles are placed throughout the backcountry.¹⁷ Will they attract lightning? What are the safety implications for the public, livestock, and wildlife anywhere near a steel power pole if lightning strikes it? What are the safety implications for campgrounds and homes that have these steel power poles near them, in terms of lightning strikes? Could lightning conducted through these steel power poles start a fire?

- Steel power poles can bend in severe wind storms. The EIR/EIS should analyze the potential impacts of San Diego backcountry winds on these power poles. If the poles do bend, can they be repaired? If they must be replaced, what are the implications in terms of service reliability and impacts to the environment? How much wind does it take to bend the poles SDG&E intends to use?
- The effects of corrosion on steel power poles, both above and below soil level should be analyzed in the EIR/EIS.
- The EIR/EIS should analyze the project's impacts related to electric and magnetic fields.

V. Fire and Reliability

The EIR/EIS should thoroughly analyze the technical aspects of SDG&E's proposed project in terms of its fire-safety features, comparing them to the causes of SDG&E's past power-line caused fires to see if the fire-hardening features of this project would have actually prevented those fires. If there is a fire, will the steel power poles have to be replaced? (How do thin-walled steel power poles respond to the extreme heat of a wildfire?) It is POC's understanding that the conductors would have to be replaced after a wildfire because soot accumulates on them and is conductive. In addition, the EIR/EIS should analyze the spring 2013 fire that was caused by the Pala to Monserate wood to steel project line after it was converted to steel power poles.¹⁸ If steel power poles prevent fires, why did that line cause a fire after it was converted? There were also power reliability problems reported in that area around the same time that appear to have been on the power line. They should be analyzed in the EIR/EIS as well since improving reliability is a goal of this project.

VI. Monitoring, Mitigation Compliance and Reporting

The EIR/EIS should clearly lay out the monitoring that will be performed to ensure that all mitigation commitments are being performed as described in the EIS/EIR and related decision documents), and whether the mitigation effort is producing the expected outcomes and resulting environmental effects. This should include the frequency at which the agencies will review this monitoring and mitigation compliance. The results of this monitoring of the mitigation efforts should be reported on a regular basis, and those reports should be published and made readily available to the public, preferably on a website. Because of the size of this project and the

¹⁷ The capacity of steel power poles to conduct lightning is acknowledged on page 11 of American Iron and Steel Institute's *Steel Distribution Poles: What Every Lineman Should Know*. Available at <http://www.smdisteel.org/~media/Files/SMDI/Construction/UPoles%20-%20Training%20-%20Marketing%20-%20Student%20Manual.pdf>.

¹⁸ See Ramsey, Debbie (5/2/13). "Fallbrook Plagued with Power Outages in April." Village News. Available at <http://www.thevillagenews.com/story/70797/>.

environmental sensitivity of many of the areas involved, this monitoring should be done by an independent third party, paid for by SDG&E but under the direction of the agencies.

Power lines are known to be a serious hazard to birds, but very little systematic mortality monitoring of them ever takes place. Because steel poles can be more hazardous than wood for birds and because more than half of these poles will be on Federal property, it would be appropriate to have a mortality monitoring program. Such a program would provide much needed information on avian mortality from steel power poles and would provide an opportunity for the Federal agencies to implement Executive Order 13186. Mortality monitoring protocols could be adapted from the U.S. Fish and Wildlife Service's Wind Energy Guidelines, in consultation with U.S. Fish and Wildlife Service staff.¹⁹

Such monitoring should be conducted by an independent third party under the supervision of the CPUC or the U.S. Fish and Wildlife Service and reports should be published and made available to the public. This would be a ground-breaking study and an opportunity for the project to distinguish itself.

VII. Implications of Heavier Conductors for Thermal Load-Carrying Capability

In its Revised Plan of Development, SDG&E states that no increase in system capacity will occur, but then quickly qualifies that statement:

No changes to the system capacity will result from the additional circuits; rather, the additional circuits will provide increased system reliability. "System capacity," as used in this context, refers to the nominal operating voltages of the transmission facilities in question. In this case, the nominal operating voltage of the electric transmission facilities affected is 69 kV, and this will not change. What may change is the thermal load-carrying capability of affected transmission lines, as their conductors are replaced and/or reconfigured. (page 32)

The EIR/EIS should analyze the implications of changes in the thermal load-carrying capability of the transmission lines, caused by changing to different or reconfigured conductors. Will this project potentially result in increased system capacity, not measured in voltage, but in another unit of measurement?

Similarly, the San Diego Sierra Club has raised related concerns in its public discussions of increased wattage and amperage related to increasing the thickness of the conductors (e.g., at the recent scoping meetings). The EIR/EIS should fully analyze the wattage and amperage issues raised by the San Diego Sierra Club.

VII. Growth-Inducing Impacts and System Capacity

Sections of two power lines in this sections of this project are proposed to be changed from single circuit to double circuit, reportedly to increase system reliability (TL625B and TL629E).

¹⁹ There is also a helpful discussion of transmission line mortality monitoring in Convention on Migratory Species (2011), *Guidelines For Mitigating Conflict Between Migratory Birds And Electricity Power Grids*. Available at http://www.cms.int/bodies/COP/cop10/docs_and_inf_docs/doc_30_electrocution_guidlines_e.pdf.

Those changes should be analyzed for their potential growth-inducing impacts in their local areas (roughly Alpine and Boulevard, respectively).

Although the Revised Plan of Development says that no increase in system capacity (as measured in voltage) will occur, POC has a number of questions we would like to see answered in the EIR/EIS: How much unused transmission capacity will be available on the double circuited lines once the work has been completed? Once the lines have been made double circuit, what is the largest system capacity they can be increased to if SDG&E comes back and reconductors them? What kind of review procedure would that require at the CPUC? What kind of substation and related equipment upgrades would also be required to get to that maximum capacity and what kind of review procedure would that require at the CPUC?

VIII. Connected Actions

There are many centralized renewable energy projects planned throughout the study area and they should be analyzed as potential connected actions. They cannot be built without transmission capacity, and from what has occurred so far in Boulevard, these types of projects appear to generally require changes and upgrades to the grid. POC is continually learning of new proposed projects, so the list of projects to be analyzed will need to be updated throughout the time that the EIR/EIS is written. Current planned projects of which POC is aware include two Ecoplexus solar projects (Pine Valley and Descanso), I-8 and Japatul Valley Road solar project (Alpine), Tule Wind (Boulevard), three Soitec solar projects (Boulevard), Chapman solar project (Boulevard), Fox solar project (Boulevard), and the Campo Reservation solar project (Boulevard).

IX. Cumulative Impacts

The EIR/EIS should analyze the cumulative impacts of the energy building boom that has been taking place and is planned to take place in the San Diego back country. These include the proposed renewable energy projects described above, the Sunrise Powerlink transmission line, other proposed wood to steel power line projects in the study area such as TL 6931 (A.12-12-007), and other completed wood to steel power line projects in the vicinity of the study area such as Warner Springs to Santa Ysabel (approved in Advice Letter 2191-E).

X. TL 637 Should Be Analyzed as Part of the Master Special Use Permit Project

TL 637 has been separated into a separate CPUC proceeding from the Master Special Use Project even though it shares 12 poles with a power line in SDG&E's Master Special Use Project, TL 626. It was going to be included in the Master Special Use Project, by order of the CPUC, but it was separated after SDG&E objected.

Analyzing the two projects separately is clearly incorrect under both NEPA and CEQA. The two lines share 12 poles, therefore they are a Connected Action under NEPA. Both projects involve removing wooden poles and replacing them with steel poles and reconductoring with heavier conductor, all described as fire hardening, both projects involving the same 12 poles. It would be piecemealing under CEQA to analyze them separately. This may be obscured by the current emphasis in the Master Special Use Project on the Forest Service permits, but that project

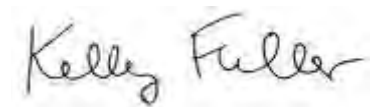
involves decisions by four other agencies besides the Forest Service, and nearly half the poles are outside the Cleveland National Forest, so it is hardly just a Forest Service project. The current description of the Master Special Use Permit project SDG&E is using is too narrow.

XI. Additional Public Engagement

POC requests that the pre-hearing conference for the Master Special Use Permit project be held in eastern San Diego County so that members of the public can attend and hear the scoping of the issues, including from SDG&E's perspective, which has not yet been heard here.

Thank you for your consideration of our comments. Please keep POC on the notification list for this project.

Sincerely,

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

Kelly Fuller
Consultant to The Protect Our Communities Foundation
kelly@kellyfuller.net

From: [Kelly Fuller](#)
To: lisa.orsaba@cpuc.ca.gov; [CNFMSUP](#)
Cc: ["Hawkins, Robert H -FS"](#)
Subject: MSUP scoping comment period

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

The Protect Our Communities Foundation continues to be very concerned that the scoping period for SDG&E's Master Special Use Permit has been not extended, for the following reasons:

1. There are going to be significant impacts on communities that are not even listed in the CPUC/Forest Service public outreach materials and who therefore don't know that they should be participating in the process
 - For example, once I was able to look at the hard copy maps, I saw that the rural part of Alpine will have three helicopter fly yards, yet Alpine was not a listed community. Rural Alpiners commonly have cattle, horses, and goats. Helicopter flights are something they are going to want to know about, so they can ask questions about the flight routes and see if they and their animals will be affected. There was community suffering, especially in the El Monte area, from helicopter construction during the Sunrise Powerlink. It appears from the revised Plan of Development that SDG&E plans to ask for the same helicopter use conditions that it did during Sunrise, and that is of concern.
 - There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.
 - The Sunrise Powerlink is very much a living memory in the southern San Diego back country.

There is a great deal of distrust of SDG&E because of what happened during the Sunrise Powerlink process. People still talk about it and are still upset by it. They are not going to take a “just trust us” attitude toward this project, no matter how noble the goal. They need a real chance to be honestly engaged if they are going to have any trust in the process.

- These southern back country communities are getting bombarded by energy projects and that is also increasing their distrust. Boulevard has at least five renewable energy projects proposed in and around it, plus another wood to steel power pole project (TL 6931, A.12-12-007). Boulevard will be affected by the Master Special Use Permit project, but wasn't listed in the outreach materials. The nearest repository to Boulevard with a hard copy of the revised Plan of Development is 35 miles away.
3. Now is the most critical time for communities to give the agencies comments, while you are still shaping the project alternatives for the EIR/EIS:
- If the communities come up with any large, constructive changes that they – and you -- want analyzed, that can be accommodated most easily now, during scoping. It's much harder to accommodate a great idea that would improve the project during the draft EIR/EIS comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.
 - The comment period has only been the Forest Service's ***minimum*** 45 day period under NEPA for EIS scoping, so we haven't maxed out on time yet.

In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: [Kelly Fuller](mailto:kelly.fuller@cpuc.ca.gov)
To: lisa.orsaba@cpuc.ca.gov; CNFMSUP
Cc: "Hawkins, Robert H -FS"
Subject: RE: MSUP scoping comment period

Lisa,

I need to amend one statement in the email below. The statement about the processes for notifying the public about scoping having met legal requirements was meant as a reference to what The Protect Our Communities Foundation knows about where the scoping notices were made public and who was notified. It was not intended as a blanket statement certifying that everything about the way scoping has been noticed has met all legal requirements. It would have been better expressed as "appear to have met legal requirements based on what The Protect Our Communities Foundation knows at this time."

Sometimes these details matter later on, so I want to be clear.

Thank you,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

From: Kelly Fuller [mailto:kelly@kellyfuller.net]
Sent: Monday, November 04, 2013 7:48 PM
To: lisa.orsaba@cpuc.ca.gov; Master Special Use Permit email (CNFMSUP@dudek.com)
Cc: 'Hawkins, Robert H -FS'
Subject: MSUP scoping comment period

Lisa,

This email is to follow up on our phone conversation today. As I stated on the phone, I contacted you rather than Bob because these concerns relate to communities rather than the forest, but I want to make sure that he knows about them too.

