



State of California • The Resources Agency

Arnold Schwarzenegger, Governor

DEPARTMENT OF PARKS AND RECREATION • P.O. Box 942896 • Sacramento, CA 94296-0001

Ruth Coleman, Director

0053

November 23, 2005

Ms. Julia Souder
U.S. Department of Energy
Office of Electricity, Delivery, and Energy Reliability
1000 Independence Avenue, SW
Washington, DC 20585

RE: Notice of Intent to Prepare a 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 Notice of Intent to prepare a 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 units and major unclassified properties. Unit classifications, in addition to State Parks, include State Recreation Area, State Beach, State Historic Park, State Vehicular Recreation Area, State Reserve, Natural Preserve, Cultural Preserve, 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. The 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.

At this time, California State Parks is unable to identify specific SPS units that may be impacted directly, indirectly, and cumulatively by the West-wide Energy Corridor proposal and subsequent related activities because the location of existing and proposed new corridors in relation to SPS units cannot be determined. We request, therefore, that California maps of existing and proposed corridors be made available so that we can provide you with information about potential impacts to the California State Park System. The maps should illustrate existing and proposed new corridors between sites of generation to points of local distribution.

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California State Parks is concerned that, with the adoption of one of the proposed alternatives, action would result in irreversible damage to the scenic, historic, and natural resources of the SPS. Based on descriptions in the Notice of Intent, the *Increased Utilization Alternative* and the *New Corridor Alternative* may impact SPS units beyond impacts related to current operation levels. Impacts of multiple-use or new activity would likely occur to an SPS unit under the conditions established by two scenarios. First, a unit may be impacted by energy transmission activities if it is adjacent to, or surrounded by, federal lands with existing proximate corridors or with land being studied for new corridors. Second, a unit may not be directly adjacent to federal lands, but still experience significant indirect and cumulative impacts. In this scenario, a decision to create multiple-use corridors or new corridors on federal land will generate the need to upgrade or create new corridors on non-federal lands to maintain system integrity and capacity. If an SPS unit is near an exiting transmission corridor that transects federal lands at a distant location, the SPS unit will likely still be affected by the need to create increased or multiple-use capacity along the entire route from point of energy generation to point of local energy distribution. If new corridors will be proposed on federal lands, California State Parks also requests that any need to connect them to new or existing corridors on non-federal lands be addressed in the Draft PEIS. This may include activities by private and regional public entities at sites of energy generation and distribution, as well as other reasonably foreseeable actions, that will incrementally contribute to cumulative impacts. Access to existing and proposed energy corridor maps would be especially useful to assess these issues.

Potential effects of the proposed action that particularly concern us include, but are not limited to, the following planning documents, processes, and resource values. Please consider these issues during your planning efforts and in preparation of the Draft PEIS.

SPS Unit/Subunit Classifications, General Plans, and Additional Planning Efforts:

As described above, SPS units and subunits are managed according to their classification. The California PRC determines the general types of uses that may occur within each unit depending on its classification. For example, the State Wilderness, Natural Preserve, and Natural Reserve classifications afford a higher level of protection of natural resources compared to other classifications and a State Historic Park and Cultural Preserve are managed to maintain the integrity of their cultural resource values. Generally, California State Parks has intentionally not developed modern infrastructure in units classified with higher natural and cultural resource values unless the technology improves management and preservation of the resources contained within those units.

SPS units are operated according to their individual general planning documents (PCR § 5002.2). A general plan is a formal land-use planning document that provides broad policy and programmatic guidance regarding the development and management

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of an individual unit of the State Park System, including natural, cultural, scenic, aesthetic, and recreation values. The guidance from these planning documents is essential to California State Parks' managers and staff, and is of value to those organizations and individuals who have a substantial interest in the State Park System and its individual units. We request that direct, indirect, and cumulative impacts to SPS unit long-range planning, management, and development be considered. The Draft PEIS should also explain any conflicts and proposed resolutions to impacts related to California State Parks planning documents.

Another component of the California State Parks planning is the ongoing effort to acquire new properties to add to existing units and to establish entirely new park units. Therefore, new properties have the potential of being impacted by proposed actions if not considered during the time the PEIS is being prepared. Thus, we urge DOE and BLM to consult with us throughout environmental review and future project development processes regarding our long-range planning processes and ongoing acquisition efforts.

Recreation:

In addition to reduction in SPS unit and adjacent open space lands, potential impacts to SPS units may include deterioration of the natural, cultural, and aesthetic resource values. Long, linear corridors of energy transmission infrastructure may also parallel or transect recreational trail systems that are regional or statewide in scope and which link public lands and open space under multiple jurisdictions. Subsequently, impacts to these resources would lead to the decline in the recreational experience of park visitors and have potential economic impacts because of a decrease in recreation-generated revenues like equipment, fees, and services. The proposed project has the potential to result in direct physical and reasonably foreseeable indirect and cumulative changes in the recreation environment, especially in rural areas where many of California's state parks, National Park Service, U.S. Forest Service, and Bureau of Land Management units occur. We refer DOE and BLM to the statewide recreation plans such as California Outdoor Recreation Plan and the California Recreational Trails Plan.

