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U.S. Forest Service

POST OFFICE BOX 779
DESCANSO, CA 91916
(619) 659-8962

www.cnff.org

info@cnff.org

August 24, 2015

To: Randy Morre, Regional Forester, USDA Forest Service;

Attn: SDG&E MSUP; 1323 Club Drive, Vallejo, CA 94592

Fax: 707-562-9229

Via E-Mail: objections-pacificsouthwest-regional-office@fs.fed.us

Dear Randy Morre,

The Cleveland National Forest Foundation is a nonprofit group dedicated to preserving the plants, animals and other natural resources of Southern California mountains by protecting the land and water they need to survive. We are writing to object to the Draft Record of Decision issued by Forest Supervisor Will Metz which permits the replacement of electrical lines and poles and upgrade of electrical service on lands within and adjacent to the Cleveland National Forest. The ROD gives two basic reasons for the project: to continue SDG&E's electrical service and to reduce fire risks within the Cleveland National Forest.

The immediate problem with these two reasons for the project is that they are rendered mostly meaningless when compared with the mission of the Forest Service, which "is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations." As we will document below, the real dangers facing the forest are urban development within its boundaries and urban pressures from without as recognized by the Forest Management Plan. Additionally, the threat of drought and climate change places ever increasing burdens on the forest and elevates the importance of protecting California's dwindling wilderness resources. Reading through the narrative of the



SDG&E power project one is impressed by the cavalier disregard of the forest and wilderness setting of this project. In fact a fourfold increase in power transmission increases the technical/industrial dangers to the forest and we believe, therefore, that alternatives must be developed to avoid these dangers and better serve the mission of the forest service.

Located within the central area of the Peninsular Range Ecosystem, the importance of habitat value of the Cleveland National Forest is illustrated in this recent settlement agreement with the Center for Biological Diversity to establish new Wilderness areas in the forest. “The Forest now has new areas managed as wilderness, which is the highest level of protection that the Forest Service can provide and especially important in this highly developed Region,”¹ said Cleveland Forest Supervisor Will Metz. These brief descriptions about the value of the forest illustrate that in the age of climate change and historic drought the overarching purpose of any infrastructure project within the Cleveland Forest is to serve the needs and purpose of the forest and not vice versa. Nowhere do we find in the ROD how this statement about the critical nature of wilderness preservation aligns with the rationale for increasing and improving electrical service in the forest.

In Southern California it is apparent that the greatest danger to our local forest is urban development and not the threat of fire. The unique system of meadowlands that characterize the biological heart of our forest also happen to be privately owned and threatened by development. These facts are documented in detail by past forest supervisors Gallegos and Rogers. Speaking of private inholdings in the forest, Rogers states, “development of these properties is not an answer that San Diego’s indigenous wildlife can live with. There is no way that the current configuration of Cleveland National Forest Lands can provide all the habitat requirements for San Diego County’s remaining wildlife populations.”² Gallegos goes on to cite specific ranches that are vulnerable to development and how their loss would degrade the biodiversity and ecosystem functions of the forest. In their letters, the former supervisors have gone to great lengths to explain how fragile and unique this Forest is in Southern California and how vulnerable it is to urban development.³ In the light of this expert

¹ <http://www.fs.usda.gov/detailfull/cleveland/home/?cid=stelprd3821693&width=full>

² https://d3n8a8pro7vnm.cloudfront.net/transitsandiego/pages/18/attachments/original/1440440771/Forest_Supervisor_Letters-Importance_of_Inholdings.pdf?1440440771

³ https://d3n8a8pro7vnm.cloudfront.net/transitsandiego/pages/18/attachments/original/1440440771/Forest_Supervisor_Letters-Importance_of_Inholdings.pdf?1440440771



testimony, the so-called purpose of increasing electrical service in the forest becomes highly questionable and therefore raises the question again about the mission of the forest service: is it to provide energy for urban uses in and around the forest, or is it rather to serve the people by protecting the land? In 1993 the people responded to the concerns of Supervisors Rogers and Gallegos by passing the Forest Conservation Initiative which restricted urban development on private inholdings outside the country towns, and thus for the succeeding two decades, protected the forest.⁴

