

Comment Set F0003
USDA Forest Service – Cleveland National Forest

	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
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File Code: 1950-4/2720-1
Date: August 20, 2008

Billie Blanchard, CPUC/Lynda Kastoll, BLM
Regulatory Analyst/Realty Specialist
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: Forest Service Comments on the Recirculated Draft Environmental Impact Report / Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Sunrise Powerlink Project (SCH No. 2006091071, DOI Control No. DES-07-58)

Dear Ms. Blanchard and Ms. Kastoll:

I have completed my review of the Sunrise Powerlink Project RDEIR/SDEIS and offer these comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM).

F0003-1

Section 1.3 Analysis Not Included...

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

Section 3 Revisions to Proposed and Alternative Transmission Line Routes

F0003-2

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

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

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F0003-4



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

F0003-4 cont.

Section 3.3.2 BCD Alternative and BCD South Option Revisions

F0003-5

Section 3.3.2.2 Biological Resources

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

Section 3.3.6 Pacific Crest Trail (PCT) Reroute

F0003-6

3.3.6.2 Biological Resources

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

3.3.6.4 Wilderness and Recreation Resources

F0003-7

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

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

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

3.3.6.5 Conclusion

F0003-8

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

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Section 5.2 Environmentally Superior Southern Route

F0003-9

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

This concludes the Forest Service comments on the RDEIR/SDEIS. As always, I would be glad to meet at your convenience to discuss these comments. Please contact Project Manager Bob Hawkins at 707-562-8699 or by email at rhawkins@fs.fed.us to arrange a meeting.

Sincerely,



for WILLIAM METZ
Forest Supervisor

Attachment

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F0003-10



United States Department of the Interior

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

IN REPLY REFER TO:

CA-18772
2800
(CA-067.26)

SEP 29 1986

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

Dear Mr. Rogers:

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

Sincerely,

Gerald E. Hillier
District Manager

Enclosure

10-25

X GWAR -
Never
put there -
never W.

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RIGHT-OF-WAY RESERVATION

F0003-10 cont.

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

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

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

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

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

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

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

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

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

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

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


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F0003-10 cont.