The Protect Our Communities Foundation continues to be very concerned that the scoping period for SDG&E's Master Special Use Permit has been not extended, for the following reasons:

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- There will be likely be traffic delays or detours where power pole replacement is happening immediately adjacent to roads. Alpine suffered greatly from traffic problems during construction of the Sunrise Powerlink, and Alpiners have not forgotten this:
<http://www.sandiegoreader.com/weblogs/news-ticker/2013/mar/20/alpine-business-owners-sue-sdge-over-impacts-from-/>
2. Closing scoping without ALL of the affected communities really having had a chance to know what is going and participate on risks creating public distrust and anger.
 - Unfortunately, the processes for notifying the public about scoping, while they met legal requirements, did not get the word out. That's because the scoping notices did not go up on the "back country telegraph" (a.k.a. the bulletin boards outside stores and post office in the back country, where people post notices). In contrast, SDG&E's laminated notices announcing this project went up all over the place in 2012 and are still up, including on power poles themselves, but I saw no hard copy notices about scoping posted in the same locations. For example, I have photographs of the Perkins Store in Descanso that illustrate this, taken shortly before the scoping meetings. They show one of the laminated notices, but no scoping notice. I promise you, if scoping is extended/re-opened, I will personally drive around the back country posting scoping notices.
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comment stage without doing a supplemental EIS, which would delay the project. Any delay that occurs now during scoping would be much shorter than a delay then.

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In closing, The Protect Our Communities Foundation sincerely hopes the agencies will reconsider their decision not to extend the scoping comment period.

Thanks for considering our request,

Kelly Fuller
(619) 659-5133
kelly@kellyfuller.net

APPENDIX E-5

Individuals

From: [Thomas Cerruti](#)
To: [CNFMSUP](#)
Subject: SDG & E --Notice letter
Date: Thursday, September 26, 2013 12:41:25 PM

Hello,

My corporation, Blue Ribbon Farms, Inc. owns property in Valley Center/Pauma Valley, CA, along Pauma Heights Road. Specifically, the property consists of four parcels: 133-290-20-00; 133-290-21-00; 133-290-22-00; and 133-290-23-00.

My question is, will this project affect the power lines that go through this property--and will my property be used in any way in connection with the project?

Thanks in advance for your help and cooperation.

Sincerely,
Tom Cerruti

Thomas E. K. Cerruti
Blue Ribbon Farms, Inc.
P. O. Box 615
Pauma Valley, CA 92061
(858) 459-1100
(619) 887-1900 (mobile)
tcerruti@findtofund.com

October 23, 2013

From : Shannon and William Davis
mail to: 1185 East Lane, Imperial Beach, CA 91932

To: State of California Public Utilities Commission
505 Van Ness Ave., San Francisco, CA 94102-3298

TO: USDA Forest Service/Cleveland National Forest
18945 Rancho Bernardo RD., San Diego. CA 92127-2107

RE: SEMPRA ENERGY, SDGE Master Special Use Permit To Construct Power Line Replacement Projects
EIS/EIR

Dear Governor Brown, CPUC Board Commissioners, and Forest Supervisor Metz,

We believe there is cause for concern of environmental impacts in regards to the SDGE Master Special Use Permit especially in regards to the modification application on lands (privately owned like our three parcels surrounded by Cleveland National Forests), on Forest Service lands, Bureau of Land Management lands, Indian land, and State Park lands. These lands are identified as habitat for many species that are Endangered, Threatened or Protected Species of Special Concern. Understandably combining all the modifications under one permit simplifies matters, however each section of route requires more detail than is adequate time to review.

Our main concerns to our 3 parcels are that there is no increase in voltage higher than 69KV. In this particular detail the fact that these metal poles can be modified to carry more voltage we are opposed to that. In particular the property in Jamul 20731 Spice way 91935 has many hawks and eagles that perch on the existing wood poles. We were told by Billy Blanchard that bird perch's could be added to the top of the metal poles destined for that property.

Our other main concern is the two private properties located on the N.W. and S.W. corners of Sunrise Highway and Mt. Laguna Dr. 91948. Concerning the electric line pull site on the S.W. corner parcel vehicles weight can and will disturb the roots of the existing specimen Jeffrey Pine trees.

Do not use explosives for creating holes for electric poles. The shock waves can and do cause wells to dry up.

Do not increase utility right of way width.

Do not assume guy wire easements. Check San Diego County records for all existing easements. Private property owners should be respected, and dealt with on a legal level that land condemnations and acquisitions for future expansion of electric transmissions is required on a one on one basis, not with a bureaucracy that is not aware of each detailed property.

We have always been proponents for undergrounding utilities. The tall Jeffrey Pines reach 80 plus feet. High winds can cause limbs to break and fall down on charged electric lines leading to fires. Fire ladders to the crowns of the trees leads to out of control fires. Sunrise Highway from Pine Valley to Lake Cuyamaca is a Nation Scenic Byway. Protect the natural beauty by undergrounding the electric lines.

Thank you for considering our concerns and permitting us to comment.

Respectfully,

Shannon and William Davis

OCT 24 2013

October 23, 2013

Ms. Lisa Orsaba
California Public Utilities Commission
Mr. Will Metz
Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

Dear Ms. Orsaba and Mr. Metz:

As a Campo resident, I am writing in support of SDG&E's Power Line Replacement Projects, which are being proposed for Cleveland National Forest (CNF) and involve replacing 1,800 wood poles with fire resistant, weatherized steel. These infrastructure improvements are critical to increasing fire safety and electric reliability in eastern San Diego County's backcountry.

SDG&E's existing infrastructure within CNF is a crucial supplier to homes, businesses and emergency services in the area, as well as the U.S. Forest Service. Reliability is essential to these customers, particularly during the hot summer months and cold winter nights. Replacing the current wood poles and distribution lines with taller steel structures will help ensure the backcountry has a safe and reliable electric system.

Safety and reliability are clearly important issues. I look forward to the U.S. Forest Service and the California Public Utilities Commission working together to review and approve the Power Line Replacement Projects.

Sincerely,



Randy Lenac
Campo

From: [Dwayne Cohoon](#)
To: [CNFMSUP](#)
Subject: SDGEG Master Permit
Date: Tuesday, October 29, 2013 1:42:17 PM
Attachments: [image001.jpg](#)
[20131029132916.pdf](#)

Attached please find my letter of support with regards to the SDGE replacement of wood poles for steel ones in the back country. Thank you! Janette Cohoon

October 29, 2013

Dwayne and Janette Cohoon
Homeowners
32114 Highway 94
Campo, CA 91906

Subject: Support for SDG&E's Power Line Replacement Projects

To Whom It May Concern:

I am writing to express my support for San Diego Gas & Electric's (SDG&E) Master Special Use Permit and Permit to Construct for Power Line Replacement Projects in and adjacent to the Cleveland National Forest.

I support these projects because they provide direct benefits to the region's residents, businesses, and recreational enthusiasts within the Cleveland National Forest and surrounding communities by enhancing public safety, improving the integrity of the electric system and limiting environmental impacts.

I am eager for the U.S. Forest Service and the California Public Utilities Commission to approve the projects so SDG&E can begin the vital task of replacing wood poles with new steel poles.

Please feel free to contact me if you would like to discuss further.

Sincerely,



Janette Cohoon
619-478-9774



**CALIFORNIA PUBLIC UTILITIES COMMISSION /
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

(please print)

Name: Skip Miller
 Organization (if any): _____
 Do you have authorization to represent this Organization? Yes: No:
 Address: P.O. Box 394 (31675 Tale Springs T.L.)
 City, State, Zip: Descanso, CA 91916
 E-mail: _____ Telephone: (619) 742-0060
 Would you like a copy of the environmental document? No: Yes: CD Hard Copy

Written Comments

(please print)

Concerns regarding SDG&E TL 626:
 Topography — TL 626 is routed perpendicular to the San Diego River Watershed's Boulder Creek and Cedar Creek drainages along with numerous tributary drainages. The resulting topography along this route is one of extreme elevation changes over short distances and therefore severe slope conditions.
 The distance of this line into a pristine wilderness area, from existing transportation corridors (Boulder Creek and Eagle Peak Roads) necessitates frequent, extensive and potentially dangerous intrusion into this area to perform routine maintenance and inspections. The severity of slope in this area results in extensive erosion if disturbed, and presents dangerous conditions for equipment operators and maintenance personnel as well as potential environmental damage to the entire watershed. The option of creating numerous and lengthy access roads along ridge tops or down drainages, from existing roadways would be equally impractical.
 Re-routing this line to follow Boulder Creek Road, though longer and more circuitous, would significantly improve access and reduce costs for maintenance and inspections as well as for fire fighting resources. Additionally, numerous residents along Boulder Creek Road, currently without electrical power, would have this service option.

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.



**CALIFORNIA PUBLIC UTILITIES COMMISSION /
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

(please print)

Name: Skip Miller

Organization (if any): _____

Do you have authorization to represent this Organization? Yes: No:

Address: P.O. Box 394 (31675 Tule Springs T.T.)

City, State, Zip: Descanso, CA 91916

E-mail: _____ Telephone: (619) 742-0060

Would you like a copy of the environmental document? No: Yes: CD Hard Copy

Written Comments

(please print)

Concerns regarding SDG&E TL 626.

Weather — As with topography, the alignment of TL 626 with the direction of seasonal Santa Ana winds is an annual concern. Hurricane force wind gusts, recorded at the Sill Hill and Boulder Creek weather stations, are often the highest recorded in the county. The potential for powerline caused fires in this area is alarming as evidenced by the devastation of both the Cedar and Witch Creek fires.

Re-alignment of TL 626 with the Boulder Creek roadway would improve access for fire fighting resources initial attack and further management. Additionally, undergrounding portions of this line in high wind areas would mitigate the potential for fire ignition as well as equipment damage.

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.

From: [s_Wilson](#)
To: [CNFMSUP](#)
Subject: SDGE replacement pole comment
Date: Tuesday, October 29, 2013 10:45:30 AM
Attachments: [SDGE Replacement pole project.pdf](#)

Attached is a copy of your comment form with comments from me.



**CALIFORNIA PUBLIC UTILITIES COMMISSION /
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company
Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

Name: S. J. Wilson (please print)

Organization (if any): retired

Do you have authorization to represent this Organization? Yes: No:

Address: 25280 Manzanita Ln

City, State, Zip: Descanso CA 91916

E-mail: swilsondescanso@gmail.com Telephone: _____

Would you like a copy of the environmental document? No: Yes: CD Hard Copy
for Mac

Written Comments
(please print)

I would like to see underground along Viejas Blvd in Descanso. There is already underground fiber optics along 79 & 80 into Pine Valley.

I also would not want to see higher poles along Viejas Blvd. Aesthetics of the valley at the east end of Viejas Blvd. would be damaged.

I am also concerned that with larger lines there would be a need for larger transformers. As it is

I am noticing car radio interference on Hwy 8 around the new bigger lines such that there is so much static that the stations, both FM & AM, can't be understood.

Please note: Comments, including personal information, become public information and may be released to interested parties if requested.

NOV 05 2013

November 1, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: SDG&E Power Line Replacement Projects

Dear Ms. Orsaba and Mr. Metz:

Safety and electric reliability are important issues for the San Diego region, particularly East County's rural backcountry. Extreme weather conditions such as high winds make this area vulnerable to wild fires, requiring added safety measures. That is why I strongly support SDG&E's Power Line Replacement Projects in Cleveland National Forest.

As part of the Power Line Replacement Projects, SDG&E plans to replace approximately 1,800 wood poles in and around Cleveland National Forest. The new poles will be made of steel that is both weatherized and fire resistant. These stronger poles will be safer and more reliable than the existing infrastructure. It is my understanding that they will also be placed farther apart to further enhance safety and will require less maintenance.

I also support the addition of more weather stations in Cleveland National Forest and the surrounding area. It is imperative that we have the ability to track weather patterns during high-risk conditions, and these weather stations will better enable SDG&E to do so.

