



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: 1950/2700

Date: FEB 21 2007

Billie Blanchard, CPCU/Lynda Kastoll, BLM
Regulatory Analyst/Realty Specialist
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

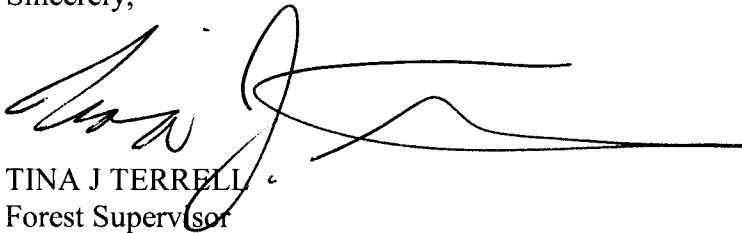
Dear Ms. Blanchard and Ms. Kastoll:

In view of the quantity of National Forest System lands and program areas potentially affected by the electric transmission alignments, proposed in the "Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project", the Cleveland National Forest requests additional time to complete its review and comment.

The Forest will be able to complete its comments, and reply to the Commission by March 16, 2007.

Please contact Lands Specialist, Rich K. Tobin at 858-674-2904, if you have any questions or concerns.

Sincerely,



TINA J TERRELL
Forest Supervisor

cc: Thomas F Gillett, Graciela Terrazas, Gloria Silva





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: 2720/1950

Date: **MAR 16 2007**

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

Dear Ms. Blanchard and Ms. Kastoll:

This reply is provided to the California Public Utilities Commission and the Bureau of Land Management (CPUC/BLM) in response to the "Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project". In the notice, three of the alternatives identified (Southwest Powerlink, Inland Valley, and System) affect public lands administered by the Cleveland National Forest (Forest).

The Forest has reviewed each of these alternatives against the Special Use screening criteria established by regulation at Title 36 Code of Federal Regulations § 251 Subpart B. Although there are 9 screening criteria, the primary factor used for this review was criteria (ii), consistency with the 2005 Cleveland National Forest Land Management Plan (LMP). Proposals are suitable if they are consistent, or can be made consistent through mitigation and design factors, with the applicable LMP standards. If it is uncertain if a proposal can be made consistent with the LMP, but the proposal otherwise meets the criteria and is in the public interest, it may be accepted and evaluated. Based on this review, we have identified probable issues and concerns associated with the National Forest System (NFS) lands proposed for the construction, operation, and maintenance of the Sunrise Powerlink 500 kV Electric Transmission Line Project. We also include recommendations for alternatives located on NFS lands that could be considered in detail.

1. "Southwest Powerlink Alternative": The Cleveland NF agrees with elimination from further detailed study proposed routes B, C, and B-C, (Figure 8). The Forest also recommends elimination from further study that portion of alignment D east of Loveland Substation north thru the San Diego River Basin (D-25 to D-50), and the Interstate 8 alternative.

Alignment D, north from Loveland Substation to San Diego River Basin (D-25 to D-50):

- Development within this alignment would be inconsistent with the LMP desired conditions for the Places affected. Management emphasis within the Upper San Diego River Place is to keep this remote, naturally appearing landscape, as an undisturbed expanse with panoramic views. Built elements are to be rustic and unobtrusive. The Sweetwater Place stresses management for preservation of natural appearing landscape attributes and the undeveloped character of this rural area. LMP Strategy LM-2,



Landscape Restoration, identifies these areas as key places for restoration and retention of scenic values.

- This route traverses the following land use zones designated in the LMP; Back Country Non-Motorized (BCNM), Back Country (BC), Back Country Motorized Use Restricted (BCMUR), and Developed Areas Interface (DAI). Development of facilities, roads, and major utility corridors in the BCNM land use zone would be inconsistent with the LMP (Table 2.2.3 Suitable Uses). An LMP amendment would be required to accommodate development of a high voltage electric transmission line in the BCNM land use zone.
- This route would move, or duplicate, impacts from an existing and adjacent parallel transmission system (see SDG&E Route D) to undeveloped natural open space in the Forest. This action would be inconsistent with Goal 7.1 of the LMP, which stresses minimization of development in natural areas. The LMP promotes co-location of facilities (CNF-S5 Co-locating Facilities).
- This route segment would likely introduce roads into the No-Name and Sill Hill Inventoried Roadless Areas. The Forest must comply with the 2001 Roadless Rule per a U.S. District Court, Northern District of California decision to reinstate the 2001 Roadless Area Conservation Rule (i.e. "Roadless Rule"). There is an agreement between the State of California and Forest Service that requires the Forest to consult with the State on any new roads (see enclosed letter dated April 4, 2006).
- Much of the route is designated with a Scenic Integrity Objective of "High". This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management. A LMP amendment could be required.
- This alignment is generally within remote areas with steep slopes, dense vegetation, and limited access (this is where the catastrophic Cedar Fire started in 2003). Introduction of high voltage electrical facilities would increase the risk of wildfire, both as a causal source and a hindrance/hazard to aerial and on the ground fire-fighting efforts. Reliability concerns are an issue due to wildfires in this fire prone area.

