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Jill D. Larson
Senior Counsel

101 Ash Street
San Diego, CA 92101

Tel: 619-696-4364
Fax: 619-696-4488
jdlarson@sempra.com

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Ms. Billie Blanchard
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Ms. Lynda Kastoll
El Centro Field Office
Bureau of Land Management
1661 S. 4th Street
El Centro, CA 92243

Dear Ms. Blanchard & Ms. Kastoll,

SDG&E appreciates the opportunity to provide the attached comments to the California Public Utilities Commission and Bureau of Land Management (CPUC/BLM) Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS). This third comment letter covers comments on Sections A, B, C, D, F, G and Appendix 12 of the Draft EIR/EIS. SDG&E will provide additional specific comments in future letters for the CPUC/BLM to consider in preparation of the Final EIR/EIS and may provide additional subsequent comments on the sections of the Draft EIR/EIS included in this submission as our review of the document continues.

Similar to SDG&E's second comment letter, these comments focus on identifying potential inaccuracies, omissions, inconsistencies and clarifications that can be fully addressed in the Final EIR/EIS. In addition, SDG&E identifies certain impacts that it believes are overstated in their significance. Similarly, certain mitigation measures are excessive because either the impact's significance is overstated or the mitigation is disproportionate to the impact. SDG&E intends to submit more substantive comments with respect to the various alternatives in its next comment letter.

Thank you in advance for your consideration of SDG&E's comments.

Sincerely,

A handwritten signature in cursive script that reads "Jill Larson".

Jill Larson

cc: Mike Niggli
Greg Barnes

CH#	Pg#	Par#	Comment
A	A-1	1st	Right-of-Way Grant Application was filed with BLM on November 2, 2005 for areas outside of ABDSP. Right-of-Way Grant Application was amended to include areas within ABDSP in 2007.
A.1, A.6.3.1	A-2	7th	Significant portion of transmission corridor in ABDSP is under jurisdiction of BLM, rather than State Parks and Recreation. Federal transmission corridor was reserved from grants of land to State for inclusion within ABDSP.
A.1	A-2	8th	Statement that SDG&E would have to obtain an additional 50 feet of ROW is incorrect. SDG&E has indicated that Proposed Project could be built within existing 100-foot-wide transmission corridor in ABDSP.

CH#	Pg#	Par#	Comment
B	B-10	2 and 3	Analysis regarding BLM jurisdiction of ROW needs to be clarified. In the discussion titled History and Discussion of BLM's 100-Foot ROW Grant, it should be clarified that BLM has asserted its continuing federal interest and jurisdiction in those portions of the ROW for which it granted easements previously. Revise the text to include this information.
B.2	B-14	2	Outside of the ABDSP but still within Grapevine Canyon, the DEIR describes and SDG&E originally proposed to remove the existing 69 kV line and underbuild it on the new 500 kV structures. The existing wood poles carry a 12 kV circuit so these poles would just be topped off. However, SDG&E could alternatively leave the 69 kV structures with the 12 kV underbuild alone and place the 500 kV structures parallel to the existing structures.
B.1	B-6	2	Proposed Project route near MP-50 crosses BLM parcels that are gifted lands. BLM has notified SDG&E that the Proposed Project needs to avoid these parcels. SDG&E has proposed a route modification to avoid the subject parcels. See SDG&E's GIS shape files accompanying this comment submittal. SDG&E requests that the FEIR include this modification.

CH#	Pg#	Par#	Comment
C.3	C-12	Table	States that the Modified Route D Alternative would not require an amendment of the Forest Plan to use land zones. However, the FEIR should clarify that an amendment would be required because of the incompatibility with the Scenic Integrity Objectives.
C.4	C-11	Table	Under ABDSP Link, the DEIR states that the Partial Under Ground SR78 to S2 Alt meets regulatory feasibility and would require a de-designation of wilderness and a GP Amendment. However, on p. C-37, under Regulatory Feasibility, it states that de-designation of wilderness and a GP amendment are regulatory infeasibilities that could delay the in-service date. This inconsistency should be reconciled in the FEIR.
C.4	C-37	9	It should read Central East Substation Construction.
C.4.3.2	C-39	3rd	Statement that Overhead 500kV ROW Alternative would cause greater impacts is conclusory and unsupported.
C.4	C-58	4	Text notes that I-8 Alternative Substation would be used if a conversion to 230kV is required. Since the CPUC identifies the Star Valley Road 230kV segment as part of the Environmentally Superior SWPL route, text should say that I-8 Sub is required to provide the conversion.
C.4	C-75	1	States that New In-Area generation meets goal of promoting renewable energy but does not describe how this translates to "more economical access" to renewables.
C.4	C-75	3	Text cites that there are economic, legal and technical feasibility challenges to developing individual PV solar but still finds it technically feasible as part of a larger renewables alternative. The option does not appear feasible to meet in service date given the feasibility challenges.
C.4	C-77	3	Text should be update to note ENPEX has not moved forward with project and that City of Santee is strongly opposed to the project.
C.4.10.2	C-78	5th	Feasibility of Margarita peaking plant made may be legally infeasible due to the LaderaHope petition filed on January 2, 2008 to overturn governmental approvals of Margarita peaker plant project.
C5.5.3	C-106	5	SDG&E has a corridor from Poway Sub to Chicarita, it is currently vacant from Pomerado Rd west to Chicarita.
C5.5.3	C-109	4	SDG&E has a corridor from Poway Sub to Chicarita, it is currently vacant from Pomerado Rd west to Chicarita.

CH#	Pg#	Par#	Comment
D.4.2. 2	D.4-4	4th	SDG&E has proposed alternative that would allow Proposed Project to remain within existing 100-foot-wide transmission corridor.
D.4.2	D.4-12	2	It is misleading to state that the Proposed Project alignment would pass through the Vallecito Mountains Wilderness Area, implying that the route would impact wilderness in that area. The Vallecitos Wilderness Area is located south of and in some cases not immediately adjacent to the Proposed Project.
D.5	D.5-36	3rd	2nd sentence, should be "both because of the inherent value of wilderness land"
D.5	D.5-36	3rd	3rd sentence, delete second "as a" after EIR/EIS
D.5	D.5-82	1st	2nd full sentence, spell out "Pacific Crest Trail" instead of "PCT"
D.5	D.5-82	3rd	3rd sentence, should be "In the reasonably foreseeable case"
D.5	D.5-86	1st full	The analysis contains a discrepancy for the number of acres of wilderness that would be reclassified. The first sentence of Impact WR-4 says that a one-mile segment of overhead segment of the alternative would require approximately 20 acres within Grapevine Mountain Wilderness Area, then in the same paragraph, says 40 acres of wilderness would be reclassified under this alternative. The text should be revised to clarify whether the correct number is 20 or 40 acres.
D.6	D.6-61 to 63	Table D.6-13	The analysis makes conclusions that are unsupported by the data. In Table D.6-13, there's no Assessors Parcel Number (APN) information or other data available on amount of Williamson Act lands in certain areas, but text of the DEIR makes conclusions about numbers of acres of Williamson Act lands, where did DEIR obtain numbers? What's basis for acreage conclusions?
D.6	D.6-15	Table D.6-8	Estimates for permanent impact on agricultural land (especially Imperial Valley) are much greater than presented in the PEA. Impact totals for Prime Farmland, Farmland of State Importance, Unique Farmland and Farmland of Local Importance in the DEIR are 270.5 acres. The PEA had 10.3 acres for the same categories. If we use the mileposts used in the DEIR/EIS (8- 12) for Imperial Valley agricultural lands, and multiply by R/W width (200') the resulting total impact is approximately 267 acres. This seems to confirm that the DEIR/EIS analysis considers the entire R/W a permanent impact. Although easement rights will be over the 200 foot width, actual permanent impacts within the agricultural land will be limited to structure footprints and any new access roads. The majority of the right of way will still be useable for farming purposes as is the case under the existing Southwest Powerlink alignment across agricultural lands. The Final EIR/EIS needs to provide this clarification regarding permanent impacts to agricultural lands.
D.6	D.6-21	3	States that 18.2 acres of Williamson Act land in Imperial Valley is permanently converted due to presence of transmission structures and roads. However, it appears that calculations may be based on the entire R/W width and not just the impact from structures/roads. The Final EIR/EIS needs to clarify that within agricultural lands, other than structure footprints and any new access roads, the land will still be useable as it is today.

CH#	Pg#	Par#	Comment
D.6	D.6-25	2	States that proposed project has potential to convert a total of 254.3 acres of Williamson Act land. 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 (incorrectly) a total of 157.4 acres of permanent impact to Williamson Act land for the entire project. The Final EIR/EIS needs to reconcile this apparent inconsistency and present the actual permanent impacts from structure footprints and new access roads not the remainder of the easement which is still available for agricultural uses.
D.6	D.6-15	Table D.6-8	Footnote explains that the total acreage for Agricultural Resources is less than the simple sum of each type of resource. However, the 491.8 acres of total impact to agricultural resources in Imperial Valley as noted in the table will likely be the figure that stands out in the minds of most readers.
D.6	D.6-37	4	Assumes that 10 acres of Williamson Act Land would be converted by future 230kV expansion, but does not indicate how that assumption is justified.
D.7	D.7-25, 26	1, 2	In Section D.7.8.3 Impacts, the text "identifies impacts that may be unavoidable." It should also state that impact assessments (i.e., numbers of sites projected to be impacted in each link) for the Proposed Project are based on preliminary engineering data and that SDG&E intends for the final engineering design to avoid cultural resources to the greatest extent possible (CR-APM-5).
D.7	D.7-29; D.7-30		The number of sites impacted within links varies within and between paragraphs throughout Chapter D. Statements regarding the number and type of cultural resources impacted and/or present in each link should be double-checked against and made consistent with the table presented in Ap.9B.
D.7	D.7-30	1st partial	The DEIR states that CA-IMP-7857/7858 is NR-eligible; this and four (should say "three") other sites in the Imperial Valley Link contain human remains; impacts would remain Class I. In preparing final engineering plans, SDG&E intends to avoid cultural resources to the greatest extent possible. Two of the sites mentioned should be able to have the access road routed to avoid them. The existing powerline access road through one site may not be able to be rerouted because of site size; however, no human remains or important artifacts were noted in survey of this existing access road; testing would be necessary to determine whether there would be an effect on the site from use of this existing road (mitigation measure C-2a would apply). The fourth site is in a remote area that does not presently have road access. Opening the area to greater human use could result in Class I impacts. The text should state that SDG&E would investigate other means for constructing and maintaining this portion of the transmission line, other than opening a road into the area.

CH#	Pg#	Par#	Comment
D.7	D.7-35	1	The DEIR states that 36 CFR 800 considers impacts to human remains an unmitigable adverse effect. A statement to this effect is not found in 36 CFR 800, although there are several statements relating to consultation with Indian tribes regarding properties of religious and cultural significance. The Advisory Council on Historic Preservation "Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects" provides relevant information, i.e., "Principle 4: Burial sites ('any natural or prepared physical location ... into which as a part of the death rite or ceremony of a culture, individual human remains are deposited'), human remains and funerary objects should not be knowingly disturbed." Statements in the DEIR pertaining to impacts to human remains and impacts to sites with human remains should be clarified.
D.7	D.7-39	4	The DEIR recommends that all known historic built environment resources within 0.5 miles shall be inventoried and subjected to visual analysis ... by an Architectural Historian. The DEIR states that the only known resource of this type in Imperial Link is the De Anza Trail-Southern Emigrant Road; however, this is not an architectural resource or standing structure and could be evaluated by other cultural resource and/or visual specialists.
D.7	D.7-39	7	DEIR mentions two sites (P-13-004244 and-004245) within the fenced area of Imperial Substation that are potentially eligible for the NR. Since this area was not surveyed by G&A, if substation improvements are part of project, then a cultural resources survey and update on site status is recommended.
D.7	D.7-48/49	passim	The DEIR does not include a recommendation for maintenance/upkeep of the historic adobe on the Central East Substation site (recommended eligible for NRHP and CRHR). This would probably be required by 36 CFR 800, and should be addressed in the DEIR.
D.7	D.7-62	6	The DEIR states that the Central East Substation to Sycamore Canyon or Penasquitos Substation future expansion would follow the proposed SRPL project route. It appears that the impacts identified are essentially a reiteration of those described for SRPL, which would presumably already have been built when a future expansion is considered. By listing them again, it gives the impression that the future expansion will have all the same impacts as the Proposed Project would. The focus here should be on identifying additional impacts and mitigation measures related to a future expansion. This should also be the focus of the other future expansion projects that follow the SRPL route. The text should be revised here and in other future expansion project discussions to only list impacts that would not have already been dealt with for the Proposed Project.