The Power Line Replacement Projects represent another positive step in SDG&E's efforts to help enhance safety in San Diego County. I applaud the company's initiative in this area and urge you to approve the proposed infrastructure improvements in Cleveland National Forest.

Sincerely,



Jennifer Purczynski
12975 Brookprinter Place, Suite 220
Poway, CA 92064

From: [Betty King](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Sunday, November 03, 2013 7:10:57 PM

Dear Lisa Orsaba,

I think this permit is not a good idea. I live on Mount Laguna and experienced the Chariot Fire in July. All SDG&E lines should be underground. Thank you.

Would you please email me a copy of the environmental document?

Respectfully,

Elizabeth J. King

NOV 05 2013

November 4, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Cleveland National Projects

Dear Ms. Orsaba and Mr. Metz:

As you know, SDG&E has implemented several measures to help prevent wildfires as part of its Community Fire Safety Program and is now proposing to build on this effort through a series of power line replacement projects in Cleveland National Forest. I am writing to urge your support for the permits needed to construct these critical infrastructure improvements. I believe they are necessary to ensure safety during high-risk weather conditions and to strengthen the reliability of the electric grid within Cleveland National Forest and nearby areas.

The power line replacement projects will replace more than 1,800 wood poles with taller, fire resistant structures made out of weatherized steel. Not only will these new poles require less maintenance and improve reliability, they will also be placed farther apart to bolster safety during high wind conditions. SDG&E also plans to increase the number of weather stations in the area to help track weather patterns. These steps to prevent wildfires are of great importance to Cleveland National Forest, the East County community and the entire San Diego region.

Thank you for giving this important issue the serious consideration it deserves. I urge you to approve SDG&E's Power Line Replacement Projects and look forward to participating in this process moving forward. You can reach me at (619) 922-1009 with any questions.

Sincerely,



Brit Coupens

November 4, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

NOV 05 2013

Dear Ms. Orsaba and Mr. Metz:

As a resident of San Diego's East County, I am writing to urge your support for SDG&E's proposed infrastructure improvements within Cleveland National Forest (CNF) and the surrounding areas. As you know, SDG&E is seeking a Master Special Use Permit and Permit to Construct for the Power Line Replacement Projects, which would involve the replacement of roughly 1,800 wood poles with weatherized, fire-resistant steel poles. The new poles would also be placed farther apart than the existing structures. Overall, the projects would boost the reliability of the electric system in the area while helping to improve fire safety during extreme weather conditions. Additionally, the addition of new state-of-the-art weather stations will make it easier to track weather patterns during high risk conditions.

Fire safety and reliability are serious concerns for East County, and I appreciate any steps that can be taken to reduce fire risks and help keep the lights on. SDG&E's Power Line Replacement Projects are critical in that respect and should be approved without delay.

Sincerely,



Gene Vick
31310 Hwy 94
Campo, Ca 91906
619-405-3544

November 5, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Forrest Supervisor Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

As a resident of San Diego's East County, I am writing to express my support for San Diego Gas & Electric's plans to improve the safety and reliability of electricity to me and my neighbors who live in local rural communities. SDG&E's efforts over the years to strengthen the electric system in high fire risk communities is refreshing and I encourage more of such projects.

I'm told that plans include the replacement of more than 1800 wood poles with ones that are taller and made of fire resistant steel. I also support converting conductors to underground where appropriate. SDG&E has also significant contributions to the overall safety of our communities by installing more than one hundred state-of-the-art weather stations throughout San Diego's back country providing critical weather data to not only SDG&E but to all emergency agencies in the county.

San Diego County has suffered its share of wildfires over the past ten years and the efforts by our communities and organizations like SDG&E will help ensure that we never experience such devastation again.

Please consider the importance of these improvement as you review SDG&E's application for project permits through the Cleveland National Forrest.

Sincerely,

Richard Edwards
Lakeside, California

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

Rich Tobin
B. Hawkins
D. Hobbs

GERALD W. FISHER

23550 Hwy. 76 Santa Ysabel, CA 92070 • Phone 760-782-9208 • Fax 760-782-0824 • jfisher760@aol.com

State of California Public Utilities Commission
c/o Lisa Orsaba
505 Van Ness Avenue
San Francisco, CA 94102-3298

November 5, 2013

USDA Forest Service
Cleveland National Forest
c/o Will Metz
18045 Rancho Bernardo Rd.
San Diego, CA 92127-2107

Re: SDG&E Master Special Use Permit – Power Line Replacement Project, 14-12-10-009, as amended.

Dear Sirs:

As an owner of property that is encumbered by this line, the following EIR/CEQA elements – as currently known – are adversely affected:

- #1 [**Aesthetics**]: Property located on California Hwy. #76 which is a “Scenic Highway”. **NOT ACCEPTABLE.**
- #2 [**Biological Resources**]: Property is in a Preserve, has other protected designations, already damaged by existing operation. **NOT ACCEPTABLE.**
- #3 [**Cultural Resources**]: Located on property, already damaged. **NOT ACCEPTABLE.**
- #4 [**Hazards – Fire**]: Poor maintenance documented with CPUC and others; death and destruction by Fire is well-documented. **ABSOLUTELY NOT ACCEPTABLE.**

[**Note**]: The above is factual. Additional concerns will be known when **all** elements are disclosed and the undersigned is notified and given reasonable time to respond.

[**Summary**]:

Keeping the power lines above ground, on subject property as well as the total area in question, would, at the least, be contrary to good judgment by the CPUC, EIR/CEQA process, and, most importantly, the proven responsibility for human death and home destruction. Certainly not an acceptable corporate measure to reach a better net income.

Since the current line on subject property closely parallels State Hwy. #76, undergrounding in the highway right-of-way, as AT&T has already done, will provided a safe, economic, no conflict resolution, supported by all.

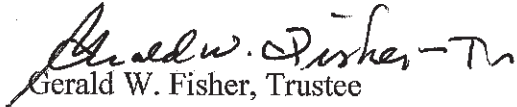
Frankly, the above seems a strange, unnecessary conflict.

For example, the Wright Brothers, Thomas Edison, and Henry Ford all **improved** their products. The computer has improved from being the size of a building down to a “chip”.

Poles and wires, no matter what they are made of, are the same as those on which the first telegraph was sent!!

Undergrounding is the solution, to the benefit of all issues, for all parties.

Respectfully submitted,


Gerald W. Fisher, Trustee

cc: Palomar Mountain Planning Organization
Pauma/Pala Planning Group
Supervisor Dianne Jacob
Dudek
Others

November 5, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Forrest Supervisor Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

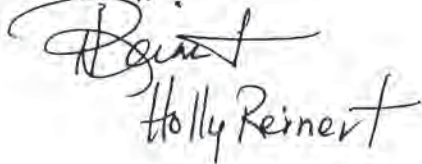
As a resident of San Diego's East County, I am writing to express my support for San Diego Gas & Electric's plans to improve the safety and reliability of electricity to me and my neighbors who live in local rural communities. SDG&E's efforts over the years to strengthen the electric system in high fire risk communities is refreshing and I encourage more of such projects.

I'm told that plans include the replacement of more than 1800 wood poles with ones that are taller and made of fire resistant steel. I also support converting conductors to underground where appropriate. SDG&E has also significant contributions to the overall safety of our communities by installing more than one hundred state-of-the-art weather stations throughout San Diego's back country providing critical weather data to not only SDG&E but to all emergency agencies in the county.

San Diego County has suffered its share of wildfires over the past ten years and the efforts by our communities and organizations like SDG&E will help ensure that we never experience such devastation again.

Please consider the importance of these improvement as you review SDG&E's application for project permits through the Cleveland National Forrest.

Sincerely,


Holly Reinert

November 5, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Forrest Supervisor Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

As a resident of San Diego's East County, I am writing to express my support for San Diego Gas & Electric's plans to improve the safety and reliability of electricity to me and my neighbors who live in local rural communities. SDG&E's efforts over the years to strengthen the electric system in high fire risk communities is refreshing and I encourage more of such projects.

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San Diego County has suffered its share of wildfires over the past ten years and the efforts by our communities and organizations like SDG&E will help ensure that we never experience such devastation again.

Please consider the importance of these improvement as you review SDG&E's application for project permits through the Cleveland National Forrest.

Sincerely,

A handwritten signature in black ink, appearing to read "Myranda Munoz". The signature is fluid and cursive, written over a light blue horizontal line.

November 5, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Forrest Supervisor Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

As a resident of San Diego's East County, I am writing to express my support for San Diego Gas & Electric's plans to improve the safety and reliability of electricity to me and my neighbors who live in local rural communities. SDG&E's efforts over the years to strengthen the electric system in high fire risk communities is refreshing and I encourage more of such projects.

I'm told that plans include the replacement of more than 1800 wood poles with ones that are taller and made of fire resistant steel. I also support converting conductors to underground where appropriate. SDG&E has also significant contributions to the overall safety of our communities by installing more than one hundred state-of-the-art weather stations throughout San Diego's back country providing critical weather data to not only SDG&E but to all emergency agencies in the county.

San Diego County has suffered its share of wildfires over the past ten years and the efforts by our communities and organizations like SDG&E will help ensure that we never experience such devastation again.

Please consider the importance of these improvement as you review SDG&E's application for project permits through the Cleveland National Forrest.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Perini". The signature is fluid and cursive, with a long horizontal stroke at the end.

November 5, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Forrest Supervisor Will Metz, Cleveland National Forrest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Power Line Replacement Projects

As a resident of San Diego's East County, I am writing to express my support for San Diego Gas & Electric's plans to improve the safety and reliability of electricity to me and my neighbors who live in local rural communities. SDG&E's efforts over the years to strengthen the electric system in high fire risk communities is refreshing and I encourage more of such projects.

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San Diego County has suffered its share of wildfires over the past ten years and the efforts by our communities and organizations like SDG&E will help ensure that we never experience such devastation again.

Please consider the importance of these improvement as you review SDG&E's application for project permits through the Cleveland National Forrest.

Sincerely,



Bob Hawkins
Jeff Heys.

November 6, 2013

To: California Public Utilities Commission //505 Van NESS Ave., San Francisco, CA 94102
United States Forest Service//18945 Rancho Bernardo Rd., San Diego, Ca 92127

Re: Dan Diego Gas and Electric Company Master Permit Special Use and Permit to Construct Metal Power Pole Replacements on existing lines Projects No. A.12-10-009

Dear CUPC Commissioners and FS Supervisor Will Metz,

Please add this supplemental letter to our previous letter of concern on SEMPRA, SDGE Project A.12-10-009.

What we want to explain is our concern for heat in the lines. As we stated in the Oct. 23, 2013 letter of concern "that there is no increase in voltage higher than 69KV" in this replacement. We question if, in fact increasing the amperage, does not add much more heat to the equation? We look at the effort to replace wooden poles with metal poles and ask, with more heat, doesn't this defeat the original purpose of this project, to prevent fires? Metal not burning, we understand for the poles, but aren't the heated lines far more dangerous to causing forest fires?

The ampere is a measure of the amount of electric charge passing a point in an electric circuit per unit of charge. The amperage can be viewed as a flow rate, i.e. the number of charged particles moved per unit of time. Isn't this analogy like turning up the pressure in a garden hose? We ask if we are correct about there being more heat added to the line?

By turning up the pressure in a garden hose the water pressure increases because the amount of water put into the hose increases but the size of the hose remains the same. The water shoots out further. If you wanted to keep the same pressure when more water is required then you need a larger hose size. Are we interpreting this understanding of more amperage as a far greater a charge correctly and the larger hose size correctly?

So, when SDG&E increases the amperage five times on the 69 KV line of Circuit 440 through Mount Laguna in order to keep the heat created in the line constant then you need a larger line size. Won't you need a lot larger size line?

One formula is $W = V \times A$ Watts = Voltage x Amperage if amps increase 5 times, watts do also

$5W = V \times 5A$ If this formula is not correct, please explain in detail in the EIS/EIR?

