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 San Diego Gas and Electric Company

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D.2	85 & Table D.2-7 pp. 85-87;	1st on p.85	Similarly, there is no data to support the assumption that there is not enough mitigation land to mitigate all communities in-kind. Of the approximately 50 different vegetation communities listed in Table D.2-7, only four communities, Sonoran creosote bush scrub (approximately 700 acres), northern mixed granitic chaparral (116 acres), coast live oak woodland (88 acres) and Engelmann oak woodland (56 acres) have offsite mitigation requirements greater than 50 acres. These are still relatively common communities in San Diego. Mitigation sites should be available for these. All of the remaining community mitigation requirements are under 50 acres each. It is reasonable to assume that 50 acres of in-kind replacement habitat can be found for each of these communities within close proximity to the project site. With the exception of the desert communities, many of the remaining mitigation requirements could be feasibly fulfilled with the acquisition of 1-2 high quality properties. The desert habitats may require more properties, but given the extensive expanses of many of these
			habitats, and the checkerboard land ownership pattern of public and private lands along or in the immediate vicinity of the Proposed Project, (ABDSP actively acquires minor and major in-holdings) it is reasonable to assume that adequate lands are available for mitigation that would mitigate both in-kind (capturing high amounts of both floristic and genetic diversity of the impacted communities) and in reasonable distance from the impacts.

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Chapter #	Page #	Paragraph #	Comment
	85 & Table D.2-7 pp. 85-87;	1st on p.85	<p>Because this is a long-linear project, the impacts and mitigation requirements (1,360 acres) are also spread out over the 150 miles so that the mitigation requirement would be relatively small in any geographic area. However, the type of mitigation that would result from the logic presented in the DEIR/EIS (depending on what exactly "close proximity" means) could result in the type of mitigation, i.e., postage stamp preserves, that are no longer acceptable as likely more, smaller properties would be required the "closer" the distance restriction. There is no data given to determine what "close proximity" for the distance between mitigation lands and project impacts should be. Floristic and genetic composition vary over gradients, yet studies on the vegetation communities and their representative species of concern are either lacking or scant at best. Any qualitative estimate on "close proximity" even the intuitive axiom "closer is better" is still highly speculative in the absence of data. Instead of making "close proximity" a high priority (i.e. a Class I impact if</p>
			<p>not met), which may result in over valuing lower quality habitats, the highest priority should be given to the acquisition of high quality habitats, within the County, that preserve significant biological resources that would be impacted by the project, but could also provide important additions to existing preserve system(s). The off-site acquisition of 1,360 acres of high quality habitat that meets these criteria would mitigate the impacts to sensitive vegetation from the Proposed Project to a Class II.</p>

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D.2	85	3	The DEIR/EIS states that "Much of the western end of the project route extends through the MSCP area, where mitigation ratios vary depending on the location of the impact and the location of the mitigation. In this case mitigation ratios are conservatively calculated based on an assumption that all impacts occur in preserve areas and that all mitigation will occur in preserve areas. The assumption that all impacts will occur in preserve areas is conservative since all impacts will not occur there, but the higher ratios are being used to help offset the impacts to the preserves that regional conservation plans rely on." This is disproportional mitigation. The project route was known, the MSCP preserve areas have boundaries, this project shouldn't have to mitigate for impacts outside of the preserve as if they were inside the preserve just because there are impacts elsewhere, inside the preserve. That is why there are different ratios for the location of impacts.
D.2	82	1	The DEIR/EIS states that for the Proposed Project "The loss and trimming of this large number of native trees is considered significant impacts that would not be mitigable to less than significant levels (Class I) because adequate mitigation land required for Mitigation Measure B-1a for restoration and/or acquisition may not be available." See Comments above regarding availability of mitigation land.
D.2	82	2	The DEIR/EIS states that "If the project were to cause a fire or inhibit fighting of fires and this leads to type conversion of sensitive vegetation communities, the impact would be significant (Class I) according to Significance Criteria 1 ....and/or 2". These significance criteria do not define why such an impact is a Class I. Vegetation type conversion occurs as the result in an increase in frequency and sometime intensity of fires, primarily due to changes in land use at the landscape level. So there are a lot of contributing factors to setting the stage for type conversion. Type conversion in southern California cannot be attributable to a single fire event, as previous fire history and land use both at the landscape level are just as much contributing factors. The analysis does not attempt to provide any threshold level, only assumes that any conversion is a Class I.