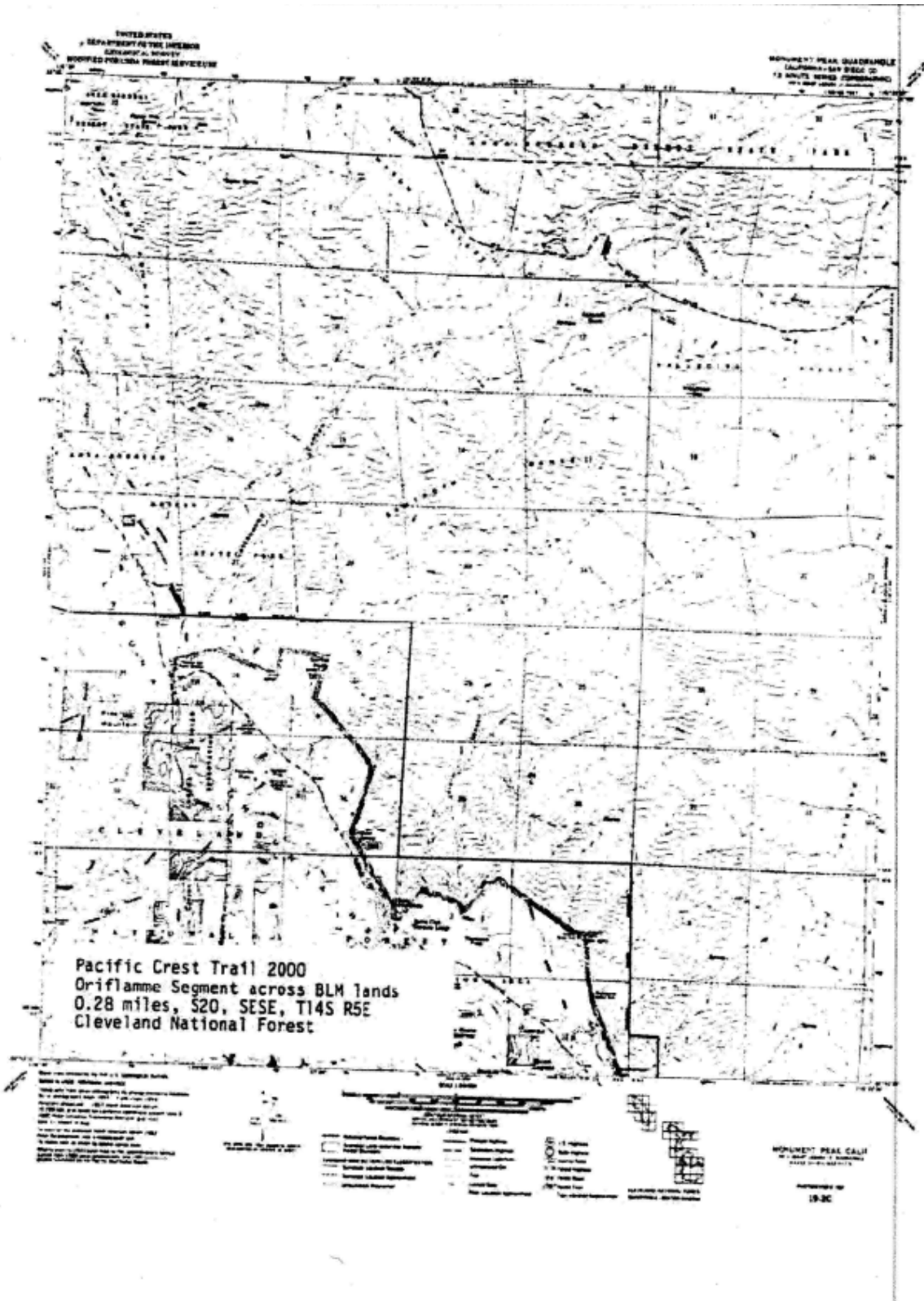
1. The trail constructed under the provisions of this right-of-way will be under control and jurisdiction of the Forest Service.
2. The agency having jurisdiction of the trail may extend or grant rights and privileges for use of the trail to other users, including members of the public and other Government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

Dated this 26 day of Sept, 1936.



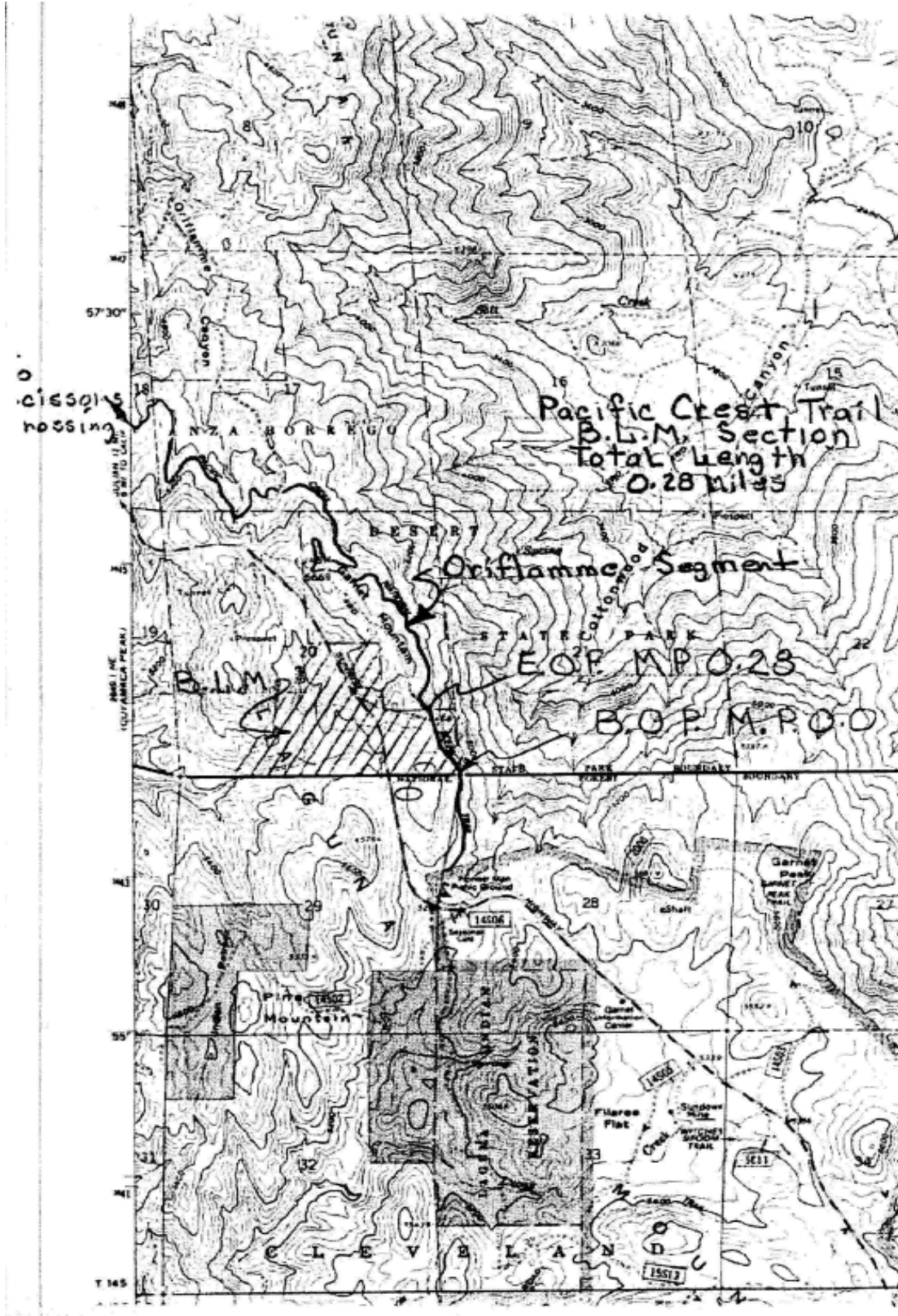
Gerald E. Hillier
District Manager
California Desert District