CH#	Pg#	Par#	Comment
D.7	D.7-122	5	"Angelina Springs [sic] Cultural District." Site locations are confidential, and this inclusion violates that principle. This comment should <u>not</u> be made in a manner that would place it in the public record, since this would only serve to draw more attention to the confidential location of a highly significant resource. A more general or ambiguous term such as the Grapevine Canyon Cultural District or DS-2-106 Cultural District should be used instead.
D.7	D.7-166 & 167	4	Although the criteria that are listed and used for establishing the paleontological sensitivity of geologic units are reasonable and acceptable, it may be beneficial to replace them with the criteria that are presented in Instruction Memorandum No. 2008-09 "Potential Fossil Yield Classification (PFYC) System for Paleontological Resources on Public Lands", as this is the most current and up-to-date guidance document in use for the purpose of classifying paleo sensitivity.
D.7	D.7-177 D.7-211 & 212	Table D.7-10 Table D.7-27	To say that "Construction of the project would destroy or disturb significant paleontological resources" for the Project and different alternatives shown cannot be known with the current level of information. The word "potentially" should be inserted between "would" and "destroy".
D.7	D.7-176	6, bullet 2	Just because a fossil illustrates a geologic principle that does not necessarily make it significant. Justification for determination of significance of a paleontological resource needs to be correctly cited.
D.7	D.7-176	6, bullet 4	This significance criterion is confusing and may be due to a typo. The significance criterion should be re-written. The word "or" after "type locality" should either be changed to "for" or "of".
D.7	D.7-179	1	The last sentence reads "...addressed here a construction-related." The word "a" should be "are"
D.8	D.8-17	2nd paragrap h and Table D.8-12	The statement "This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels would not exceed 70 dBA" is not referenced. Provide a reference. It appears that the author is using Bell's doubling rule. As a general rule, noise decreases by approximately 6 dBA with every doubling of the distance from the source (Bell 1982). Using this rule and assuming a worst case 90 dBA at 50 feet, the noise level at 800 feet can be predicted at 66 dBA. The noise level at 1,000 feet would not be expected to exceed some number less than 66 dBA, not 70 dBA as stated. Re-evaluate the estimated sound level at 1,000 feet.

CH#	Pg#	Par#	Comment
D.8	D.8-22	3	The DEIR overstates the impacts for Impact N-4; Routine inspection and maintenance activities would increase ambient noise levels. The DEIR concludes Class I impact from routine inspection and maintenance activities, but earlier noted that the inspection and maintenance activities would not be expected to increase over what occurs now for existing line. Revise the analysis to include an explanation of what the difference in noise levels is, and there should be differing impacts assigned to those areas where the line will be built in or near ROW for existing line
D.9	D.9-16	1 and 2	Need clarification on discussion of permits State permits. Permits required by California State Parks, construction activities within existing easements of Caltrans and County of SD roadways may proceed without permit from State Parks, right of entry permit required for all construction and maintenance activities located outside of existing easements for all roadways regardless of jurisdiction, access right in writing must be obtained from State Parks for existing and future access roads. Please add this information to the discussion on Caltrans and California State Parks.
D.9	D.9-22	3 and 4	Impacts may be overstated. There appears to be overlap between discussions of potential disruptions to emergency services (Impact T-2) in this section versus discussion of same impacts in Sec D.14 (utilities), in some portions of Sec D.14 classifies the impact as Class III and refers to transportation section - appears to be over counting impacts. Compare impact in D.9 and D.14 to identify any overlap, and revise the text accordingly.
D.9	D.9-23	3 and 4	Clarification required regarding mitigation for damaged roadways. Under Impact T-5 (in several links in addition to the analysis on the referred page), the analysis of potential damage to roadways, concludes Class II impacts because no APMs are suggested by SDG&E. Indicate whether the various access and encroachment permits include provisions for fixing any damage to roads.
D.9	D.9-47	4	Global comment re: speculative nature of FTSE and associated impacts; just one ex here - Impact T-8, construction would conflict with planned transportation projects, future routes are hypothetical and any future transportation projects along those routes are hypothetical, but still conclude Class III (adverse) impact.
D.9	D.9-129, 134, 138	2 ,3,3	For Chuck Wagon Alternative operational impacts, first says that once permits are acquired from FAA for Airspace Obstruction Analysis, there would be no aviation impacts associated w/this alternative (note typo here as well, should be "d" at end of "associate") and no mitigation required then in next paragraph, says operation of this alt would be less than significant with appropriate permits and mitigation, so Class II - inconsistent since there's no mitigation required, should be Class III if any; same comment for Pomerado Road to Miramar North Alt on D.9-134 and Los Penasquitos Canyon Preserve-Mercy Road alternative on D.9-138
D.10	D.10-28	2	Under Impact P-3, DEIR concludes there's no environmental contamination in an area, such as Imperial Valley substation, but then nevertheless concludes Class II impact because of very small likelihood that there might be unknown contamination, should be Class III; same comment on D.10-28 discussing ABDSP - this has been park since 1930s, likelihood of preexisting soil and/or groundwater contamination in vicinity of ROW seems very low (particularly since DEIR characterizes ABDSP elsewhere as "undeveloped land")

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).
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.
D.14	D.14-6, D.14-10, D14-35	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
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.
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.
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.

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.
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.
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.
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.
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.
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.
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.
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.
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

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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.
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.
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.
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.
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.
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.
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.

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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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E.1.2, E.2.2, E.3.2, E.4.2, E.5.2, E.6.2, E.7.1.2, E.8.2	Discussed throughout entire Biological Resources section (i.e.; section E.1.2 page 31 paragraph 5)		The DEIR/EIS assessed impacts to specific biological resources equally for each alternative regardless of extent or intensity of those impacts between alternatives, i.e. all impacts to Quino were assessed as Class I despite the fact that some alternatives impacted critical habitat while others likely do not impact the species. Other examples of this discrepancy in analysis include: 1) Approximately 24 acres of Quino checkerspot butterfly critical habitat will be impacted by the Environmentally Superior SWPL Alternative. The DEIR/EIS states that the Proposed Project would not likely impact any occupied habitat, yet it is assessed the same as an alternative that is known to impact critical habitat. 2) Most impacts to the least Bell's vireo are from the Partial Underground 230kV ABDSP SR78 to S2 Alternative with the All Underground Option. Only 2 migrants were found on the Proposed Project in 2007 surveys, yet the alignment with 19 known locations was ranked environmentally superior to the Proposed Project. 3) Impacts to the southwestern willow flycatcher would result from the Partial Underground 230kV ABDSP SR78 to S2 Alternative with the All Underground Option; however, none were found on the Proposed Project in 2007 surveys so the alignment with 24 migrants should not be selected as the environmentally superior alternative to the Proposed Project. 4) Impacts to the yellow-billed cuckoo would result from the Partial Underground 230kV ABDSP SR78 to S2 Alternative with the All Underground Option; however, this species is not known to occur along the Proposed Project so the alignment with 24 migrants should not be selected as the environmentally superior alternative to the Proposed Project.
E.1	1	6	Additional I-8 route options exist to improve on the preliminary design or lessen the environmental impacts. These include; BCD South non motorized avoidance, Jacumba / SWPPL Breakaway Point, Plaster City Archeological Site, Father Joe's non-motorized avoidance, Pine Valley non-motorized avoidance, High Meadows - Hanson Quarry and Modified Route D Substation Ingress / Egress. Shape files for these route options will be provided.
E.1	5	1	500 kV underground technologies identified the fluid fill for "cooling" purposes, the fluid is in fact a dielectric fluid which is utilized to increase the dielectric properties of the paper insulation as well as in the event of a breach of the protective jacket, the positive pressure from the fluid pressurization system will keep impurities out of the cable, the fluid flow will maintain physical integrity of the majority of the cable system minimizing the section requiring to be replaced.
E.1	5	1	It is correct that 500 kV XLPE cable systems do not utilize a fluid cooling system, however and 500 kV XLPE cable system would require a cooling system consisting of a minimum of a tunnel system with forced cooling fans and controls. Depending on the ratings of the XLPE cable, the heat transfer available with ambient air forced cooling may not be sufficient to maintain cable ratings with out utilizing an air-conditioning system to chill outside air for circulation in the tunnel system.

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E.1	5	2	The design stated would be for a SCFF system. An XLPE system would require a tunnel system with auxiliary forced cooling equipment and an auxiliary power system.
E.1	5	2, last bullet point	At the overhead to underground transition stations, oil storage tanks, pressurization pumps and auxiliary power would also be required.
E.1	6	1	XLPE systems would most likely require an air conditioning system to cool the forced air. This system would have the potential for refrigerant leaks. The system fans would also increase noise.
E.1.1	E.1.1-1	5	Text should note that the 400 foot separation of SWPL and SPL is measured from the R/W centerline.
E.1.1	E.1.1-2	First Bullet	Text should clarify that although there are access roads along the existing SWPL line and this would incrementally reduce the amount of access roads required for a new line, additional roads and spur roads will be required and these additional roads will have impacts.
E.1	E.1.1-2 to 4	to be included in the route description section	Description of I-8 alternative should include that portion would cross Viejas reservation as noted on E.1.7-1.
E.1.1	E.1.1-4	5	Text should be revised to note that the Campo Indian Reservation does not support the Campo North option or any other option that crosses tribal land.
E.1	E.1.1-5	1	Buckman Springs Option 500kv Underground. Self Contained Fluid Filled "SCFF" fluid is an insulating agent not a cooling agent. SCFF would require additional vaults for pumping and storage equipment for the insulating agent. Maintenance for these additional vaults would be required on a monthly not yearly basis. Additional duct bank conduits and path to SDG&E SCADA system would be required to monitor the high/low pressure fluid levels and cable temperature.
E.1	E.1.1-7	2 & 3	230 and 500kV Future Transmission System Expansion. "Two additional 230kV circuits could be installed within Alpine Boulevard, with appropriate compact duct banks and engineering to avoid, or possibly relocate, existing utilities." The current 230kV underground option for 8.1 miles of two 230kV Bundled Underground Circuits in Alpine Blvd maintaining the SDG&E preferred separation between circuits of 20', even reducing this separation to 15', along with relocating the two existing fiber optic backbone cables (on opposite sides of roadway) and relocating the existing water, sewer, communications and power on Alpine Blvd render the roadway area incapable of additional expansion. We are unaware of any current installation of "230kV compact duct banks" as referred to in Appendix 1 of DEIR in the United States.