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Chapter #	Page #	Paragraph #	Comment
D.2	99	3	The DEIR/EIS states that for the Proposed Project, "although some special status plant species were found, the results of the surveys are inconclusive because the poor rainfall conditions likely prevented the germination of many annual species. Habitat for special status species may also occur where ROE permission was not granted." And "Because it is not possible to completely assess the impacts to all special status plant species (i.e., those with potential to occur [see Table D.2-3] since the survey results were inconclusive and some areas could not be surveyed), and because the possibility exists that the results of complete conclusive surveys would result in a significant impact, the overall impacts to special status plant species are considered significant and not mitigable to less than significant levels (Class I)". These statements are misleading and in some cases without justification for the following reasons:
D.2	99-102	3	No assessments were made for individual species to determine significance on a individual species basis. Implying that because an assessment for every sensitive species could not be made so no assessment of any sensitive species can be made has no justification. The statement that the 2007 survey data for such species as summer holly, Del Mar manzanita, Borrego bedstraw, San Diego barrel cactus, Nuttall's scrub oak, and other large woody or succulent perennials is inconclusive due to low precipitation and annuals didn't germinate has no justification. These are long-lived relatively large species, and population sizes are not going fluctuate due to short-term drought conditions. The 2007 survey data presented on pages 99-102 is more than adequate to assess
			the impacts to these species and for species with similar life-forms that have the potential but were not observed during the surveys. Given their life form these species would have been observable (and is stated as such in Table D.2-7 of the DEIR/EIS). There is no justification for claiming that the survey results were not conclusive for assessing these species.

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Chapter #	Page #	Paragraph #	Comment
D.2	99	3	Floristic diversity, including ephemeral species which would likely be the most affected by the drought conditions were surprisingly good in the Coastal, Inland Valley and Central Links. A total of 492 taxa were observed during the 2007 rare plant surveys of the Proposed Project which accounts for 21% percent of the County's Flora (Rebman and Simpson, 2006). This is an extremely high diversity considering that the surveys did not extend east of Tamarisk Grove Campground in ABDSP and this was just a general inventory and was not meant to be a complete inventory. Twenty four sensitive plant species were observed during surveys in 2007. These include several CNPS List 4 species that were not addressed as sensitive species in the DEIR/EIS, nor are they required to be given their relatively low sensitivity status. The point to be made is that despite the low rainfall a high number of: 1) plant species; 2) sensitive plant species; and 3) ephemeral species, e.g. annuals, and geophytes were observed along the Proposed Project in western San Diego County.
			These include sensitive annuals such as delicate clarkia and San Diego thommint; and perennial herbs such as felt-leaved monardella, San Felipe monardella, San Diego button celery, San Diego sunflower. Lastly as part of the rare plant survey protocol on the Proposed Project, several known sensitive plant reference populations were periodically visited to determine their phenological state. Though population levels at these sites would be expected to be lower than in other years, these populations seemed to be fairly robust in size and distribution. Though no survey can ever be "scientifically conclusive", and subsequent surveys in more favorable climatic years may have different results, at least for the Coastal, Inland Valley and Central Linkages along the Proposed Project, the data is more than sufficient to analyze the impacts to sensitive plant species. These impacts should be Class II because they can be mitigated.
D.2	102	Last	Please define the criteria of "complete conclusive surveys". The DEIR/EIS makes the statement that the survey results were inconclusive for the Proposed Project, but does not define what "complete conclusive surveys" are. Mitigation Measure B5-a states that "A qualified biologist shall survey for special status plants in the spring prior to construction activity..."