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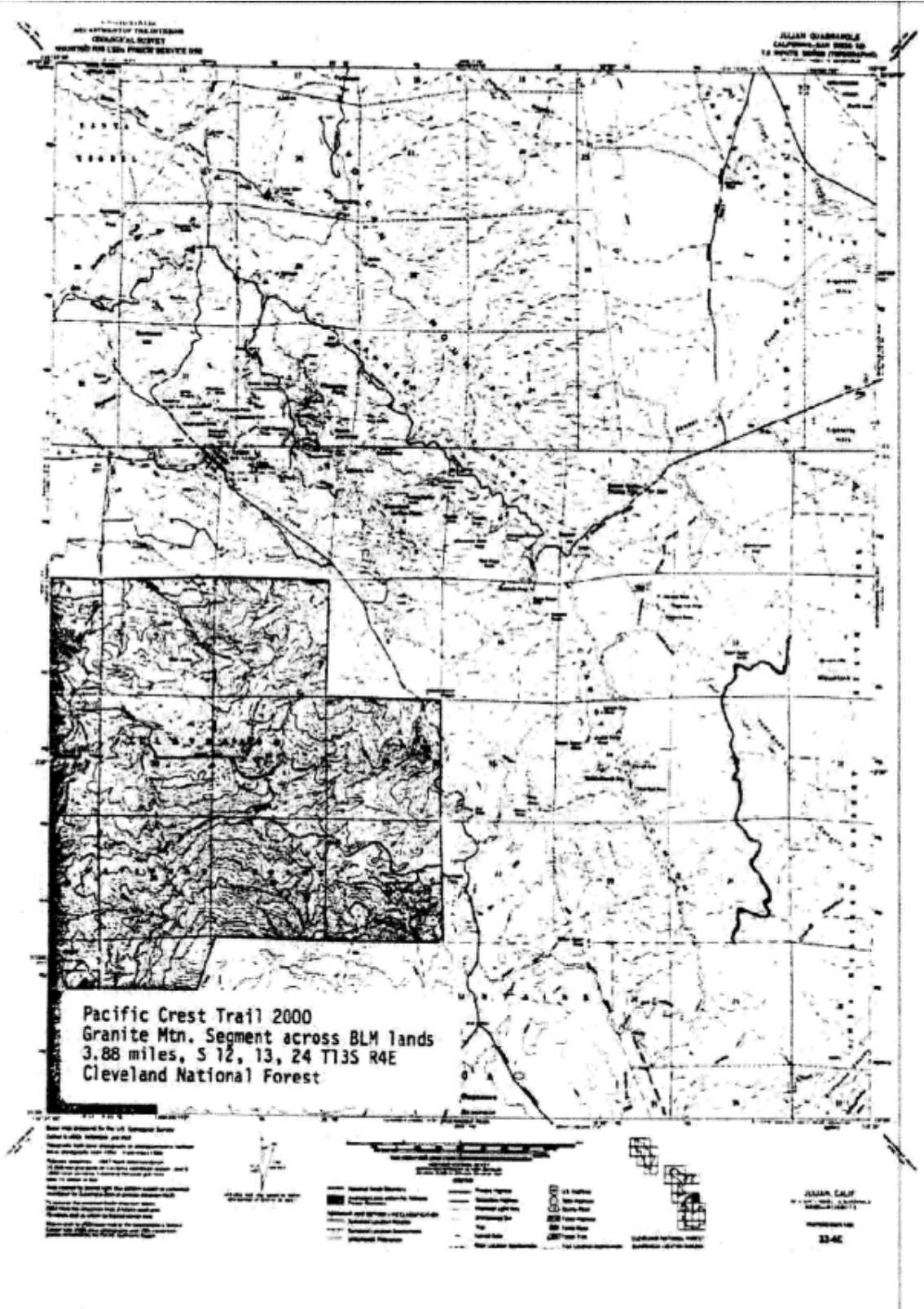
F0003-10 cont.