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E.1	E.1.1-7	1	Future transmission is along existing transmission corridors from Chicarita Substation to Escondido Substation. This route is congested with existing transmission and is along developed areas. Future transmission would require expansion of right of way impacting residences and business. The future transmission routes are a longer route to the northern cities of San Diego County. SDG&E's extra high voltage (EHV) transmission lines are along the coastal and in the southern areas of the County. The northern inland areas of the County have very little EHV lines. Thus, having a substation closer to the northern areas would provide the least impactful and cost effective way to serve these load centers. Additionally, the 500 kV along the northern route alternatives would be in less fire prone areas. That means fires would most likely occur on the 230 kV segments but would most likely impact one 230 kV circuit at a time. Whereas, the southern routes propose the 500 kV in fire prone areas so that a fire will more than likely put the 500 kV and 230 kV segments out of service.
E.1.2	7-8	5	The EIS/EIR states that this and all other alternatives are subject to mitigation requirements as the preferred route. It states that only topsoil from sensitive habitats will be salvaged and used in temporarily disturbed areas to facilitate regrowth. This should be expanded to include salvage of topsoil in all habitats for use in revegetation efforts along with whole plant salvage and native seed collection, where applicable. Non-sensitive habitats can also include species which can be beneficial in revegetation efforts and should also be included in all salvage efforts (i.e. create a plant list by species which should be identified for seed and topsoil collection and whole plant salvage).
E.1.2	9	4	This paragraph has an indirect reference to Mitigation B-7a. This proposed mitigation is inappropriate. It proposes to modify BIO-APM-14 so that trenches/excavations are covered at all times except when active. This would not be feasible or necessary, especially for long trenches or large excavations. Additionally, using silt fence where trenches can't be covered would not be effective at keeping any wildlife (except snakes) out and would be an unreasonable cost. As long as escape routes are provided in active trenches, BIO-APM-14 would be sufficient. If B-7a cannot be removed from the text, add the following language "...shall be covered...or fenced when feasible". Inspecting trenches 3 times per day (vs. 2 times as proposed in the APM) also seems unreasonable and unnecessary.

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E.1.2	10	4	The draft EIR/EIS states that: "The I-8 Alternative would cross Peninsular bighorn sheep (PBS) critical habitat in two areas: between MP I8-15.8 to MP I8 17.9 (Coyote Mountains) and between MP I8-22.8 and MP I8-30.4 (In-ko-pah Gorge)." In fact, the proposed I-8 alternative would pass south of the Coyote Mountains, along the edge and just inside of currently designated bighorn sheep Critical Habitat. However, this area has no documented use by bighorn sheep, follows an existing transmission line and dirt roads, and is below the toe of the slope outside of high quality habitat so impacts to PBS are not anticipated. The EIR/EIS should reflect this. As originally designated by the USFWS, Critical Habitat for desert bighorn sheep in the Peninsular Ranges was not developed using any quantitative analysis of empirical data. Instead, the USFWS used a highly subjective and qualitative approach, that was found by Turner et al. (2004, 2006) to include large areas that had a near zero probability of bighorn sheep use. The USFWS "model" used was purely descriptive and derived from the opinions of Recovery Team members. This meant that the way Critical Habitat was defined was not verifiable, and it included areas of no documented bighorn sheep use (Turner et al. 2004, 2006). Those areas of non-use included alluvial fans that extended one half mile from the toe of the slope, like the I-8 alternative, where bighorn sheep have not been documented. However, these areas are largely excluded from the Proposed Rule to revise Critical Habitat (USFWS 2007). These revisions were a result of Agua Caliente Band of Cahuilla Indians vs. Scarlett (Case No. 05-187 (C.D. Cal Aug. 11, 2006) and the USFWS subsequent desire to more precisely define Critical Habitat for this DPS (USFWS 2007).
E.1.2	11	1	San Diego thorn-mint was identifiable during the 2007 survey season along other alternatives. Therefore, presence should not be assumed; the EIR/EIS should simply state it was present.

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E.1.2	12	5	The draft EIR/EIS states that several state or federally listed species (including subspecies and DPS): "have a moderate to high potential to occur within the vicinity of the I-8 Alternative." However, the draft EIR/EIS fails to note that the I-8 alternative would pass through a very short section of what only appears to be seasonally occupied habitat by a few bighorn at the very southern extent of the bighorn sheep range, in the Island Area of I-8 and In-ko-pah Gorge (Botta 2008, pers. com). The area of currently designated Critical Habitat south of the Coyote Mountains has no documented use by bighorn sheep, which should be acknowledged in the draft EIR/EIS. As originally designated by the USFWS, Critical Habitat for desert bighorn sheep in the Peninsular Ranges was not developed using any quantitative analysis of empirical data. Instead, the USFWS used a highly subjective and qualitative approach that was found by Turner et al. (2004, 2006) to include large areas that had a near zero probability of bighorn sheep use. The USFWS "model" used was purely descriptive and derived from the opinions of Recovery Team members. This meant that the way Critical Habitat was defined was neither verifiable nor repeatable, and it included areas of no documented bighorn sheep use (Turner et al. 2004, 2006). Those areas of non-use included alluvial fans that extended one half mile from the toe of the slope, like the I-8 alternative, where bighorn sheep have not been documented. However, these areas are largely excluded from the Proposed Rule to revise Critical Habitat (USFWS 2007). These revisions were a result of Agua Caliente Band of Cahuilla Indians vs. Scarlett (Case No. 05-187 (C.D. Cal Aug. 11, 2006) and the USFWS subsequent desire to more precisely define Critical Habitat for this DPS (USFWS 2007).
E.1.2.3	13	Table E.1.2.3, Interstate 8 Alternative, Impact B-10 Impact, Table E.1.2.3, All Options, Impact B-10 Impact	Impact B-10 is defined in the EIR/EIS as follows: "Presence of transmission lines may result in electrocution of, and/or collisions by, listed or sensitive bird species (No impact for electrocution; Class I for collision for listed species; Class II for collision for non-sensitive species or daytime migration)." The literature does not support the frequently stated impact discussions on Raptors at Risk from Collisions (Impact B-10) and the resulting proposed mitigation is questionable. In fact the EIS/EIR refers to Bittner 2007, a local expert, who said that "eagles do not tend to be collision victims." The impact analysis on Golden Eagle collision risk is contradictory to this statement and the literature, including: <ul style="list-style-type: none"> • 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, Commission Staff Report. P500-02-071F. The Final EIR/EIS should change the Class II impact and the proposed mitigation.

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E.1.2.3	13-14	2	The EIS/EIR overestimates potential rare plant and vegetation impacts resulting in a 'Class I' designation. It states that this and all other alternatives are subject to mitigation requirements as the Proposed Project. Impact acreages and mitigation ratios are assumed based on preliminary project design and assumed requirements by the regulatory agencies. If projected mitigation acreage and HMP's are implemented prior to any ground disturbing activities are conducted as proposed throughout the biology sections in the EIR, the regulatory agencies typically will require lower mitigation ratios because there will not be temporal loss of habitat. Revise ratios and reduce acreages to account for no temporal loss of habitat and allowances for final proposed impact acreages based on final project design.
E.1.2.3	14	3	The EIS/EIR assumes all impacts are 'Class I' without presenting detailed data. The document should identify and categorize all impacts based on final project design and field review and should not rely on unfounded assumptions or should at least recognize the impacts have been grossly overstated.
E.1.2	15-17	Table E.1.2-4	The EIS/EIR assumes mitigation ratios which may not be applicable to calculate mitigation acreages. Impact acreages and mitigation ratios are assumed based on preliminary project design and assumed requirements by the regulatory agencies. If projected mitigation acreage and HMP's are implemented prior to any ground disturbing activities are conducted as proposed throughout the biology sections in the EIR the regulatory agencies typically will require lower mitigation ratios because there will not be temporal loss of habitat. Revise ratios and reduce acreages to account for no temporal loss of habitat and allowances for final proposed impact acreages based on final project design.
E.1.2	18	1	The EIS/EIR assumes impacts to RCA's without project specific details or referencing the Edison Electric MOU concerning transmission lines on federal lands. The projects final engineering design would be used to determine if there will be any impacts to RCA's; the document should reference and utilize all applicable elements of the MOU to facilitate the implementation of the project.
E.1.2	18	2	The EIS/EIR makes assumptions on the presence of species and classifying impacts. Impacts to RCA's may be allowable based on the Edison Electric MOU concerning transmission lines on federal lands. Recommend using the project's final engineering design to determine if there will be any impacts to RCA's and reference and utilize applicable elements of the MOU to facilitate the implementation of the project. The number of trees projected to be impacted by trimming and removal is inflated. Trimming of native trees and removal of non-native trees do not by default equate with significant impacts. Mitigation for impacts to native trees should be based on final design specifications with definitions and mitigation ratios for various levels of significance for removal and trimming of native and non-native trees.
E.1.2	19	2	The EIS/EIR assumes that implementation of the project will cause fires that will result in type conversion of habitats along and adjacent to the project ROW. This assumption does not reference any scientific study which would aid in confirmation of the assumption; therefore, include references that support this statement. Additionally, include in the discussion other factors that occur in the project area that cause type conversion, such as overgrazing which can convert perennial grasslands to annual grasslands.

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E.1.2	20-22	1	The EIR/EIS assumes presence of sensitive plant species which may or may not be present within potential impact areas. The project design should be finalized and focused rare plant surveys should be conducted during suitable field conditions to determine presence/absence of sensitive plant species. Require mitigation based upon the results of detailed rare plant surveys and final project design and state that this process will occur.
E.1.2.3	25	1, 2	The EIS/EIR states "These impacts are significant according to Significant Criterion 1.c. (substantial adverse effect on FTHL MAs) and Significant Criterion 1.f. (directly or indirectly cause the mortality of a special status wildlife species). These impacts are significant and not mitigable to less than significant levels (Class I) because it is unknown if enough mitigation land is available to compensate for the impacts. Implementation of Mitigation Measures B-1a, B-1c, B-2a, B-7a, and B-7b is required to, at least in part, compensate for impacts to the FTHL and its habitat." SDG&E is committed to compensate for impacts to FTHL at ratios determined by the Flat-Tailed Horned Lizard Rangewide Management Strategy (Flat-Tailed Horned Lizard Interagency Coordinating Committee, 2003) and it is SDG&E's responsibility, working with land management agencies, to identify mitigation land; therefore, the assumption that mitigation lands are not available is speculative. This impact is mitigable and should be classified as a Class II impact, not a Class I impact.
E.1.2	25,26	2nd to last paragraph	The draft EIR/EIS states under Impact B-7B that the project would result in: "Direct or indirect loss of Peninsular bighorn sheep or direct loss of habitat (Class I)" and overstates this impact by making the erroneous assumption that "the species is assumed to occur throughout the designated PBS critical habitat." Yet there are no bighorn sheep sightings along the proposed I-8 alternative where it passes south of, but not through, the Coyote Mountains. This area is marginal habitat consisting of rolling hills beyond the toe of the slope where bighorn sheep occur. The EIR/EIS must acknowledge that Critical Habitat for this DPS is being revised, in part, because the U.S. Fish and Wildlife Service wanted to "more precisely define" Primary Constituent Elements for this DPS and incorporate bighorn location data (U. S. Fish and Wildlife Service 2007). The section of the EIR/EIS that is in need of correction is as follows: "As noted in Section D.2.11, eight PBS ewe groups are known to occur (USFWS, 1999a). The southernmost known PBS ewe group occurs north of I-8 in Carrizo Canyon, which includes portions of the Tierra Blanca, In-ko-pah, Coyote, and Jacumba Mountains. Historically, a ewe group occurred along the Mexican border, but has disappeared since the 1980s; the loss was poorly documented but was likely the result of the construction of I-8 in the mid-1960s, railroad activity, livestock grazing, poaching, and fire suppression (USFWS, 2000a). The I-8 Alternative would cross through two areas where there are known PBS sightings, In-ko-pah Gorge and the Coyote Mountains. These areas are considered part of the Carrizo Canyon ewe group. Although no PBS was observed during vegetation mapping and rare plant surveys, the species is assumed to occur throughout the designated PBS critical habitat."

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E.1.2	25	2nd to last paragraph	The EIR/EIS cites a number of hypothetical causes for bighorn sheep extirpation south of I-8 but does not include human use of waterholes and disease from domestic livestock, including respiratory disease spread by dispersing bighorn: "the loss was poorly documented but was likely the result of the construction of I-8 in the mid-1960s, railroad activity, livestock grazing, poaching, and fire suppression (USFWS, 2000a)." The two additional hypothetical causes of extirpation: 1) human use of waterholes and 2) disease, both have very plausible cause and effect mechanisms. Bighorn sheep can be excluded from water sources during human occupancy (Jorgensen 1974; Campbell and Remington, 1981) and livestock disease, including respiratory pathogens carried by infected bighorn sheep, infected much of the Peninsular Ranges (Elliot et al. 1994).