SDG&E is saying they are hardening the line for a variety of beneficial reasons to reduce the risk of fires. But how can that be, when they are increasing the size of the line to carry increased heat? They are adding extra poles to shorten the pole distance. Aren't the extra poles for the added weight it will take to carry this amperage and increased heat? Please explain and answer to the question, with a heavier weighted line, with more heat, how is this not more dangerous to the environment, especially with

concern to all the tremendous fuel up in the forest at Mt. Laguna? Many of those trees well be in the air space of those lines which are cleared only 15 feet from the center of the poles. Isn't the Utility 30 foot right away corridor that is permitted all that will be needed for this replacement? Or is this a new way for SEMPRA, SDGE to request a larger size maintenance ground and air space right a way? Aren't the Jeffrey Pines and old growth Oaks taller than these lines? Isn't it possible that llmbs, pine cones, sometimes the trees themselves, animals, etc. could fall on these lines in the forest? Isn't this the old "B" route going through Mt. Laguna, that was once considered for SEMPRA's SDGE Sunrise Powerlink Transmission 500KV Line? Wasn't this area (Mt. Laguna) considered a bad place to put lines that carry increased heat and the potential for future expansion for Sempra once before, in the heavily forested Treed area in regards to significantly devastating fire potential? In increasing amperage you square the heat, this is our point of concern.

Another formula is known as Joule's First Law where the heat produced is proportional to the square of the current multiplied by the electrical resistance of the wire. Doesn't this theory apply to this project?

$$\text{HEAT} = \text{CURRENT squared} \times \text{Resistance} \qquad P = I^2 \times R$$

So, when SDG&E increases the amperage five times then the resistance would have to drop 25 times to maintain a constant heat in the line. Isn't this correct?

$$\text{HEAT} = 5 \times 5 \times 1/25 \quad \text{Is the current 25 times hotter?}$$

Another way to reduce the heat in the line is to increase the voltage. So, is SDG&E creating a two step move to increase the heat and then at a later date increase the voltage to reduce the heat ? This concern is to address our original letter about no increase in 69kV.

Again, we ask why wasn't undergrounding considered for Mt. Laguna? Was it all along, simply another way to establish future expansion for SEMPRA ENERGY's SDGE for increase voltage transmission? What is the real purpose? Could the CUPC Board members come and see how precious Mt. Laguna is within the Cleveland National Forest? If there is to be an increase of voltage, and this is the ultimate case, we ask that our environmental concerns for the Sunrise Powerlink Transmission Line be pulled out and applied to this project. Because that was a 45 page detailed letter to the CUPC not only concerning "D" Route but also other areas of the Cleveland National Forest, and in which species like the Endangered Mt. Laguna Skipper Butterfly, the Quino Checkerspot Butterfly, and the sighting of Peninsular Bighorn Sheep on Sunrise Highway in Mt. Laguna by a State Fish and Game Officer, were addressed. By the way our Federal Government thinks Mt. Laguna's Sunrise Highway is important enough to name it a National Scenic Byway. But back to the lengthy comment we submitted, you will find in that letter, that the "A" Route had only one more specie of concern than the amount that we listed on the "B" and "D" Route of the Cleveland National Forest Lands. You will find rational arguments not only protecting the Critical Habitats for many significant protected species, but also for protecting the Wilderness areas of the Cleveland National Forest. Can the CUPC revisit the the fact that before they made a decision on where they would put the "Sunrise" that Sempra added the Federal Department of Energy Corridor in the Draft EIS/EIR to go parallel to "D" Route through the BLM lands before the Feds had started their draft for the

Federal Corridor? What happened to the legal check and balance systems in this country? When the California Department of Energy makes a mistake and or CPUC the only recourse is supposed to be The Federal Department of Energy. Talk about conflict of interest?

We sympathized with the Forest Service because BLM was the lead from the Department of Agriculture of the sighting decision. But that done, now the Forest Service is party to the decision. And more amendments to the Forest's Management Plan like when under Cleveland Forest Supervisor Tina Terrel's objection at the NOP time for Sunrise to take 300 foot wide corridors over the original 30 foot wide utility corridor. Are there any changes this time to any of SDGE easement sizes?

By undergrounding environmental concerns of protection and historical cultural elements are better protected. We believe that this project will physically divide an established community and may conflict with with any applicable land use plan for the San Diego County tax payed private properties of Mt. Laguna and East Jamul Deerhorn area near Cinnamon, Thyme and the existing private lands north above Barret Lake Substation. These are established communities with conservation plans of concern. We are concerned that zoning of the private lands does not change because of the decisions of the Forest Service and CPUC. We are very concerned about water flow in these neighborhood and that nothing disturbs or taps the underground water areas of Mt. Laguna and Jamul and in particular drainage in the Barret Lake area and the Descanso areas. Please spare the private land communities of Jamul and Mt. Laguna that have undergone devastating fires in the past, ingards to to communities that have had financial hardships in rebuilding and some areas still yet to be restored. A number of the land owners that ar to be affected in the Cinnamon, Spice Way, and Thyme Road of Jamul have not been able to financially rebuild and any land condemnations and or takings if ultimately more than the original 30 foot right of ways is to be approved would be a hardship on those owners. Mt. Laguna recently lost 100 structures, and those owners and their hardships of rebuilding is of concern as well.

We have many bird , animal, and plants Endangered, that are rare, and of special concern that need to be protected. For all these reasons as stated above we hope you will consider our concerns. It is possible that SEMPRRA, SDGE is not on the up and up with the Forest Service on this project. Please no future expansion beyond existing 69KV.

Sincerely,

Shannon and William Davis //mail to/1185 East Lane/Imperial Beach, Ca 91932

NOV 07 2013

Barry Jantz
3515 Brittany Ct.
Jamul, CA 91935

November 6, 2013

Ms. Lisa Orsaba, California Public Utilities Commission
Mr. Will Metz, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Subject: Support for SDG&E's Master Special Use Permit and Permit to Construct

Dear Ms. Orsaba and Mr. Metz:

As a San Diego East County resident, active community member and former member of the La Mesa City Council, I ask you to approve SDG&E's request for a Master Special Use Permit and Permit to Construct for Power Line Replacement Projects in Cleveland National Forest (CNF). I believe these projects are needed to help improve the reliability and integrity of the electric system within CNF and the surrounding areas, as well as to enhance safety during fire season.

As you know, electric reliability and safety is a critical aspect for East County businesses and organizations to remain competitive. SDG&E's proposed Power Line Replacement Projects will remove 1,800 unreliable wood poles and replace them with stronger, fire resistant steel poles. The project will also enhance reliability.

East County's extreme weather conditions put the region at risk for large wildfires. SDG&E's proposed infrastructure improvements will improve safety in those conditions. The new steel poles will be placed farther apart, which will bolster safety during high winds. I support any and all steps that can be taken to prevent wildfires from occurring.

Thank you very much for the opportunity to express my support for SDG&E's Power Line Replacement Projects in CNF. I encourage you to approve these important projects to ensure safety and reliability for our region.

Sincerely,



Barry Jantz
(619) 300-3795

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 3:27:26 PM

Scenic Integrity issues with Master Permit Comments 11-6-13

Please modify the master plan to include language that requires all poles in the CNF and on in holdings within the CNF be colored brown in accordance with scenic integrity guidelines. In addition, require SDG&E to color all poles and towers along the Sunrise Powerlink correctly as was a condition of contract when constructed. Do not allow SDG&E to proceed with the master plan until conditions and requirements of the Sunrise Powerlink are complete.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Plan
Date: Wednesday, November 06, 2013 3:31:48 PM

Scenic Integrity gate issues 11-6-13

Please change the master plan to include instructions for all gates on CNF lands be painted in accordance with scenic integrity guidelines. Bright white gates are not acceptable.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 3:35:06 PM

Master Permit gate log request comments

Please add a requirement to the CNF master plan that requires SDG&E and all contractors to log in and log out when opening or closing gates in the CNF. This would establish a record of whom and when gates were opened and/or left open by employees of SDG&E and/or its contractors. A simple email system notifying the district involved would be adequate. SDG&E has a long history in the last permit of leaving gates open and unlocked for lengths of time with no effort or concern to improve this.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 3:38:50 PM

Comments relating to master permit

Please add the following changes to the master plan proposal. If transmission and distribution lines are increased in size for strength during wind storms, then also require SDG&E to increase the strength of wires from transformers to individual meters. If SDG&E does not want to show good faith and upgrade the wires from transformers to meters, add language to require this strengthening on all in holdings in the national forest. A second improvement would be to require SDG&E to replace all poles on private property in the CNF with metal poles. As a condition of approval of the master plan, SDG&E should be required to make all infrastructure relating to powerlines in the CNF safer and meet the same codes and maximum wind speed ratings.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 3:56:33 PM

Alternatives and Comments regarding TL626/D79 and CNF Master Permit

TL 626/D79 at current state and proposed state per CNF master plan is a dangerous and likely illegal piece of electric infrastructure. TL626/D79 is not rated to handle the current wind speed data, the access roads are a violation of just about every agencies policies, and all this could be fixed by under grounding TL626/D79 under Boulder Creek Road. TL626 fire hardening is a disguised upgrade to the carrying capacity of TL626. A phone call to an SDG&E engineer provided by SDG&E at a public hearing revealed SDG&E will not be raising the voltage, but instead raising the amperage 4-5 times to increase transmission on TL626. The formula for this is $Power = Volts \times Amps$. It is important to note, carrying capacity is not the volts or the amps of the wire, but the product of the volts multiplied times the amps. An increase in either voltage or amperage is an upgrade to the system and needs to be stated as such. SDG&E's own engineer told us that max operating temperature of TL626 and all upgraded 69kv lines in the master plan would double to approximately 300 degrees F. Please explain for the record, how this upgrade and how a transmission line with a temperature several degrees away from the ignition temperature of dry grass is a fire safety improvement? The wire SDG&E is proposing is not special fire hardening wire, but the standard upgrade wire SDG&E has done all over San Diego to increase the capacity of their 69kv transmission lines. SDG&E tried to replace TL626 in 2012 with the new upgrade wire under the banner of public safety and the CNF stopped it. Linemen working for SDG&E told me in 2011, that TL626 had to be upgraded with larger wire to handle transmission requirements that would be coming online with the Sunrise Powerlink. These comments were given to the CNF and SDG&E was required to restring TL626 with the existing wire size. For public record, please supply the current stated amperage carrying capacity of TL626 and the new capacity SDG&E is upgrading too. Please supply the current and future max operating temperature of all 69kv lines in the CNF. The master plan submitted as of October 2013 as it relates to TL626/D79 should be rejected. Removal of TL626/D79 and under grounding these lines is the only option. Cost of under grounding TL626/D79 is not a concern, public safety over rides the increased cost and the cost is far less then when TL626 /D79 burn down San Diego county. TL626 is the most dangerous transmission line in Southern California in terms of fire risk. Only the strictest requirements should be placed on the future of TL626 regardless of cost. Reject the current master plan proposal and relocate TL626/D79 under Boulder Creek road if TL626 truly fulfills a necessary purpose and need.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 4:02:27 PM

Safety based decisions on under grounding powerlines in the CNF comments

I object to the CNF master plan proposal to underground sections of SDG&E powerlines near Pine Valley and Buckman Springs. CNF powerline under grounding of distribution lines and transmission lines needs to be based on public safety. The maps I saw at the open house reflect a plan to underground powerlines near populated areas of Pine Valley. Under grounding powerlines near Pine Valley and Buckman Springs has nothing to do with public safety and everything to do with private property values and the close proximity to the Mountain Empire SDG&E maintenance yard. The under grounding proposal in the Master Plan needs to be rejected and resubmitted to address extreme fire danger and wind speed issues relating to SDG&E infrastructure on CNF lands.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 4:12:41 PM

Master Permit access roads comments for TL626/D79 including Boulder Creek Road, Boulder Creek, and Cedar Creek drainage

