

Comment Set H0034
Colleen Holmes

H0034-1

Bear CPUC,

PLEASE CONSIDER OPTIONS
FOR THE SUNRISE POWERLINK THAT
GENERATE POWER LOCALLY WITHOUT
STRINGING HUGE POWERLINES
ALL OVER OUR BEAUTIFUL
BACKCOUNTRY.

THE LATEST ROUND OF COMMENTS
CONCERNS THE SOUTHERN
ROUTE OPTION. I HAVE
HIKED IN A PLACE CALLED
PAT'S CANYON AND BARBER
MT ROAD, OR FOREST ROUTE
S1011, AND IT IS BEAUTIFUL.
THIS LINE WOULD SCRAPE
IT UP AND SEND SILT INTO
BARRET LAKE.

THIS IS A BEAUTIFUL

Comment Set H0034, cont.
Colleen Holmes

TRAIL ALONG A CREEK
THROUGH LARGE OAKS
AND UP TO ONE OF THE
FEW PROMONTORIES WHERE
THE PUBLIC CAN EASILY SEE
A SPECTACULAR VIEW OF
BARRETT LAKE. ALSO,
AT THIS SPOT WE CALL
"THE KITCHEN" IS A ROCK
DOME WITH SEVERAL
MORTAR PESTLES NEXT TO A
SMALL WATERFALL. INDIAN
WOMEN SAT HERE FOR CENTURIES
PREPARING FOOD AND LOOKING
OUT ACROSS TO ECHO MT
WAITING FOR THEIR WARRIORS
TO COME HOME. IT IS A
MAGICAL PLACE AND
SHOULD ALWAYS BE

H0034-1 cont.

Comment Set H0034, cont.
Colleen Holmes

CHERISHED, WE CAN FIND
OTHER SOLUTIONS TO MEET
OUR ENERGY NEEDS.

THANK YOU!

SINCERELY
Colleen Gannon Holmes
City Heights San Diego
calif 92105

H0034-1 cont.

Responses to Comment Set H0034

Colleen Holmes

- H0034-1 The commenter's support for in-basin generation and opposition to transmission lines in the backcountry of San Diego County is acknowledged. Visual impacts along the Modified Route D Alternative have been analyzed in Section E.4.3 of the Draft EIR/EIS and in Section 3.3.7.3 of the RDEIR/SDEIS. Please see Response to Comment H0021-1 regarding erosion impacts and mitigation measures. Cultural impacts along the Modified Route D Alternative have been analyzed in Section E.4.7 of the Draft EIR/EIS and in Section 3.3.7.4 of the RDEIR/SDEIS.

Comment Set H0035
Cheryl Lenz

CPUC/BLM
c/o Aspen
Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

August 30, 2008

VIA E-MAIL

Comments on the Sunrise Powerlink Recirculated DEIR/Supplemental
DEIS

Dear Ms. Blanchard and Ms. Kastoll:

The No Project/No Action Alternative is the best choice by denying the ill-advised, destructive and incredibly expensive, Sunrise Powerlink, and redirecting the focus from distant industrial scale energy generation, to developing distributed on-site, or close to point of use, energy production, and related infrastructure upgrades. Add in new fair market value feed-in tariffs for citizen and public generators of renewable energy, increased energy efficiency standards and incentives, new and improved LEED building requirements, such as the Department of Energy's efforts to develop marketable Net-Zero Energy Commercial Buildings, that use advanced efficiency technologies and on-site renewable energy generation, increased subsidies for retrofitting older less energy efficient buildings. With a new direction, we will be well on the way to a better, and more sustainable, energy future. And it can be done without the unwarranted and unnecessary sacrifice of our rural communities, or our cherished parks, forests, wild lands, wildlife, deserts, and open spaces.

H0035-1

Sincerely,

Cheryl Lenz
2040 Ross Avenue
Boulevard, CA 91905

Responses to Comment Set H0035

Cheryl Lenz

H0035-1 The commenter's support for the No Project/No Alternative and support for onsite generation is acknowledged. The commenter states that onsite renewable technology will limit impacts to rural communities, parks, forest, wildlife, deserts and open spaces. Impacts to communities along the Proposed Project and Alternatives ROW were addressed in Sections D.14, E.1.14, E.2.14, E.3.14, and E.4.14. Impacts to the ABDSP was analyzed in the D sections, impacts to wilderness in the ABDSP were analyzed in Section D.5.6. Impacts to CNF were analyzed in the Sections E.1, E.2, E.3, and E.4. Impacts to CNF from the LEAPS alternatives were analyzed in Section E.7. Impacts to desert and open space were considered in the D and E Sections. Impacts to wildlife from the Proposed Project or Alternatives were analyzed in Section D.2, E.1.2, E.2.2, E.3.2, and E.4.2. The decision on the project's merits will be made by the Lead Agencies' decisionmakers, who will consider all comments.

Comment Set H0036
William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

28 August 2008

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

Comments on the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the Sunrise Powerlink Project

H0036-1

Dear Ms. Blanchard and Ms. Kastoll:

We initially provided comments (5 March 2007) on the second round of scoping meetings for alternatives to the proposed Sunrise Powerlink Project, followed by comments on the Project and its DEIR/DEIS (11 April 2008), and would like to incorporate them by reference here. Thank you for the present opportunity to provide these comments concerning the Sunrise Powerlink Project Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS). We also appreciate the extension (verbal, Ms. Blanchard) of submittal time to 5pm Aug. 29, 2008.