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E.1.2	26	3	<p>The EIR/EIS speculates that: "It is unknown whether I-8 Alternative access roads, tower structures, or other project features would be perceived by PBS as barriers." However, no such barrier effect has been described from the Kofa Mountains (Arizona) or Old Dad Mountains (California) where transmission lines pass through areas used by bighorn sheep (Smith et al. 1986). Following is more supporting information that transmission lines do not impact PBS: Once constructed, powerlines and support structures are inanimate objects in the environment. There is no empirical evidence that powerlines fragment bighorn sheep habitat or preclude movements under the powerline. Research on bighorn sheep prior to, during construction, and during operation of the 500kv Palo Verde Devers No. 1 transmission line through Kofa National Wildlife Refuge in 1982 showed only a minor, transient effect on bighorn sheep. The overall conclusion by Smith et al. (1986) was: "To summarize the preceding material, it appears generally that construction and operation of the Palo Verde to Devers 500kV Line 1 had little negative impact on bighorn populations in the Dome Rock Mountains, New Water Mountains, or the Livingstone Hills." Also, "There were no clear indications that construction or operation of the line caused nearby resident sheep to abandon or even move normal home areas. Quite to the contrary, several individual sheep most directly affected actually appeared to be drawn to construction activity."</p> <p>There has also been no demographic effect. From 1957 through 2006, 569 bighorn sheep were captured and removed from Kofa National Wildlife Refuge for translocations. The Arizona Game and Fish Department has regularly issued 5 - 17 hunting permits a year since 1960 and has achieved 89 percent success rate over the past 20 years (Kofa National Wildlife Refuge and Arizona Game and Fish Department 2007). These populations have been consistently over 800 individuals for nearly two decades post construction. Only recently, have these populations undergone a decline for other reasons. An investigate report by the Arizona Game and Fish and Kofa National Wildlife Refuge concluded that the decline was due to drought and mountain lion predation. The powerline is not mentioned as a possible cause of decline.</p> <p>A similar example can be found in the Old Dad Mountains in the Mojave Desert where a transmission line traverses occupied bighorn sheep habitat. This population has been the source of numerous bighorn sheep translocations and trophy ram hunting since the 1980s.</p> <p>It should be clear from the examples above that powerline construction has only a temporary effect on bighorn sheep (several months) which can be mitigated through avoidance and minimization measures, and that powerline operation in general is a non-issue for bighorn sheep management. This impact should be changed to Class II and Class III.</p>

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E.1.2	26	4	The EIR/EIS relies on speculation to support its conclusion that impacts are significant and not mitigable: "As mentioned in Section D.2.11, human and construction activity and project features in PBS habitat could cause bighorn to avoid affected areas and could interfere with the use of resources such as escape terrain; water; mineral licks; rutting, lambing, or feeding areas; the use of traditional movement routes, and/or could cause physiological stress or increased predation, all of which could adversely affect survival and recovery of the species. These impacts are significant according to the following Significance Criteria: 1.a.) Substantial adverse effect through any impact to one or more individuals of a federal or State listed species; 1.f.) Substantial adverse effect by any impact that directly or indirectly causes the mortality of special-status wildlife species; 4.a.) Substantial adverse effect by preventing access to foraging habitat, breeding habitat, water sources, etc.; 4.b.) Substantial adverse effect by interfering with connectivity between blocks of habitat or block or interfere with a wildlife corridor; and 4.c.) Substantial adverse effect by fragmenting a species' population. Based on the high sensitivity of this species and evidence that shows that human activities significantly affect it, these impacts would be significant and not mitigable to less than significant levels (Class I)." Suggest changing impact to Class II.
E.1.2.3	30	4, 5	The EIS/EIR states that Impact B7h applies to the golden eagle for this alternative for two known golden eagle nests: "... Impacts to this eagle pair would be significant and not mitigable to less than significant levels (Class I) because of the distance between the nest area and the project (less than 4,000 feet) and the direct line-of-sight that would occur. Implementation of Mitigation Measure B-7h, which states that no construction or maintenance activities shall occur during the eagle breeding season, is still required to minimize the impact, however." -- This impact should be categorized as Class II because a 4,000 foot buffer is arbitrary and does not seem to have any citations to back it up. Typically, raptor nests (including eagle nests) have a buffer of 1/4 to 1/2 mile around them only when active. Therefore, if SDG&E conducts nesting surveys during the appropriate season and finds an active nest, they could avoid construction within 1/4 mile during nesting season and not disturb the eagles. If the nest is inactive, there should be no restrictions on construction even during nesting season. 2) SDG&E would avoid construction within the buffer zone at active eagle nests. This is a Class II impact that is mitigable to less than significant levels by surveying for and avoiding active nests.

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E.1.2; E.2.2; E.3.2; E.4.2; E.5.2	E.1.2-30, E.2.2-13, E.4.2-15, E.5.2-58 (Golden Eagle disturbance and setback discussed 14 more times in this section)	2,4,1,1	<p>The EIR/EIS describes Impact B-7H as follows: "Direct or indirect loss of golden eagle or direct loss of habitat (Class I for nests within 4,000 feet; Class II in existing transmission corridor) and impacts to active nests can be mitigated to less than significant levels by limiting construction activities within 4,000 feet of a nest during the nesting season." This should be a Class II impact based on the following discussion:</p> <p>The literature does not support this Impact Conclusion and Proposed Mitigation. Specifically, human disturbance (B-7H), especially noise from construction and maintenance of the power line on birds, in particular raptors such as the golden eagle, is not supported by the literature. See examples below.</p> <p>1. Birds are unlikely to hear the construction noise from building the power line. They have narrower auditory ranges than humans. This is true not only for Golden Eagles but also for the grasshopper sparrows, Northern Harrier, Southern California Rufous-Crowned Sparrow, White-Tailed Kite, and the Yellow Warbler referenced in the EIS/ EAR. Please refer to: a. Dooling, R.J. (2002) Avian Hearing and Avoidance of Wind Turbines. National Research Energy Laboratory. Technical Report NREL/TP-500-30844. b. Dooling, R.J. 2007. The Effects of Highway Noise on Birds. The California Department of Transportation, Division of Environmental Analysis. Sacramento, California. c. Yamazaki, Y., H. Yamada, M. Murofushi, H. Momose, and K. Okanoya. YEAR? Estimation of hearing range in raptors using unconditioned responses. Ornithological Science 3:85-92.</p> <p>2. Studies by Craig and Craig 1984 (Craig, T. H. and E.H. Craig. 1984. A Large Concentration of Roosting Golden Eagles in Southwestern Idaho. Auk 101:610-613) showed high tolerance for human activity directly below where Golden Eagles roosting on power lines. During the road censuses next to transmission lines for a large concentration (>700) of roosting Golden Eagles in Idaho, the authors noted that "most birds remained perched as we passed them" and were not disturbed by vehicular traffic and observers close to their perching locations.</p> <p>CONTINUED...</p>

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[continued from previous]			<p>3. Studies by Stalmaster and Newman 1978 (Stalmaster, M. V. and J.R. Newman. 1978. Behavioral Responses of Wintering Bald Eagles to Human Activity. Journal of Wildlife Management 42:503-513) show that eagles are tolerant to non-threatening human activity and become acclimated to it. Acclimation to human activity is common in birds. Vegetation and topographic conditions reduce the potential disturbance even further. This study and studies on wading birds show that the mere presence of human activity may not be disturbing to birds if it is not directed at them, e.g. walking parallel to a particular bird (non-threatening) versus walking directly at a particular bird (threatening activity). Construction and maintenance of the power line will not be directed at Golden Eagles and should not be considered a threatening activity.</p> <p>4. Richardson and Miller 1997 (Richardson, C.T. and C.K. Miller. 1997. Recommendations for Protecting Raptors from Human Disturbance: a Review. Wildlife Society Bulletin 25: 634-638) cite studies that also show that the flushing distances of Golden Eagles are also quite small. Eagles are somewhat less tolerant to human activity than vehicular distances, but flushing distances are less than 1,000 feet.</p> <p>The impact analysis needs to be updated to reflect a Class II impact for nests and proposed mitigation should be updated as follows. Mitigation using a 4,000-ft buffer is not justified by the literature. The document should propose a specific and realistic buffer for Golden Eagles found along the Sunrise Powerlink that should be developed based on an in-depth literature review and evaluation of site specific conditions along the proposed corridors, e.g. actual habitat buffers between construction activities and known locations of Golden Eagle nests. This analysis would result in specific setback recommendations that SDG&E could use to develop appropriate mitigation. In general we recommend a buffer of up to 1/4 mile for active nests. Activities that would occur within 1/4 mile of an active should not be prohibited, however, especially in areas where the activities are screened by natural topography or vegetation (obstructed view). These cases could be monitored by a qualified raptor biologist to provide construction flexibility; if the biologist determines that construction activities are not disturbing the nest, construction could continue. The biologist could stop work if the nest was deemed to be disturbed. Another alternative would be to use the study methods developed by Stalmaster and Newman 1978 to determine what the actual flushing distances are for Golden Eagles and recommend specific buffers and other mitigation for construction and operation of the power line.</p>

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E.1.2.3, E.2.2.2	35, 16	1st paragrap h (page 35, section E1.2.3), 4th paragrap h (page 16, section E.2.2.2)	The EIS/EIR states that there is a Class I impact on bare foot banded gecko, although "No surveys were conducted for this species. If surveys were conducted, and the species was not found, the survey result would have to be considered false negative because of the species' highly elusive nature. The barefoot banded gecko is, therefore, assumed to be present along the I-8 Alternative from approximately MP 18-23 through MP 39. Any impact to the barefoot banded gecko or its habitat would be significant according to Significance Criterion 1.a. (substantial adverse effect, either directly or indirectly, on one or more individuals of a federal or State listed species through habitat modification) and not mitigable to less than significant levels (Class I) since the extent of the impacts that would occur is unknown. Implementation of Mitigation Measures B-1a (that requires all construction to remain within delineated construction limits) and B-1c (Conduct biological monitoring) would provide some protection for this species but is not adequate to mitigate impacts to less than significant levels." Existing occurrence data should be incorporated for this species. Suitable habitats could be avoided, where feasible, to reduce impacts. Please change the classification to a Class II impact.
E.1.2.3, E.1.2.5	36, 45	7th and 8th (page 36, section E.1.2.3), 1st paragrap h (page 45, section E.1.2.5)	The EIS/EIR states that there is no known concentrated migration (and that it is unlikely because of existing topography) in the vicinity of this alternative, then it states "Even so, since most birds migrate at night, and migration corridors have never been studied systematically (their use by birds has had to be pieced together from anecdotes), there is no way to know how many birds and what species of birds could actually be impacted by collision with the project transmission lines, towers, poles, or static wires. There is no way to know because much of the migration occurs at night when it cannot be seen, and birds that collide with transmission line features and fall to the ground are often taken away by predators/scavengers before morning. Therefore, as with the Proposed Project, it is assumed that some migrating species could be federal or State listed or of other special status, and their mortality would be a significant impact that is not mitigable to less than significant levels (Class I) according to the following Significance Criteria: 1.a. (substantial adverse effect through any impact to one or more individuals of a federal or State listed species), 1.f. (directly or indirectly cause the mortality of candidate, sensitive, or special status wildlife species), and 1.g. (result in the killing of migratory birds)." It cannot be assumed or stated without a citation that 1) more birds will collide with the line at night; 2) that these are "often" carried away by scavengers before morning; and 3) these would be federal or state-listed or other special status species. Additionally, much of this alternative parallels the SWPL line. If impacts relating to collisions have not been shown to be an issue on that line, one cannot assume it will be a Class I impact for this alternative.