The access roads as shown for TL626/D79 in the CNF should be removed immediately and not permitted on the new master plan permit as proposed to the CNF. Erosion is the main issue on the access road for TL626/D79. Max grade of the road that I have measured along TL626/D79 is 47%. A specific section leading into a tributary of Boulder Creek has a 47% grade over 100 feet long. The 47% road bed itself is over 6 feet below grade, with no hope of any BMP controlling erosion. Every year this section must be re-graded with a bulldozer and the required water truck won't even go down the road because it will get stuck in the canyon. The next half mile contains numerous 30% grade slopes eventually terminating in Boulder Creek with another 40% grade section right into a creek with documented populations of steelhead and western pond turtles. None of this section of TL626/D79 is maintained by SDG&E with the required water truck for soil compaction and fire protection because SDG&E or its contractors cannot get those vehicles up and out of the area on the current access roads. SDG&E does not practice a realistic BMP in this area, but more of a "out of sight out of mind" policy. The facts on dirt road construction in San Diego County and the CNF are completely ignored by SDG&E and the current master plan as proposed does not address this. San Diego County land use policy encourages limits on dirt road grades on private land to 15% grade. A 20% grade is allowed for a short distance if required and 25% is allowed only with a special permit. USFS/CNF limited SDG&E to a max grade of 15% on the Sunrise Powerlink several years ago. All roads in question including TL626/D79 should be required to meet road specs set forth during Sunrise Powerlink construction. Allowing a 47% grade dirt road in an area with 20+inches of yearly rainfall is a show stopper for this road. The TL626/D79 access road continuous for at least 5 more miles north out of Boulder Creek and into Cedar Creek with numerous stretches of grade 30% to 40% grade over hundreds of feet. I can provide you with data points and pictures of readings all along the way. As condition of permit to keep this road, the entire access road should be officially surveyed and required to be brought up to modern standards as condition of permit renewal. In addition, no new roads should be allowed to be constructed in the CNF and sections above 15% should be removed or paved in accordance with current rules and regulations. The access road for TL626/D79 does not meet modern safety or environmental standards and should not be re-permitted under the master plan proposal. TL626/D79 and its access roads are the only man made intrusion in the proposed wilderness areas per CNF LMP 2013. Removal of TL626/D79 would greatly help public safety and the efforts of the USFS/CNF in preserving this area.

After reading my comments and investigating the current state of TL626/d79 access roads, I urge you to require SDG&E to remove this road and seek an alternative. The only alternative to TL626/79 that will fulfill the needs and purpose as requested by SDG&E and meets safety, county, and USFS/CNF requirements is undergrounding TL626/D79 under Boulder Creek Road. If not technologically feasible to underground TL626/D79 under Boulder Creek road, please investigate moving TL626/D79 to state route 79 through Cuyamaca State Park. A powerline route along state route 79 has much lower wind speed exposure, has paved road access, and does not compromise hundreds of thousands of acres of CNF and peoples lives in San Diego County.

Note: See pictures sent separately of percent grade along TL626/D79

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 4:17:26 PM

TL626/D79 wind speed safety concerns continued

The program to turn off and on TL626/D79 when SDG&E feels necessary is not a public safety solution to rebuilding the most dangerous powerline in Southern California. SDG&E turned off TL626/D79 October 5, 2013 during a Santa Anna event that approached 70mph. An SDG&E worker along TL626/D79 told local residents that workers saw "visible sparking" and had TL 626/D79 de-energized. Was the report of "visible sparking" made public record for the evaluation of the future of TL626/D79 or was it covered up by SDG&E? I don't understand how "visible sparking" would occur at 70 mph, but no danger existed in 2012 when SDG&E left TL626/D79 energized during a sustained wind event that eventually peaked at 93mph. Fall and Winter 2012/2013 wind speed along TL626/D79 peaked numerous times in the 70-85 mph range and no safety shutoff occurred. On October 5th and 6th, 2013 when SDG&E wanted to re-energize TL626/D79, employees had to inspect from utility truck the entire length of TL626/D79 before re-energizing. I asked the SDG&E crews who were sitting in their truck hiding from the 50+mph wind, "where was the helicopter to inspect the lines?" SDG&E workers informed me that the current wind speed was too strong to fly helicopters in! SDG&E should be denied re-permitting on TL626/D79 and on any other powerline in a high fire danger area of the CNF if the wind gets so strong that safety inspection and fire protection air assets cannot even fly. The master plan as proposed needs to be rejected. SDG&E wants to change wooden poles to metal and upgrade wires to a max wind speed rating that is less than max wind speed for the area. The master plan proposed by SDG&E for the CNF is negligent and puts all of San Diego at risk. Do not allow SDG&E to re-build TL-626/D79 as proposed. TL626/D79 is the spark waiting to happen in tinder dry brush along the windiest corridor in Southern California.

Note: See pictures and graphs included as separate emails.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E MAster Permit
Date: Wednesday, November 06, 2013 4:22:55 PM

Comments relating to public safety and wind speed along TL626/D79

TL626/D79 at current state has ignited 2 wind related fires in the last 9 years. Both fires resulted from sustained Santa Anna winds on TL626/D79. Had the brush in the immediate area of Boulder Creek Road mile 8 not been removed in the 2003 cedar fire, TL626/D79 would have caused the same type of catastrophic fire burning hundreds of thousands of acres in San Diego County. TL626/D79 is likely the most dangerous powerline in Southern California relating to wildfire risk. A fire starting anywhere along the TL626/D79 on the western slope of the Cuyamaca mountains during a Santa Anna wind event with normal fuel load cannot be stopped until it reaches town miles away. The land east of TL626/D79 or downwind TL626/D79, has yearly 90+ mph wind events for multiple days and no access roads for distances up to 10 miles. TL626/D79 if fire hardened under the current proposal would be upgraded to 85 mph per my conversation with SDG&E. Last year, TL626/D79 hit 92 mph. Why is SDG&E upgrading or fire hardening a powerline to a lower standard then they already know exists in this area? Let the record show for future lawsuits, SDG&E wants to upgrade a powerline, TL626/D79, to a lower wind speed rating then they(SDG&E) have documented on public certified weather gages. The data for this line and wind only goes back 3 years. On the CNF lands under TL626/D79, it is common to have fall and winter biweekly wind events in this area exceeding 50mph. It's common to have sustained wind events which above 50mph for up to 3 days. TL626/D79 experiences 70 mph wind events multiple times a year. TL626/D79 experiences 80mph+ at least once a year, sometimes 90 mph, and yes 100 mph+ occur in this area. Firefighters responding to the McCoy fire 2007, which was caused by TL626/D79 at Boulder Creek Road mile 8.5, reported wind gusts in excess of 100 mph. The upgrade proposal for TL 626/D79 does not even come close to bringing these powerlines to fire-resistant. A safety factor over max wind speed should be required on any proposal for re-permitting. Safety factors of 150% of max exposure risk are common in most engineering projects where human safety is a concern and should be mandatory on this project. If left in current location and above ground, TL626/D79 will more than likely ignite a fire that will destroy the area it serves before the master permit for this area expires. Please explain the purpose and need for TL626/D79 to remain above ground at such a huge risk to life. The only safe options for TL626/D79 is removal or undergrounding of the line.

Note: See pictures and/or graphs included in separate emails.

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Wednesday, November 06, 2013 4:33:26 PM

Master Permit access road gate comments

The master permit application needs improvement on gate control issues throughout the CNF. Gates on all access roads should meet a minimum standard. SDG&E gates need side extension barriers that will block all offroad activity around gates. Horse and pedestrian gates need to be designed to limit two wheeled motorcycle trespass through the gates. Additionally, gates and barriers need to be paid for by SDG&E. Master Permit also needs to require SDG&E in the event new non-permitted access is made to an SDG&E/CNF road, to install additional access road protection as necessary. The addition protection requirement needs to be in effect throughout the life of the master permit, to permitted access roads. Signs should be required on all gates stating no off road activity and motorized use by permit only. Signage and replacement signs need to be provided and paid for by SDG&E as a condition of permit. CNF personnel informed me at the open house that CNF cannot pay for the needed signs. All gates need to be additionally signed with the following, "gate to remain closed and locked at all times." All gates should meet minimum lock standards. The schlage/kryptonite lock should be on all gates. Current state of access roads has a mixture of the small junk brass padlock, the schlage lock, and no lock at all. Many gates along TL626 are damaged and held closed with minimal chains put on by local residents since SDG&E does not maintain current access gates. Gate damage or violation issues should have a required response time written into the master plan contract. A response number should be made public and written into the contract. Previous requests for a response number received comments asking people to call the Monta Vista center at 619-572-5262. Monta Vista is an unacceptable response because Monta Vista dispatch has no idea what I'm talking about nor do they care about access road issues. Past calls got no response until I emailed the district ranger. District ranger response to calls to Monta Vista dispatch in October of 2011 was something to the effect of, "road violation issues hardly constitute an emergency." Open gates along TL626/D79 where reported to SDG&E lands use Manager Molly Dana and CNF personal in the past and gates remained open and unlocked until locals residents closed them. On October 6, 2013 SDG&E personal patrolling TL626/D79 left access gates open along TL626 at Boulder Creek Road near mile marker 6. The fire danger was so extreme, SDG&E had de-energized TL626/D79. When I arrived mid-morning of the 6th, a white minivan was joy riding around on the TL626/D79 access road in the CNF. I reported these open gates to SDG&E and they were closed several hours later. The fact remains, SDG&E and its contractors have little concern over access roads or public safety along TL626/D79 or any access road in the CNF. Please change the master plan to include the above comments and changes to access road gate issues along TL626/D79 and all access roads in the CNF

master plan proposal.

From: nweflen@yahoo.com
To: [Nate W.](#); [CNFMSUP](#)
Subject: Sdg&e master permit
Date: Wednesday, November 06, 2013 4:43:46 PM
Attachments: [IMAG0809.jpg](#)

TL626/D79 access road percent grade measuring.

Sent from my Verizon Wireless Phone



2013/10/05 10:42

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Wednesday, November 06, 2013 4:45:35 PM
Attachments: [IMAG0820.jpg](#)

47.05% grade on TL626/D79 access road.

Sent from my Verizon Wireless Phone



Digital Angle Gauge

47.05%

ON/OFF 0% Calibrate HOLD

2015/10/05 10:47

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E Master permit
Date: Wednesday, November 06, 2013 4:47:17 PM
Attachments: [IMAG0823.jpg](#)

TL626/D79 access road at 47% grade.

Sent from my Verizon Wireless Phone



2013/10/05 10:49

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Wednesday, November 06, 2013 4:50:46 PM
Attachments: [IMAG0888.jpg](#)

TL626 access road near Cedar Creek at over 40% grade.

Sent from my Verizon Wireless Phone



Digital Angle Gauge

41.62°

ON/OFF 0% Calibrate HOLD



2013/10/13 13:57

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Wednesday, November 06, 2013 4:52:45 PM
Attachments: [IMAG0892.jpg](#)

TL626 access road 35% grade.

Sent from my Verizon Wireless Phone



2013/10/13 14:07

From: [Nathan Weflen](#)
To: [CNFMSUP](#)
Subject: SDG&E master permit
Date: Wednesday, November 06, 2013 5:16:53 PM
Attachments: [IMAG0895.jpg](#)

----- Forwarded Message -----

From: "nweflen@yahoo.com" <nweflen@yahoo.com>
To: cnfmsup@dudek.com; Nate W <Nweflen@yahoo.com>
Sent: Wednesday, November 6, 2013 4:53 PM
Subject:

TLS626 access road at 38% grade near Cedar creek.

Sent from my Verizon Wireless Phone



2013/10/13 14:22

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: Sdg&e master permit
Date: Wednesday, November 06, 2013 4:55:10 PM
Attachments: [IMAG0897.jpg](#)

More TL626 access road readings.