Comment 1. Miscellaneous malfunctions, oversights, errors.

1A. We couldn't find documents referenced in the RWEIR/SDEIS; we encountered several problems on the CPUC website provided in Appendix 2 to access complete texts of comment letters on the DEIR/DEIS.

1. There was NO listing for the Forest Service letters excerpted in that Appendix. It was useful to see the entire letters to be able to interpret abbreviations, subjects & references in the excerpts by placing them within the whole context. Thanks to quick problem solving by Susan Lee at Aspen, once we thought to ask, we were able to link to that letter. We wonder if other letters have not been listed?
2. There was a broken link to the comment input from our Subregional Planning Group (Crest-Dehesa-Harbison Canyon-Granite Hills), so presumably no one would be able to review their letter. We've been informed that the link will be fixed. We wonder whether other letters have broken links?
3. Our own comments were apparently missing, not even listed under "Individuals". We've been informed that they were attached (erroneously? mistakenly?) to another's (Group) input. We wonder if that's been done to others' submittals, and whether the count provided of inputs is accurate? Were our comments overlooked in evaluating the need for & content of the RDEIR/RDEIS?
4. We saw no letter listed from Sweetwater Authority. Is it missing from the list, or did they not comment? Given that the west-most leg of Modified Route D & its Western Reroute (MRDA), as well as Star Valley Option, would create impacts in their watershed, and that the Future Transmission System Expansion associated with these routes (as described in the DEIR/DEIS) would entail another 500kV line passing by their

Comment Set H0036, cont.

William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

dam within 10 years, and extra 230kV lines passing by, near and/or across, their property, we would have expected a definite response from them.

H0036-1 cont.

1B. We could not find the appropriate Figure 5-2 to accompany and illustrate the text description and “analysis” of the UCAN Modified Southern Route in the paper RDEIR/SDEIS document. In two paper copies of the RDEIR/SDEIS that we have seen, Figure 5-2 was missing from Section 5, Environmentally Superior Alternatives; instead it was replaced with a duplicate of Figure 5-1. This was initially frustrating because the UCAN proposal in Appendix 2 generated interest, given the rejection of it from consideration in Section 5, yet we were unable to fully study the matter without the map. Ultimately we discovered that the DVD version of the RDEIR/SDEIS does have Figure 5-1 and 5-2 in their appropriate places, so complete information was available for review in the electronic format. We wonder how many paper copies of the RDEIR/SDEIS were sent out, incorrectly collated & incomplete, and how many folks attempting to review them were hampered in their evaluation of the new environmental issue by the document production error that eliminated Figure 5-2?

1C. Has there been a mapping error for the Pacific Crest Trail in Figure 3-11 (p. 45, Section 3.3.6) Modified Route D Alternative: PCT Reroute, or is there in fact a discontinuity in the trail? The text says the reroute “would cross the PCT” (p. 41), yet that is not shown in the figure. Its southern extreme just ends abruptly, due south of the MRD-12 milepost on Modified Rte D Alternative, near and almost due north of the PCT Reroute Structure at the corner of the red PCT Reroute, ending west of the Reroute.

H0036-2

Comment 2. Page 1-6, Consistency with MSCP’s will be addressed in the Final EIR/EIS. The RDEIR/SDEIS announces that “In response to the Conservation Groups’ and others’ comments on consistency with MSCPs, additional information will be provided in the Final EIR/EIS that shows the relationship of the Proposed Project and alternatives with the boundaries of the various regional habitat conservation plan areas, and the designated or proposed preserve areas within each plan.”

H0036-3

We feel that the additional information provided in the Final EIR/EIS besides the relationships of the Proposed Project and alternatives, those of all associated Future System Expansion routings identified in the DEIR/DEIS, for Project AND alternatives, should be shown as well. Also, rather than just consider MSCPs, also consider all other designated ecological reserves & preserves.

The Sycuan Peak-Sweetwater River Ecological Preserve was established before the MSCP concept/?? was created/formed, as a wildlife habitat reserve, bought and administered by California Department of Fish & Game (CDFG) with voter-approved conservation bond monies. Among many biological resources, it has extensive riparian habitats, is remote, relatively undisturbed & is the 2 nd largest state preserve closest to Modified Route D’s original westmost leg or its Western Reroute (MRDA).

We specifically request that the Sycuan Peak-Sweetwater River Ecological Preserve be included among the properties in the study done for the Final EIR/EIS of the

Comment Set H0036, cont.

William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

relationship of the Project and alternatives with the resource agencies' regional habitat preservation efforts. We also specifically request that the impact of the West of Forest Alternative (Future Expansion for Modified D /Western MRDA) on the Preserve and on the MSCP lands in the Crest-Dehesa-Granite Hills-Harbison Canyon Planning Subregion be included in this study done for the Final EIR/EIS.

H0036-3 cont.

Prompted by the RDEIR/SDEIS's reference to "others' comments" (p. 1-6, see quote above) we visited the CPUC's project website at the address given in Appendix 2 of the RDEIR/SDEIS, which was provided so that "The complete comment letters may be viewed" (p. Ap 2-1). Despite some problems with the site's list of DEIR/DEIS comments received (see Comment 1A.1 etc. above), we found & reviewed the joint letter from the U. S. Fish and Wildlife Service and the California Department of Fish and Game (comment tracking number: A0024). On page 1 of their letter's enclosure detailing the agencies' comments and recommendations (under Regional Conservation Planning), the agencies state that the Sunrise Powerlink Project DEIR/DEIS "...does not identify all conservation lands owned and/or managed by the Department. The properties listed below are directly and/or indirectly affected by the Proposed Project alignment and alternative route proposals. The final EIR/EIS should correctly identify these lands and discuss the potential impacts the Proposed Project (and alternative routes) would have on the long-term management objectives of these areas."

