

Comment Set E0002, cont.
 San Diego Gas and Electric Company

Chapter #	Page #	Paragraph #	Comment	
D.4	D 4-1, D4-2	2, 1	This paragraph appears to give the false impression that the route would cross all the lands "located within, or would pass adjacent to, or near the boundaries of various state, local, and Federal jurisdictions, including BLM, NPS, DOD," etc. Some of these lands would not be affected by the route. For example, the Project does not cross DOD lands as the text implies. SDG&E suggests re-wording the paragraph to identify which agency lands the project crosses through and which agency lands it does not.	E0002-190
D.4	D 4-4	5	This may give the impression that Tamarisk Grove is a cultural site when the word "and" was omitted. Re-word to "Tamarisk Grove Campground and a cultural resource site."	E0002-191
D.4	D.4-4 to 4-5, D.4-72, D.4-77		In describing agency jurisdiction through ABDSP, the EIR/EIS suggests that BLM only has jurisdiction over MP83-83.5 (western boundary of park and outside of park). The Final EIR/EIS should note that BLM has asserted its continuing federal interest/jurisdiction over those portions of existing corridor through the park.	E0002-192
D.4	D.4-9	2	It is incorrect to describe SDG&E's ROW as a utility ROW dedicated to SDG&E, it should be stated as granted.	E0002-193
D.4	D 4-16	3	Table D 4-12 does not define what constitutes a Class I impact. Information needs to be provided that identifies why certain impacts are Class I. For example, Impact L2 - "divide an established community or disrupt land uses at or near the alignment" is too broad a definition. Revise to state the type of disruption of land uses would constitute a significant impact within the text first, and then explain why the Project would result in the impact (to the extent it does, if at all) with supporting justification.	E0002-194
D.4	D.4-19	4	States that SDG&E shall obtain a license from IID for canal crossings. This should not be so narrowly focused. SDG&E would obtain the required rights determined appropriate but would not be limited to a license.	E0002-195
D.4	D.4-61	2	States that after construction, access to and around transmission lines and towers would be fully restored. If fully restored means revegetated or removed from use, the EIR/EIS should note that access roads and maintenance pads required for long term maintenance would remain in place after construction.	E0002-196

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Chapter #	Page #	Paragraph #	Comment
D.5	D.5-21	5	The EIR/EIS does not but should clearly explain that the existing ROW and access roads were not included in the designated wilderness areas. They only point to the ROW. This occurs again on p. D.5-23.
D.5	D.5-23	1st	The EIR/EIS should state that General Plan acknowledges possibility that utilities might seek to expand existing utilities through the Park.
D.5	D.5-29, D.5-32, D.5-46, D.5-58, D.5-60, D.5-88, D.5-89, D.5-95, D.5-107	3, 2, 4, 1, 2, 3, 3, 3, 5	The Class I impact level is overstated for corona noise. The addition of project-related corona noise is permanent; however, the significance of the impact is lessened because it is intermittent, not continual, as the conditions necessary for corona noise are intermittent (primarily wet weather; see Noise section). There would a significant impact only if there were a sensitive receptor within a distance such that corona noise would be audible over the ambient noise levels. With the exception of developed facilities located in close proximity to the ROW, the effect on recreation uses or wilderness areas would not be significant because an insignificant number of people, if any, would use a transmission line ROW and nearby areas for recreation activities, particularly during wet weather. Encounters in most locations, if any, would likely be brief; and therefore insignificant.
D.5	D.5-31	2nd	Statement that if construction activities occurred for duration of person's visit to Park is subjective and unsupported. Such an assumption would convert any temporary effect to a permanent one. In addition, effect could be mitigated, i.e., by constructing at different time of year.
D.5	D.5-32	3rd	Statement that Proposed Project would cause visitors not to visit Park is conclusory and unsupported by evidence. Backcountry policy means hundreds of thousands of acres of open space available for recreation and camping.
D.5	D.5-35, D.5-47, D.5-82, D.5-88		Statement that recreationists would be precluded from using trails because transmission structures would be sited on or immediately adjacent to trails is conclusory and unsupported by evidence. No plans to locate structures on trails, and potential effect is mitigated by locating structures off of trails.
D.5	D.5-74	3rd	Statement that construction would dissuade visitation or block access roads is conclusory and unsupported by evidence. Effects would be temporary and could be mitigated.

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Chapter #	Page #	Paragraph #	Comment
D.6	D6-12	2&3	The criteria used to determine impacts to agricultural lands are based on erroneous information. The EIR/EIS states that significance criteria used in the analysis of impacts was derived from Appendix G of the State CEQA Guidelines. That is incorrect – the wording in the Appendix G Guidelines differs greatly from the criteria used in the EIR/EIS and leads the EIR/EIS to incorrectly conclude that there are some significant and not mitigable agricultural impacts based on this erroneous information. The draft document states that “the following significance criteria were derived from previous environmental impact assessment and the CEQA Guidelines (Appendix G, Environmental Checklist Form). Impacts to agriculture would be significant if the Proposed Project would convert 10 or more acres of DOC Farmland to non-agricultural use. The State CEQA Guidelines, Appendix G, state if “the project Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance . . . to non-agricultural use”.
D.6	D6-12	3	One criteria used in the EIR/EIS to identify significant agricultural impacts is if 10 or more acres of Department of Conservation farmlands would be disturbed by the proposed project. The State CEQA Guidelines do not provide acreage threshold criteria for impacts to agricultural resources that are classified as prime farmland, unique farmland and farmland of statewide importance. The EIR/EIS should provide logical and defensible basis for this significance criteria and/or add citations as to where it was developed or derived.
D.6	D6-18	5	Aerial spraying impacts from airplanes that spray pesticides on agricultural fields are identified in the EIR/EIS as significant and not mitigable (Class I impacts) due to hazards associated with power lines. This impact can be mitigated through public education and notification programs that could be initiated by the project proponents, that are already recommended in the EIR/EIS as mitigation measures (See Mitigation Measure AG-3b). To conclude that these impacts are significant and not mitigable appears to have no basis. Please provide a citation or a logical and defensible basis for this significance determination or revise the significance determination. Aerial sprayers already spray fields along I-8 adjacent to existing power lines with no exceptional risk and with no reported incidents of accidents.

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Chapter #	Page #	Paragraph #	Comment	
D.6	D.6-26	4	States that proposed project has potential to convert a total of 663.4 acres of DOC Farmland. If conversion is the same as displacement due to permanent impacts, this is not consistent with Table D.6-8 on page D.6-15 which indicates a total of 344.7 acres of permanent impact to DOC Farmland for the entire project.	E0002-204
D.6	D.6-46	3	Provides figures for acres of significant and unmitigable permanent impacts to agricultural lands. These figures are lower than the permanent impacts in Table D.6-8 but there is no discussion of how the lower significant unmitigable acreages were derived. If they are derived using Table D.6-9 that should be stated.	E0002-205
D.6	D.6-47 to 49	Table D.6-9	There should be some discussion/definition of what the term "permanently convert" means. Does this mean conversion occur merely due to presence of the R/W (easement)? Or, does it mean where land is actually converted due to presence of a physical (structure, road) improvement? Clarifying this would lead to a more realistic assessment of actual permanent impacts discussed in the whole of Chapter D.6.	E0002-206