



July 10, 2006

Ms. Julia Souder
U.S. Department of Energy
Office of Electricity, Delivery, and Energy Reliability
Room 8H-033
1000 Independence Avenue, S.W.
Washington, DC 20585

RE: Preliminary Draft Map of Potential Energy Corridors on Federal Lands Related to the Programmatic Environmental Impact Statement for the "Designation of Energy Corridors on Federal Lands in the 11 Western States"

Dear Ms. Souder:

The California Department of Parks and Recreation (California State Parks) welcomes the opportunity to comment on the Preliminary Draft Map of Potential Energy Corridors on Federal Lands as it relates to the Programmatic Environmental Impact Statement (PEIS) for the "Designation of Energy Corridors on Federal Lands in the 11 Western States" (West-wide Energy Corridor). California State Parks is a state agency with jurisdiction and management of the State Park System as defined by California Public Resources Code (PRC) § 5001 through 5001.5 and § 5019.50. We are, therefore, responsible for the resources that may be affected by the West-wide Energy Corridor PEIS as they exist within units of the State Park System (SPS).

The mission of California State Parks is to provide for the health, inspiration, and education of the people of California by helping preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation. The 1.4 million-acre California State Park System for which we are responsible is currently made up of 278 classified and several major unclassified units. Unit classifications, in addition to State Parks, include State Recreation Areas, State Beaches, State Historic Parks, State Vehicular Recreation Areas, State Reserves, Natural Preserves, Cultural Preserves, and State Wilderness. The management approach for any particular unit is based on the unit classification statutes as specified in PRC § 5019.50 through 5019.74 and specific direction provided in each unit's general plan. These statutes set forth the primary purpose of each classified unit, identify in general what types of facilities and uses may be permitted, and provide direction on how unit resources shall be managed.

California State Parks sent a letter dated November 23, 2005 (November 2005 letter) to the co-lead agencies in response to the Notice of Intent (NOI) for the West-wide Energy Corridor PEIS. Please refer to the November 2005 letter for general information about potential impacts to SPS units, including departmental planning

efforts, site-specific and landscape level effects, and environmental justice issues. In the letter, we also requested that the co-lead agencies provide a California map of existing and proposed corridors. The purpose of requesting a detailed map was so that California State Parks resource specialists could adequately analyze potential impacts of the proposed *Increased Utilization Alternative* and *New Corridor Alternative* described in the NOI. The California map currently posted on the federal website, <http://corridoreis.anl.gov/>, does not illustrate existing and proposed new corridors from sites of generation to points of local distribution, as was requested, and thus the map is insufficient. The black solid and dotted lines designating "potential energy corridors" are difficult to see on this map, in some regions being obscured by other map features. Furthermore, public and private non-profit protected lands are not shown with enough resolution for analysis of potential landscape level impacts. Without a map that contains complete, clearly drawn corridors and other meaningful features, California State Parks remains unable to provide the co-lead agencies with a thorough and meaningful analysis of potential impacts to units of the State Park System.

In December 2005, California State Parks provided up-to-date electronic GIS data of the 278 SPS units to the California Energy Commission, the agency representing California in the PEIS effort. We provided the data to advance efforts to avoid or minimize impacts in the vicinity of SPS units. At this time and in order to fully assess potential impacts to the State Park System, we urge the co-lead agencies to provide electronic GIS map data of existing and proposed energy corridors in California. In addition, we request associated GIS descriptive information for transmission lines, pipelines, power plants, substations, and other pertinent energy infrastructure that may be upgraded as a direct or indirect result of the *Increased Utilization Alternative* or *New Corridor Alternative*. This data will allow California State Parks to effectively assess the potential direct, indirect, and cumulative impacts to SPS units on a statewide level.

We believe that the current map does not reflect the level of analysis being undertaken by the co-lead agencies; a map with relevant detail is needed because of impacts likely to result from the *Increased Utilization Alternative* or the *New Corridor Alternative*. As stated in our November 2005 letter, implementation of either of these alternatives may affect SPS units beyond impacts related to current operation levels. Impacts of expanded use or of newly developed corridors would likely occur to a unit under the conditions established by two situations. First, a unit may be impacted by energy transmission activities if it is adjacent to, or surrounded by, federal lands with existing energy corridors nearby or with land being studied for new corridors by federal agencies. Second, a unit may not be directly adjacent to federal lands proposed for expanded or new use, but still may experience significant impacts. In this situation, a decision to expand use along existing corridors or designate new corridors on federal lands will generate the need to upgrade or create new corridors on non-federal lands to maintain system integrity and capacity. Reasonably foreseeable actions include

development by public and private entities at sites of energy generation and distribution, as well as other related activities, that will incrementally impact the environment along an entire transmission route. The second situation demonstrates that a currently undeterminable number of SPS units will be subject to indirect and cumulative impacts from West-wide Energy Corridor activities. For this reason, potential impacts to units distant from federal lands should be addressed in the PEIS.