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F0003-10 cont.

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F0003-10 cont.

Responses to Comment Set F0003

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F0003-1 The USFS notes that Section 1.3 of the RDEIR/SDEIS characterizes power line fires relative to other ignition sources without reference to the fire data USFS maintains on National Forest Service System lands. Please see Response to Comment G0013-2, which clarifies the difference between high-voltage transmission line fires and “power line” fires generally (distribution system and lower voltage transmission system fires). Please also see General Response GR-9. In addition, the text of Section 1.3 of the RDEIR/SDEIS has been modified to clarify this point as follows:

...Type conversion is largely a cumulative problem: it depends on the time since the last fire (ignited by any source), on the number of other ignitions from all other sources, and on such things as land use policy changes and road-building. ~~Since power line fires generally make up only 1% of ignitions, and high voltage lines make up about 3% of these, and because few of these fires are large~~ Because the wildfire ignition rate of high-voltage transmission lines is small, because Santa Ana wind conditions occur only on a few days per year, and because the likelihood of any given fire potentially caused by the project to occur in a recently burned area is also small, it would be unduly burdensome to carry out a detailed analysis of potential type conversion as a result of the project, because the probability of it occurring is small, and depends on a number of complex, cumulative factors. Furthermore, the impacts of type conversion are poorly defined, and any study of this type would be speculative...

F0003-2 The surveys performed for biological, visual and cultural resources are described below:

- **Biological Resources.** Investigation of biological resources for the RDEIR/DSEIS included the following and followed the approach outlined in Section 1.3 of the Recirculated Draft EIR/Supplemental Draft EIS:
 - *Biological Survey work for the Reroutes.* HELIX completed the majority of the vegetation mapping for the reroutes through interpretation of aerial photographs because the majority of the reroutes differ only by several hundred feet from the portions of the Proposed Project, alternatives, or options that they would replace. Existing vegetation mapping, which was collected for the Draft EIR/EIS, and generalized MSCP vegetation mapping of San Diego County were used as references during interpretation of aerial photographs. Vegetation mapping was ground-truthed only along the Coastal Link System Upgrades Alternative Revision because it would traverse areas of coastal San Diego County that were not assessed as part of the Draft EIR/EIS. A literature review was conducted and included a review of information obtained from the USFWS, CDFG, California Department of Parks and Recreation, BLM, and USDA Forest Service. Databases managed by the CNPS and CNDDDB were also reviewed. Information from the Wildlife Research Institute regarding golden eagle nest locations and information from Phil Unitt, bird migration expert and Collection Manager for Department of Birds and Mammals, San Diego Natural History Museum, regarding bird migration routes were also reviewed.