Sent from my Verizon Wireless Phone

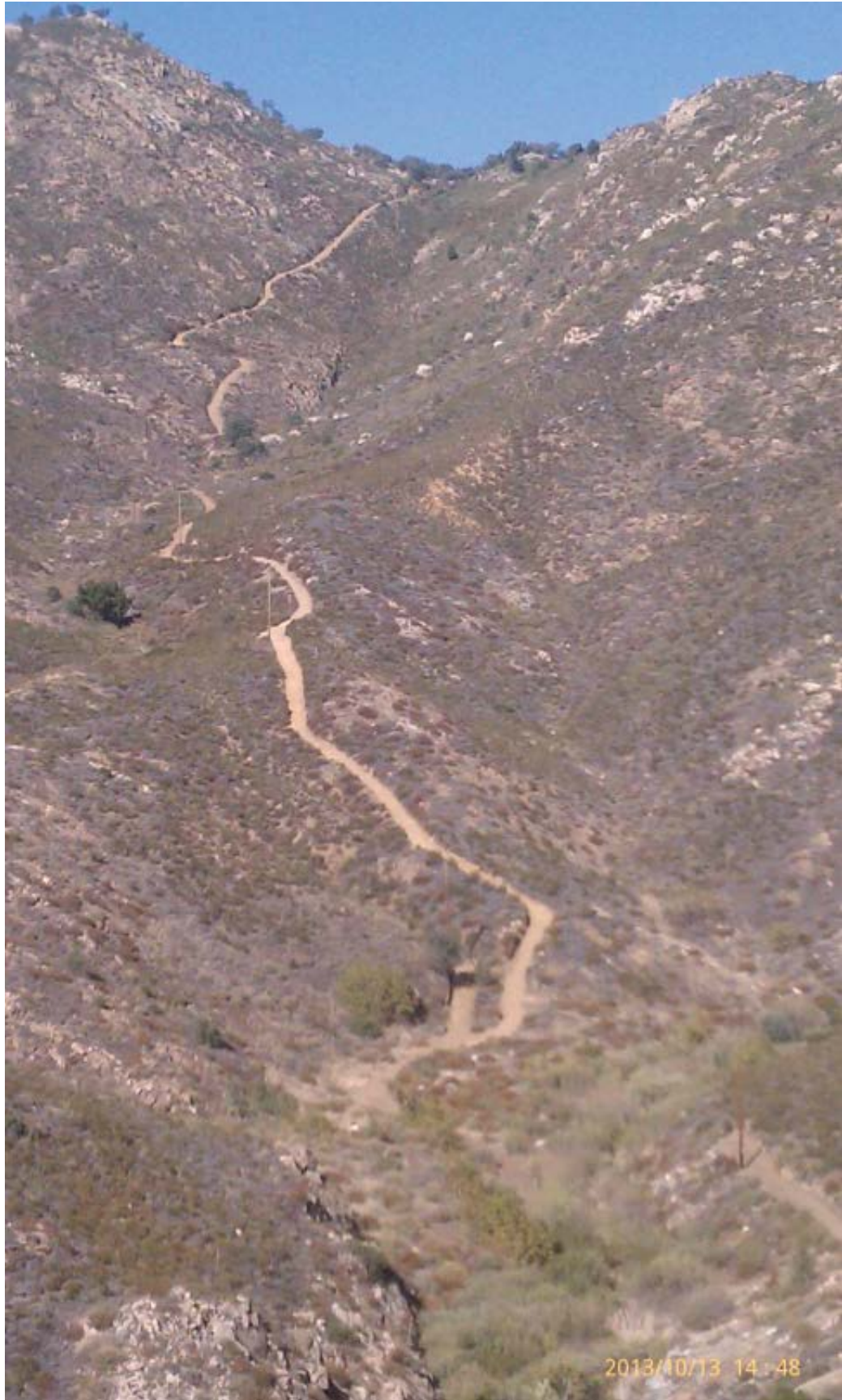


2013/10/15 14:32

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&e master permit
Date: Wednesday, November 06, 2013 4:57:48 PM
Attachments: [IMAG0910.jpg](#)

Steep section of TL626 into Cedar Creek. All exceeding modern dirt road regulations.

Sent from my Verizon Wireless Phone

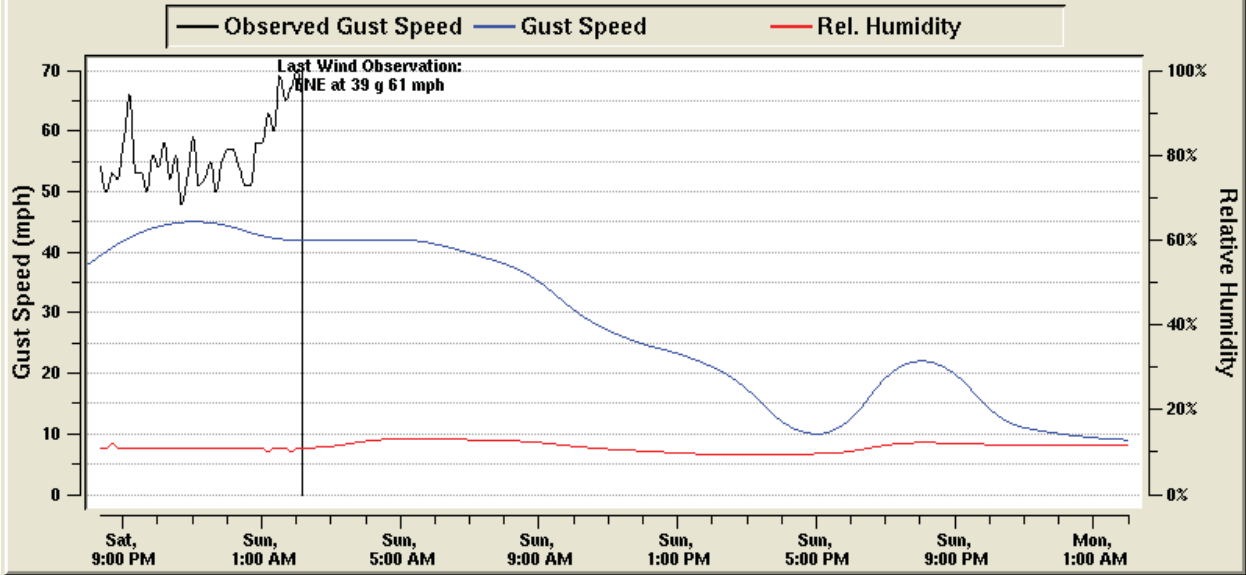


From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&e master permit
Date: Wednesday, November 06, 2013 5:02:01 PM
Attachments: [sil_ndfd-68.gif](#)

TL626/D79 70mph wind speed data for powerline shut off October 2013.
Please refer to comments on "visible sparking" during thus wind event.

Sent from my Verizon Wireless Phone

Gust/Humidity Plot - Sill Hill (79, 626)



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&e master permit
Date: Wednesday, November 06, 2013 5:07:57 PM
Attachments: [DSCN8659.JPG](#)

SDG&E helicopter checking for wind damage at Sill Hill weather station along TL626/D79 after 92 mph wind.

Sent from my Verizon Wireless Phone

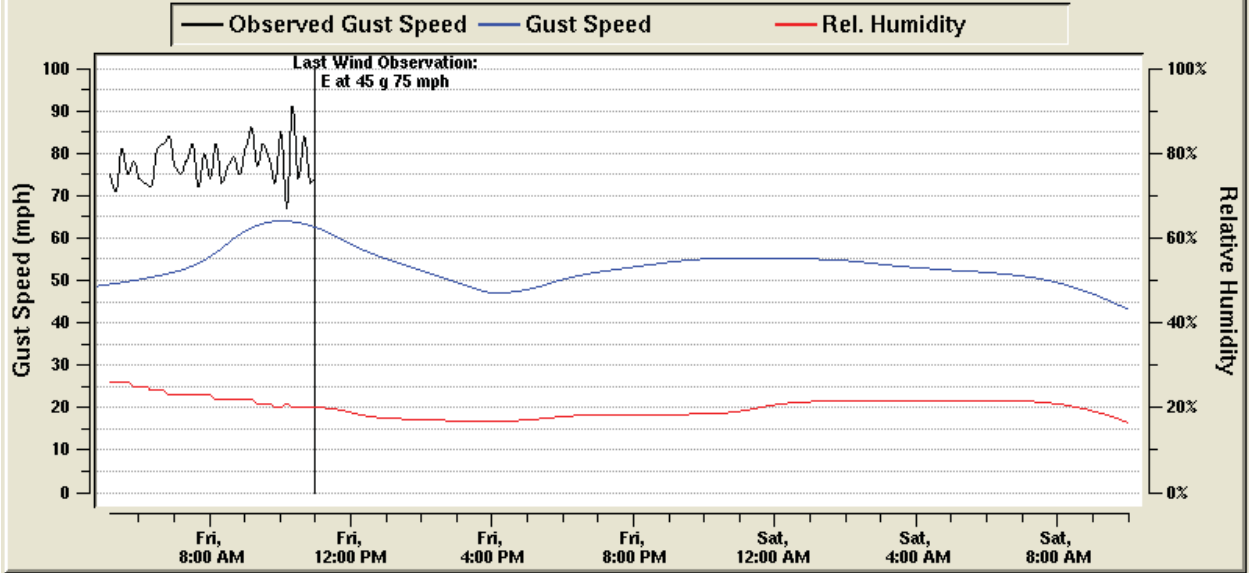


From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&e master permit
Date: Wednesday, November 06, 2013 5:08:16 PM
Attachments: [sil_ndfd-63.gif](#)

92mph wind gust data along TL626/D79.

Sent from my Verizon Wireless Phone

Gust/Humidity Plot - Sill Hill (79, 626)



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&e master permit
Date: Wednesday, November 06, 2013 5:11:49 PM
Attachments: [gust_latest-13.png](#)

Image showing TL626/D79 wind event reaching 92 mph. Note red area of highest wind speed focused on TLS626/D79, the most dangerous powerline in southern California.

Sent from my Verizon Wireless Phone

From: [Cindy Buxton](#)
To: [Orsaba, Lisa](#); [CNFMSUP](#); [Will Metz](#)
Cc: [Joan Friedlander](#); [Bjorn Fredrickson](#); [Robert Hawkins](#); jaheys@fs.fed.us; [Don Christiansen](#); dshobbs@fs.fed.us
Subject: RE: SDG&E Master Permit
Date: Thursday, November 07, 2013 3:56:21 PM

This is disappointing. You've discussed this with the POC several times. I have every respect in the world for the POC and you should continue to do so. I represent the Sierra club and the 12,000 members in San Diego. I had CPUC specific questions and one which for the moment was confidential. Apparently there is no such thing.

I will work around them. Or forget them as it seems you've just precipitated something far more interesting if not disconcerting.

These comments due to their nature I present as my own:

Communication has been a struggle through this project so far. I understand why some would want to be moving on with this as we are burned out from the barrage of projects including everything from the original Sunrise Powerlink through to the SEIS/DEIS of the LMP. Nevertheless, I also agree that the information was not disseminated in the matter it was published to be, to the audience it was apparent it was for. Let the record show that in part it is because SDG&E has stepped into this and "rolled their own" version of the process to the point of putting hundreds of flyers on gates and poles and other items in the backcountry, and much of the public-as the man from Dudek even publically stated at the Julian open house and I'm pretty sure I noticed that was being taped so you DO have this on record-much of the public said that they thought this was already final, based upon the communications they had seen from SDG&E. It seems apparent now it is a deliberate muddling of public information. Like a scene in the 2nd Indiana Jones where they had to find a large diamond in a floor full of ice. Camouflage so to speak. Will the real master permit announcement please stand up. You should be asking why if anyone allows you to. I won't hold my breath.