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D.2	102-103	Last on 102; 1st on 103	Even if "complete conclusive surveys" were possible and these surveys determined that there were significant impacts, the DEIR/EIS assumes that any of these potential impacts are inherently unmitigable. This conclusion is not supported by any data and should be recharacterized to allow for mitigation.
D.2	109	Last	The DEIR/EIS states that for the Proposed Project "Most of the non listed species habitats are sensitive vegetation communities (Table D.2-7); the mitigation for the loss of sensitive vegetation communities (Mitigation Measure B-1a) would normally compensated for the potential loss of these sensitive species and their habitats. However, since adequate land required by Mitigation Measure B-1a may not be available, the impacts to non-listed wildlife sensitive species are considered significant and not mitigable to less than significant levels (Class I)." These findings are overstated for the following reasons:
			The argument posed in the DEIR/EIS for the reasoning for the Class I impacts to sensitive vegetation is "it is not likely that all the sensitive vegetation communities can be mitigated "in-kind" or that all the mitigation will occur within close proximity to the impacts. Therefore, the impacts to sensitive vegetation communities would be significant and are not mitigable to less than significant levels (Class I)." The argument for a Class I impact for wildlife based on an assumption that "in-kind" for sensitive habitats is flawed and unlogical. Even if mitigation for all the sensitive habitats cannot be accomplished to meet the "in-kind" scenario that the DEIR/EIS envisions, this has absolutely no bearing on the ability to acquire habitat for mitigation for sensitive wildlife species as many reside in more than one habitat. Not meeting the in-kind requirement sensitive vegetation (as proposed in the DEIR/EIS) doesn't automatically mean that the mitigation for wildlife species cannot be met.

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Chapter #	Page #	Paragraph #	Comment
D.2	107-109	All	<p>The DEIR/EIS does not assess mitigation habitat compensation for individual non-listed wildlife species. As such, not stated in the DEIR/EIS what the actual mitigation would be for these non-listed wildlife species. The DEIR/EIS however assumes that there is potentially unavailable mitigation for sensitive vegetation, and hence unavailable mitigation for sensitive wildlife species and hence Class I impacts. This is speculative reasoning without any justification, i.e., it's not stated what habitat compensation acreage should be. By not assessing individual impacts and compensation the DEIR/EIS and using the acreage numbers in Table D.2-7 , in essence the benchmark threshold for determining between Class I and Class II, the analysis assumes that all the sensitive habitats impacted were occupied by sensitive wildlife species. This assumption results in an over-estimation of impacts as indicated by the species-by-species assessment on pages 107-109 which indicates that 13 non-listed sensitive wildlife species observed during the surveys of the Proposed Project.</p>
			<p>Relatively small numbers of these individuals were observed, as would be expected with a narrow ROW and many of the species were assessed as not being affected. If species by species mitigation were calculated in the DEIR/EIS it would have resulted in lesser impacts to occupied habitat and lower mitigation requirements that stated in Table D.2-7. The lower offsite habitat mitigation requirement would further argue that impacts to non-listed sensitive wildlife species should be Class II.</p>