Conclusion – This northern section of route D is not consistent with many requirements of the LMP, and would fundamentally change the character of the undeveloped forest land that it would cross. We do not recommend that this alignment be studied in detail.

Alignment BCD (BCD-20 to BCD-37.9):

- Development within this alignment would not be consistent with the LMP desired conditions for the Places affected. Management emphasis within the Morena and Sweetwater Places is to maintain those naturally occurring Forest landscapes that function as a primary gateway to the deserts of the southwest and San Diego County. These scenic attributes are to be preserved over time and are viewable daily by thousands of people from the Sunrise Scenic Byway, Pacific Crest National Scenic Trail (PCT), and Interstate Highway 8.
- This route traverses the following land use zones designated in the LMP; BCNM, BC, BCMUR, and DAI. Development of facilities, roads, and major utility corridors in the BCNM land use zone would be inconsistent with the LMP (Table 2.2.3 Suitable Uses). An LMP amendment would be required to accommodate development of a high voltage electric transmission system in the BCNM land use zone.

- Much of the route is designated with a Scenic Integrity Objective of “High”. This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management. View shed degradation is likely from Interstate 8, the Sunrise Scenic Byway, and the PCT. If night lighting is required on towers there could be further effects to dark skies and visibility from the Mount Laguna Observatory. A LMP amendment could be required for Aesthetic Management standards.
- This route crosses the PCT and may be inconsistent with LMP standard CNF-S12, Pacific Crest Trail.
- The route crosses an eligible Wild and Scenic River corridor (Cottonwood Creek). A suitability study would be required prior to initiating activities (S59 Wild and Scenic River Standard).
- The route appears to cross the proposed Guatay Mountain Research Natural Area (RNA). Management of a RNA is inconsistent with development of a high voltage electric transmission line. This area is also considered sacred by local tribes.
- The route is in close proximity to a popular hang-gliding and paragliding launch site near Sheephead Mountain and Horse Canyon north of Interstate 8 and Buckman Springs Road. Construction of high voltage overhead transmission lines would create a safety hazard to the pilots and their passengers.
- The mapping provided for this route appears to locate the alignment partially within the Pine Creek Wilderness. Development is not allowed within wilderness areas.
- Where the alignment intersects the Pine Creek drainage between Interstate 8 and Pine Creek Wilderness, the passageway may be too narrow to feasibly locate a high voltage transmission line of this magnitude.
- Introduction of high voltage electrical facilities to this area of steep slopes and dense vegetation would increase the risk of wildfire, both as a causal source and a hindrance/hazard to aerial and on-the-ground firefighting efforts. This area is known for frequent high velocity winds, low humidity and dangerous fast moving wildland fires that require aggressive fire suppression tactics. The origin of the catastrophic Laguna Fire of 1970 was in this general area. Reliability concerns are an issue due to wildfires in this fire prone area.

Conclusion – Although there are many inconsistencies with the LMP, there may be opportunities to mitigate the effects of the proposal through changes in alignment and design elements. A modified BCD alignment, developed in consultation with Cleveland NF staff, could be carried forward for detail study.

Alignment Interstate 8 (I 8-15 to I 8-40):

- Development within this alignment would be inconsistent with LMP desired conditions for the Places affected. Management emphasis within the Morena and Sweetwater Places is to maintain naturally occurring Forest landscapes that function as the major eastern gateway to San Diego County. Unspoiled natural views to the Pacific Ocean are common and viewed daily by thousands of people from Interstate Highway 8 and Sunrise Scenic Byway. Preservation of these scenic attributes over time is emphasized in the LMP.