It appears to me if someone seems nice to us, takes an interest in our questions, heaven forbid they should actually like something on the land, a waterfall, view, wildlife, they are suddenly pulled away and not allowed to talk to us any more. its been like a disease that has swept through the Forest Service ever since the Sunrise Powerline came to town. Not cool to like beauty if you want SDG&E to like you, and you "want" SDG&E to like you... it seem like it anyway. This mindset and class of behavior does not belong on the forest, in the Forest Service or on a project like this. It should not be tolerated much less allowed to

continue.

Since when did the USFS become SDG&E's (and we can deduce FERC or the Dept of Energy) very own personal CIA or gestapo? Question is ,is FERC doing this to THEM as well. We could only wonder. SDG&E used to be a community based entity. Not necessarily any more and they as of a little while ago may have convinced me they don't belong in our community because they really don't seem to have the people in mind, not when they pull this for the dozen'th or so time. Serioiusly? I guess we must be very important to be so worthy of avoiding.

Considering the **real** opportunities in hand that they are so oblivious to, they should be run out of town just for being stupid, much less bullies.

You just got to be next. I'm very sorry guess I thought the CPUC was immune, but this speaks volumes, to the contrary, huh. Someone has worked this to the point that anyone who seems to be getting along they look for some way to come in between. I've seen this with many members of the USFS too, especially last summer when this project was announced. There was an announcement in April right on the heels of our LMP. I did not get it for a couple of weeks. Wouldn't you think given the close proximity of the LMP that that was information we might have wanted? I had to write SDG&E a nasty gram telling them yet again I am a commenter of record back to the original from 2009. I did the same in the first one too.

People are reprimanded for being nice, thorough, getting along, taking an interest , or being competent? There is the real problem isn't it.

If a forest ranger acts like they might be actually enamored by the beauty of the land they so happened to be tasked with managing for the public, someone their "virtual Nazi core" comes along and intimidates them for either knowing beauty when they see it or makes fun of them for being nice to a "tree hugger" - and they do and I know they do.

So the standard M.O. is to insult the target. I bought that for a while too. Not any more, thank you. After awhile even the timid catch on. I'm pretty sure calling you was an acceptable measure last week, gee something sure changed in a hurry and since I was late to the Alpine meeting doesn't seem to be coming out of there.

Or as in your case, you just seem to like people and genuinely take an interest in them, probably had something to do with being hired into the position you have; -or lands officers that spent time with us because they are exceptional at what they do, and seem to be getting along, suddenly one day out of the clear blue sky we can no longer get communication from them, they even have to do something bogus to try to open the rift, is

that how this works? - it sure is starting to look this way. I've even been in meetings where someone from the USFS approached but as soon as they did immediately there's this presence of onlooking that would never let them talk alone.

Ever since SDG&E became a part of the CPUC not to be confused with YOU personally, but the CPUC came into existence on the heels of capers like Enron, the people can not rest and we can not know if we are told the truth. I do not think the CPUC is doing the job it claimed to in forming or doing right by the people's energy needs or concerns. This is pretty much the straw that put me right back to thinking about it.

Maybe someone would like to explain this because it sure isn't NEPA. Or perhaps the several times a couple of years ago I mentioned on the phone I was going somewhere to a friend and yup, I would get followed. I even joked on the phone that I was followed a couple of times by a big black car and the next time I was followed by a small white one. Perhaps there is humor in this yet. Or the fact that in every one of these commenting periods, I get hit by people trying to corrupt my computer or it seems to coincide precisely like the coincidence of the century that when there is an SDG&E comment period that is the day SDG&E wants to trim the shrubbery in the back yard. Yep yesterday was the day. Gestapo.

Wouldn't you think if the CPUC was looking out for the people they would be stopping these things. Heck no I think they are helping their buddies along. I had no idea swimming under a waterfall could be so dangerous. -Not you you were doing a good job so now you can't take a call. If they put a fraction as much time into actually taking a look at the land, or in SDG&E's case some research and development for better transmission techniques we would not be having these issues at all. I have even made some suggestions but no one ever cares what the peanut gallery has to offer, if they did it would no longer be my idea would it?

I didn't claim to be a genius, guess it took a while to catch on. Most in life was pretty average basically hiding from socially pretentious people by spending time in the woods where things are real. After all, this is the US Forest Service who'd a thought this crap would happen in the land of snakes and snails and poison oak? -and it seems this way ever since the Sunrise Power link SDG&E 's projects and constant -and I do mean constant presence, one project after the other because we never seem to get the whole intention the whole picture of what they want out there at once,-which happens to violate both NEPA and CEQA for fragmentation issues, has created all of this tension and controversy, ego, or a situation that creates some notion of blame or credit and distance, where it used to be the land itself that was all that was required for mutual ground, we all just stood in tandem with that common focus.

You too are very attentive and supportive, It's a compliment from the peanut gallery, and

I'm the only one in the room that has actually seen most of the 626 as well as the routes all the way around Barrett and Lyons Valley and even up on top of Bell Bluff from a distance. Boy, that much be scaring the living daylight out of them someone stands up and calls them out for being stewards of a gorgeous place. Gee we can't have that.

I'm sorry if you did your job well and now no longer able to communicate directly, you are in very good company, too. So forget what I was going to ask, I'd like standing on the issue that it appears that SDG&E via whatever agent is unclear, but whoever/whatever they are they are very good at destroying relationships that might get something done, even too good. They are taking steps to compromise the public ability to communicate with public and government officials in order to manipulate a public process to the benefit of their profits. Where I come from we call that Racketeering and it is a required reportable event. Not that they seem to have any difficulty themselves butting in and making demands.

There is a common joke out there that for the letters SDG&E the E stands for 'extortion'. If that bothers them, I would sure hope it does, that it the thing they should be addressing and let these agencies do NEPA and CEQA once and for all and get back to doing Forestry.

I take it someone picked up on your willingness to be approachable and thorough and put a stop to that sneaky business. Yes I'm angry. this is right on the doorstep of basic fundamental democracy due process and equal rights. I'm not mad at you, not at all, thanks for what you did so far. I've seen this too many time in the last eight years. I'll try to calm down before I write more but trust me there IS more. This pushes well out of NEPA to laws far more serious concerns when we don't have equitable ability to communicate just because someone is doing a competent job.

So let the record show in my opinion the first thing you need to address in this master permit is the general character and ethics of the people who are proposing it- whoever they really are. You can't have a solid plan if there is no solid and reliable business foundation to put it on that the public can count on, aka trust in government, state or federal. I think you need to address the ethics and integrity of this process and ensure that it is an honest one. I feel like there has been a conscious effort to hide the full intentions many times over and withhold information, dodge questions, hide expansions under amperage, and intimidate and complicate people into not participating fully.

God Bless America , Let's save some of it.

Sincerely,

Cindy Buxton **on behalf of myself**

Chair of the Forest Committee , San Diego Chapter of the Sierra Club

541 Spruce Street
Imperial Beach, Ca. 91932

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

.....

1964 - 2014 Civil Rights 50 ~ Wilderness 50

Bop ba da, shoo-be doo-be doo-be do-wah! --Van Halen

.....

From: lisa.orsaba@cpuc.ca.gov
To: iokuok2@hotmail.com
CC: rnitka@dudek.com; jporteous@dudek.com; rhhawkins@fs.fed.us
Subject: RE: SDG&E Master Permit
Date: Thu, 7 Nov 2013 18:13:52 +0000

Hi Cindy,

I just picked up your voicemail left yesterday.

Cindy, I am sorry, but I could not understand your question.

I would like to ask again that you call the project vm at 866/467-4727. Or send an email to CNFMSUP@dudek.com

That way someone can respond to your question and, hopefully, get you the information you requested.

Thanks again for your continued interest in this project.

Best Regards,

Lisa

Lisa Orsaba | Energy Division
Infrastructure Permitting & CEQA
California Public Utilities Commission
505 Van Ness Avenue | S.F. CA 94102-3298
415-703-1966 | lob@cpuc.ca.gov

From: [Marcella Sharp](#)
To: [CNFMSUP](#)
Subject: SDG&E Master Permit
Date: Thursday, November 07, 2013 10:00:59 PM

To whom it may concern:

My family has maintained property ownership in Boulder creek for decades The SDG&E Master permit has raised concern over several issues raised by Mr. Nathan Weflen that have caught our attention. We would like to go on record as having the same issues as stated below by Mr Weflen in prior comments:

Scenic Integrity issues with Master Permit Comment-

Please modify the master plan to include language that requires all poles in the CNF and on in holdings within the CNF be colored brown in accordance with scenic integrity guidelines. In addition, require SDG&E to color all poles and towers along the Sunrise Powerlink correctly as was a condition of contract when constructed. Do not allow SDG&E to proceed with the master plan until conditions and requirements of the Sunrise Powerlink are complete.

If transmission and distribution lines are increased in size for strength during wind storms, then also require SDG&E to increase the strength of wires from transformers to individual meters. If SDG&E does not want to show good faith and upgrade the wires from transformers to meters, add language to require this strengthening on all in holdings in the national forest. A second improvement would be to require SDG&E to replace all poles on private property in the CNF with metal poles. As a condition of approval of the master plan, SDG&E should be required to make all infrastructure relating to powerlines in the CNF safer and meet the same codes and maximum wind speed ratings.

The access roads as shown for TL626/D79 in the CNF should be removed immediately and not permitted on the new master plan permit as proposed to the CNF. Erosion is the main issue on the access road for TL626/D79. Max grade of the road that I have measured along TL626/D79 is 47%. A specific section leading into a tributary of Boulder Creek has a 47% grade over 100 feet long. The 47% road bed itself is over 6 feet below grade, with no hope of any BMP controlling erosion. Every year this section must be re-graded with a bulldozer and the required water truck won't even go down the road because it will get stuck in the canyon. The next half mile contains numerous 30% grade slopes eventually terminating in Boulder Creek with another 40% grade section right into a creek with documented populations of steelhead and western pond turtles. None of this section of TL626/D79 is maintained by SDG&E with the required water truck for soil compaction and fire protection because SDG&E or its contractors cannot get those vehicles up and out of the area on the current access roads. SDG&E does not practice a realistic BMP in this area, but more of a "out of sight out of mind" policy. The facts on dirt road construction in San Diego County and the CNF are completely ignored by SDG&E and the current master plan as proposed does not address this. San Diego County land use policy encourages limits on dirt road grades on

private land to 15% grade. A 20% grade is allowed for a short distance if required and 25% is allowed only with a special permit. USFS/CNF limited SDG&E to a max grade of 15% on the Sunrise Powerlink several years ago. All roads in question including TL626/D79 should be required to meet road specs set forth during Sunrise Powerlink construction. Allowing a 47% grade dirt road in an area with 20+inches of yearly rainfall is a show stopper for this road. The TL626/D79 access road continuous for at least 5 more miles north out of Boulder Creek and into Cedar Creek with numerous stretches of grade 30% to 40% grade over hundreds of feet. I can provide you with data points and pictures of readings all along the way. As condition of permit to keep this road, the entire access road should be officially surveyed and required to be brought up to modern standards as condition of permit renewal. In addition, no new roads should be allowed to be constructed in the CNF and sections above 15% should be removed or paved in accordance with current rules and regulations. The access road for TL626/D79 does not meet modern safety or environmental standards and should not be re-permitted under the master plan proposal. TL626/D79 and its access roads are the only man made intrusion in the proposed wilderness areas per CNF LMP 2013. Removal of TL626/D79 would greatly help public safety and the efforts of the USFS/CNF in preserving this area.

After reading my comments and investigating the current state of TL626/d79 access roads, I urge you to require SDG&E to remove this road and seek an alternative. The only alternative to TL626/79 that will fulfill the needs and purpose as requested by SDG&E and meets safety, county, and USFS/CNF requirements is undergrounding TL626/D79 under Boulder Creek Road. If not technologically feasible to underground TL626/D79 under Boulder Creek road, please investigate moving TL626/D79 to state route 79 through Cuyamaca State Park. A power line route along state route 79 has much lower wind speed exposure, has paved road access, and does not compromise hundreds of thousands of acres of CNF and people's lives in San Diego County.