H0036-4

The specific properties listed in the letter's enclosure do NOT include the Sycuan Peak-Sweetwater River Ecological Preserve. That omission is an unfortunate oversight since the West of Forest Alternative to the Proposed Project cuts directly through the heart of this State/CDFG ecological reserve. The West of Forest Alternative (Scoping stage) was announced as eliminated from further consideration & environmental analysis in the DEIR/DEIS, so perhaps that explains the omission of the Sycuan Peak-Sweetwater River Ecological Reserve from the list in the agencies' letter (they thought it was no longer relevant?); but in truth the West of Forest Alternative IS retained in the Project as a Future Transmission System Expansion option connected to the I-8 and the Modified Route D Alternatives, as it is one of the three SWPL alternatives defined on pages E.1.1-7 – E.1.1-8 and E.4.1-3 of the DEIR/DEIS.

Other factors contributing to how CDFG (& members of the public for that matter) could overlook impacts on the Sycuan Peak-Sweetwater River Ecological Preserve include the vague graphics in both the RDEIR/SDEIS (Fig. 5-1) and in the DEIR/DEIS (Figs. E.1.1-1, E.1.1-6):

H0036-5

Fig. 5-1 includes the "...Modified Environmentally Superior Southern Alternative", On it the Preserve land is mostly obscured by the boxed label "Modified Route D Substation Alternative", so there is no visual connection showing that property and its location relative to the "Western MRDA Reroute".

Figs. E.1.1-1 "SWPL Alternatives Overview" shows the state Preserve clearly, but not any Future Expansion Routes

Fig. E.1.1-6 "SWPL Alternatives 500kV Future Expansion" shows the pertinent West of Forest routing but does NOT show the state Preserve

Comment Set H0036, cont.

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Comment 3. The RDEIR/SDEIS reduces the number of SWPL options for Future Transmission System Expansion routes. The revisions to proposed and alternative transmission line routes discussed in the RDEIR/SDEIS effectively eliminate the Interstate 8 Alternative from MP 51 to MP 74 from further consideration, but the consequences of this elimination are not explicitly analyzed in the document.

H0036-6

One major consequence is that two of the three SWPL options for Future Transmission System Expansion discussed in the DEIR/DEIS are also eliminated, so that the only remaining SWPL option for Future Transmission System Expansion is the route formerly known as the West of Forest Alternative. Narrowing the three SWPL options in the DEIR/DEIS to a single remaining option which is unexamined in either the DEIR/DEIS or the RDEIR/SDEIS has deprived both the public and the resource agencies of the opportunity to review and comment on an important aspect of the proposed Sunrise Powerlink Project that is inseparably linked to one of the SWPL alternatives (Modified D/Western MRDA Reroute) that could be selected following certification of the Final EIR/EIS.

If the Powerlink should be approved, then if the Modified D Alternative (original or Reroute) should be chosen as its pathway, there will be a single potential path described in the environmental documents for the Future Transmission System Expansion inseparably linked with it. Even though the Future Expansion would be a separate future action involving separate future environmental analyses and certification, the choice of Modified D/Western MRDA Reroute causes reasonably foreseeable significant impacts to the area where the West of Forest route is located.

If these impacts are not assessed in the preliminary or final EIR/EIS, now, then both the public and the resource agencies will have been deprived of the opportunity to review and comment on the “whole of the action” (see Comments A0028, Aguirre/City of San Diego), and the decision makers will be deprived of the big picture: choice of a route should be based on the full range of realistic impacts it will create, for the current Powerlink transmission line as well as those future expansion routes linked to it. Otherwise a choice is being made by officials wearing “blindfolders”.

Comment 4. Uninformed Ranking of the Environmentally Superior Southern Route. In the RDEIR/SDEIS (Section 5), the so-called Environmentally Superior Southern Route (also called Southwest Powerlink [SWPL]) Alternative) is ranked as the fourth least environmentally damaging of the Proposed Project alternatives (page 5-1).

H0036-7

The ranking given this alternative must have been determined without a complete understanding of its full potential impacts compared with those of the other alternatives, because the impacts of the only remaining SWPL option for Future Transmission System Expansion were not considered either in the DEIR/DEIS or the RDEIR/SDEIS. (The DEIR/DEIS did consider impacts of Future Transmission System Expansion options associated with the Proposed Project and its northern route alternatives.) Following the path of the West of Forest Alternative, the Future Transmission System Expansion route for the Environmentally Superior Southern Route is an integral part of the entire project,

Comment Set H0036, cont.

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and the impacts of this Future Expansion must be understood to properly evaluate the environmental ranking of the Environmentally Superior Southern Route.

H0036-7 cont.

CEQA and NEPA require that all reasonable foreseeable significant impacts of the Project be disclosed and analyzed. Given the evolution of alternatives considered and analyzed in the CEQA/NEPA process for this Project, if the impacts of the West of Forest Alternative route are not disclosed and analyzed in the Final EIR/EIS it will be seriously flawed and incomplete and can not provide the basis for a proper, legal certification.

