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Forest
Service

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File Code: 1950-4

Date: MAR 12 2008

Billie Blanchard, CPUC/Lynda Kastoll, BLM
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RE: Forest Service Preliminary Comments on the Draft Environmental Impact Report /
Environmental Impact Statement (Draft EIR/EIS) for the Sunrise Powerlink Project. (SCH No.
2006091071, DOI Control No. DES-07-58)

Dear Ms. Blanchard and Ms. Kastoll:

I have completed my initial review of the Sunrise Powerlink Project Draft EIR/EIS and offer these preliminary comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM). These preliminary comments may be useful to those parties participating in the CPUC Phase 2 proceedings for the Certificate of Public Convenience and Necessity (Proceeding A-06-08-010). I will be filing detailed comments on the Draft EIR/EIS by April 11, 2008.

Introduction

Although the proposed Sunrise Powerlink Project would not occupy any National Forest System (NFS) lands, several project alternatives would. If an alternative that uses National Forest System (NFS) lands is selected, I must decide whether to issue a special use authorization under the authority of the Federal Land Policy Management Act (43 USC § 1761). The regulations promulgated by the Council on Environmental Quality for the National Environmental Policy Act (NEPA regulations) provide that agencies with jurisdiction by law shall be a cooperating agency (40 CFR 1501.6). The Forest Service is a cooperating agency with the BLM because of our jurisdiction over several of the alternatives. These preliminary comments are offered pursuant to Part 1503 of the NEPA regulations (40 CFR 1503).

Forest Service involvement improves the efficiency of the regulatory review process, and is consistent with direction in Section 1221 of the Energy Policy Act of 2005 (EPAct) to coordinate the Federal Agency environmental review of proposed transmission projects. I intend to use the Final EIR/EIS to support my evaluation of the selected route if that route occupies NFS lands. If the NEPA analysis conducted by the CPUC/BLM does not meet Forest Service NEPA policy or provide the record necessary to support the findings required by other statutory requirements, a decision regarding the special use authorization would not be likely without preparing a supplement to the EIR/EIS.



this area include changing the support tower type and color, reducing or eliminating roads, and moving the alignment south of Interstate 8 to avoid skylining of support towers.

Interstate 8 Routes – As identified in Forest Supervisor Hernandez’s March 16 letter, the Interstate 8 Route on the Cleveland National Forest (primarily west of BCD south at milepost 51 and east of Modified Route D at milepost 71) has numerous conflicts with the Forest Plan, including conflicts with LUZ designations, Proposed Research Natural Areas, and SIO’s. The potential impact of the transmission line on emergency operations in this highly used transportation corridor is of great concern. The Buckman Springs Underground Option would mitigate some of these concerns for a short segment of the route. It does not appear that the remaining conflicts with the Forest Plan could be resolved by reroutes or mitigation, unless an underground route was possible for the entire length. As currently described in the Final EIR/EIS, the Interstate 8 route on the Cleveland National Forest (primarily between BCD south and Modified Route D) would not meet the screening criteria and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands.

Route D - As identified in Forest Supervisor Hernandez’s March 16 letter, Route D has conflicts with the Forest Plan Back Country Non-Motorized LUZ, and Inventoried Roadless Areas. It also creates an impact parallel to the existing 69 kV line, in conflict with the Forest Plan direction to co-locate facilities to reduce impacts.

The conflict with the Forest Plan direction and Inventoried Roadless Area would be difficult to resolve or mitigate. As described in the March 16, 2007 letter, activities in Inventoried Roadless Areas are subject to the Roadless Area Conservation Rule. Although the Draft EIR/EIS states that no new roads would be constructed in roadless areas (measure T-11a, Draft EIR/EIS page E.3.9-3), the detailed alternative maps in Appendix 11 (Draft EIR/EIS Figure Ap. 11C-72) show an extensive system of roads proposed within the roadless area. Even if helicopters are used to support construction, several new roads in the Inventoried Roadless Area would be required to provide road access to the proposed pulling sites.

As currently described in the Final EIR/EIS, Route D would not meet the screening criteria, and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands.

Modified Route D - The Modified Route D alternative, which is the primary component of the Environmentally Superior Southern Route Alternative that is located on NFS lands, is generally compatible with the Forest Plan Land Use Zone (LUZ) designations in all areas except the area to the south of Morena Lake near milepost 10. The proposed transmission line and access roads cross through the edge of an area designated as Back Country Non-Motorized. In order to accept this route, I would require a slight modification of alignment, and relocation or elimination of access roads to avoid this conflict.

Modified Route D is co-located along a portion of the route with an existing 69 kV. Co-locating the facilities is consistent with the Forest Plan. A significant portion of Modified Route D is also located within a proposed federal “West-wide Energy Corridor”. The corridor, proposed under



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Date: April 10, 2008

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**RE: Forest Service Final Comments on the Draft Environmental Impact Report /
Environmental Impact Statement (Draft EIR/EIS) 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 Draft EIR/EIS and supporting documents and offer these final comments to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM). These final comments incorporate by reference my initial March 12, 2008 comments, with the following clarification regarding the Interstate 8 (I-8) alignment. On page 3 of my initial comment letter, I described the conflict between the I-8 alignment and the Cleveland National Forest Land Management Plan (LMP). To clarify, the section of the I-8 alignment with the greatest conflict is west of milepost 51 (where the BCD South route crosses the I-8 alignment) and east of milepost 71 (where the Modified Route D route rejoins the I-8 alignment). My final sentence of that section mistakenly referred to the Final EIR/EIS. The corrected sentence (with the correction in italics) is "As currently described in the *Draft EIR/EIS*, the Interstate 8 route on the Cleveland National Forest (primarily between BCD south and Modified Route D) would not meet the screening criteria and a proposal to construct a transmission line along this route would not be accepted as an application for a special use on NFS lands." There is a short section of the I-8 alignment east of milepost 51 on National Forest System (NFS) lands, and that short section is consistent with the LMP land use zones. There is also a section of the I-8 alignment that crosses NFS lands between I-8 milepost 81 and milepost 83, and that section is consistent with the LMP land use zones.

Biological Resources

In my initial comment letter, I discussed the need for the Final EIR/EIS to disclose the effects of the alternatives on Endangered Species and Forest Service Sensitive Species in a context that supports the findings required by law, regulation, and policy. A similar requirement exists for Forest Service Management Indicator Species (MIS). The MIS Report (Appendix 8M) does not provide the information required to support the findings about how the proposed project or alternatives will affect population and habitat trends for the affected species. Disclosure of how the project or alternatives will affect population and habitat trends is required, including