- *Sempra Wind Project*. Insignia Environmental, contracted by SDG&E, conducted a records search, general biological survey, and rare plant survey for the Jacumba/ECO substation in Spring 2008. The records search for the substation included a review of aerial photographs, USGS topographic maps, National Wetland Inventory maps, San Diego County Bird Atlas, USFWS Recovery Plans for peninsular bighorn sheep and quino checkerspot butterfly, Flat-tailed Horned Lizard Interagency Coordinating Committee's Flat-tailed Horned Lizard Rangelwide Management Strategy, and database searches that are managed by the CNPS and CNDDDB. Rocks Biological Consulting, contracted by SDG&E, conducted a habitat assessment and protocol surveys for Quino checkerspot butterfly at the Jacumba/ECO substation in Spring 2008.
- **Visual Resources**. A field reconnaissance was conducted to identify candidate key viewpoints for new study areas. Consultations were then conducted with staff of the Bureau of Land Management, Cleveland National Forest, and Anza-Borrego Desert State Park to finalize the list of key viewpoints for new study areas as well as identify the specific locations of sensitive viewing areas and viewpoints of concern raised in comments on the Draft EIR/EIS. In addition, field visits were made with representatives of the U.S. Forest Service and Anza-Borrego Desert State Park to select some specific viewpoint locations. Field analyses were then conducted at each key viewpoint to assess visual quality, viewer concern, viewer exposure, overall visual sensitivity, as well as visual contrast, project dominance, view blockage, overall visual change and the resulting visual impact significance. Where appropriate, consistency with BLM VRM Class Management Objectives and Cleveland National Forest Scenic Integrity Objectives was also assessed in the field. Following the preparation of digital terrain model viewshed maps, sensitive viewing areas were evaluated in the field to determine project visibility. Existing view photographs were also acquired and in some cases were used for the preparation of visual simulations of the project actions.
- **Cultural Resources**. The CPUC and BLM's Cultural Resources team conducted a literature review-based analysis for reroutes/revisions considered in the RDEIR/SDEIS. No new intensive surveys were conducted for the reroutes/revisions. Initially, the Sunrise-specific cultural resources GIS was reviewed to ascertain if additional records searches would be necessary for the reroutes/revisions. For each reroute or revision that extended beyond the limits of cultural resources records searches previously conducted for Sunrise Powerlink, a new one was conducted at the South Coastal Information Center at San Diego State University. The only exception is the BLM Gifted Lands Reroute, for which a search was conducted at the Southeastern Information Center at Imperial Valley College. The results of the records searches were combined with existing data to assess the number of cultural resources within the reroute/revision study corridor or study area and the percentage of each reroute/revision that had been intensively surveyed for cultural resources within the previous five years. The results of this analysis were compared with the data for the corresponding bypassed portions of the Proposed Project, alternative, or Connected Action to ascertain whether the reroute or bypassed segment would present greater impact/more adverse effects on cultural resources.

F0003-3 Analyses for each reroute/revisions in Section 3 of the RDEIR/SDEIS have been updated to include an individual discussion of impacts to additional issue areas, where minor changes in impacts to those disciplines may occur. However, there have been no changes to overall impact classifications. In addition, a statement discussing differences in ground disturbance impacts during construction has been added to relevant reroute analyses. Finally, a statement has also been added for each route addressed in Section 3 of the RDEIR/SDEIS to explain that for all remaining issue areas, the reroute is analyzed in the EIR/EIS in the section addressing its original route (e.g., all modifications to the Modified Route D Alternative are also described in Section E.4).

F0003-4 The commenter states that the Final EIR/EIS should include the details of the proposed mitigation, including the location and specific details for the wildlife habitat mitigation lands and required fuelbreaks. Mitigation Measure F-3a has been revised in the Final EIR/EIS, and the requirement to construct and maintain fuelbreaks has been removed. Regarding habitat mitigation and revisions to Mitigation Measure F-3a, please see Response to Comment A0009-18 and General Response GR-18.