Comment 5. Section 3.1.1 BLM Gifted Lands Reroute. The BLM Gifted Lands Reroute will result in two additional towers, two additional staging areas and a longer access road, compared to the original segment of the Proposed Project.

H0036-8

We are astonished to read (page 3-2) that “Although the original segment of the Proposed Project would result in fewer impacts to sensitive vegetation and to FTHL habitat....the reroute is environmentally superior to the original segment of the Proposed Project for biological resources.”

The RDEIR/SDEIS admits that the original segment “would impact a Caltrans-owned biological resources mitigation parcel, which would require consultation with Caltrans and greater compensatory measures may need to be developed to offset impacts.” It is further admitted that the original segment would impact lands given to BLM, and that there could be required “...(a) request for Biological Opiniion from the U. S. Fish and Wildlife Service for potential impacts to federally listed species...which could cause a delay in permitting for the Proposed Project.”

If the Proposed Project utilizes the original segment, consultations with Caltrans and the Service would most likely result in compensatory mitigation for the impacted sensitive vegetation and Flat tailed horned lizard habitat, and compared to the reroute segment there would be two less towers, two less staging areas and a shorter access road.

If the Proposed Project utilizes the BLM Gifted Lands Reroute, not only will there be more direct physical impacts to sensitive biological resources, there will most likely be less mitigation carried out in spite of these greater impacts on the ground.

In Section 3.1.1.3 it is stated that “The Proposed Project is preferred for cultural resources, because the route would likely have fewer cultural resources and the route would be shorter resulting in less ground disturbance.” But the conclusion of Section 3.1.1.4 states that the “...reroute...was found to be overall environmentally superior.”

Section 3.1.1.4 Conclusion advances the argument that it is environmentally superior to avoid lands given to BLM as a gift in Imperial County and Caltrans-owned biological resources mitigation land, in part because locating the Proposed Project across the Caltrans parcel would diminish or negate the value of the previous biological mitigation of acquiring the habitat as compensation to the public for the impacts resulting from several Caltrans projects located elsewhere. In fact, if the Proposed Project is located

Comment Set H0036, cont.
William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

across the Caltrans parcel and the impacts there are mitigated elsewhere at a 1:1 compensation ratio then there would be no diminishment or negation of the previous biological mitigation/compensation. If the impacts of the Proposed Project there are mitigated elsewhere at a compensation ratio greater than 1:1, then the overall biological mitigation/compensation for cumulative development impacts (from past Caltrans projects plus the Proposed Project original segment) to sensitive biological resources will actually be increased as a result of utilizing the Caltrans parcel rather than the reroute on private land.

H0036-8 cont.

It is Orwellian double-speak, if not simple outright lying, for the RDEIR/SDEIS to state that "...this reroute, which would avoid BLM-gifted and Caltrans mitigation lands was found to be overall environmentally superior to the Proposed Project." Is it a violation of CEQA and/or NEPA to lie in the public documents? The Final EIR/DEIS should admit that this reroute is desired, in spite of the fact that it will cause more environmental impacts than the Proposed Project original segment, because it will be quicker, easier and cheaper to accomplish,

Hmmmmm.... Lesser impacts and greater mitigation associated with the original segment versus more impacts and less mitigation with the reroute...which could be environmentally superior?

Comment 6. Section 3.1.2 Northern Grapevine Canyon Reroute. The reroute would result in greater impacts to sensitive plant communities and other biological resources, because of the addition of four towers north of MP 86, and the construction of new access roads. The original segment of the Proposed Project would result in fewer impacts to sensitive vegetation communities and it is environmentally superior to the reroute.

H0036-9

"Therefore the Northern Grapevine Canyon Reroute is environmentally superior to the Proposed Project." (3.1.2.5 Conclusion, page 3-9) Huh?

How is this conclusion justified?

Comment 7. CEQA Recirculation Triggers. To a large extent, we regret to say we feel that the fourth "trigger" listed on page 1.1 of the RDEIR/SDEIS (what might trigger Recirculation) might actually be descriptive of this RDEIR/SDEIS: a document that is "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

H0036-10

Along the lines of many of the comments from the Wildlife Agencies (Letter # A0024), and other letters in Appendix 2, we wish to comment that there is no transparency which allows an understanding of how the conclusions are drawn regarding biological resources, cultural resources, etc. It seems that time and time again in Section 3 the parts of the Revisions are described as having more impact than the original route. Yet when all of the parts are merged together, the conclusion produced somehow spins

Comment Set H0036, cont.

William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

the Revisions (Reroutes) as the environmentally superior choice, rather than the original segments.

H0036-10 cont.

Complete field data has not been gathered, so assumptions are relied upon to create mitigations that don't really reduce the impacts, all of which seems counter to CEQA. It truly seems as though the Reroutes are predetermined to be deemed superior, and then words have been spun into double-speak to try to justify the "conclusion."

Comment 8. Importance of the Federal Section 368 West-wide Energy Corridor.

Much has been made of the Federal Section 368 West-wide Energy Corridor (see RDEIR/SDEIS, comments from Forest Service #A0009, p. 3, 4/10/08; and Bill Powers #Boo12, p. 18, 4/3/08) in the DEIR/DEIS given that both the Modified D Route variants and the Future Transmission System Expansion routes would utilize the proposed federal corridor. This factor helped rank the Environmentally Superior Southern Route (SWPL) Alternative in fourth place, highest of the San Diego County transmission line routes.