- Where the alignment intersects the Pine Creek drainage between Interstate 8 and Pine Creek Wilderness, the passageway may be too narrow to feasibly locate a high voltage transmission line of this magnitude.
- The route is in close proximity to a popular hang-gliding and paragliding launch site near Sheephead Mountain and Horse Canyon north of Interstate 8 and Buckman Springs Road. Construction of high voltage overhead transmission lines would create a safety hazard to the pilots and their passengers.
- This alignment poses the greatest concern regarding impacts on emergency responses to traffic collisions, wildfire, and other incidents. Towers and transmission lines would likely affect aerial operations, especially Life Flight. Introduction of high voltage electrical facilities to this area of steep slopes and dense vegetation would increase the risk of wildfire, both as a causal source and a hindrance/hazard to fire-fighting efforts. This area is known for frequent high winds and dangerous fast moving wildland fires that require aggressive fire suppression tactics. Reliability concerns are an issue due to wildfires in this fire prone area. The Interstate 8 corridor records the greatest number of fire starts on Forest. Many rural communities are located along this route with recurring fire protection needs. The origin of the catastrophic Laguna Fire of 1970 was in this general area.
- The proposed alignment would more than double the width of the development footprint through the Forest by paralleling and completely avoiding the constructed Interstate 8 right of way. Transmission facilities instead would be located on adjacent natural landscapes of high scenic character. Labeling this alignment as Interstate 8 is misleading since no portion of the project is within the built environment of the Interstate 8. This action would be inconsistent with Goal 7.1 of the LMP, which stresses minimization of development in natural areas.
- Pine Creek Bridge is a nationally significant feature of the Federal Interstate Highway System and listed as such on the Federal Highway Administrations Historic Preservation Interstate Highway System List.

Conclusion – Given the proposal to parallel Interstate 8, it would be difficult to mitigate the effects of this proposal to be consistent with the LMP. Fire suppression and emergency response are of particular concern. We do not recommend this alignment for detailed study.

Alignment D (south of Loveland Substation D-5 to D-25)

- Development within this alignment could be inconsistent with LMP desired conditions for the Pine Creek and Sweetwater Places. The desired condition within these Places is to preserve as predominantly natural areas, especially where visible from Interstate 8 and the PCT. LMP Strategy LM-2, Landscape Restoration identifies these places as key areas for restoration and retention of scenic values.
- The route traverses the BC and BCMUR land use zones designated in the LMP. The proposed development would be suitable for consideration in this area (Table 2.2.3 Suitable Uses).
- The Scenic Integrity Objective for this area is “High”. This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management.

- This route is within an existing transmission alignment across the Forest and private lands and closely aligned with a potential utility corridor alignment identified in the Federal West Wide Energy Corridor Study for the 11 Western States (D-6 to D-22).

Conclusion - Although there are potential inconsistencies with the LMP, there may be opportunities to mitigate the effects of the proposal through changes in alignment and design elements. A modified alignment for this southern portion of route D, developed in consultation with Cleveland NF staff, could be carried forward for detail study.

Alignment WF - 23-25 & WF-5-6:

- Development within this alignment could be inconsistent with LMP desired conditions for the Pine Creek and Upper San Diego River Places. Management emphasis in these Places is to keep naturally appearing landscapes as undisturbed expanses with panoramic views. Built elements are to be rustic and unobtrusive. LMP Strategy LM-2, Landscape Restoration, identifies these places as key areas for restoration and retention of scenic values.
- Hang-gliding and paragliding activities occur in the WF 23-25 area. Development of high voltage overhead transmission lines would create a safety hazard for pilots and their passengers.
- The Scenic Integrity Objective for these areas is “High”. This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management.
- Introduction of wildfire causal source and/or hindrance and hazard to aerial and on-the-ground fire fighting efforts and emergency rescues. Reliability concerns may be an issue during wildfires.

Conclusion – This alignment crosses a small portion of the Cleveland NF. Mitigation developed in consultation with Cleveland NF staff could address LMP consistency issues. This alternative could be carried forward for detail study.

2. “Inland Valley Alternative”: This proposed alignment would cross a small portion of the Forest at location point 112 near Hwy 78. The alignment is presently occupied by a 69 kV electric transmission line.

- Management emphasis within the Upper San Diego River Place is to preserve the remote, naturally appearing landscape as undisturbed expanse. Built elements are to be rustic and unobtrusive.
- The route traverses the DAI land use zone designated in the LMP. The proposed development would be suitable for consideration in this area (Table 2.2.3 Suitable Uses).
- The Scenic Integrity Objective for this area is “High”. This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management.

Conclusion – This alignment crosses a small portion of the Cleveland NF. Mitigation developed in consultation with Cleveland NF staff could address LMP consistency issues. This alternative could be carried forward for detail study.

3. “System Alternative”: This alternative identifies the transmission line portion of the Lake Elsinore Advanced Pumped Storage Hydroelectric Project as a proposed route to locate a regional high voltage electric transmission interconnect that could alleviate the need for the Sunrise Powerlink Project. This alternative also identifies another proposed alignment call the Serrano/Valley Central 500 kV Full Loop which appears to skirt or edge the entire eastern side of the Forest’s Trabuco Ranger District. The alternative also appears to mischaracterize two 500 kV transmission segments as existing within the northeast portion of the District.