Natural Resources:

California State Parks manages biological resources at each SPS unit to protect the natural and sustainable function of ecosystems, as well as sensitive resources. Construction and ongoing management activities associated with the *Increased Utilization Alternative* and the *New Corridor Alternative* are likely to impact natural resources, such as biological, geological and soil, paleontological, hydrologic, water and air quality values. Impacts of such large scale actions realistically would encompass landscape-level resources such as watersheds and wildlife corridors, thus impacting areas that may include multiple SPS units, even if the units are not transected or immediately adjacent to a corridor. Consequently, it is critical for the Draft PEIS to develop alternatives that avoid direct and indirect impacts to units of the SPS and other critical publicly and privately protected conservation lands in order to avoid habitat

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fragmentation and degradation. Following are impacts and concerns that may arise.

- Loss of habitat along energy corridor alignments, construction staging areas, and associated permanent support facilities and infrastructure;
- The general impact and scale of construction and earthmoving activities as these relate to disruption of vegetative cover, introduction of plant exotic invasive species, compacted soils, access roads, disturbed surfaces, erosion, sedimentation of waterways, hazardous materials and the long-term effects of such disturbance;
- Transection of riparian areas and wetlands and related impacts to wildlife, including but not limited to special-status species;
- Impacts to unique and aesthetically beautiful geological formations, as well as those of scientific interest, energy value, and related to hazardous geological areas, unstable soils, and fault areas;
- The impact of support facilities and infrastructure like those used for access, operations, and maintenance;
- Disruption of regional wildlife movement by linear corridors with the physical nature of the infrastructure, including any need for fencing, presenting a barrier to wildlife;
- The impact of light pollution, such as night lighting for construction activities and permanent lighting of permanent infrastructure and facilities;
- In the case of improved or new electrical transmission corridors, Impacts of electromagnetic fields (EMF) on wildlife movement and migration;
- Impacts to paleontological resources, which are as a rule rare even in areas of high local density since new unique discoveries are still being made.

Cultural Resources:

Construction activities for the *Increased Utilization Alternative* and the *New Corridor Alternative* will result in infrastructure removal, consolidation, and new facility development, as well as increased need for operations and maintenance. These activities have the potential to disturb, degrade, or damage archaeological sites, buried archaeological remains, historic structures or features, cultural landscapes, or sacred sites of significance to California State Parks and to the history of the State of California. We urge protection of archaeological and historical resources within, adjacent to, and in the vicinity of SPS units that may be pertinent to interpretation of cultural resource values. Protections, such as avoidance and minimization measures, identification, and interpretation should be addressed in the Draft PEIS. Along with the need for research and surveys prior to site-specific studies, we urge DOE and BLM to commit that any new facilities will be designed and constructed to avoid archaeological remains to the greatest extent practicable. If unavoidable, an appropriate recovery plan should be considered and if remains are found during construction, work should be stopped for recordation, determinations, and development of a protection plan. In addition, all

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historical resources should be mapped, recorded, and evaluated to determine eligibility for placement on the National Register of Historic Places. Projects should be designed to avoid significant impacts to potentially eligible historic resources.

Environmental Justice

The California State Park System contains park units that have special significance to minority and low-income populations. Several of these units also are named and classified for their historical importance and the presence of multiple-use or new energy corridors in view of these units would be a severe impact on their viewsheds and the interpretation of their value to California and the nation. Early planning efforts are necessary to avoid proximity to units serving high proportions of low-income populations or that represent significant achievements by minorities.

In summary, California State Parks urges DOE and BLM to avoid direct, indirect, and cumulative impacts to units of the California State Park System with careful planning during the PEIS process. Detailed study and analysis will also be necessary for any site-specific environmental documents prepared in relation to the West-wide Energy Corridor PEIS. Impacts to California State Parks as a result of adoption of a proposed action and preparation of a Record of Decision require full and timely mitigation for natural, cultural, and aesthetic resources, and effects to recreation prior to project commencement. With that said, it is important that DOE and BLM make particular efforts to consult with this Department throughout future environmental review and project development processes.

As this proposed action proceeds through the environmental review process, we anticipate that we will be able to further identify issues and possibly bring others to your attention. If any of our current comments need clarification or further explanation please do not hesitate to contact me at (916) 653-0578 or hwest@parks.ca.gov.

Sincerely,



Heidi West
Natural Resources Division

cc: Resources Agency
James Bartridge, Transmission Specialist, California Energy Commission
Rick LeFlore, Superintendent IV, California State Parks,
Off Highway Vehicles Division
Mark Jorgensen, Superintendent III, California State Parks,
Colorado Desert District