Instead of mentioning the threat of urban growth within the forest, the ROD stresses the danger that fire poses to the forest. This statement contravenes the facts. If forest officials were truly concerned about the danger of fire to forest habitat they would give serious consideration to prohibiting hunting since two of the greatest fires in California history, along with many others, were started by hunters- the Cedar fire and the Rim fire. The Cedar fire, started by a hunter in the forest near Julian, scorched 280,278 acres of land in and around the Cleveland Forest, killed 14 people and destroyed 2,232 homes.⁵ As documented by the National Park Service “as many as 90 percent of wildland fires in the United States are caused by humans. Some human-caused fires result from campfires left unattended, the burning of debris, negligently discarded cigarettes and intentional acts of arson.”⁶ Despite this inconvenient truth regarding the real causes of fire, both SDG&E and Forest Supervisor Metz claim reduction of fire risk as the main purpose of the project. There is little evidence to support this conclusion.

As amply documented above by former Forest Supervisors Rogers and Gallegos the truth is that the real danger to the Cleveland Forest is development, not the fleeting risk of fire. As Gallegos points out, “Studies have shown that along with increases in human population come increased fire frequencies” (Gallegos). With this in mind it is understandable why the former Forest Supervisors are so concerned about the status of the private inholdings. For the simple reason that the forest can survive fire but can never recover from urban development.

⁴https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0CCUQFjABahUKEwih092AosLHAhVBLYgKHUD3AP4&url=http%3A%2F%2Fwww.sandiegocounty.gov%2Fcontent%2Fdam%2Fsdcm%2Fpds%2Fgupdate%2Fdocs%2FGP%2FFCIAppendix.pdf&ei=QFfbVaGzDMHaoATA7oPwDw&usg=AFQjCNGHdCHmtH9nFEg0_mj6XierAN_Xtg&cad=rja

⁵http://www.fire.ca.gov/cdf/incidents/Cedar%20Fire_120/incident_info.html

⁶<http://www.nps.gov/fire/wildland-fire/learning-center/fire-in-depth/wildfire-causes.cfm>



On top of the highly questionable idea that a power line upgrade will protect the forest from fire, the power transmission project itself entails the intrusion of a massive armada of equipment and personnel into the forest and wilderness areas which are so highly prized by forest officials. A dramatic illustration of this intrusion is documented in the pole replacement activity in the Sweetwater River meadow along Riverside Drive in Descanso, a forest inholding. Into this meadow came a massive construction operation involving drilling, generators, jackhammers, heavy equipment, cranes and trucks coming and going simply to “fire harden” the power lines running through Descanso. This invasion lasted over one month. Could anyone seriously conclude that this same destructive activity marching through our delicate wilderness would be a benefit to the forest?



If the fire danger argument is misleading and we don't need to invade the forest with heavy equipment to prevent an exaggerated threat or danger, then we must ask again, what is the purpose of this project?

We are told that the Project supplements the transmission of the region's existing energy supply with a “fourfold increase in the conductor's ability to move energy” (DEIR at G-3). The problem is, this fourfold increase clearly has the potential to serve new growth in and around the forest.

Growth in San Diego's backcountry cannot occur without energy to fuel, light, warm and cool new homes. For example, the proposed 1,746-unit Accretive/Lilac Hills project and the 430-unit Castlerock project will be served by energy from the grid—not from individual generators. In this case, SDG&E's pole replacement and power upgrade project actually extends to places far afield from the forest such as the Rincon Substation which is located on Valley Center Road serving an area completely outside of forest lands. In addition, the County is considering an amendment to the County General Plan that would dramatically "upzone" certain private inholdings in the Cleveland National Forest. The county's proposed amendment to the Forest Conservation Initiative would redesignate land to accommodate an additional 2,893 dwelling units in Alpine (Staff Recommendation), many of which would be served by energy from the grid transmitted through local substations. There are 12 substations to deliver electricity throughout the project area. But again we must remind ourselves of the nature of the project area: it is an islandized wilderness with less than 5000 residents mainly concentrated in small country villages such as Pine Valley, Guatay, and Descanso. Why, to serve so few costumers, should SDG&E regional rate payers subsidize this massive half billion dollar invasion into the forest when a majority of those same rate payers voted to protect the forest when they passed the FCI?