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Chapter #	Page #	Paragraph #	Comment
D.2	111	2&3	<p>The DEIR/EIS states that for the Proposed Project impacts to the flat-tailed horned lizard "are significant and not mitigable to less than significant levels (Class I) because adequate mitigation land may not be available." Again this analysis is skewed because the assumption is based on speculation, i.e. that there may not be available land, with no data presented to support this assumption. Additionally, the DEIR/EIS correctly states that the FTHL Rangewide Management Strategy allows for "compensation for FTHL habitat impacts could involve purchase of FTHL habitat and/or monetary compensation." Since monetary compensation is an option as defined by the FTHL Rangewide Management Strategy, an assessment of all Class I impacts to the FTHL (mortality, harassment, loss of habitat, predation) because adequate mitigation land may not be available is unjustified as it assumes that the entire mitigation compensation to be habitat acquisition. Impacts to this species should also be a Class II.</p>
General Comment for Proposed Project and Alternatives			<p>The alternatives were ranked strictly by Class I impacts. Many of the biological Class I impacts were assessed strictly by various assumptions that with a reassessment of the existing analysis to include the implementation of APM's, may turn out to be Class II, Class III or no impact, which could alter the eventual ranking as there was only a difference of approximately 10 Class I impacts between the preferred alternatives compared. The assessment did not appear to take into account the implementation of APM's which promote pre-construction studies and relocation of facilities to avoid impacts as the primary mitigation directive, which has been incorporated into the project, automatically changing the Class I impacts minimally to Class II.</p>
General Comment for Proposed Project and Alternatives			<p>Additional data, is likely to reduce the number of Class I impacts assessed in the DEIR/EIS. This is because the DEIR/EIS assumed worst-case scenario, i.e. occupied habitat, etc., for areas not surveyed or not complete enough. Many of these areas are just as likely to be unoccupied as occupied especially for assumptions of occupied habitat in areas generally outside of the known range of some of these species.</p>

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General Comment for Proposed Project and Alternatives			The Class I impacts above (B-1, B-5, B-7, B-7A, B-7B, B-7H, B-7J, B-7L, B-7O, B-10, B-12) were all assessed equally across all of the alternatives, i.e., all the alternatives had a Class I impact on native vegetation, sensitive plants, etc. In reality, impacts to all these resources would not be the same from each alternative and in combination with the future surveys a reanalysis and comparison of the alternatives could alter the ranking system.
D.2	113, 256	D.113 paragraph 1 D.256 Mitigation Measures B-1a thru B-7c	The EIR/EIS overstates Class I Impacts on bighorn sheep. These include: 1) personal communications; 2) the Recovery Plan for desert bighorn sheep in the Peninsular Ranges - an outdated document that contains much speculation regarding threats to bighorn sheep and a Critical Habitat mapping approach that was recently rejected by the Court; and 3) a single peer reviewed publication (Rubin et al. 1998) was cited in support of presumed threats, however, the quantitative analyses in this paper only dealt with bighorn distribution and the delineation of subpopulations. Rubin, E.S., W.M. Boyce, M.C. Jorgensen, S.G. Torres, C.L.Hayes, C. S.O'Brien, and D.A. Jessup (1998) Distribution and abundance of bighorn sheep in the Peninsular Ranges, California. Wildlife Society Bulletin 26:539-551.
D.2	113-116 and throughout document		No mention is made of the fact that bighorn sheep Critical habitat a court remanded for new rule making, resulting in the Proposed Rule (USFWS 2007) to revise Critical Habitat for bighorn sheep in the Peninsular Ranges. This is significant because the proposed Critical Habitat designation would substantially reduce the amount of Critical Habitat traversed by the proposed project and alternative alignments. Offsite mitigation would be reduced. Consider both the current and proposed Critical Habitat designations in weighing alternatives.
D.2	113-116 and throughout document		The Draft EIR/EIS makes statements regarding impacts to justify a Class 1 Unmitigatable Impact to bighorn sheep (these are listed below):