F0003-5 The commenter states that the BCD Alternative and BCD South Option revisions should include mitigation for golden eagle. The introductory text in Section 3 of the RDEIR/SDEIS has been clarified as follows to explain that mitigation measures required for alternatives would apply to the reroutes as well:

The revisions and reroutes to portions of the Proposed Project and alternatives discussed in this section are included in the RDEIR/SDEIS either because they may create new or more severe significant impacts, and to provide the public with a meaningful opportunity to comment. Any mitigation measures that have been required for implementation for any of the original routes would also apply to its revision/reroute unless specifically noted.

In the Draft EIR/EIS, Mitigation Measure B-7h (Implement appropriate avoidance/minimization strategies for eagle nests) was required for impacts to golden eagle from the BCD Alternative and the BCD South Option. Therefore, Mitigation Measure B-7h is also required for the BCD South Reroute. No further changes other than those above were made to the RDEIR/SDEIS based on this comment.

The commenter also states that Mitigation Measure B-10a should reference the 2006 edition of the Avian Power Line Interaction Committee (APLIC) standards. The fourth paragraph of Mitigation Measure B-10a references the 2006 edition for the avian reporting system that is required for the project. Mitigation Measure B-10a references the 1994 edition of the APLIC standards instead of the 2006 edition because the 1994 edition outlines techniques to reduce bird collisions. The 2006 edition details techniques to prevent bird electrocutions with power lines and does not provide any guidance for reducing bird collisions. No changes were made to the RDEIR/SDEIS based on this comment, because the EIR/EIS determined that there would be No Impact associated with electrocution.

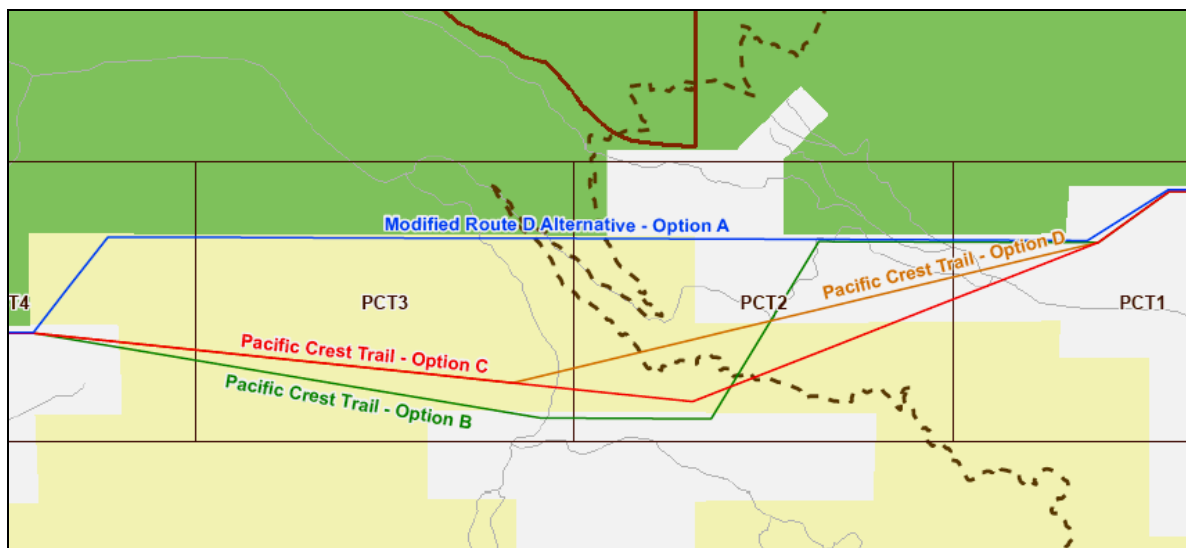
F0003-6 The commenter states that the PCT Reroute should be modified to avoid having pulling sites located in riparian areas or in occupied least Bell's vireo habitat, including upper Hauser Creek. The PCT Reroute (also called Option B in the Final EIR/EIS) that was presented in the RDEIR/SDEIS has been eliminated and Section 3.3.6 of the