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E.1.2; E.2.2; E.3.2; E.4.2; E.5.2	E.1.2- 37, E.2.2- 17, E.3.2- 18, E.4.2- 19, E.5.2- 61	1,5,7,5,2	Impact B-10 is defined in the EIR/EIS as follows: "Presence of transmission lines may result in electrocution of, and/or collisions by, listed or sensitive bird species (No impact for electrocution; Class I for collision for listed species; Class II for collision for non-sensitive species or daytime migration)." The literature does not support the frequently stated impact discussions on Raptors at Risk from Collisions (Impact B-10) and the resulting proposed mitigation is questionable. In fact the EIS/EIR refers to Bittner 2007, a local expert, who said that "eagles do not tend to be collision victims." The impact analysis on Golden Eagle collision risk is contradictory to this statement and the literature, including: <ul style="list-style-type: none"> • 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, Commission Staff Report. P500-02-071F. Change the proposed mitigation. Conduct an avian risk assessment for the line as a part of the APP and consider mitigation, e.g., marking the line, only in higher risk areas.

CH#	Pg#	Par#	Comment
E.1.2.3	39	1	<p>The draft EIR/EIS claims that maintenance would result in Class I impacts 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 ... and/or adverse effects to Peninsular bighorn sheep from maintenance activities that cause sheep to avoid affected areas. Even with implementation of the APMS, disturbance to wildlife and potential wildlife mortality would be significant according to Significance Criteria 1.a. (impacts to one or more listed species), 1.c. (disturbance to FTHL MAs), 1.d. (disturbance of critical habitat)" Additionally, the draft EIR/EIS relies on speculation to justify Class I impacts. "Impacts to PBS and its critical habitat (see Impact B-7B) from maintenance activities could cause PBS to avoid affected areas and could interfere with the use of resources such as escape terrain; water; mineral licks; rutting, lambing, or feeding areas; the use of traditional movement routes, and/or could cause physiological stress or increased predation. All of these potential effects could adversely affect survival and recovery of the species and are significant and not mitigable to less than Class 1 impacts." This impact should be changed to a Class III impact in most cases and a Class II impact in others, but it should not be a Class I impact. There is no documented basis that bighorn sheep abandoned lambing habitat during construction activities for the Palo-Verde Devers No.1 project. 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. 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.</p> <p>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.")</p> <p>[continued]</p>
Continued from above			<p>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 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.</p>

CH#	Pg#	Par#	Comment
E.1.2	112	7th species down in table	The taxonomy and common name for bighorn sheep used in the draft EIR/EIS is in error. The EIR/EIS refers to bighorn sheep in the Peninsular Ranges (<i>Ovis canadensis nelsoni</i>) as: "Peninsular bighorn sheep <i>Ovis canadensis cremnobates</i> " Change to the accepted name desert bighorn sheep in the Peninsular Ranges (<i>Ovis canadensis nelsoni</i>) (listed as a distinct population segment).
E.1.3	E.1.3-1	2	"Passing less than one mile southeast of the southwest corner of ABDSP ..." should be passing less than one mile southwest of the southwest corner of ABDSP.
E.1.3	E.1.3-8	V-56	"Increased structure contrast, view blockage, skylining when viewed from Key Viewpoint 44 at Dunaway OHV Staging Area". The term skylining implies the towers are at the top of a ridge; in fact this viewpoint is in the desert flats and is paralleling the existing SWPL.
E.1.3	E.1.3-36	V-66	The author states the re-located cable poles would be less visible on the south side of I-8 than the north side as proposed by SDG&E. In reality if the cable poles are located south of I-8 they would be skylined along Alpine Blvd. and I-8 as they would be above the elevation of both where the conductors cross the interstate. The result of this aerial crossing by the CPUC is an unnecessary interstate crossing that could be detrimental to low flying aircraft. Conversely, SDG&E's proposal would place the cable poles on the north side of I-8 at a point lower than the interstate elevation so worst case is the pole tops may be visible but not the whole structure and contrary to what is implied.
E.1.3	E.1.3-27	V-3a	In Key Viewpoint 51 it depicts graded areas at each tower location, initially this will be likely but low growth vegetation will fill in; this appears to be a subjective view as other Key Viewpoints do not show graded pads at tower locations. This is a temporary visual impact. Also, the comment is made "...on sunny summer days the transmission line would stand out more and the contrast would be more noticeable." This appears to be an assumption and is not necessarily true, the steel will be dull galvanized and the conductor will be non-specular for the purpose of reducing glare.
E.1	E.1.3-36	3	For the I-8 crossing on the west end of Alpine Boulevard, the Draft EIS/EIR argues the overhead crossing of the I-8 is preferred visually as compared to an underground crossing. SDG&E has submitted an underground crossing as part of a data request response that was termed the Peutz Valley crossing. This alternative is not mentioned in the Draft EIS/EIR. SDG&E strongly feels the underground crossing is superior to an overhead crossing just from the visual impacts of the conductor crossing the I-8. There are also other advantages such as one less point of potential risk for wires coming across the highway due to an airplane or helicopter contact. This especially makes sense because there is an opportunity to underground 230 kV unlike the other I-8 crossings which are 500 kV.

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E.1.3	E.1.3-42	V-68	Key Viewpoint 55 assumes steel poles. If structures are relocated lower on the slope to eliminated skyling and lattice towers are used, the visual would be reduced as the lattice would blend into the side slope.
E.1.3	E.1.3-41	3	The visual impact is overstated for the Proposed transmission line as viewed from KVP 55. The new pole structures would be set back at a distance too far from Moreno Blvd. to block any portion of the view, as the structures are small in scale relative to other landscape features; therefore, view blockage is low. There is no significant sky-lining of the poles because hills form a backdrop that is higher in elevation than the poles as seen from the highway. In addition, textural and color variations of the background of rolling hills provide some screening for the lattice structure, which provides numerous openings through which the background is visible, which provides some screening. The scale of the structures is small relative to the surrounding landscape elements, and so would be subordinate rather than co-dominant. The character of the landscape would not be degraded from the introduction of the poles into the landscape, and the overall visual change would be low. Impact V-67 should be changed to Class III, as the impact is less than significant.
E.1.3	46, 54 Figures E.1.3-14B, E.1.3-15B	4,4	KVP 56: Visual Simulation, KVP 57: Visual Simulation. The soil color selected for the new access road is too light, which overemphasizes the color contrast of the new road. The highly visible access road as shown in the simulation would be temporary, as the strong line and color contrasts would be mitigated by revegetation. In the event there is no revegetation, the surrounding grasses would encroach on the cleared roadway, significantly softening contrasts. Typical transmission line access roads (long-term) are visible as a lightly-used two-track road. It should be disclosed that the visual impact of the new access road is temporary, or the simulated access road should be replaced with a two-track road.
E.1.4	E.1.4-1	3	The land use description for Interstate 8 Alternative acknowledges tribal lands along the route as sensitive land uses. However, the text does not explain that where the route may cross these sensitive land uses, tribal approval for such crossing may not be granted.
E.1.4.1; E.1.4.4	E.1.4-1; E.1.4-14	Various	Feasibility of options that cross Campo Reservation is questionable, since Campo Tribe will not permit entry into reservation.
E.1.4	E.1.4-2, E.1.4-2, E.1.4.7	last paragraph, Table E.1.4-1, Table E.1.4-2	The tables identify a number of sensitive land uses without defining why they are sensitive. Definitions of sensitive land use categories should have been provided to support the identification of certain kinds of land uses as sensitive. Some of the categories identified as sensitive include rural residential, multi-family residential and single family residential, with no supporting facts to justify why they would be considered sensitive. An appropriate location to add definitions of sensitive land uses would be the last paragraph on page E.1.4-1.
E.1.4	E.1.4-3	Table E.1.4.1	Data for milepost 35 needs to note the 1000 acres of land recently purchased by the Nature Conservancy as a sensitive land use.
E.1.4	E.1.4-6	6th row down	Under Campo North Option in chart, should be "CN 0-1.4" not "NC", "CN" is denoted on maps

CH#	Pg#	Par#	Comment
E.1.4	E.1.4-6	6th row down	Under Campo North Option in chart, "tribal" should be included under Land Use Classifications, and "Campo Reservation" should be included under Specific Land Uses, since this option still runs through the Campo reservation
E.1.4	E.1.4-7	6th row down	Under Campo North Option in chart, should be "CN 0-1.4" not "NC", "CN" is denoted on maps
E.1.4	E.1.4-13	1	Clarification is needed for a described situation in which Mitigation L-1a could not be implemented: "there may be situations where the alignment or facility components cannot be relocated" is identified as an impact upon future development, and a conclusion is made that this impact is not mitigable. SDG&E will work with property owners who are in the process of developing their properties to minimize construction and operations related impacts to reduce or mitigate impacts to the extent feasible. This would reduce the identified impact to significant and mitigable and reduce to Class II.
E.1.4	E.1.4-14	1	Text makes reference to I-8 Substation Figure Ap. LU E.1.8, but the figure cannot be found in the text or appendix.
E.1.4	E.1.4-14	5	Text should be updated to indicate that although the Campo tribe suggested a re-route to the north of I-8, they currently support none of the southern alternatives
E.1	E.1.4.-15	4	Additional clarification is needed regarding the determination of a Class I impact. A conclusion of a Class I impact for future development was made (Impact L2) with no discussion or supporting documentation as to why the impact would be significant and not mitigable.
E.1	E.1.4-15, E.1.4-8, E.1.4-22, E.1.4-23	3, 4, 4, 6	With regard to temporary construction impacts, for example, the following statement is made: "While this disturbance would be short-term and temporary at any one location, impacts would be significant if construction was not carefully managed and residents not kept informed." Successful construction management techniques and informing the public of construction activities could fully mitigate impacts. Suggest phrasing the sentence to read: "while this disturbance would be short-term and temporary at any one location, impacts would not be significant as long as construction was carefully managed and residents kept informed." The same sentence/approach is used throughout the document.
E.1.5.2; E.1.5.4; E.2.5.2; E.2.5.3	E.1.5-5 & 6 / E.1.5-10 to 12	4th row in table E.1.5-1, 3	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives.
E.1.6	E.1.6-4, E.1.6-8, E.1.6-12, E.1.6-15, E.1.6-18	6, 1, 3, 3	Text asserts that presence of the R/W and line would permanently impede livestock access to feed, water. This is an assumption without any discussion as to how an impediment occurs. If this merely implies that a different traveled route is taken to access feed and water, there is no impediment created. Likewise, the addition of access roads could actually improve and not impede the circulation for transport of livestock.

CH#	Pg#	Par#	Comment
E	E.1.7-2	5	There is little information about the significance of site CA-SDI-6706, unlike the previous and following paragraphs on page E.1.7-2 regarding other historic resources. The DEIR should add that a portion of the site is currently in open space on the Viejas Indian Reservation, and that the site is presumed eligible for the NRHP/CRHP (Table Ap.9B-83).
E	E.1.7-2	6	On page E.1.7-2 the DEIR mentions that Desert View Tower (CHL 939) is a NRHP/CRHP property located within 0.5 miles of the I-8 Alternative, but omits mention of Mountain Springs Station, also a California Historic Landmark, located within 0.22 miles of the Alternative. The Mountain Springs Station should be discussed in the text.
E.1	E.1.7-6, 10, 12, 16, 19,23 (I-8); E.2.7-6 (BCD); E.3.7-3, 5 (D); E.4.7-3, 6, 8 (Mod D); E.5.7-163, 167 (NIAR)	2, 5, 2, 5, 2, 1 (I-8); 4 (BCD); 3, 5 (D); 4, 4, 3 (Mod D); 2, 3 (NIAR)	The DEIR states that currently no TCPs have been identified that would be directly impacted by the I-8 Alternative; however, a search of the Sacred Lands File noted that lands sacred to Native Americans are present in the vicinity of the alternatives. The DEIR does not define "vicinity", so impacts to TCPs can't be realistically evaluated if there is no definition of the term. Since the alternatives presented in the DEIR covers three Counties in southern California, making a statement that lands sacred to Native Americans are present in the vicinity of the alternatives is inadequate for the evaluation of impacts to TCPs in the I-8 Alternative without a definition of the term "vicinity". A definition of "vicinity" needs to be determined or change the sentence to accurately reflect this I-8 Alternative, not alternatives. This comment also applies to the BCD, D, Modified D, and New In-Area Renewable Alternatives.
E.1; E.7 E.2 E.4	E.1.7-26; E.7-125 E.2.7-8 E.4.7-10	bullet 3 bullet 1 bullet 2	Based on the description provided for metasedimentary rocks (schist, quartzite, marble and amphibolite), these should not be classified as having "marginal" paleontological potential. These are higher grade metamorphic rocks that have been altered to the extent that fossils would be unrecognizable. Even if a remnant of a fossil were identified, it would likely have no scientific value. As a result, any mitigation measures suggested for this unit throughout the remainder of this chapter would be completed unnecessary and ineffective.
E.1	E.1.7-10	4	The Campo North Option is located entirely within the Campo Indian Reservation and permission was not granted for an archaeological record search or for field surveys. Therefore, mitigation measures C-1a and C-1b (Inventory and Evaluate Cultural Resources and Avoid and Protect potentially significant resources) need to be added for this option. Also, since nothing is known about cultural resources in this option, only two (C-3 and C-4) of the six standard impacts (C-1 through C-6) are listed. The other four standard impacts relate to "known" resources. The text should include an acknowledgment that all six standard impacts could apply once the option is surveyed.