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D.2	113-116 and throughout document		There is no documented basis that bighorn sheep abandoned lambing habitat during construction activities. There are examples from Palo-Verde Devers No. 1 that bighorn sheep ewes were either not affected by transmission line construction or were attracted to it. (e.g. "PBS were found to be more sensitive to disturbance during spring and fall, corresponding with the lambing and rutting seasons, and abandonment of lambing habitat was observed while construction activities were ongoing (USFWS, 2000).". Smith, E.L., Gaud, W.S., Miller, G.D., and M.H. Cochran (1986) Studies of desert bighorn sheep ( <i>Ovis canadensis mexicana</i> ) in western Arizona: Impacts of the Palo Verde to Devers 500 kV Transmission Line. Final Report-Volume II. E. Linwood Smith and Associates, Tucson, AZ. Submitted to Southern California Edison Co. and Arizona Public Service Co. 51.
D.2	113-116 and throughout document		The EIR/EIS speculates that: "Moist air and rain may cause unstable irregularities in the electrical field around conductors and insulators of transmission lines, which can generate a crackling noise. The effects of this noise on PBS are not known. PBS could avoid the area subjected to the noise. Also, the noise could prevent PBS from hearing approaching predators.") There was no report of any negative effect from noise from the Palo Verde Devers No. 1 study. Bighorn sheep crossing rates increased after the transmission line was completed and energized. There was no mention of noise in an investigative report of bighorn sheep declines in the Kofa National Wildlife Refuge nor in management plan for these mountain ranges recently authored by the Arizona Game and Fish Dept. and US Fish and Wildlife Service (2007). Arizona Game and Fish Department (2007) Kofa Mountains Complex predation management plan. Unpublished report, Arizona Game and Fish Department, Phoenix, Arizona, April 2007.

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D.2	113-116 and throughout document		It is suggested that the cited threats will preclude recovery of the ESA listed bighorn sheep population: (e.g. " All of these potential effects would adversely affect survival and recovery of the species."). Although there is no quantitative basis for inferring that bighorn sheep population recovery in the Peninsular Ranges would be precluded, there is an potential Endangered Species Act (ESA) legal argument being presented here in the EIR/EIS. A recent 9th Circuit Court decision raises the bar on jeopardy analyses such that these must show that actions will not preclude the recovery of species. The Final EIS/EIR should state important counter-arguments to these assertions include: 1) the lack of quantitative basis for these hypothetical worst-case effects; 2) noting that bighorn sheep in the Peninsular Ranges are already at recovery levels (25 ewes per subpopulation; > 700 bighorn sheep overall; with the exception of the San Jacinto subpopulation in the
			northernmost part of the range); 3) previous construction of the existing transmission line and SR 78 did not result in the decline of this population; 4) no negative effects were reported from the construction or operation on Palo-Verde Devers No. 1.; and 5) mitigation measures could enhance this population in such a way that it will be better off than before transmission line construction.
D.2	113-116 and throughout document		The assertion that metapopulation dynamics (e.g. movement of bighorn sheep between populations which contributes to genetic exchange) will be disrupted is unsupported by any empirical evidence. For example, the EIR/EIS asserts: "The other aspect deals with the overall impacts to the population affected by the Proposed Project. One of the goals for recovery of the PBS is to reconnect the entire range of the PBS metapopulation. A metapopulation maintains stability through unobstructed movement between geographically separated subpopulations (such as the southern San Ysidro Mountains ewe group). This interchange allows natural levels of genetic heterogeneity and demographic augmentation that compensates for temporary declines at the subpopulation level and maintains population stability over time across the entire metapopulation.") However, experience with Palo Verde Devers No. 1 showed no such effect with limiting crossings (Smith et al. 1986), nor have any been reported from the Old Dad Mountains of California where a transmission line

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			traverses part of bighorn population range. Transmission lines are inanimate objects in the environment that pose no threat to bighorn sheep or impediment to their crossing.
D.2	113-116 and throughout document		(For example, the EIR/EIS asserts the following: " 1.a.) the Proposed Project would have a substantial adverse effect through any impact to one or more individuals of a federal or State listed species; 1.f.) the Proposed Project would have a substantial adverse effect by any impact that directly or indirectly causes the mortality of special-status wildlife species; 4.a.) the Proposed Project would have a substantial adverse effect by preventing access to foraging habitat, breeding habitat, water sources, etc.; 4.b.) the Proposed Project would have a substantial adverse effect by interfering with connectivity between blocks of habitat or block or interfere with a wildlife corridor; and (4.c.) the Proposed Project would have a substantial adverse effect by fragmenting a species' population."). These purported impacts are overstated/or unsupported.
D.2	113-116 and throughout document		The EIR/EIS proposes as series of unnecessary restrictions on construction and maintenance that constrain these into a narrow range of dates that will result in construction delays: "With regard to timing of activities, construction and maintenance activities in bighorn sheep habitat shall be limited to outside the lambing season and the period of greatest water need. The lambing season is February through August. The period of greatest water need is May through September." It is not necessary to restrict construction and maintenance activities during the entire span of possible lambing dates but only during the period when the majority of the populations lambing occurs (31 January to 1 May, when 87% of lambing occurs) and only when construction is within 1 km of occupied lambing areas.
			Similarly, the EIR/EIS suggests restricting activities during the period of greatest water need (May-September). This restriction is unnecessary if water sources are nowhere near the transmission line corridor. In fact, construction during this period could result in less disturbance to bighorn. That is because bighorn are more likely to be concentrated near water sources.