As an example of the invasion of the project into sensitive forest areas the Record of Decision lists three conflicts that would need to be resolved through a forest plan amendment (ROD p. 4). Even assuming that there are some situations where exceptions might be warranted, this is not one of them. SDG&E has not shown that less impactful alternatives such as the microgrid or distributed generation systems are not feasible which is especially perplexing considering the fact that a microgrid solution would cost half as much as the proposed project. Nor has it shown that the "increased vegetation management alternative" is infeasible (FEIR p. C-20). In fact, it has proposed a mitigation measure requiring development of a plan for increased vegetation management (MM FF-1). When a problem presented itself in the Boulder Creek area SDG&E proposed an off-grid solution to service a customer with photovoltaic panels (FEIR p. C-7). This particular off-grid solution raises the question of why SDG&E has not analyzed a microgrid alternative for the entire project when it is well known that such projects are being built throughout rural lands in



America.⁷ Here SDG&E has the opportunity to look at successful solutions like the microgrid system in Borrego Springs and new battery technologies to tie together a sustainable alternative that would serve the purpose of the project with a much reduced environmental impact.^{8,9}

One of those significant impacts that the Forest Service recognizes is that utility corridors themselves are a “significant challenge” to wilderness landscapes (CNF LMP p. 11). In our previous comments on the DEIR we have given ample evidence that this significant challenge is avoidable. Power lines are rarely the cause of wildfires and the few fires in the forest that were linked to power line ignitions were because SDG&E was out of compliance with GO 95, Rule 31.1. (EIR D.8-7). This rule requires that design, construction, and maintenance should be done in accordance with “accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.” Furthermore, even after completion of this half a billion dollar project, the EIR concedes that SDG&E will need to comply with GO 95 and perform vegetation management in accordance with accepted good practice to achieve overall risk reduction (EIR D.8-47).

What is missing in all these project details and from the project description is the condition of the forest itself. It is in decline. The umbrella species such as deer and mountain lion are disappearing. Over time the land area of the forest has diminished from 2 million acres to 600,000 acres that are now islandized in three Counties.¹⁰ Our section of the Cleveland Forest is in a region that is considered to be the endangered species capital of the nation. “San Diego County shelters approximately 200 imperiled plants and animals—more than in any other county in the nation.”¹¹ In the 120 years since the National Forest System was established there have been continuous losses in the Cleveland Forest. “First lost were the California Grizzly Bear (1908), Long Eared Kit Fox (1931), and California Condor (1933). The last Pronghorn were recorded at Campo in 1922, though some ranchers remember barbecuing antelope just before the 1940's

⁷ <http://energypolicyupdate.blogspot.com/2012/01/park-and-forest-service-renewable.html>

⁸ <http://www.utilitydive.com/news/inside-the-nations-first-renewables-plus-storage-microgrid/401476/>

⁹ <http://www.teslamotors.com/powerwall>

¹⁰ <http://www.cnff.org/coverage.html>

¹¹ <http://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/california/placesweprotect/san-diego-county.xml>



from the San Felipe Valley near Lake Henshaw.”¹² This short history should alert us to the fact that what we have left of our forest is beyond precious and it is our duty to protect it.

In summary, we reiterate that essential questions have been left unanswered by both forest and energy officials in their support of this project: does the power project advance forest preservation or does it serve as a catalyst for future population growth and forest degradation? While the ROD is commendable in some respects for protecting small parts of the Forest, the project as a whole represents a continued threat to the viability of the Forest. Have less intrusive alternatives to the project been properly considered and evaluated? In all essential details the forest area matches perfectly the conditions for microgrid services that are being installed throughout the nation. It is an islandized rugged area with relatively few customers. Finally, given that it is urbanization of wilderness, not fire, that is the real threat facing our forest, we believe that the ROD arbitrarily dismisses the microgrid alternative. For the foregoing reasons, CNFF urges the Forest Service to reconsider the Draft Record of Decision.

As always, please contact me if you require any additional elaboration or clarification of our position and arguments.

Sincerely,

Duncan McFetridge



Executive Director
Cleveland National Forest Foundation

¹² <http://www.cnff.org/documents/range.pdf>