RDEIR/SDEIS has been deleted. The Modified Route D Alternative through this area, as defined in this Final EIR/EIS, would follow the original Modified Route D Alternative route that was presented in the Draft EIR/EIS (adjacent to the existing 69 kV transmission line and also called Option A in the Final EIR/EIS). A PCT Option (also called Option C/D) to the Modified Route D Alternative has been added to Section E.4.1 and analyzed within every issue area. This PCT Option C/D differs from the PCT Reroute (PCT Option B) considered in the RDEIR/SDEIS; it was modified in response to BLM concern that the PCT Reroute (PCT Option B) affected parcels that were donated to BLM with land use restrictions. Neither the Modified Route D Alternative (PCT Option A) nor the PCT Option C/D would include a pulling site in occupied least Bell's vireo habitat or in riparian habitat in upper Hauser Creek.

F0003-7

Regarding the Pacific Crest Trail (PCT) reroute, the comment identifies that PCT is on public lands managed by BLM, but that it is maintained by the Forest Service under a right-of-way reservation. Under the reservation, BLM retains the right to occupy and use the ROW and to grant ROWs to others, provided that the occupancy and use will not unreasonably interfere with the rights granted to the Forest Service for the PCT. The commenter requests that the Final EIR/EIS evaluate the impact to the PCT in the context of the ROW reservation, detailing how the construction and operation of the project would affect use of the PCT. The affects on the PCT, including construction impacts, are analyzed in Section E.4.5 (Wilderness and Recreation).

The Modified Route D Alternative (PCT Option A) would cross the PCT in three locations within about a mile just south of the Hauser Wilderness, due to the circuitous nature of the trail in the area the alternative would traverse (see map below). The PCT Reroute (PCT Option B), described and analyzed in Section 3.3.6 of the RDEIR/SDEIS, would shift the transmission line south, where it would cross the PCT only once. As described in Response to Comment F0003-6, a modification of the PCT Reroute (PCT Option B), called the PCT Option C/D, is analyzed in Section E.4 of the Final EIR/EIS. The PCT Reroute (PCT Option B) considered in the RDEIR/SDEIS has been eliminated from consideration and deleted in the RDEIR/SDEIS.



In addition, a new mitigation measure has been added to the impact analysis for Recreation and Wilderness in Section E.4.5.2, to require consideration of a reroute of the PCT, in the event that the Modified Route D Alternative is selected. The reroute would eliminate two of the three PCT crossings, to reduce the permanent change of recreational character of this area that would result from the installation of a 500 kV transmission line in this sensitive spot between two wilderness areas. Mitigation Measure WR-2b is as follows:

WR-2b Evaluate and Implement PCT Route Revision. SDG&E shall consult and coordinate with the U.S. Forest Service, BLM, and the Pacific Crest Trail Association to develop route options for revising the PCT so it would cross the Modified Route D Alternative only once, rather than three times. SDG&E shall prepare and submit a report to the BLM and U.S. Forest Service prior to energizing the new transmission line. The report shall identify feasible PCT relocation options, and, under the direction of the federal agencies, shall evaluate whether its construction and restoration of the old trail segment would create overall greater impacts than those created by three crossings of the PCT that would occur with the Modified Route D Alternative. If directed by the BLM, SDG&E shall be responsible for constructing the new trail segment and restoring the old trail segment in manner acceptable to the BLM and U.S. Forest Service. Trail construction and restoration shall be completed within one year of energizing the transmission line.

F0003-8

As described in Responses F0003-6 and F0003-7, the PCT crossing options/revisions have been designed to minimize the number of PCT crossings, avoid donated parcels, minimize new road construction, and avoid additional impacts to riparian areas. The text in Section E.4.1 has been revised as by adding the following text to describe the evolution of the PCT Options. Section E.4 also includes an analysis of the options for each issue area.