LEAPS Project

- The Federal Energy Regulatory Commission (FERC) is considering an application for a hydropower license from the Elsinore Valley Municipal Water District and the Nevada Hydro Company, Inc., for a license to construct and operate a proposed hydropower project. The proposal is being evaluated and considered at a scope and scale appropriate for licensing a hydropower project that would be primarily located at Lake Elsinore and San Juan Creek in the City of Lake Elsinore in Riverside County. The Final EIS was issued in January of 2007. Although there is a transmission component of the project, it is considered in the EIS as a hydroelectric project component.

Conclusion - It would not be appropriate to consider the transmission only option until FERC has made a decision on the hydroelectric project.

Serrano/Valley Central 500 kV Full Loop

- Development within this alignment could be inconsistent with LMP desired conditions for the Elsinore Place. Management emphasis within the Place is to preserve the natural appearing skyline and undeveloped quality and character of the mountainous backdrop for the City of Lake Elsinore and surrounding communities. As one of the most visible landscapes within the Forest, LMP Strategy LM-2, Landscape Restoration, identifies Elsinore as a key place for restoration and retention of scenic values.
- The route traverses the following land use zones designated in the LMP; BCNM, BC, and DAI. Development of facilities, roads, and major utility corridors in the BCNM land use zone would be inconsistent with the LMP (Table 2.2.3 Suitable Uses). An LMP amendment would be required to accommodate development of a high voltage electric transmission system in the BCNM land use zone. The mapping also appears to locate a portion of the alignment within the San Mateo Wilderness. Development is not allowed within wilderness areas.
- The alignment appears to cross the Wildomar Off Highway Vehicle recreation area. Location of transmission facilities would likely be non-compatible with this recreation use.
- Nearly all the route is designated with a Scenic Integrity Objective of “High”. This proposal could be inconsistent with LMP Standards; S-9 & S-10 Aesthetic Management. A LMP amendment could be required.
- The route is in close proximity to a popular hang-gliding and paragliding launch site. Construction of high voltage overhead transmission lines would create a safety hazard to the pilots and their passengers.
- This alignment is generally within steep slopes, dense vegetation, and limited access. Introduction of 30 miles of high voltage electrical facilities within the chaparral would

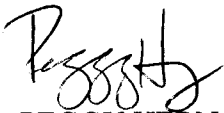
increase wildfire risk, both as a causal source and a hindrance/hazard to aerial and on-the-ground firefighting efforts. Reliability concerns could be an issue due to wildfires in this fire prone area.

Conclusion – The Serrano/Valley Central 500 kV Full Loop is not consistent with many requirements of the LMP. It is unlikely that the LMP consistency would be improved by changes in design, and alignment changes in this area would be difficult. We do not recommend that this alignment be studied in detail.

In summary, we are identifying four alignments on NFS lands (D5 to D25, revised BCD, WF, and Inland) that could be suitable for detailed analysis. All the alignments need some level of modification in alignment or design to better meet our LMP objectives. We have requested Cooperating Agency status and are working with the BLM on an Interagency Agreement so that we can work directly with the CPUC and BLM staff, as this project goes forward.

If you have any questions, please feel free to contact our Forest Lands Specialist, Rich Tobin at this office. His telephone number is (858) 674-2904.

Sincerely,



PEGGY HERNANDEZ
Acting Forest Supervisor

Enclosure

cc: Robert H Hawkins, Thomas F Gillett, Keith W Fletcher, Graciela Terrazas



File Code: 1570

Date: September 22, 2006

Route To:

Subject: District Court Decision in California v. USDA (C05-03508) and Wilderness Society v. USFS (C05-04038)

To: Regional Foresters, Station Directors, Area Director, IITF Director and Deputy Chiefs , WO Staff Directors

The United States District Court for the Northern District of California issued an order on September 20, 2006, in the subject consolidated cases. Plaintiffs in these cases alleged that the Forest Service's adoption of the State Petitions for Inventoried Roadless Area Management Rule (2005 Rule) violated the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). The Court set aside the 2005 Rule, and reinstated the 2001 Roadless Area Conservation Rule (2001 Roadless Rule), including the Tongass Amendment to the 2001 Roadless Rule.

We are actively reviewing this ruling. In the meantime, **the following action must be taken immediately to comply with the Court's order:**

Do not approve any further management activities in inventoried roadless areas that would be prohibited by the 2001 Roadless Rule. Management activities in inventoried roadless areas on the Tongass National Forest shall be consistent with the December 30, 2003, Tongass Amendment to the 2001 Rule.

Please contact Bill Supulski at 202-205-0948 if you have any questions regarding whether an activity would be prohibited by the 2001 Roadless Rule. Additional information will be provided as it becomes available.

/s/ Dale N. Bosworth
DALE N. BOSWORTH
Chief