CH#	Pg#	Par#	Comment
E.1	E.1.7-13	2	In paragraph 2 of page E.1.7-13 the DEIR states that indirect visual impacts to Old Hwy 80 are not significant for the West Buckman Springs Option of the I-8 Alternative because of the proximity of Old Hwy 80 to modern features like the I-8. Paragraph 4 of the same page states that for construction of the Project Old Hwy 80 can be mitigated to a level less than significant (Class II); however, on the following page (E.1.7-14) the DEIR states that Old Hwy 80 is potentially subject to long-term and operational impacts. This contradicts the previous statement in paragraph 2 of page E.1.7-13 that states indirect impacts to this resource would be less than significant due to the proximity to modern features. The DEIR needs to clarify how the long-term and operational impacts from the one pad location on the east side of Hwy 80 will occur if it is not visual, which is an impact that the DEIR has determined to be less than significant.
E.1.8; D.8.3.3	E.1.8-9	3	The Draft EIR/EIS identifies that there will be noise and vibration impacts during construction and maintenance activities for which mitigation measures have been identified. It is noted that the San Diego County Code of Regulatory Ordinances prohibits construction noise at a residential property line over 75 dBA weekdays from 7 a.m. to 7 p.m., and the Riverside County Code, which restricts the hours of construction near residences. Two of the construction options being considered by SDG&E are 6 day / 10 hour-per-day or 6 day / 12 hour-per-day work-weeks. Any construction activities on Saturday would need to be low-noise and would substantially limit foundation drilling or helicopter work. This may also result in longer construction duration if work cannot occur on Saturdays.
E.1	E.1.9-10	1	Draft EIS/EIR contemplates future 230 kV circuits could be installed underground in Alpine Boulevard. Installation of the initial double circuit 230 kV line, if feasible, will need to avoid conflicts with existing communication facilities. Thus, future 230 kV circuits within the same road are not feasible.
E.1.10 through E.8.10	Global - all references to Impact P-1 throughout the text	Global, Impact P-1	The wording for Impact P-1 should coincide with that used for Impact P-5 describing the potential for spills associated with operation. Impact P-1, "Soil or groundwater contamination results due to improper handling and/or storage of hazardous materials during construction" is really referring to the potential for accidental spills or releases due to improper handling and/or storage resulting in soil and groundwater contamination. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities." The same text should be used to describe Impact P-1 for all Section E text.
E.1.10 through E.8.10	Impact P-1 in Tables E.1.1.1.0-1 through E.7.1-23	Global, Impact P-1	The wording for Impact P-1 should be the same as Impact P-1 as used in Table D.10-6. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities."

CH#	Pg#	Par#	Comment
E.1.10 through E.8.10	Global - all references to Impact P-3 throughout the text	Global, Impact P-3	The potential risk of exposure to previously unknown contamination is overstated because the most likely types of contamination encountered would be oil, gasoline, diesel, etc. which generally could be detected by visual and olfactory observations. For all discussions of Impact P-3 (Previously unknown soil and/or groundwater contamination could be encountered during grading or excavation), add sentences: "The most likely types of contamination encountered would be oil, gasoline, diesel, etc. These types of contamination generally could be detected by visual and olfactory observations."
E.1.10 through E.8.10	Impact P-1 in Tables E.1.1.1.0-1 through E.7.1-23	Global, Impact P-1	The wording for Impact P-1 should be the same as Impact P-1 as used in Table D.10-6. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities."
E.1.10 through E.8.10	Global - all references to Impact P-3 throughout the text	Global, Impact P-3	The potential risk of exposure to previously unknown contamination is overstated because the most likely types of contamination encountered would be oil, gasoline, diesel, etc. which generally could be detected by visual and olfactory observations. For all discussions of Impact P-3 (Previously unknown soil and/or groundwater contamination could be encountered during grading or excavation), add sentences: "The most likely types of contamination encountered would be oil, gasoline, diesel, etc. These types of contamination generally could be detected by visual and olfactory observations."
E.1.10	E.1.10-4	3, Impact P-1, second sentence	This section needs to clarify that although spills could result in soil contamination, the most likely incidents would be minor spills that could easily be cleaned up. Replace sentence with: "If a spill occurred that resulted in soil contamination, it would be a significant impact. However, the most likely incidents involving these hazardous materials would be associated with minor spills and drips. Small spills can be easily cleaned up."
E.1.12	4,6,7	4,6,1	The document states, in effect, that the magnitude of the substation grading makes it impossible to mitigate for downstream erosion and sedimentation effects if constructed in the rainy season (October through April). Therefore, Mitigation Measure H-1a states that the substation grading should only occur in the dry season (May through September). The document implies that mitigated construction during the rainy season is either infeasible or prohibited. Currently, there is not believed to be any jurisdictional regulation prohibiting construction of this project during the rainy season. There exist in regulatory documents and guidance appropriate BMP practices to mitigate for erosion and sedimentation of a project of this magnitude during the rainy season. It appears that this mitigation measure is applied subjectively, as the decision to construct during the rainy season, and the resultant BMP regimen used, would almost certainly be an economic decision, rather than a feasibility or regulatory issue.

CH#	Pg#	Par#	Comment
E.1.4 E.2.4 E.3.4 E.4.4 E.5.4	E.1.4-4 E.2.4-3, E.3.4-3, E.3.4-4 E.4.4-4; E.4.4-6 E.5.4-112, E.5.4-116, E.5.4-116, E.5.4-118	2, 4 3, 5 4, 6 3, 1, 3, 4	With regard to temporary construction impacts, the following statement is made: "While this disturbance would be short-term and temporary at any one location, impacts would be significant if construction was not carefully managed and residents not kept informed." However, successful construction management and informing the public of construction activities could fully mitigate impacts. Re-phrasing the sentence to read: "while this disturbance would be short-term and temporary at any one location, impacts would not be significant as long as construction was carefully managed and residents kept informed. Repeated 2 pages later.
E.2	E.2.1-1	1	The BCD Alternative proposed in the Draft EIS/EIR goes through Back Country Non-motorized zones. SDG&E proposes a route modification to avoid these non-motorized zones. This re-route would follow the BCD Alternative but continue north at BCD-9 avoiding Back Country Non-motorized Zone before come back south to rejoin the BCD South Alternative.
E.2.2.3	24	1	The EIS/EIR states "The BCD South Option would impact golden eagle (Impact B-7H), QCB (Impact B-7J), and arroyo toad (Impact B-7K). The BCD South Option could impact least Bell's vireo (Impact B-7D), southwestern willow flycatcher (Impact B-7E), and bald eagle (Impact B-7I). The BCD South Option would not impact the following listed or highly sensitive wildlife species: FTHL, PBS, burrowing owl, least Bell's vireo, southwestern willow flycatcher, desert pupfish, desert tortoise, golden eagle, bald eagle, QCB, arroyo toad, Stephens' kangaroo rat, coastal California gnatcatcher, San Diego and/or Riverside fairy shrimp, and barefoot banded gecko. Therefore, Impacts B-7A, B-7B, B-7C, B-7F, B-7G, B-7L, B-7M, and B-7N are not discussed." This paragraph is contradictory because it states that the golden eagle, QCB, and arroyo toad would be impacted and then states that these species would not be impacted. Need to clarify and classify impacts correctly.
E.2.5.2 / E.2.5.3	E.2.5-2 / E.2.5-5	Various	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives.
E.3.2	3	Table E.3.2-1	The EIR/EIS assumes impacts to vegetation and sensitive plant species cannot be mitigated to a level less than significant. Impacts to most vegetation communities and rare plant species can be mitigated to a level less than significant. Final project design and rare plant survey data to determine significance of project impacts are grossly overstated.

CH#	Pg#	Par#	Comment
E.3.2	5-6	Table E.3.2-2	The EIR/EIS assumes mitigation ratios from other similar projects will be applicable for the proposed project. Propose mitigation ratios that reflect the implementation of HMP's prior to any ground disturbing activities as proposed in the EIR <u>or</u> retain the proposed mitigation ratios which typically account for temporal losses of habitat and remove the requirement for the implementation of all mitigation and HMP's prior to any ground disturbing activities.
E.3.2	7	1	The EIR/EIS assumes that trimming and removal of native trees constitute Class I impacts and violation of the MBTA. Native tree removal dependent upon age can be significant; however, impacts are based on a preliminary project design and not the final project design. Use the final project design to determine if proposed impacts cannot be mitigated to a less than significant level.
E.3.2	9	5	Contrary to the statement that the rare plant survey for the proposed project conducted by ARCADIS in 2007 yielded poor results, the rare plant survey of the proposed project in 2007 yielded good results with the identification of 492 plant taxa, 25 of which are sensitive.
E.3	E.3.4.-5	4	Future transmission is proposed following the Route D Alternative. The USFS will not issue a special use permit for a route that will impact Back Country Non-motorized Zones. Thus, this alternative is not feasible.
E.3	E.3.5-1	1	The first paragraph states this alternative will not traverse a federal or state designated wilderness and any wilderness study areas. This chapter fails to make mention of the proposed wilderness areas within the CNF along this alternative.
E.4.2.2	10	3	The EIS/EIR states "The Modified Route D Alternative would impact the following listed or highly sensitive wildlife species: least Bell's vireo (Impact B-7D), golden eagle (Impact B-7H), QCB (Impact B-7J), arroyo toad (Impact B-7K), and" Delete ", and" or add and discuss other species if they were accidentally omitted.
E.4.5.2	E.4.5-2 & 3	Various	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives. Based on the land use compatibility matrix of the Forest Service Land Management Plan.
E.4	E.4.7-10 & Table E.4.7-3	bullet 3	Bullet 3 on page E.4.7-10 says that metavolcanic rocks have no paleontological potential; however, Table E.4.7-3 lists the same rocks as having marginal potential. The text and table needs to be consistent.
E		Figure E.1.1-3	The I-8 Alternative figure does not indicate the access road required to reach the public right-of-way (Highway 79). This is in contrast to the depiction of access road grading shown in Figure B-36 for the Central East substation.
E.4	E.4.1-1	4	MRD-10 to MRD-11 overhead span goes across CNF land. SDG&E proposes a route modification to avoid crossing CNF. See GIS shape files.