Marcella Sharp

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 9:23:44 AM
Attachments: [IMAG1064.jpg](#)

2012 TL626/D79 restringing site. Please note the tan plants/grass/star thistle on left side of access road. Almost 100% recovery of ground cover with non-native plants. An example of SDG&E current BMP for the CNF. Please do not allow this environmentally destructive behavior by SDG&E to continue. Reject the Master Permit as written.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E Master Permit
Date: Thursday, November 07, 2013 10:21:02 AM
Attachments: [IMAG1055.jpg](#)

SDG&E access gate on Boulder Creek Road at pole Z372092. Gate is missing lock as it has for weeks allowing anyone to offroad on over one half mile of TL626/D79 access road. A reflection of SDG&E values in action regarding current powerlines in the national forests. Please reject the master plan as written. I will email you updates on this gate weekly as public comments until I see it locked.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 10:25:33 AM
Attachments: [IMAG1052.jpg](#)

Close up of locking system on TL626/D79 access road gate in the Descanso district of the CNF. As of 11-7-13 gate is still unlocked leaving .5 miles of CNF open for non-authorized activities. Please reject the Master Permit until a system and contract language is created to fix, monitor, and report gate issues such as this.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: Fwd: SDG&E master permit
Date: Thursday, November 07, 2013 2:41:18 PM
Attachments: [IMAG1061.jpg](#)

Sent from my Verizon Wireless Phone

----- Forwarded message -----

From: "nweflen@yahoo.com" <nweflen@yahoo.com>
Date: Thu, Nov 7, 2013 9:30 am
Subject: SDG&E master permit
To: <cnfmsup@dudek.com>, "Nate W" <Nweflen@yahoo.com>

Another TL626/D79 access road gate. 2.5 strands of barbed wire protecting the access road. Current state 11-7-13 after years of SDG&E Best management Practice in the CNF. Please reject the Master Permit until addressed.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 2:42:37 PM
Attachments: [IMAG1060.jpg](#)

TL626/D79 visible through access gate lock hole with no lock present. Please reject master permit.

Sent from my Verizon Wireless Phone



2013/11/07 08:35

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:21:36 PM
Attachments: [IMAG1071.jpg](#)

TL626/D79 access road in CNF. 36% grade for hundreds of feet looking North across Boulder Creek. All erosion moves into Boulder Creek. Remove TL626/D79 access road or bring it up to code.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:30:53 PM
Attachments: [IMAG1084.jpg](#)

42% grade on access road TL626/D79 at Boulder Creek crossing. Note there is no room to create a turn around as proposed. To get to this point on access road, you already had to go down a 47% grade 100+ feet long. Reject permit as written. Remove this road and move TL626/D79 under ground beneath Boulder Creek Road.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit.
Date: Thursday, November 07, 2013 3:56:08 PM
Attachments: [IMAG1093.jpg](#)

TL626/D79 gate SDG&E is pretending to lock. Easy access for unauthorized users who no longer need to use the path they made on the left side of this gate. Picture reflects two issues with SDG&E gate control. First, they do not fix the bypass created around this gate. Second, the gate has been fake locked for who knows how long. This gate and bypass were included in 2009 master permit comments. Gate had issues then and still does 4 years later. Please look up my comments on Master plan for SDG&E 2009 and include them in these comments. Reject the master permit until issues like these are addressed.

Sent from my Verizon Wireless Phone



2013/11/07 14:22

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 9:30:20 AM
Attachments: [IMAG1062.jpg](#)

Current state SDG&E access road TL626/D79 gate. 3 strands of old barbed wire and a flyer by SDG&E stating the master permit will be starting soon. A complete lack of care or concern by SDG&E regarding access road control in the CNF. Please reject the master permit until rewritten to address these issues.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E Master permit
Date: Thursday, November 07, 2013 9:41:51 AM
Attachments: [IMAG1049.jpg](#)

SDG&E access gate protecting western Cuyamaca peak. Gate is missing pieces and chained closed with chain placed on it by local resident. Gate has multiple attempts to bypass by offroad vehicles. No care or concern by SDG&E. Gate has been like this reflecting SDG&E values in action for several years. Please reject the Master Permit until access gates like this are fixed. Additionally add language to fix and sign these gates as needed.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 10:15:35 AM
Attachments: [IMAG1051.jpg](#)

Another picture of SDG&E gate on Cuyamaca peak near TL626/D79.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:17:50 PM
Attachments: [IMAG1065.jpg](#)

Erosion in TL626/D79 access road in CNF after two storms since re-grading.

Sent from my Verizon Wireless Phone



2013/11/07 11:27

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:27:04 PM
Attachments: [IMAG1082.jpg](#)

TL626/D79 access road on south side at Boulder creek crossing. 42% grade 100+ feet long straight into Boulder Creek. See water in photo. Road is just as bad on North side of creek. Remove the road as condition of master permit renewal. SDG&E proposal to put a turn around in here will not work without massive amounts of grading and earth moving. Do not approve master permit.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:34:05 PM
Attachments: [IMAG1076.jpg](#)

Propose site of turn around on TL626/D79 south side Boulder Creek crossing. Do not approve this plan, a turnaround here is a massive earth moving operation in the middle of a proposed wilderness next to a steelhead, western pond turtle, and California newt inhabited creek.

Sent from my Verizon Wireless Phone



From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:38:29 PM
Attachments: [IMAG1073.jpg](#)

Another view of 35%+ grade TL626/D79 access road south of Boulder Creek. Note SDG&E BMP is not stopping erosion on this road. SDG&E and its contractors do not use water here for fire protection and soil compaction because water trucks cannot travel up the 47% grade road to get out if this area. Remove this road and powerline and put it somewhere safety and environmental needs are need such as under ground in Boulder Creek Road.

Sent from my Verizon Wireless Phone



2019/11/07 11:34

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit.
Date: Thursday, November 07, 2013 3:44:54 PM
Attachments: [IMAG1085.jpg](#)

Looking South on TL626/D79 access road north of Boulder Creek Crossing. 30%+ grade here for hundreds of feet. This road is subject to tremendous erosion and silting with this area receiving 20+ inches of rain a year. This area receives documented 92mph winds. Please note how fighting a fire along TL626/D79 is almost impossible. Also note how this powerline and access road are the major intrusion into this portion of the Sill Hill proposed wilderness per CNF LMP.

Sent from my Verizon Wireless Phone



2013/11/07 13:03

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: SDG&E master permit
Date: Thursday, November 07, 2013 3:49:26 PM
Attachments: [IMAG1092.jpg](#)

Nice example how SDG&E secures TL626/D79 access road along Boulder Creek Road. Chain can be lifted over post for easy off road access. This gate was reported unlocked to CNF and SDG&E land use manager Molly Dana multiple times in past years. Please reject the master plan until strict security and monitoring guidelines for access roads and gates are added to the master permit.

Sent from my Verizon Wireless Phone



APPENDIX E-6

Tribal

OCT 23 2013

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



October 22, 2013

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

Re: Scoping Comments, SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects, Environmental Impact Report/Environmental Impact Statement, Application No. A.12-10-009

Dear Ms. Orsaba and Mr. Metz,

Thank you for the opportunity to provide scoping comments on the above-referenced project. This letter constitutes our comments on behalf of the Pala Band of Mission Indians.

We are primarily concerned with the scoping process for determining effects to cultural resources. In particular, the existing TL682 running from Rincon Substation east to Warners Substation is an area of concern for us. This route encompasses a portion of the San Luis Rey River watershed that Pala considers to be part of its Traditional Use Area (TUA). Therefore, we wish to see the EIR/EIS include a substantial review of the potential impacts to cultural resources. Considering changes in the law that have taken place since the original power poles were installed, we are concerned that cultural resources may have been disturbed along the route in the past. The EIR/EIS needs to include not only a records search for known sites, but a comprehensive pedestrian survey of the route. Further, the lead agencies should consult early and often with Pala and other tribes along the route to ensure that they know when and where surveys will be taken place, and be offered the opportunity to participate. The EIR/EIS should also include potential strategies for mitigation in the event that cultural resources will be impacted, including relocation of poles, staging areas, access routes, and other project-related activities to avoid cultural sites altogether. A Memorandum of Understanding or Agreement should be drafted with interested tribes so that mitigation plans are agreed upon in advance. This will streamline the process in the event that unanticipated discoveries are made.

Since this initial notification is only for scoping comments, we reserve our right to make additional comments once the draft EIR/EIS has been made available. We are hopeful that consultation with tribes will continue during the development of these environmental documents.

Please feel free to contact me with any comments or concerns: sgaughen@palatribe.com or 760-891-3515.

Sincerely,



Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer

APPENDIX E-7

Late Comments (after November 7, 2013)

From: nweflen@yahoo.com
To: [CNFMSUP](#); [Nate W](#)
Subject: Master Permit CNF comments update 12-3-13
Date: Tuesday, December 03, 2013 6:29:50 PM
Attachments: [IMAG1275.jpg](#)

Please add the image and following comments to my comments submitted 11-7-13 relating to TL626/D79 master permit application for the Cleveland National Forest. Included image shows TL626/D79 access road gate still unlocked one month after initial comment letter. Gate current state allows illegal off roading to occur on approximately .5 miles of access road in the CNF. SDG&E makes no effort to control or monitor gates in the plan area as illustrated by this photo one month after the original comment photo.

Sent from my Verizon Wireless Phone



APPENDIX F

*United States Department of Agriculture,
Forest Service,
Cleveland National Forest State Office,
November 1, 2013 Letter*



United States
Department of
Agriculture

Forest
Service

Cleveland National Forest
SO

10845 Rancho Bernardo Rd.
Suite 200
San Diego, CA 92127-2107
(858) 673-6180
(858) 673-6192 FAX
(800) 735-2922 CRS

File Code: 1950/1500

Date: November 1, 2013

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

Dear Ms. Fuller:

Thank you for your recent letter on behalf of The Protect Our Communities Foundation requesting that the Forest Service and California Public Utilities Commission (CPUC) provide additional access to documents filed by San Diego Gas & Electric (SDG&E), and extend the comment period for the Master Special Use Permit / Permit to Construct Project. In response to your first request, SDG&E has made copies of their application and Plan of Development available at numerous locations within the project area, including the Julian and Alpine Branch libraries.

With regards to your request for an extension of the comment period, I have concluded, in consultation with and the concurrence of the CPUC, that an extension of the comment period is not warranted. The Notice of Preparation (NOP) and a Notice of Intent (NOI) published on September 23, 2013 established a 45-day review and comment period ending November 7, 2013. Although the California Environmental Quality Act (CEQA) guidelines require a 30-day comment period, both the Forest Service and CPUC agreed on an extended comment period to facilitate public review and comment on the NOP and NOI.

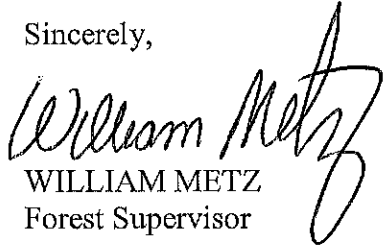
The NOP has been available for public review at the locations identified in our public notice since the start of the comment period. The CPUC project website referenced in the NOP contains all of the background information, including the POD. While the POD has very detailed information about what SDG&E proposes, it is not our intent to solicit comments on the application or the POD. The intent of scoping is to solicit public comment on the scope of the analysis proposed by the agencies and described in the NOP. Comments that inform the agencies about additional issues and alternatives beyond those identified in the NOP would be most relevant to the process.

While it is true that project locations may change, that won't be known until we complete scoping and identify alternatives. Any location changes associated with alternatives will be identified in the scoping report that will be released early next year. I'll be able to determine at that time, in consultation with the CPUC, if additional notice is required.



Thank you again for your request. Please contact Bob Hawkins at (916) 849-8037 or rhawkins@fs.fed.us if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "William Metz". The signature is written in a cursive style with a large, stylized initial "W".

WILLIAM METZ
Forest Supervisor

cc: Robert H Hawkins, Lisa Orsaba