Pacific Crest Trail (PCT) Route Options. The original Modified Route D Alternative, also called PCT Option A below, has been retained in this Final EIR/EIS as part of the Final Environmentally Superior Southern Route Alternative. PCT Option B was described and analyzed in the RDEIR/SDEIS to reduce impacts of the line crossing the PCT, but it has since been eliminated from consideration. Finally, PCT Option C/D, which is preferred by the USFS, has been analyzed in the Final EIR/EIS in order to allow agencies the opportunity to include either option as part of the approved route and/or the Agency Preferred Alternative (should a southern route be chosen). The three options are described as follows:

- **PCT Option A (original Modified Route D Alternative route).** PCT Option A is the same as the original Modified Route D Alternative route that was analyzed in the Draft EIR/EIS. The route would be located on BLM land just south of the CNF boundary between MP MRD-11.7 and MP MRD-14. The route would follow the existing 69 kV transmission corridor, and would maximize use of existing access roads. Both the 69 kV and 500 kV lines would cross the PCT three times within a space of about 0.25 miles.

- **PCT Option B (PCT Reroute from the RDEIR/SDEIS).** This reroute, which was included in the RDEIR/SDEIS, was suggested by SDG&E, with input from the USFS, CPUC and BLM, to minimize impacts to its crossing of the Pacific Crest Trail; however, due to the development of Option C/D, it has been eliminated from consideration and deleted from the text of the RDEIR/SDEIS. The reroute would diverge from the Modified Route D Alternative at MP MRD-11.7. The reroute would head southwest for 0.45 miles where it would cross the PCT and then would continue for another 0.15 miles before it would turn west. The route would travel west and west-northwest for approximately two miles, rejoining the original Modified Route D Alternative at MP MRD-14. The reroute would also include construction of a new access road on the BLM lands to support construction and maintenance of the transmission line and towers.
- **PCT Option C/D.** PCT Option C/D is a further revision by SDG&E, USFS, CPUC and BLM that replaces PCT Option B. PCT Option C/D would create a new transmission line right-of-way and where feasible the towers would be constructed by helicopter (thus minimizing the need for access roads to the extent feasible). With this reroute, PCT users would cross under the 69 kV line, then cross below the 500 kV line only once farther to the southwest. This option would begin at MP MRD-11.0 and would travel southwest for approximately 1.7 miles before turning west-northwest for approximately 1.7 miles and rejoining the Modified Route D Alternative at MP MRD-14.

Similar to PCT Option B, the PCT Option C/D would move a segment of the Modified Route D Alternative (PCT Option A) from its original location on BLM land in the Hauser area (adjacent to the SDG&E 69 kV transmission line and just south of the border of the Cleveland National Forest) further south onto a gifted parcel of BLM land that has been in federal ownership since it was donated to the BLM in 2005. The lands were donated to the BLM for wild-life habitat conservation and to support habitat linkages between Baja, Mexico and southern California. BLM accepted these lands under a donation agreement. The agreement specifically states that "BLM shall not construct roads, structures, and other improvements on the properties, except to the extent minimally necessary and consistent with the restoration and protection of the natural resources."

In addition, the following text has been added to Section 3.3.6 of the RDEIR/SDEIS to explain that the description and analysis of the PCT crossing for the Modified Route D Alternative can be found in Section E.4.1 of the Final EIR/EIS.

The analysis for the Pacific Crest Trail Reroute (also called PCT Option B in the Final EIR/EIS) has been deleted from the RDEIR/SDEIS; because, the route described herein has been eliminated and a new route option, the PCT Option C/D, has replaced the PCT Reroute (PCT 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 3-11 (Modified Route D Alternative: PCT Reroute) has been deleted from this document. Figure E.4.1-4 (Modified Route D Alternative: PCT Option C/D) can be found in the Final EIR/EIS.

- F0003-9 The original Modified Route D Alternative north of the Modified Route D Substation has been found in this Final EIR/EIS to be environmentally superior to the Star Valley Option and Star Valley Option Revision. In consultation with the USFS, BLM, CPUC, and SDG&E, many of the Modified Route D Alternative components have been refined to reduce roads and pulling sites, as is shown on the figure in Appendix 11C in the Final EIR/EIS. This same approach could be used to refine the route segment north of the Modified Route D Substation for final design, if further Forest Service review indicates that additional changes are required.
- F0003-10 Please see Response to Comment F0003-7 regarding the USFS ROW reservation from the BLM for the PCT.