CH#	Pg#	Par#	Comment
E.4.3	15	1	The document states that a two-level pad would be used because of the sloping nature of the parcel. This is incorrect. The general arrangement depicted in Figure E.4.1-2 is designed for a single level substation pad.
E.4.12; E.1.12	4; 4 and 6	3; 2 and 5	<p>The Modified Route D Substation is noted to require a grading impact of approximately 35 acres. This is incorrect. The substation pad alone, without graded slopes, is approximately 40 acres in area. Preliminary grading plans associated with the General Arrangement of the substation (as depicted on Figure E.4.1-2) indicate a permanent pad and graded slopes impact area in excess of 60 acres.</p> <p>The I-8 Substation is noted to require a grading impact of approximately 37 acres. This is incorrect. The substation pad alone, without graded slopes, is approximately 40 acres in area. Preliminary grading plans associated with the General Arrangement of the substation (as depicted on Figure E.1.1-3) indicate a permanent pad and graded slopes impact area likely in excess of 60 acres.</p>
E.5	31	1	Utilizing the minimum spacing criteria for wind turbine generators as identified in the DIER, the turbine interconnection system will be 100.6 miles long by 3 feet wide. Soil conditions and location of the wind turbine collection substation will most likely require multiple trenches to not overheat the underground cable system increasing the trench length significantly above 100 miles.
E.5, E.6	222, 198	1, 9	Grading/drainage permits are typically obtained from the relevant local agency. SWPPP for construction and post-construction BMPs are prepared but are not routinely submitted to agencies for review and approval. Mitigation Measure H-1a should be revised accordingly.
E.5.4	E.5.4- 111	entire discussio n	The Solar Thermal option is not a feasible alternative given that the availability of the land identified for this option use is not known, and there is no proposal to develop such a facility on this property. The feasibility of this alternative is remote and speculative. Additionally, even if it were a feasible option, the transmission line that is proposed as a part of the option goes through ABDSP with unknown environmental impacts because the requisite environmental studies to determine such impacts have not been conducted, either for the transmission line or on the site itself.
E.5.4	E.5.4- 113	2	The Solar Photovoltaic Alternative is only vaguely described. This option would involve roof top installation of solar systems on individual homes and businesses which is infeasible due to the historical lack of installations. Additionally, thousands of systems would be needed which is infeasible. This option could not meet the project in-service date. Therefore, this alternative is remote and speculative.
E.5.4	E.5.4- 115	entire discussio n	The Biomass/Biogas Alternatives (one facility near Fallbrook and two near the Miramar Landfill) are not feasible alternatives given that the availability of the land identified for these options is not known, and there is no proposal to place such a facility on these properties. The feasibility of these alternatives is remote and speculative.

CH#	Pg#	Par#	Comment
E.5.4	E.5.4-117	3	The Wind Generation Alternative proposes wind turbine facilities on Indian Reservations (Campo, La Posta, and Manzanita). No indication is provided as to whether wind facilities have been or could be proposed by tribes. Therefore, this alternative and associated land use impacts is remote and speculative. This option could not meet the project in-service date. No specific locations for these facilities have been identified, nor for the associated transmission lines and substation that would be needed, and, as a result, no detailed land use analysis was conducted. Although a wind generation facility currently exists on the Campo Reservation, it is unknown if the tribe has plans for expansion of these facilities.
E.5	E.5.7-153	1, 2	The text on page E.5.7-153 states that only one site has been recorded within the 1,450-acre area, but no information is provided about whether the site was recorded as part of a systematic survey, and, if so, how much acreage the survey covered (what percentage of the 1,450 acres). The text also states that one other resource (no site number or description provided in text or Appendix 9B) is recorded within the transmission line corridor extending between Borrego Substation and the ABDSP boundary. The text should discuss previous survey work on the site and transmission corridor, provide site information about the unidentified site in the text and tables, and indicate whether this site was identified in a Class I record search.
E.5	E.5.7-154	2	Site CA-SDI-2367 identified as a "prehistoric habitation site" on page E.5-153 in the introductory paragraph, and is later changed to "an extensive temporary camp consisting of 20 or more camp sites" on page E.5.7-154. This site is a habitation site and the site description on both pages should reflect this.
E.5	E.5.7-154	4	DEIR states that site D2-S-106 (potential TCP) "is too expensive to be spared from direct construction impacts and indirect visual intrusion of the Proposed Project". This is not entirely accurate because the SDGE design crew has developed a work-around route for this site to avoid construction impacts to the site. The paragraph should be changed to include this information.
E.5; E.6	E.5-160; E.6-128	3	To assume that Pleistocene Age sediments may be present at an unknown depth is not an acceptable criterion to require paleo mitigation measures. This information is purely speculative and cannot be substantiated without extensive trenching.
E.5	E.5.7-160	2	The text on page E.5.7-160 states that the Fallbrook Facility Area is 80 acres in size and has had adequate previous survey over 99 percent of its 209-acre area. This is contradictory. Does the 209 acres include the Fallbrook Facility Area and the 0.5 mile record search buffer? If so, the text should state that the percentage of the actual 80-acre facility surveyed. Please clarify the text and provide citations for the previous adequate surveys that addressed the property.
E.5	E.5.7-164	4	For the Wind Energy Alternatives, no information is provided about the number of acres that were included in the record search (with and without the 0.5 mile buffer) or in the Campo Reservation portion of the Alternative, for which record searches could not be obtained. Also, no information has been provided about whether any portions of the record search area outside the reservation been subjected to systematic survey. The text should state whether the information can be used to project estimates of the numbers of sites which could be encountered in an intensive archaeological survey, as has been done for the proposed project and some of the alternatives, and include any projections that can be made.

CH#	Pg#	Par#	Comment
E.5	E.5.7-165	2, 4 bullets, 3	The second sentence of paragraph 2 on page E.5.7-165, which states "The BCD Alternative the Wind component along MP BCD-7 through MP BCD-12" is a non sequitor and needs to be corrected and clarified. Also, no site numbers are provided for the sites described in the four bullets, either in the text or in Appendix 9B (Table 9B-109) and need to be included in both places. It is not clear whether the prehistoric camp referred to in paragraph 3 is already accounted for in the record search results discussion. This needs to be clarified in the text, and any necessary corrections to the table should be made.
E.5	E.5.7-165	last	The text on page E.5.7-165 states there are three known sites in the Wind Component and goes on to mention the sites within the BCD alternative. Again, it is unclear how the two areas relate physically to one another. The text should be rewritten to clarify what is meant here.
E.5.8	E.5-171	Table E.5.8-1	Table E.5.8-1 conflicts with Table D.8-12. Table D.8-12 shows a higher dBA at 50 feet for jack hammer, dozer, air compressor and backhoe. The entire document should provide consistency for estimations of noise levels by types of construction equipment. Provide consistency throughout the document.
E.5.8	E.5-171	N-1 Construction	Impact N-1 states that noise would cause substantial disturbance. However, the resultant class is both III and I. A substantial increase can only result in Class I. Impact N-1 should be clarified to reflect substantial for Class I and not substantial for Class III. Suggest listing N-1 twice; one demonstrating a substantial Class I impact and one demonstrating less than significant, Class III or rewrite impact to clarify. This applies to all of Chapter E.
E.5.8	E.5-171	Table E.5.8-1	Table E.5.8-1 presents different types of construction equipment (specific to construction of solar thermal site only) than Table D.8-12 a separate calculation of noise impacts at distances greater than 50 feet should be conducted. The resultant noise level at 1,000 feet will differ from Table D.8-12 because the maximum instantaneous noise level is 88 as compared to 90 as estimated on page D.8-17.
E.5.8	E.5-172	N-1 Construction	The statement "because of sufficient distance to the solar thermal site, no nearby noise-sensitive receptors would be affected.... (Class III)" is not supported. Clarify the distance to the nearest receptor.
E.5.10	Global	Global, Impact P-3	This section needs to clarify that although spills could result in soil contamination, the most likely incidents would be minor spills that could easily be cleaned up. After the sentence "...spills could occur and cause soil contamination, resulting in significant impact", add text: "The most likely incidents involving these hazardous materials would be associated with minor spills and drips. Small spills can be easily cleaned up."

CH#	Pg#	Par#	Comment
E.5.11	E.5-212	4	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with building biogas/biomass facilities. The construction mitigation measures identified in the DEIR for the biomass/biogas facilities construction in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of biomass/biogas projects and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.
E.5.11	E.5-214	1	This Section of the DEIR addresses air impacts from the operation of biomass/biogas plants and combustion of gases. The DEIR suggests that emissions increases of PM10 and ozone precursors (i.e. NOx and VOC) from the new plants would have to be offset. This requirement seems excessive for small (non-major source) biomass plants that would emit much less than 50 tpy of ozone precursors (since APCD rule would not require offsets).
E.5.11	E.5-215	2	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with building wind generation facilities and associated substations. The construction mitigation measures identified in the DEIR for the wind generation facilities construction in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of wind generation projects and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.
E.6.11	E.6-176	8	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with the replacement of the South Bay Power Plant and associated substations. The construction mitigation measures identified in the DEIR for the construction of a replacement power plant in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of a new power generation plant and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.

CH#	Pg#	Par#	Comment
E.6.11	E.6-179	1	This Section in the DEIR addresses criteria emission from the operation of a new natural-gas fired power plant that would replace the existing South Bay Power Plant. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a). This mitigation measure appears to be speculative and not roughly proportional to the impacts since the operating parameters, level of emissions, and air impacts from the replacement facility have yet to be determined.
E.6.11	E.6-180	2	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with the San Diego Community Power Project (also known as "ENPEX"). The construction mitigation measures identified in the DEIR for the construction of ENPEX generation facilities in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities for ENPEX and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.
E.6.11	E.6-181	2	This Section in the DEIR addresses criteria emission from the operation of a new generation facilities that would be constructed as part of the ENPEX project. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a). This mitigation measure appears to be speculative and not roughly proportional to the impacts since the operating parameters, level of emissions, and air impacts from the new generation facilities have yet to be determined.
E.6.11	E.6-182	4	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with the development of 4 proposed peaks in San Diego and Orange Counties. The construction mitigation measures identified in the DEIR for the construction of the peakers are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities for the peakers and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.

CH#	Pg#	Par#	Comment
E.6.11	E.6-183	4	This Section in the DEIR addresses criteria emissions from the operation of the 4 new proposed peakers that would be constructed in San Diego and Orange County. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a) because the 4 peakers would collectively have significant impacts on the region. It is evident that the four peakers would be dispersed in the different locations in the region (e.g. Pala, Borrego, Miramar etc.) and would be operated intermittently at different times and it would be unrealistic to treat emissions from the units collectively. Furthermore (based on projected emissions provided for each Peaker in Table E.6.11-4) of the DEIR, it appears that each peaker will emit much less than the 50 tons/yr of NOx and VOCs major stationary source/offset trigger level (per SDAPCD NSR rules). It is therefore unlikely that offsets would be needed from each individual peaker to mitigate impacts. Also recent permitting of peakers in San Diego County (e.g. Miramar I peaker) has shown that the air impacts from these low/intermittent use units (that are extensively controlled and meet BACT standards) are less than significant (based on an Air Quality Impact Analysis, AQIA).
E.5.12 & E.6.12	E.5-220 to E.5-234 & E.6.188 to E.6.199	N/A	While chapters E.5.12 and E.6.12 provide information on some general potential impacts to streams, wetlands, and riparian areas that could occur as a result of the New In-Area All Source and Renewable Generation Alternatives, it is also important to acknowledge that true impacts cannot be determined until these areas have been properly surveyed. Please add that impacts on coastal resources in San Diego Bay are unknown for the area indicated by red circle #1 on Figure C-8. There are also unknown impacts on vernal pools (for the area indicated by blue circle #4 on Figure C-8), and unknown impacts on coastal resources at Aqua Hedionda for the area indicated by red circle #3 on Figure C-8, all of which need to be acknowledged.
E.6.2	E.6-47	4	The text states that impacts to green sea turtles would be mitigable to less than significant (Class II), "eliminating the warm water effluent would benefit the South Bay ecosystem by returning the water conditions to their state prior to the operation of the SBPP. However, the green sea turtle is known to occur in the South San Diego Bay throughout the year and is attracted to the existing warm water effluent of SBPP. Because the existing warm water discharge from SBPP would cease, abruptly stopping the warm water discharge in the wintertime could adversely affect the turtles. Impacts to green sea turtles would be significant but reduced to less than significant with Implementation of mitigation measures B-1h, B-6a, and B-12d. The impact of maintenance activities on wildlife would be less than significant with Implementation of mitigation measures below (Class II)." The mitigation measures for Impact B-15 do not address how impacts to the turtle will be reduced to less than significant. The mitigation measures do not apply to the turtle at all and there is no attempt to address the impact that will be caused by eliminating warm water discharges in the bay. As written, with no mitigation measures specific to the turtle, this should be categorized as a Class I impact.