H0036-11

We think, given the fragmented nature of this proposed federal corridor (DEIR/DEIS Figure E.4.1-1a) its importance is overrated, and we don't think it should be given so much weight in selecting a route. We can't help but notice that several of the modified reroute segments in the RDEIR/SDEIS (Western MRDA, Fig. 3-12; PCT, Fig. 3-11) align the Powerlink out of the Federal Corridor, while the Cameron Reroute (Fig. 3-10) has no Corridor segments along it.

Comment 9. In-basin Generation. We disagree with the decision (RDEIR/SDEIS, page 1-3) to ignore any "in-basin" projects (rooftop solar, commercial, residential, photovoltaic, water or space heating) for renewable generation, as part of any cumulative bundled solution, and think it is short sighted. Such projects would be reasonable, feasible and realistic to incorporate into a non-wire alternate scenario of locally generated electricity and/or reduced need for commercial power from SDG&E. The use of a multitude of local point sources of generation would be worth including with the Alternatives that have been presented, not because of an attempt to consider all feasible alternatives in the EIR/EIS, but because an alternative of this ilk would broaden the range of possible solutions that would not require long transmission lines over long distances. Rather, to locally generate small individual amounts of power, and/or provide for individual needs by local renewables would cumulatively add up within the service area and contribute to meeting overall local need. And it would be even better, if the CPUC, California Legislature, and pertinent agencies would rectify the inability/disinclination for SDG&E to buy back any excess power generated within the service area. (See Aguirre, A0028, p. 4; Wildlife Agencies, A0024, p.7)

H0036-12

We ask that an In-basin Renewable Alternative be added as a component to the Final EIR/EIS, with estimates of the contribution from many point sources of generation.

Comment 10. Fire. We also disagree with the discussion and rejection of giving fresh consideration to the impacts of the 2003 and 2007 fires (RDEIR/SDEIS, page 1-4). We think they should be considered, as well as the 2001 Viejas Fire that burned much of the

H0036-13

Comment Set H0036, cont.

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area where Western Modified Route D original and MRDA revised routes are planned. There are many smaller fires in that vicinity over the years. We call for the Final EIR/EIS to contain mapping that shows all of the wildfire boundaries for all Alternatives of the Powerlink.

H0036-13 cont.

On page 1-4 RDEIR/SDEIS the language of the discussion seems vastly more dismissive and minimizing concerns like fire hazard due to powerline and type conversion impacts than exists in the DEIR/DEIS. The impedance of fire fighting by the physical presence of lines and towers should be part of the consideration that fires could burn and widely in the face of inadequate air support and ground crews held back by safety concerns, especially in steep rugged terrain characterizing much of the Modified D route. Hot fire over broad areas could impact the ability of such burn areas to recover "with similar habitat values and ... look similar to how they did before the fire."

H0036-14

There are numerous concerns expressed in the comments of Appendix 2 regarding fire, and the requests made should certainly be addressed in the Final EIR/EIS.

Comment 11. Undergrounding. The Forest Service (A0009, page 3, 3/12/08) indicated that undergrounding of the Powerlink through the I-8 portion of Cleveland National Forest would resolve the conflicts the Forest Plan has with that route. If the extensive undergrounding option can be considered through ABDSP, why not consider undergrounding for the I-8 Alternative? After the BCD Modified South option comes south to I-8, instead of continuing south to the Modified D route, turn back along I-8 west and follow it within peripheral Forest LUZ, which would be compatible (Back Country, Developed Area Interface, Non Forest System Lands), undergrounding it in the sections where there are conflicting impacts if above ground.

H0036-15

Conclusion. There are many other concerns touched on by the various comments to the DEIR/DEIS which we also share. Avoidance and minimization of significant impacts should be a firm goal, yet they seem not to be applied often except for visual impacts. Why, with all the reroute/revisions in the Western MRDA route, could there not have been sufficient diversion of the line to put safe buffers between the Golden Eagles and the powerline?

There are so many significant and unmitigable Class I impacts. Might it be possible to apply the ultimate mitigation: "Say no, to the Powerlink and all its associated impacts. Chose a Non-wire or a No Project Alternative.

Thank you.

Sincerely yours,

William L. Bretz, Ph.D. and Lesley A. Barling, M.S.

POB 20543, El Cajon, CA 92021

Responses to Comment Set H0036

William L. Bretz, Ph.D. & Lesley A. Barling, M.S.

H0036-1 The commenter expresses concern regarding difficulties with the Sunrise Powerlink Project website. The CPUC and BLM apologize for any difficulties with the website; problems brought to the attention of the CPUC and BLM were addressed in a timely fashion. The commenter's individual comment was attached to the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Planning Group Comment Letter as they were signed by the same person. The comments were read and will be responded to in the Final EIR/EIS. The Sweetwater Authority did not submit a comment letter on the Sunrise Powerlink Project.

As stated in Section 5.3.3, the UCAN Modified Southern Route would use the entire BCD Alternative and the Interstate 8 Alternative from near Pine Valley to the Descanso area. The UCAN Modified Southern Route would pass nearly entirely through National Forest land in areas that the Forest Service has determined are inconsistent with its Land Use Plan and the Forest Service would not issue a Special Use Permit for these areas. Therefore the UCAN Modified Southern Route would not be feasible because the Forest Service would not issue the necessary permit. The commenter mentioned that some of the RDEIR/SDEIS had an assembly error and were missing Figure 5-2 although the figure was correct in the web version of the document. The CPUC and BLM apologize for the inconvenience.

