

## Comment Set E0003, cont.

### San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
D.11	D.11-13	3	This Section in the DEIR states that owners/operators of off-road diesel equipment would need to begin reporting to CARB in 2008 and meet fleet emissions targets by 2009. These dates are incorrect. The date when initial fleet inventory report will be due to CARB for most fleets is March 2009. The fleet emissions targets will start to be enforced starting March 2010 (per the current version of the ATCM under public review).	E0003-53
D.11	D.11-18	Table D.11-8	Table D.11-8 specifies the Air Quality Significance Thresholds for criteria pollutant emissions from the construction activities associated with the Project. The table includes both daily (lb/day) and annual (tpy) thresholds. The use of annual (tpy) significance levels for temporary, short-term, construction projects such as SRPL are unnecessary because these levels are normally specified in the SDAPCD and ICAPCD New Source Review rules for major and permanent stationary sources. The mitigation should be removed because it is not roughly proportional to the potential impact.	E0003-54
D.14	D.14-6, D.14-10, D.14-35	bullets	The list of existing utilities crossed by route through ABDSP includes existing underground utilities within SR78 between MP69.7 and 74.8, but doesn't specify what utilities these are. This also occurs in the text for Inland Valley Link at D.14-10 and ABDSP on D.14-35. Add a discussion of when these underground utilities were built (assuming they exist in the park), no comparison of that construction and impacts to visitation with proposed project	E0003-55
D.14	D.14-15	1	Error in text. The first paragraph indicates that Section H.1 discusses environmental justice impacts, should be Section F.1. Revise text accordingly.	E0003-56
D.14	D.14-22, 44, 53, etc	3 through 5	Impact overstated for Impact S-2. Throughout section, APMs LU-5 and LU-7 involve working with agriculture land owners and water management representatives to remedy any conflicts with irrigation infrastructure, should be sufficient to mitigate to Class III; under Impact S-2, no mention about these APMs developed to avoid disrupting existing utility/irrigation infrastructure. Class II impact level should be changed to Class III.	E0003-57
D.14	D.14-34	2 and 3	Additional information needed in analysis of impacts to businesses. Discusses businesses related to tourism industry, but doesn't specify what type of businesses, e.g., outfitters, food industry, etc? DEIR assumes workers buy food, but assume none of this benefits ABDSP, just assumes businesses related to tourism will suffer. Revise analysis to include benefits as well as losses to ABDSP businesses.	E0003-58

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CH#	Pg#	Par#	Comment	
D.14	D.14-34	1 through 3	Additional analysis required regarding the impacts of project on park visitation. In the discussion for Impact S-1: Project construction and/or transmission line presence would cause a change in revenue for businesses, tribes, or governments (Class I for business revenue, Class IV for economic benefits), there is no discussion of actual likelihood that people will stop visiting Park based on construction and operation of the line, no detailed analysis with data from similar projects (compare analysis for perceived impacts to property value); also no discussion of when wildflower season is in relation to construction and whether there's actual likelihood that wildflower visitation will be affected, no discussion of how many visitors actually spend most of their time at the park in the vicinity of project construction, no discussion of AFBI support in relation to total government funds going to park. The analysis should be revised to consider the above discussion in determining whether a significant impact would occur.	E0003-59
D.14	D.14-35, D.14-36	1 through end of page, first paragraph of page D.14-36	Impact is overstated. As described for Impact S-2: Construction would disrupt the existing utility systems or cause a collocation accident (Class II). Mitigation requirements for Impact S-2 (notification to public and protecting underground utilities) seem substantially similar to APMs, if so, should be Class III impact not Class II.	E0003-60
D.14	D.14-105	Last 4 paragraphs on page	Additional information is required for the analysis. Under Impact S-2, concludes Class II impacts from disruption to existing utilities as a result of excavation, but no discussion of SDGE's obligation to determine location of existing utilities and coordinate with utility owners. Revise the text to include this information.	E0003-61
D.14	D.14-106	Last 3 paragraphs on page	Additional analysis required to support assignment of impacts. Impact S-3 indicates Class II and III impacts for U.S., but the analysis includes no discussion of what the Class II impacts are. Please revise the text to include a description of Class II impacts.	E0003-62
D.14	D.14-128	Impact S-2 and paragraph 2	Additional analysis required to support assignment of impacts. Concludes Class II impacts for Impact S-3, but no discussion of what those impacts are - text refers to Class III impacts, not Class II. Please revise text and Impact S-3 to be consistent as to level of impact.	E0003-63
D.14	D.14-130	Last 2 paragraphs	Additional analysis required to support assignment of impacts. Under Impact S-5 through ABDSP (property values), concludes Class III impact, but no mention of what private property is in vicinity of route. The text should be revised to include this information.	E0003-64
D.14	D.14-147	4	The impact is overstated for business revenues. In section D14.16.4, Impact S-1 concludes Class III adverse impacts for business revenue, but then notes that there are no businesses located in this alternative alignment. The analysis should be revised to indicate that there should be no impact.	E0003-65
D.14	D.14-153 to 154	Last 3 paragraphs	Impact is overstated. The analysis notes that in this alignment, there are no underground utilities, only two drainage pipes, but no mention of this fact under Impact S-2 re: construction disrupting existing utility systems. Revise the analysis to reduce the impact level from Class II.	E0003-66
D.14	D.14-170	2	Impact is overstated for Impact S-5. For any underground segment, impact to property values should be No Impact, not Class III - or explain what impact would occur from the underground segment	E0003-67