Examples of SPS units that may be impacted under these two situations are listed below. Neither list is exhaustive, but each shows units that may be affected by actions described in the proposed alternatives. When a project map with adequate detail is provided, California State Parks will be able to refine these lists and provide specific information about potential direct, indirect, and cumulative impacts to relevant units.

1. First Situation

Using the current on-line map, Departmental staff prepared a list of SPS units that are likely to experience impacts by energy transmission corridors related to the PEIS. The black solid and dotted lines on the map indicate that these units may be impacted by energy corridors under study by nature of their proximity. Inclusion on the list was determined by whether units are adjacent to, surrounded by, or relatively close to federal lands with designated energy corridors.

- Ahjumawi Lava Springs State Park (Shasta County)
- McArthur-Burney Falls Memorial State Park (Shasta County)
- Grizzly Creek Redwoods State Park (Humboldt County)
- Donner Memorial State Park (Placer and Nevada Counties)
- Red Rock Canyon State Park (Kern County)
- Tomo-Kahni State Historic Park (Kern County)
- Saddleback Butte State Park (Los Angeles County)
- Providence Mountains State Recreation Area (San Bernardino County)
- Silverwood Lake State Recreation Area (San Bernardino County)
- Mount San Jacinto State Park (Riverside County)
- Indio Hills Palms property (Riverside County)
- Anza-Borrego Desert State Park (Riverside, San Diego, and Imperial Counties)
- Heber Dunes State Vehicular Recreation Area (Imperial County)

2. Second Situation

The units on this list are not necessarily adjacent to federal lands, but are still likely to experience significant indirect and cumulative impacts from federal actions related to the PEIS. Energy corridors that are not on federal lands,

but are or will be connected to energy infrastructure on federal lands, do occur within, adjacent to, or in the vicinity of many SPS units.

- Jedediah Smith Redwoods State Park (Del Norte County)
- Lake Oroville State Recreation Area (Butte County)
- Clay Pit State Vehicular Recreation Area (Butte County)
- Sutter Buttes State Park (Sutter County)
- Sugarloaf Ridge State Park (Sonoma County)
- Annadel State Park (Sonoma County)
- Jack London State Historic Park (Sonoma County)
- Auburn State Recreation Area (El Dorado and Placer Counties)
- Folsom State Recreation Area (El Dorado and Sacramento Counties)
- Washoe Meadows State Park (El Dorado County)
- Lake Valley State Recreation Area (El Dorado County)
- Mono Lake Tufa Reserve (Mono County)
- Brannan Island State Recreation Area (Sacramento County)
- Mount Diablo State Park (Contra Costa County)
- Carnegie State Vehicular Recreation Area (Alameda and San Joaquin Counties)
- Lake Del Valle State Recreation Area (Alameda County)
- Henry W. Coe State Park (Santa Clara and Stanislaus Counties)
- San Luis Reservoir State Recreation Area (Merced County)
- Pacheco State Park (Merced County)
- Millerton State Recreation Area (Madera and Fresno Counties)
- Morro Bay State Park (San Luis Obispo County)
- Montaña De Oro State Park (San Luis Obispo County)
- Oceano Dunes State Vehicular Recreation Area (San Luis Obispo County)
- Gaviota State Park (Santa Barbara County)
- Refugio State Beach (Santa Barbara County)
- Colonel Allensworth State Historic Park (Tulare County)
- Tule Elk State Reserve (Kern County)
- Hungry Valley State Vehicular Recreation Area (Los Angeles and Ventura Counties)
- Antelope Valley California Poppy Reserve (Los Angeles County)
- Castaic Lake State Recreation Area (Los Angeles County)
- Topanga State Park (Los Angeles County)
- Salton Sea State Recreation Area (Imperial and Riverside Counties)

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In summary, access to existing and proposed energy corridor maps is imperative for us to assess potential impacts to the State Park System. At this time and as the release of the PEIS draws near, we request that you consider providing our resource specialists with electronic GIS data as soon as possible.

If any of our current comments need clarification or further explanation please do not hesitate to contact Heidi West at (916) 653-0578 or hwest@parks.ca.gov.

Sincerely,



Richard Rayburn,
Chief
Natural Resources Division

cc: Resources Agency
State Clearinghouse
James Bartridge, Transmission Specialist, California Energy Commission