H0036-2 The analysis for the Pacific Crest Trail Reroute (also called Option B) from the RDEIR/SDEIS is no longer relevant and a new route option, the PCT Option C/D, has replaced the PCT Reroute/Option B. A description of the PCT Option C/D can be found in Section E.4.1 and an analysis of the PCT Option C/D can be found in Sections E.4.2 through E.4.15. Figure E.4.1-4 (Modified Route D Alternative: PCT Option C/D) can be found in the Final EIR/EIS. Section 3.3.6 (Modified Route D Alternative: PCT Reroute/Option B) has been deleted from the RDEIR/SDEIS.

H0036-3 The commenter states that the Final EIR/EIS should provide information showing the relationship between all future transmission system expansion (FTSE) and regional habitat conservation plan areas, including the MSCP lands in the Crest-Dehesa-Granite Hills-Harbison Canyon Planning Subregion. Future expansion is expected during the life of the Sunrise Powerlink project, but additional FTSE lines are not anticipated within the 10-year planning horizon (2007-2016). The Draft EIR/EIS provided the possible locations for the FTSE. All future lines would require new applications to be filed by SDG&E and would require compliance with NEPA and CEQA (see Section B.2.7 of the Draft EIR/EIS). The FTSE would be analyzed for consistency with any regional plans as part of the environmental review process associated with any new applications for FTSE.

The commenter also states that the Final EIR/EIS should consider the relationship between the project (Proposed Project and alternatives) and all reserves and preserves, rather than considering only the relationship between the project and MSCPs. Appendix 8O in the Final EIR/EIS shows the relationship of the Proposed Project, SDG&E's "Enhanced" Northern Route, Final Environmentally Superior Northern Route, and Final Environmentally Superior Southern Route with the boundaries of the regional habitat conservation plan areas and the designated and/or proposed preserve areas within each plan area. The

purpose of showing the relationship of the routes with the regional conservation plan preserves is to show consistency/inconsistency with the goals and objectives of the regional conservation plans and to demonstrate whether or not the routes would result in impacts to covered species to such a magnitude that the project would preclude the take authorization for covered species under these plans (Please see Response to Comment A0024-42 and General Response GR-17, Consistency with Existing and Draft Regional Conservation Plans.) Impacts to other preserves identified in the USFWS/CDFG joint comment letter on the Draft EIR/EIS (see Responses A0024-10 and A0024-11) will be included in the Final EIR/EIS.

The commenter requests that the Final EIR/EIS include the relationship between Sycuan Peak-Sweetwater River Ecological Preserve and the project. The Modified Route D Alternative, which is a component of the Final Environmentally Superior Southern Route, does not cross through nor is it adjacent to this preserve. Therefore the analysis completed in Appendix 8O of the Final EIR/EIS does not include the Sycuan Peak-Sweetwater River Ecological Preserve.

H0036-4 The commenter states that the Sycuan Peak-Sweetwater River Ecological Preserve was not included in the USFWS/CDFG joint comment letter on the Draft EIR/EIS (Comment Set A0024) as one of the State-owned preserves by CDFG. The commenter also states that the future transmission system expansion would cross through the middle of this Preserve, which should be disclosed in the Final EIR/EIS. It is acknowledged that the FTSE associated with the Interstate 8 substation and the Modified Route D substation would cross the Sycuan Peak-Sweetwater River Ecological Preserve. Section E.1.2.6 (*Interstate 8 Alternative with Modified Route D Alignment and West of Forest Alignment: Environmental Setting*) has been revised as follows:

Overview of Special Habitat Management Areas. This option would cross the Cleveland National Forest, Sycuan Peak-Sweetwater River Ecological Preserve, and State of California lands along Sloan Canyon.

The commenter also requests that the Final EIR/EIS discuss the impacts on the long-term management objectives of this preserve. Appendix 8O in the Final EIR/EIS is provided to discuss the four composite routes' impacts on regional conservation plans and preserves. However, the analysis does not include the FTSE because this component of the project is not expected to occur within the first 10 years of the project (Please see Response to Comment H0036-3).

H0036-5 The graphics in both the RDEIR/SDEIS were not intended to be misleading or vague. Figure 5-1 of the RDEIR/SDEIS has been replaced by Figure ES-4 in the Final EIR/EIS "Final Environmentally Superior Northern Route Alternative and Final Environmentally Superior Southern Route Alternative." Although this figure has been revised for the Final EIR/EIS, due to the length and complexity of the routes, it is difficult to highlight all features in San Diego County. As the commenter states, the Sycuan Peak-Sweetwater River Ecological Reserve would be in the vicinity of the West of Forest Alternative that would only be one possible route for future transmission system expansion and is not part of the Final Environmentally Superior Southern Route Alternative. Figure E.1.1-1 did not show the FTSE routes because this figure was designed, but to give the reader an overview of the southern route alternatives. No changes have been made to this figure because of the comment. The Applicant is

correct in noting that state lands were left off of Figure E.1.1-6. Figure E.1.1-6 was designed to illustrate possible FTSE routes for the SWPL Alternatives; it was not designed to show the numerous jurisdictions along the future routes. However, to further clarify for readers the environmental setting of possible FTSE routes, Figure E.1.1-6 has been revised in the Final EIR/EIS to show state lands. Identifying the state lands in Figure E.1.1-6 would not affect the impact analysis of the future expansion routes because the analysis of the FTSE routes was not based on Figure E.1.1-6. See Response to Comment H0036-4 regarding changes made to the Environmental Setting of the *Interstate 8 Alternative with Modified Route D Alignment and West of Forest Alignment*.

