

## Energy - Docket Optical System

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**From:** Cindy Buxton [iokuok2@hotmail.com]  
**Sent:** Wednesday, October 22, 2014 1:47 PM  
**To:** Energy - Docket Optical System  
**Cc:** Debbie H; Molly Bigger; Will Metz; jaheys@fs.fed.us; donna tisdate1; Terry Weiner; Bill Powers; Kelly Fuller; Nick Ervin; Vicky Hoover; Joyce Burk; Nathan Weflen; Bill Corcoran; Don Christiansen  
**Subject:** DRECP NEPA/CEQA

Dear DRECP,

This will likely not be my only comment letter. I chair the Forest Committee for Sierra Club San Diego. I will not be stating a position for our organization in this letter. I do not know yet if our organization will state a position but I do think it is likely. My intention in this communication is to clarify what I believe is an error in the data on your maps.

Upon first review of the maps containing options for this project it is obvious to me that you do not have the latest information in creating these. Indeed these could be based on land information as much as 10 years old. Please note that you do not delineate Federally protected Wilderness areas on your maps. You are only using "inventoried Roadless areas", or "IRA" but not noting wilderness or recommended wilderness areas. These areas are intended to be set aside for perpetuity and maintain one of the highest standards of protection in our country for their scenic integrity and unique natural resource values. Their protection ellipses any IRA designation.

Furthermore there has long been the misconception that Ira's begat wilderness or one implies the potential or lineage of the other. This is totally false. IRA, though formidably protective in of itself, is a very different status than wilderness. IRA or non IRA does not preclude the addition of environmental data that must receive a "hard look" once it has been identified. The USFS, under the Department of Agriculture, evaluates lands according to their NFMA, National Forest Management Act, which includes wilderness evaluation. The BLM, under the Department of the Interior, evaluates lands according to the FLPMA.

All of that being said please note the areas you have marked as IRA, No Name, Sill Hill, Eagle Peak, Barker Valley, Caliente. These are now promoted to recommended wilderness status. Additionally the San Diego River Gorge and Cedar Gorge are also in recommended wilderness status. All of these were additionally submitted to congress by Senator Boxer for wilderness protection in the last 15 years, three times. The latter two units were not in IRA status because they were acquired by the USFS after the RAREII inventories for IRA's barely in time for the original 15 year plan necessitating some original assessments as defaulted estimates with insufficient time for the prior management to evaluate.

I know these areas, foot to the ground and many times over, in the greater Eagle Peak Proposed Collection of five wilderness areas, or units, as well as anyone I can name. Their qualities are not only unique and pristine but in many cases nearly primordial. I have thousands of photos of these areas as well as considerable video and many eye witnesses of them; all have been made available to the USFS. These have now undergone the lengthy NEPA process to acquire this new elevated status. Please consult the USFS Cleveland National Forest Management and provide the correct status to these areas before encumbering more agency and public time and resources to evaluate them in perspective to this project. There may be other areas as well and the Cleveland can clarify the latest data for you. One area in particular is the Hauser IRA that DOES appear in the original LMP but no longer appears there. I do not know why nor recall this change in any commenting DEIS document or Forest Service sopa (Schedule of Proposed Actions). I can attest that it does contain notable wild and unique character and resource values as well as the adjacent BLM areas that would be impacted by an additional 500 kv line through the general McAlmond Canyon area south of Hauser Canyon where the Sunrise Powerlink was strung.

I believe this process would benefit by additional public open houses as soon as the public has the time to better review these materials. The upcoming holiday season is additionally of concern in the public ability to evaluate lengthy documentation of an enormous project. We did not have sufficient notice before the last ones. Please consider a follow-up meeting series in December or January before the deadline. The deadline would well be served by moving it out a

month to February. I have seen indications among other persons concerned about the environmental impacts to indicate that an extension is warranted. This is a huge collection of potential projects and the time and effort dedicated now will be a solid investment in preventing delays and public resource issues later.

Sincerely,  
Cindy Buxton  
Chair, Forest Committee, Sierra Club, San Diego