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Chapter #	Page #	Paragraph #	Comment
D.2	113-116 and throughout document		There is no basis for the assertion that mainenance would result in a Class I impact to bighorn sheep: ("Impact B-12: Maintenance activities would result in disturbance to wildlife and could result in wildlife mortality (Class I for Peninsular bighorn sheep; Class II for other special-status wildlife and nesting birds; Class III for barefoot banded gecko, desert pupfish, and nonsensitive wildlife"). Experience with Palo Verde Devers No 1. (Smith et a. 1986; Arizone Game and Fish 2007) shows no basis for the assertion that transmission mainenance is a Class I impact to bighorn sheep.
			Arizona Game and Fish Department (2007) Kofa Mountains Complex predation management plan. Unpublished report, Arizona Game and Fish Department, Phoenix, Arizona, April 2007. Kofa National Wildlife Refuge and Arizona Game and Fish Department (2007) Investigative report and recommendations for the Kofa bighorn sheep herd. Unpublished report, Kofa National Wildlife Refuge and Arizona Game and Fish Department, Phoenix, Arizona, April 2007. Smith, E.L., Gaud, W.S., Miller, G.D., and M.H. Cochran (1986) Studies of desert bighorn sheep ( <i>Ovis canadensis mexicana</i> ) in western Arizona: Impacts of the Palo Verde to Devers 500 kV Transmission Line. Final Report-Volume II. E. Linwood Smith and Associates, Tucson, AZ. Submitted to Southern California Edison Co. and Arizona Public Service Co. 51.
D.2	113-116 and throughout document		The EIR/EIS refers to bighorn sheep in the Peninsular Ranges as <i>Ovis canadensis cremnobates</i> . That is an outdated taxonomic designation that was revised in 1993 and no longer in use by the USFWS. The revised taxonomy (Wehausen and Ramey 1993) synonymized this subspecies with desert bighorn sheep ( <i>Ovis canadensis nelsoni</i> ). The fact that Peninsular bighorn sheep is not a valid subspecies is why this population was instead listed as a Distinct Vertebrate Population Segment under the Endangered Species Act. The title of the Recovery Plan reflects this: "Recovery Plan for desert bighorn sheep in the Peninsular Ranges of California". Wehausen, J.D. and R.R. Ramey. (1993). A morphometric reevaluation of the Peninsular bighorn subspecies. <i>Desert Bighorn Council Transactions</i> 37:1-10.