H0036-6 The Final Environmentally Superior Southern Route Alternative, which includes the Modified Route D Alternative and use of the Modified Route D Substation Alternative, would not eliminate two out of the three identified FTSE Routes along the SWPL Alternatives. Section E.4.1 in Volume 4 of the Draft EIR/EIS describes three potential routes for future transmission expansion along the Modified Route D Alternative; they are similar to the future expansion routes described in Section E.1.1 for the Interstate 8 Alternative. The West of Forest Alternative route is only one of three potential future expansion routes.

H0036-7 Please see Response to Comment H0036-6 regarding possible FTSE routes for the Final Environmentally Superior Southern Route Alternative. Section H.2 of the Draft EIR/EIS explains the alternatives comparison methodology. Table H-25 (Comparison of Transmission Alternatives) explains the preferred transmission route alternative for each issue area along with the overall preferred transmission route alternative. See Response to Comment H0036-11 for the major factors in comparing the Final Environmentally Superior Northern Route Alternative and the Final Environmentally Superior Southern Route Alternative.

FTSE routes, including the West of Forest Alternative, were analyzed in the E.1 and E.4 Sections of the Draft EIR/EIS.

H0036-8 Section 3.1.1 acknowledges that the BLM Gifted Lands Reroute would have slightly greater impacts to biological resources and slightly greater impacts to cultural resources as the commenter notes. However, the Proposed Project would potentially be infeasible in this area because Caltrans has indicated that it may not grant the required easement or encroachment permit for Caltrans mitigation lands. Caltrans has stated that it would require mitigation of the impacts along the Caltrans-owned parcel and that this site has not been recently evaluated for biological resources. As such a Natural Environmental Study would be required for an easement or encroachment permit and even with a Natural Environmental Study it is not certain that Caltrans would allow an easement or encroachment permit across the biological mitigation site. See Section H, Comparison of Alternatives, for a discussion of the ranking of the Proposed Project and Alternatives.

H0036-9 The Grapevine Canyon Reroute was found to be environmentally superior to the Proposed Project for visual resources and because it would reduce the scope of construction. This would affect the length and intensity of short-term construction impacts and ground disturbance, slightly decreasing impacts in air quality, noise, transportation and

traffic, hazardous materials related to environmental contamination, and geologic resources related to soil erosion. Section 3.1.2.5 of the RDEIR/SDEIS discloses that the Proposed Project would be slightly preferred for biological and cultural resources, as stated in the comment. Note, neither the Proposed Project nor the Grapevine Canyon Reroute were found to be environmentally superior to the Partial Underground ABDSP SR78 to S2 Alternative, All Underground Option in this region. The Partial Underground ABDSP SR78 to S2 Alternative, All Underground Option is included in the Final Environmentally Superior Northern Route Alternative.

H0036-10 The revisions and reroutes included in the RDEIR/SDEIS were included to lessen impacts to issue areas, and in many cases were suggested in comments on the Draft EIR/EIS. The BCD Alternative and BCD South Option Revisions along with the revision of the Modified Route D were developed in consultation with the Forest Service as a means of minimizing impacts to the CNF and to properties. Impacts along the northern route were considered for as means of both minimizing impacts and for engineering reasons. Please see General Response GR-16, Adequacy of Biological Surveys.

H0036-11 As stated in Section H of the Draft EIR/EIS, major factors in comparison of the Final Environmentally Superior Southern (SWPL) Route Alternative and the Environmentally Superior Northern Route Alternative are the following:

- The Environmentally Superior Southern (SWPL) Route Alternative would not directly impact State-Designated Wilderness.
- The shorter length and reduced ground disturbance of the Environmentally Superior Southern (SWPL) Route Alternative (~~122.82440~~ 140.78438 miles as compared to 140.78438 miles for the superior northern route) results in reduced impacts in the areas of biological resources, geology, mineral resources, and soils, air quality, public health and safety, transportation and traffic, and socioeconomics, public services and utilities.
- Because the Environmentally Superior Northern Route Alternative includes several underground segments (both through ABDSP and east of the Park through the San Felipe and Santa Ysabel Valleys), the visual impacts of this alternative would be largely similar to the Environmentally Superior Southern (SWPL) Route Alternative.
- When also considering the Future Transmission System Expansion 230 kV and 500 kV lines that would begin at San Felipe Substation and would likely be routed through ABDSP, the Environmentally Superior Northern Route Alternative is less preferred for visual resources and would potentially directly impact State-Designated Wilderness (with significant impacts similar to the Proposed Project). If future 230 kV lines cannot be installed underground in roadways, this environmentally preferred northern transmission route would thus overall be less preferred than the Environmentally Superior Southern (SWPL) Route Alternative.
- The Environmentally Superior Southern (SWPL) Route Alternative would also avoid five cultural resources sites with potential to disturb human remains so is

preferred for this issue area over the Environmentally Superior Northern Route Alternative.