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CH#	Pg#	Par#	Comment	
D.16	D.16-10	Wilderness and Recreation section of table in D.16.4.1	Additional information required to explain consistency. The review of the Motorized-Vehicle Access/Transportation section of the California Desert Conservation Area (CDCA) Plan Concludes that Motorized-Vehicle Access/Transportation guideline in the CDCA Plan is inconsistent, but text explaining the consistency determination doesn't explain the inconsistency. Revise the text to add this information.	E0003-68
D.16	D.16-36 to 50	global	Analysis includes misleading information regarding General Plan Amendments. Concludes in a number of instances that Proposed Project is "inconsistent" with ABDSP General Plan, disagree with DEIR's interpretation of "inconsistent." Wilderness de-designation is the only issue related to the proposed project and certain alternatives that would require an amendment to the General Plan. For all other issues defined as inconsistencies, the ABDSP General Plan provides general direction or management strategies to park staff none of which are violated by the project, the plan explicitly contemplates the possibility that projects such as this may be proposed, and it contemplates that individual environmental review of such projects would be necessary - not a General Plan amendment for every individual project. Revise analysis to indicate that review of these projects would be necessary rather than a General Plan amendment.	E0003-69
D.17	D.17-5 to 8	global	Analysis includes misleading information regarding General Plan Amendments. Dispute that project route through Backcountry Zone requires amendment to General Plan. The Backcountry Zone through ABDSP contemplates possibility of infrastructure, and there is no explicit standard precluding this project from affecting the Backcountry Zone or requiring a Plan amendment in this instance. The DEIR says a Plan amendment "could" be required (as opposed to "would") on D.17-5, but "would" be required on D.17-6, and "may" be required on D.17.7. Revise analysis to indicate that review of these projects would be necessary rather than a General Plan amendment.	E0003-70
D.17	D.17-8	2	State Parks concludes that if it provided additional ROW for project without first amending plan with approval of State Park and Rec Commission, result would be violation of Public Resources Code. This statement- may be true if approved ROW through wilderness without de-designating and related plan amendment, but there are no other code provisions that require plan amendment under other circumstances cited here. The analysis should be revised to provide additional detail regarding de-designation.	E0003-71
D.17	D.17-14	2 and 3	Additional detail needed regarding visibility from the Pacific Crest Trail. It is not clear whether the transmission line would be visible from trail and thus require a plan amendment. Revise the text to clarify the visibility of the project as seen from the trail.	E0003-72
D.17	D.17-16	1	Regarding Pacific Crest Trail, it's not clear whether T-line would be visible from BCD-South and thus require a plan amendment.	E0003-73
D.17	D.17-14 to 15	throughout	Omits mention that Forest Plan amendments likely required to "designate" a transmission line corridor within back country and back country motorized use restricted land use zones, as well as BCNM. CNF Plan requires "designation" of major utility corridors in these areas, but current plan does not include any designated T-line routes for this project.	E0003-74

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CH#	Pg#	Par#	Comment
D.17.2 .2	D.17-8	5th	Statement of State Parks is misleading, because additional or new rights-of-way may not be required. BLM has jurisdiction over much of transmission corridor. With respect to State Park portions of transmission corridor, SDG&E has indicated that Proposed Project could be built within existing 100-foot-wide corridor. Further, SDG&E has submitted legal arguments that additional rights-of-way would not be required over State Parks land (for instance, if SDG&E perfected equitable and prescriptive rights and such rights were found to permit installation of 500kV line and/or if BLM were to determine that 1921 statute reserved federal corridor for utility line over Sections 16).

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