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DEPARTMENT OF PLANNING AND LAND USE

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June 29, 2010

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Submitted via email to: mailroom_r5_cleveland@fs.fed.us

COMMENTS ON NOTICE TO PREPARE A SUPPLEMENTAL INFORMATION REPORT

The County of San Diego has received and reviewed the notice for the Supplemental Information Report dated May 15, 2010 and appreciates this opportunity to comment. In response to the document, the County has comments that identify potentially significant environmental issues that may have an affect on the unincorporated lands of San Diego County and the Cleveland National Forest that the County will need to have explored in the environmental document. County Department of Planning and Land Use (DPLU) staff has completed their review and has the following comments regarding the Sunrise Powerlink Project environmental review documents relating to the U.S. Forest Service lands:

GENERAL COMMENTS

1. **Previous Comments** – The County of San Diego has provided a number of comment letters in the past on the Sunrise Powerlink Project Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and, most recently, on the Project Modification Report (PMR). Two of the most recent letters are attached for your consideration. Please see Attachments A and B.

2. **Cultural Resources** – The cultural resource surveys were completed recently after the Final EIR was certified. The Project Modification Report did not include an analysis of the impacts for a determination of significance of the resources. This information is needed to determine whether impacts can be mitigated and to determine whether changes in project design can lessen the impacts.

3. **West-Wide Energy Corridor** – The West-Wide Energy Corridor was created to site large-scale energy transmission facilities. The Bureau of Land Management and the U.S. Forest Service approved the corridor in January 2009. The Forest Service amended their Resource Management Plans (RMP's) to accommodate the corridor. The majority of the corridor proposed for the Sunrise Powerlink does not follow the West-Wide Energy Corridor. Please see Attachment C which shows the West-Wide Energy Corridor and the Sunrise Powerlink alignment on a map that can be enlarged to see greater detail on the PDF file. Since the RMP's have already made the accommodation for the West-Wide Energy Corridor, the cumulative impacts of the two transmission corridors should be assessed. In addition, it is unclear of what becomes of the West-Wide Energy Corridor if the Sunrise Powerlink is built. It would seem to be appropriate to remove one of the corridors to avoid multiple corridors crossing through the communities and natural landscape of San Diego County.

4. **Fire Safety Hazards** – The Final EIR/EIS used GIS modeling to determine the fire hazard areas and estimate the number of homes at risk and the miles of fire containment conflict. The methodologies used in the Final EIR/EIS to determine the fire hazard areas do not reflect an understanding of actual wildfires. The County has done extensive GIS modeling for fire hazards in this area and has verified the modeling with agency representatives from Bureau of Land Management (BLM), CAL FIRE, and local districts during real wildfires. Our modeling of the fire hazards for the Sunrise Powerlink resulted in a much greater area of impact. Therefore, as we have previously commented, the area of impact for wildfire risk is much greater than the environmental documents assumed. This modeling information is available to share with the National Forest. Fire safety is a significant concern within the fire prone landscape the Sunrise Powerlink traverses. The transmission line creates an additional ignition source in this area. In addition, the diminished ability to combat fires by creating an impediment to both air and ground fire fighting capabilities and tactics is a significant concern.

   In addition to modeling the extent of the fire risk, the County also modeled the homes at risk using the same perimeter that the Final EIR/EIS used for the impact analysis. Publicly available information from the County Assessor was used to determine potential homes (single-family and multi-family structures) at risk. According to the modeling, 2,424 homes would be at risk in the area for a 2-burn period, and 2,650 homes for a 4-burn period, instead of the 1,400 homes identified in the PMR on page 3-50 related to ¼ mile distance for noise receptors or the amount tabulated (1,300 to 1,600) from Table D.15-25 of the Final EIR/EIS. Based on the discussion at the fire agency meetings with SDG&E, the PMR should have provided an update to the number of homes at risk based on the most current project alignment. Once that updated number is provided, mitigation measure F-1e should be modified to reflect the corrected number. County GIS staff is available to share data relating to this modeling. In addition to a map showing the location of the homes, a table with the parcels identified is also available.

5. **Visual Impacts** – Impacts to the scenic viewsheds in the backcountry of San Diego County is a major concern for areas such as El Capitan, El Monte Valley, Puetz Valley, Pine Creek Wilderness, Hauser Creek Wilderness, and the areas of public trail access including the Pacific Crest Trail. These are areas that benefit not only the communities in which they are located but also the residents in the region and the economic benefits from eco tourism. The Forest Service has had extensive plans created to manage some of these areas and projects that are proposed need to fit in with the future plans and expected conditions for these areas.

6. **Biological Impacts** – The County views this type of project as a regional biological impact.

   a. The linear transmission corridor cuts across the entire southern backcountry of San Diego creating a three dimensional impediment to wildlife and fire fighting ability.

   b. The County considers the biological impacts to be the entire right-of-way for the easement and all the ancillary uses since the rights gained for the easements would allow clearing of the entire easement area.

   c. The mitigation measures for biological impacts would need to be on a regional scale to begin to off-set the impacts. Small patches of mitigation lands would not be beneficial to the existing Multiple Species Conservation Plans in both the City of San Diego and the County or the County's proposed East County Plan.

   d. The recent PMR concluded there would be impacts to 9 eagle nests but provided no additional information or analysis. This is a significant concern.

7. **Alternatives** – Other feasible project alternatives were presented in the Final EIR/EIS for the project that did not route the transmission line through the Cleveland National Forest. Potential alternative routes should be evaluated when determining necessity to traverse the Cleveland National Forest lands.

8. **Water Supply** – Both the National Forest and the unincorporated area of the County that the project traverses are groundwater dependant areas. The PMR changed the water supply for the project from what was analyzed in the Final EIR/EIS. However, little detail was provided in the PMR for the new water supply and the on-going operations water needs were not considered. Therefore, it remains a concern that groundwater resources could easily be utilized from existing wells on lands purchased for the new facility either during construction or for on-going operations. Please include water supply as a consideration in the Supplemental Information Report.

Based on the comments above and in the attached letters, the County believes that a Supplemental EIS is necessary prior to the Forest Service's decision on this project.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact LeAnn Carmichael at (858) 694-3739 or email at leann.carmichael@sdcounty.ca.gov.

Sincerely,

ERIC GIBSON, Director
Department of Planning and Land Use

Attachment A – Comment Letter on the Project Modification Report
Attachment B – Comment Letter on the Re-circulated EIR
Attachment C – Map of West Wide Energy Corridor and Sunrise Powerlink

cc: Megan Jones, CAO Staff Officer, DCAO, (via email)
Kenneth Brazell, Project Manager, Department of Public Works, (via email)
LeAnn Carmichael, Land Use/Environmental Planning Manager, Department of Planning and Land Use (via email)
Priscilla Jaszkowiak, Administrative Secretary, Department of Planning and Land Use, (via email)