While it was noted in the Draft EIR/EIS that part of the Environmentally Superior Southern Route Alternative would be within the Federal Section 368 West-wide Energy Corridor, this was not considered in the ranking of alternatives, see Section H of the Draft EIR/EIS.

H0036-12 The RDEIR/SDEIS addressed revisions to the SDCCP component of the In-Basin Renewable Energy Alternative in Section 4.2. The RDEIR/SDEIS confirms the ranking of the New In-Area All-Source Generation Alternative and the New In-Area Renewable Generation Alternative in Section 5. As stated in Section 1.3 of the RDEIR/SDEIS, a reasonable range of alternatives was considered in the Draft EIR/EIS. The City Attorney suggested that an aggressive in-basin solar rooftop initiative be considered as an alternative to the Proposed Project in the EIR/EIS. The In-Basin Renewable Generation Alternative selected for analysis in the EIR/EIS is a reasonable and feasible alternative, and is one of a range of reasonable alternatives considered. The EIR/EIS is not required to consider all feasible alternatives. Please see General Response GR-6 regarding an All-Solar Alternative.

H0036-13 The commenters disagree with the rationale stated in the RDEIR/SDEIS that recirculation of the Draft EIR/EIS is not required due to the 2003 and 2007 firestorms, and the commenters request that the Final EIR/EIS present maps that show all of the historic wildfire boundaries for all transmission alternatives for the purposes of evaluating the potential effects of the project on habitat type conversion. The historic wildfire boundaries in the project areas are numerous and would be visually confusing to present graphically. However, wildfire history is one of a number of parameters in the Wildfire Containment Conflict Model presented in Section D.15.4.3 of the Draft EIR/EIS, and is evaluated for all transmission alternatives meeting minimum criteria for modeling in the Draft EIR/EIS. Furthermore, type conversion occurs when an area of native vegetation is burned too frequently—on the order of less than every 10 years for chaparral vegetation—and would only occur as a result of the project if the project were to cause a fire that had been burned within the last 10 years. Please see Responses G0013-1 through G0013-3 for a thorough discussion of type conversion and how this impact has been evaluated in the Draft and Final EIR/EIS.

H0036-14 The commenters are concerned that where the Sunrise Powerlink transmission line creates a barrier to firefighting efforts, this could be considered to contribute to habitat type conversion in locations where recent fires have occurred, and that this should be considered as an impact in the Final EIR/EIS. This effect is acknowledged and discussed in Sections D.2 and D.15 of the draft EIR/EIS. The project's contribution to significant cumulative habitat type conversion as a result of firefighting interference is cumulatively considerable. Mitigation Measures F-3a (Contribute to Powerline Firefighting Mitigation Fund) and F-3b (Prepare and implement a Multi-agency Fire Prevention MOU), presented in the Draft and Final EIR/EIS, serve to partially mitigate the effects of Impact F-3 (Presence of the overhead transmission line would reduce the effectiveness of firefighting). In addition, Mitigation Measure B-1k, Re-seed disturbed areas after a transmission-line caused fire, would mitigate not only the project's contribution to type conversion but type conversion from other cumulative sources as well.

To clarify the cumulative effect in the Draft EIR/EIS, Section G.3.14, under “Impact F-3: Presence of the overhead transmission line would reduce the effectiveness of firefighting (Class I),” has been revised as follows.

...In addition, to the extent that the Proposed Project results in larger fires than would otherwise occur without its contribution to interfering with fire suppression activities, this can worsen the problem of vegetation type conversion (discussed in Section D.2).

Significant conflicts to wildfire containment created by the addition of the Proposed Project to landscapes currently occupied by other transmission lines would be created at MP 85-86.5, MP 90-92, MP 104-105.5, MP 110-112.5, MP 114-115.5, MP 126-128.5, MP 130.5-131.5, and MP 131.5-133 (see Section D.15.4.3 for methods). Transmission line undergrounding could mitigate this cumulative effect to a less than significant level; however, undergrounding is not feasible along the entire length of the Proposed Project and Future Transmission System Expansion routes. Mitigation Measures F-3a, ~~Construct and maintain fuelbreaks~~ Contribute to Powerline Mitigation Fund, and F-3b, Prepare and implement a Multi-agency Fire Prevention MOU, would reduce, to the extent feasible, the severity of the conflict and the project’s contribution to vegetation type conversion, and Mitigation Measure B-1k, Re-seed disturbed areas after a transmission-line caused fire, would mitigate not only the project’s contribution to type conversion but type conversion from other cumulative sources as well.

The same changes have been made for the Interstate 8 Alternative in Section G.4.2.1.

With regard to the commenters’ request that the concerns expressed in the comment letters in Appendix 2 of the RDEIR/SDEIS be addressed in the Final EIR/EIS, please see the Responses to Comment Sets A0006, A0009, A0011, A0015, A0019, A0025, A0028, B0006, B0011, B0012, B0041, B0046, E0003, and E0004.

H0036-15 The extensive undergrounding suggested in the northern route alternative would occur in roadways. Undergrounding outside of roadways greatly increases the ground disturbance and therefore the impacts of an alternative. The CPUC and BLM met with Caltrans and discussed using the Interstate 8 corridor for the Proposed Project; Caltrans regulations currently prohibit longitudinal easements within the right-of-way of restricted access highways. See Attachment 1B to Appendix 1 in Volume 6 of the Draft EIR/EIS regarding the restrictions to longitudinal easements within restricted access highways.