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D.12.13	D.12-78	4	The text states: "No significant unavoidable impacts were found." This means no Class I impacts are expected. Three comments pertaining to this are: (1) The primary driver for ranking the environmentally superior option are the number of Class I impacts that are expected, which means impacts to watercourses are not being taken into consideration when developing the environmentally superior option. (2) Ranking impacts to jurisdictional waters as Class II impacts means that these impacts are significant but will be mitigated. However, avoidance would be implemented by SDG&E. Avoidance measures include utilizing helicopter construction and following existing transmission lines with existing access roads. The DEIR/EIS (page B-51) also mentions minimizing the effect of new access road construction by using
			"...existing streets and access roads..." wherever possible. (3) A significant caveat to the above analysis, as discussed on page D.2-212, is that there could be Class 1 impacts to riparian vegetation if adequate mitigation lands are not available to compensate for significant impacts.
D.12.2.1	D.12-11	1	For the Imperial Valley Link, "there are at least 49 identified watercourse crossings", but in Table D.12-1, only 41 crossings are listed.
D.12.2.2	D.12-12	3	For the Anza-Borrego Link, "there are at least 33 identified watercourse crossings", but in Table D.12-2, only 26 crossings are listed.
D.12.2.3	D.12-13	2	For the Central Link, "there are at least 36 identified watercourse crossings...", but in Table D.12-3, only 28 crossings are listed.
D.12.2.4	D.12-14	1	For the Inland Valley Link, "there are at least 29 identified watercourses...", but in Table D.12-4, only 24 crossings are listed.
D.12.2.5	D.12-14	3	For the Coastal Link, "there are at least 25 identified watercourses...", and in Table D.12-5 all 25 crossings are listed.

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D.12.2.1 - D.12.2.5	D.12-11 - D.12-14	varied	Use the definition of direct impacts and indirect impacts in section D.2.20 on page D.2-264 to identify which type of impact applies to which stream in Table D.12-1 through D.12-5. In other words, streams that would be affected by the construction of new access roads would have direct impacts from vegetation removal and fill, whereas streams where no new roads are constructed would either have no impacts or indirect impacts (streambank erosion and stream sedimentation).
D.2	collisions mentioned 199 times, D.2-144		Overstated impact discussions on Raptors at Risk from Collisions (Impact B-10) are not supported by the literature referenced below. DEIR/EIS reference to Bittner 2007 as local expert who says that "eagles do not tend to be collision victims" and impact analysis on golden eagle collision risk appears to contradictory to the this statement and in Section D.2.14, Page D.2-144 contradicts this conclusions. The Final EIS/EIR should consider the following references: Avian Power Line Interaction Committee (APLIC). 1994. Mitigating bird collisions with power lines: the state of the art in 1994. Edison Electric Institute/Raptor Research Foundation, Washington, D.C. Bevanger, K. 1994. Bird Interactions with utility structures: collision and electrocution, causes and mitigating measures. Ibis 136:412-425 Faanes, C. A. 1987. Bird Behavior and Mortality in Relation to Power Lines in Prairie Habitats. U.S. Fish and Wildlife Service Technical Report No. 7. 24pp Hunting, K. 2002. Roadmap for PIER Research on Avian Collisions with Power Lines in California. California Energy Commission, Cor

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D.2 Listed or Sensitive Wildlife Species including discussion on noise impacts to species in different linkages	107, 108		Human disturbance (B-7H) especially noise from construction and maintenance of the power line and on birds, in particular raptors such as the golden eagle, is also not supported by the literature. Birds have different auditory thresholds and are unlikely to hear construction noise. This is also true for grasshopper sparrows, Northern Harrier, Southern California Rufous-Crowned Sparrow, White-Tailed Kite, Yellow Warbler. Please refer to: Dooling, R.J. (2002) Avian Hearing and Avoidance of Wind Turbines. National Research Energy Laboratory. Technical Report NREL/TP-500-30844, Dooling, R. J. 2007. The Effects of Highway Noise on Birds. The California Department of Transportation, Division of Environmental Analysis. Sacramento, California. Yamazaki, Y., H. Yamada, M. Murofushi, H. Momose and K. Okanoya. Estimation of hearing range in raptors using unconditioned responses. Ornithological Science 3:85-92
D.2.12 Nesting Birds, B-8a	D.2-113-114	End and top	Noise mitigation not needed. Birds unlikely to hear construction noise as described above.
D.2	Golden Eagles and Bald Eagles disturbance and set back discussed 18 times	16 references to B-7H	All impact discussions on disturbance, noise and distance set back are overstated and not fully supported by literature review.

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