CH#	Pg#	Par#	Comment
E.6.2.	46, 55, 63	3, 3,4	While collisions with stacks are known to occur, studies have shown that birds (night migrants) are attracted to the glow of certain colored lights. When they are attracted they can strike the stacks or become disoriented and fly around until they are so exhausted they fall to the ground. Night migrant passerine birds are primarily at risk for this type of impact and generally occur during poor visibility conditions. These impacts can be mitigated; the FAA recommends specific lighting regimes for minimizing impacts relating to bird collisions. This impact should be changed to Class II and the FAA recommendations should be added as mitigation.
E.6.4	E.6- 106	entire discussio n	Discussion of South Bay Power Plant Repower project is speculative. Applicant LPS Energy withdrew its application for the project in October 2007. There is opposition by the City of Chula Vista and the Port of San Diego. As a result, it is infeasible and will not meet the in-service date. Discussions/studies have occurred about South Bay Power Plant location being the new SD Chargers stadium. This should be included in the Final EIR/EIS.
E.6.4	E.6- 108	entire discussio n	The San Diego Community Power Project has been "under development" since 2000 but has not filed a formal application. Its development is remote and speculative. This option will not meet the Sunrise in-service date.
E.6.4	E.6- 109	entire discussio n	The peaking power plants identified may also not be feasible depending on land availability, political legal and regulatory implications. These will likely not meet the Sunrise in-service date.
E.6.10	E.6- 166	Impact P- 3, after 2nd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 2nd sentence, insert: "The SDCPP site is located within the eastern edge of the Miramar Marine Corps Air Station boundary. Historically areas of Miramar have been used for bombing and munitions testing. There is a potential for lead waste to occur at gun and artillery practice ranges where lead munitions are used."
E.6.10	E.6- 170	Impact P- 3, after first sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After first sentence, add text: "The Miramar peaker site is located within the Miramar Marine Corps Air Station boundary. Historically areas of Miramar have been used for bombing and munitions testing. There is a potential for lead waste to occur at gun and artillery practice ranges where lead munitions are used."
E.7.1	page 70, Figures E.7.1.3 -2B	Figure	LEAPS Key Viewpoint L1 - Visual Simulation: the soil color selected for the new access road is too light, which overemphasizes the color contrast of the new road. The highly visible access road as shown in the simulation would be temporary, as the strong line and color contrasts would be mitigated by revegetation. In the event there is no revegetation, the surrounding grasses would encroach on the cleared roadway, significantly softening contrasts. Typical transmission line access roads (long-term) are visible as a lightly-used two-track road. It should be disclosed that the visual impact of the new access road is temporary, or the simulated access road should be replaced with a two-track road.

CH#	Pg#	Par#	Comment
E.7	2-31	throughout section	The LEAPS FEIS identified the preferred alternative as the staff alternative (even though it had not been surveyed at the time the FEIS was issued), which includes a transmission alignment that generally follows the current LEAPS Transmission-Only Alternative. Two notable exceptions are where the LEAPS Transmission-Only Alternative for the SRPL Project crosses the San Mateo Canyon Wilderness north of MP 21 and again just south of MP 26. The LEAPS DEIS (pages 2-31 to 32) eliminated two segments of the transmission route because the USDA Forest Service opposed any segments that were in proximity to the San Mateo Canyon Wilderness. Since the SRPL DEIR LEAPS Transmission-Only Alternative crosses this same wilderness in two areas, it is likely that the USDA Forest Service will also oppose this segment. These two areas (north of MP 21 and south of MP 26) should be re-designed.
E.7.1.2	27	4	The EIS/EIR states "Most of the non-listed, sensitive species' habitats are sensitive vegetation communities; the mitigation for the loss of the sensitive vegetation communities (Mitigation Measure B-1a [LE]) would normally compensate for the potential loss of these sensitive species and their habitats. However, since adequate land required by Mitigation Measure B-1a(LE) may not be available, the impacts to non-listed, sensitive wildlife species are considered significant according to Significance Criterion 2.a. (impacts that directly or indirectly cause the mortality of candidate, sensitive, or special status wildlife species) and not mitigable to less than significant levels (Class I)." SDG&E is committed to compensate for impacts to sensitive species' and their habitats, and it is SDG&E's responsibility, working with land management agencies, to identify mitigation land; therefore, the assumption that mitigation lands are not available is premature. These impacts are mitigable and should be classified as a Class II impact, not a Class I impact.
E.7	E.7-110	1	Text notes that the significant impacts of 2.7 miles of transmission line and 1.1 miles of road in the FS BCNM zone are mitigated through a Land Management Plan amendment. Text should explain how such an amendment can even be considered, and if the project can successfully pass the pre-screening requirements for initiating such an amendment as well as the duration.
E.7	E.7.7-123	first bullet	Nine prehistoric resources are described for the LEAPS Transmission Alternative. The descriptions do not fully accord with those provided in Table Ap.9B-114 (referenced incorrectly in this discussion as Ap.9B-144). The table lists two loci made up of rock art and bedrock milling and no separate rock art site. Table Ap.9B-115 lists additional resources not discussed in the text, which seem to relate to substation impacts. Substations are not addressed for this alternative. The text and/or tables should be corrected for consistency, and substations should be discussed, if they are a part of this alternative.
E.7	E.7.7-123	first bullet	The text on page E.7.7-123 states that "the NRHP/CRHR eligibility of the nine prehistoric cultural resources has not been determined." For the proposed project, assumptions of eligibility are made in the DEIR based on site type. The same standard should be applied when evaluating alternatives. Here and wherever relevant throughout the document, all alternatives should state which and how many sites are assumed to be eligible based on site type.

CH#	Pg#	Par#	Comment
E.7	E.7.7-129	7	The text on page E.7.7-129 states that the four resources listed in Table Ap9B-115 will be impacted. Only one of these resources was previously mentioned in the environmental setting section for this alternative. The other three appear to relate to substations, which are not discussed elsewhere. The text and tables should be corrected to state whether substations are part of the project, and, if so, whether they have been fully and adequately surveyed (and provide citations for previous adequate surveys).
E.7.10	E.7-159	Impact P-3, after 3rd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 3rd sentence, add text: "Lead contamination may occur within many areas of Camp Pendleton used for weapons and artillery training."
E.7.10	E.7-162	Impact P-3, after 3rd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 3rd sentence, add text: "Historically areas of Camp Pendleton have been used for bombing and munitions testing, resulting in a potential for lead contamination."
E.7	E.7 - 304	4	Section E.7 evaluates the LEAPS Transmission Only alternative, which is not a feasible alternative. The conclusion of the document is that the LEAPS Transmission Only alternative is environmentally superior; however, when coupled with the LEAPS Generation; it has serious implications to the water resources as outlined in the EIR in Table E.7.2-16 on page E.7-304, which shows Class I impacts to water resources from the LEAPS Generation component in a variety of areas. The analysis should be revised to indicate that the LEAPS Transmission Only alternative would not be implemented without the LEAPS Generation, and is therefore not a feasible alternative. This would also require a re-evaluation of the environmentally superior alternatives, as the LEAPS Transmission line coupled with the LEAPS Generation is not an environmentally superior alternative.

CH#	Pg#	Par#	Comment
F	F-3	Last	2nd sentence refers to 8 jurisdictions on Table F-1 with minority populations. However, Table F-1 identifies 11 jurisdictions and the bulleted list on page F-4 lists 11.
F	F-10	1	The discussion here of two Class I impacts to the Barona reservation is the same as for the proposed project, but this description appears to only be for future transmission expansion. The FEIR should specify whether discussing proposed project or future transmission system expansion.
F	F-15	3	In discussion of impacts to Pauma, under air quality, the DEIR notes that these impacts are from the proposed project as opposed to future transmission system expansion. Earlier discussion noted no impacts to Pauma from proposed project. Should clarify what impacts are being discussed here.
F	F-16	4	Under discussion of impacts to Pala, under fire and fuel management, DEIR concludes that "activities associated with the project will ignite wildfires." This is a speculative conclusion, and "will" should be replaced by "may" or "could".
F	F-22	4	Under discussion of impacts from I8 alternative, DEIR concludes impacts to La Posta from increased noise, but there is no discussion of likelihood that people or sensitive receptors will be in vicinity of the transmission line in that area.
F	F-40	1st full	Should state "In the area of Central East Substation" - as written, it suggests still discussing ABDSP.
F	F-40	Last	In last sentence, change text to: "if human remains are discovered".

CH#	Pg#	Par#	Comment
G.1	G-34	1	Impact is overstated for temporary impacts. Impact B-1 states that: Construction and maintenance activities would result in temporary and permanent losses of native vegetation (Class I). Temporary vegetation loss is defined as vegetation clearing from construction. Revegetation should mitigate the temporary impact, so even with the incremental effect of other projects, the impact is still temporary and should not be a Class I impact. Class II is a more appropriate level of impact for temporary (yet mitigable) cumulative vegetation losses.
G.3.2	G-40	2	The impact is overstated for temporary impacts. Impact V-1 is short-term visibility of construction activities, equipment, and night lighting, and has been designated a Class I impact. This level of impact is inappropriate for short-term, temporary activities. Because the impact would be short-term as experienced from any visual receptor, the impact would not be significant. Therefore, the impact level should be changed to Class III, which is adverse but less than significant.
G.3.2	G-40	4	The impact is overstated for the visual impact in coastal zone, as the proposed project would be constructed along existing transmission structures. Industrial character would not be added, as it already exists from existing structures. The impact level should be changed to Class III, which is adverse but less than significant.
G.3.5	G-46	1	The DEIR concludes cumulative impacts from other projects that might affect other State Park lands, but SDG&E disagrees that entire state of California should be used to determine cumulative impacts of project on ABDSP, also note that EIR itself notes that many of these projects are not likely and yet cumulative impacts analysis is supposed to analyze reasonably foreseeable actions, also note that neither of the two specific projects cited here are listed on the chart of reasonably foreseeable actions used to do cumulative impacts analysis.
G.3.6	G-48	second	States "typically, cultural and paleo resources are identified....only during ground disturbing activities..." Not necessarily true; can do pot holing and if geo. Formation is known, can determine probability for fossils.
G.3.7	G-53	2	Maintenance noise impacts not Class I impacts. Maintenance noise impacts are generally short-term and intermittent over the life of the project.
G.3.11	G-63	4	Construction water quality impacts are mitigable through standard BMPs put in place.
G.3.11	G-64		Impact is overstated. Sediment can be mitigated; the analysis compares this project with subdivision projects, which is an incorrect assumption/comparison.
G.3.12	G-67	4	Incorrect statement: "Accidental spill impacts are not mitigable". Revise statement to indicate that accidental spill impacts are mitigable to less than significant through required mitigation and BMP's.
G.4	G-82	Table G.3	Table G.3. Project Alternatives Cumulative Project List, page G-82 through 97: Projects listed in the table refer to descriptions in Table G-1 (Proposed Project Cumulative Projects list) by Map ID numbers; however, several of the referenced Map ID numbers are not shown in Table G-1. Please update Table G-3 with the correct Map ID numbers.

CH#	Pg#	Par#	Comment
G.4	G-101		Discussion and analysis should be on cumulative impacts of each alternative when added to past, present and reasonably foreseeable future actions. Instead, the DEIR analyzes the difference between the proposed project and alternatives so it is not clear whether DEIR assumes the same foreseeable actions (other projects affecting state parks) as previously discussed. Additionally, charts for both ABDSP alternatives suggest that there has been a finding of cumulative impacts to biological resources, etc, when no such specific findings made.
G.4	G-102		The discussion of cumulative projects is incorrect. The EIR notes that there are no past, present or future reasonably foreseeable projects along portion of route discussed here (ABDSP). This is inconsistent with earlier assessments, and there are projects listed in beginning of section on alternatives as potential projects to be analyzed for cumulative impacts with proposed project, but those are never discussed with ABDSP. Revise the text to add cumulative projects.
G.4	G-103	Chart	Chart title includes "Class I Cumulative Impacts Identified", this suggests that Class I cumulative impacts were found. But, no Class I cumulative impacts were identified except WR.