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describes the five attributes that define wilderness character, one of which is recreation. The Final EIR/EIS should disclose the effects of the proposed project and the alternatives on the attributes described by the Wilderness Act. Route D traverses an area that has been included in proposed wilderness legislation, and the effect of a transmission line on the potential wilderness character of that area should also be disclosed.

A0009-38 cont.

Modified Route D impact WR-2 (Draft EIR/EIS page E.4.5-3) states that the alternative will be highly visible to hikers on the Pacific Crest Trail (PCT) and to visitors in the Hauser Wilderness. Since this area does not overlap with any of the key viewing points selected for this alternative, the Final EIS/EIR should include additional viewpoints from the PCT and Hauser Wilderness to address the impacts in this key area. The location of the PCT on Figure AP. 11C-77 should be corrected.

The LMP identified Cottonwood Creek as eligible for the Wild and Scenic River System. The LMP direction is to protect the outstandingly remarkable values (ORV's) and water quality of eligible river segments. The Final EIR/EIS should disclose the effects of any alternatives that cross Cottonwood Creek on the ORV's and water quality.

Cultural and Paleontological Resources

A0009-39

The technical reports supporting the cultural resource analysis are not complete, and my staff has been informed that they will not be complete until April 11, 2008. Review of this section will be deferred until the technical reports are available for staff review.

Transportation

A0009-40

The miles of existing roads used or upgraded, and new roads constructed should be quantified for the alternatives and included in the analysis. Many of the existing roads on the Cleveland National Forest will not be able to handle the construction traffic, and upgrades and increases in footprint will be required to support the anticipated machinery. Road widths ranging from 14 feet in straight section of road to 20 feet at corners or curves would be required to facilitate safe movement of equipment and vehicles. The miles of trails used as roads should also be identified. Mitigation will be required to return trails to their prior configuration. Plans will also be needed for alternative trail alignments during construction. The initial details of those plans should be disclosed in the Final EIR/EIS.

The Final EIR/EIS should quantify the numbers and acres of pull sites, describe the type of land modification needed at each site, and evaluate the impacts to soil compaction and potential sedimentation from these sites. In addition, when pull sites are located close to tributaries, distance from tributaries should be added to the document. Restoration plans for pull sites should be described.

A0009-41

Implementation of Mitigation Measure T-10b, (Draft EIR/EIS, page E.2.9-5) which revises the BCD South Option to avoid placing a tower in the CalTrans right of way, may address the visual resource issues I raised for this segment on pages 2 and 3 of my initial comment letter. It appears however that a portion of this proposed alignment may be inconsistent with the LMP

A0009-42

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land use zone for the area north of I-8. The alignment south of I-8 looks like it is located along a ridge top, which will exacerbate the “skylining” concern in this highly visible area. I encourage the CPUC and BLM to work collaboratively with the Forest Service, CalTrans, and SDG&E to develop a route that addresses all the issues in this area. The modified route should serve as the basis for a revised visual analysis, and modification of the location of key view point 79 may be necessary to accurately reflect the impact of the reroute on visual resources.

A0009-42 cont.

The discussion for Route D impact T-11 (Draft EIR/EIS page E.3.9-3) states that 1.5 miles of Route D would pass through an Inventoried Roadless Area (IRA) on the Cleveland National Forest. Based on the maps used to develop the Roadless Area Conservation Rule (36 CFR 294), the Route D alignment crosses approximately 2.5 miles of IRA, including approximately 0.5 miles in the Sill Hill IRA, and 2 miles in the No Name IRA. The Final EIR/EIS should disclose the effect of the Route D alternative on the seven Roadless Area Characteristics outlined by the Roadless Area Conservation Rule. The Final EIR/EIS should also disclose the effect of the Route D alternative relative to the State of California’s roadless area policy.

A0009-43

Water Resources

In my initial comments I discussed the need for the Final EIR/EIS to identify Riparian Conservation Areas (RCA’s) on NFS lands for the proposed project and the alternatives. This analysis should include all project activities, including the use of existing roads located within RCA’s. All applicable Best Management Practices (BMPs) should be identified and followed to meet agency direction in Forest Service Handbook 2509.22 Chapter 3.21 (1). These BMPs would be incorporated into the special use permit if an alternative on NFS lands is selected by the CPUC and BLM and authorized by the Forest Service.

A0009-44

The Final EIR/EIS should also disclose the effects of the proposed project and the alternatives on the Beneficial Uses and Water Quality Objectives listed in relevant Basin Plans for the affected watercourses. The project effects on Water Quality Limited Segments should also be disclosed and evaluated.

Given the importance of riparian areas, stream crossings on NFS lands will need individual assessment to develop the current riparian condition, disclose the effects of the project, identify appropriate BMPs, and to plan for effectiveness monitoring of BMPs and riparian condition as long as the road crossings are in use, consistent with mitigation measure H1-i (with Forest Service review and direction).

My staff has identified the following crossings of particular concern. These anticipated impacts occur across several resource areas, and an interdisciplinary review of the crossings should be conducted.

I-8 Alternative: 79 identified watercourse crossings, including (in reference to Wild and Scenic eligibility):

- App 11C-48 pdf; I-8-56, S3075, and access road crosses unnamed tributary of Cottonwood Creek in T.16S., R.5E. Section 28.

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- App 11C-49 pdf; Vicinity of BSW-5.6: Pull site near unnamed tributary and access road crosses unnamed tributary of Cottonwood Creek in T.16S., R.5E. Section 18.
- App 11C-59 pdf; Access roads cross Cottonwood Creek, unnamed tributaries to Cottonwood Creek, and the PCT in T.17S., R.5E. Section 5.
- App 11C-60 pdf; Access roads cross unnamed tributaries to Cottonwood Creek in T.16S., R.5E. Sections 31, 30, and 19.

A0009-44 cont.

BCD Alternative

- App 11C-66 pdf; access roads in T.16S., R.6E. Section 8 cross unnamed tributaries to reservoirs in Thing Valley. The path follows a trail, which would need upgrading. Additional concerns with public trail foot traffic and safety. The roads also pass mapped prospects. Inspections of the area should include abandoned mine adits, etc for safety purposes.
- App 11C-66 pdf; Access roads near S20076 in Antone Canyon, an unnamed tributary upstream of the La Posta Indian Reservation in T.16S., R.5E. Section 13. The water source of the La Posta Indian Reservation and other uses of the tributary should be checked with the Tribe.
- App 11C-66 pdf; Access roads are shown on top of the PCT. Changing the character of the trail to support heavy equipment should be evaluated in the historic and recreation impacts section.

Route D Alternative - 22 major crossings that will need assessments; some specific areas noted:

App 11C-71.pdf

- Access road off Old Viejas Grade to the east of Poser Mountain follows a trail in T.15S., R.3E. Sections 15/10. The trail follows an unnamed tributary of King Creek. Upgrades will require assessment work, etc.
- Pull sites of D-3 near Forest Service road 15S24 near Capitan Grande Indian reservation in vicinity of unnamed tributary to King Creek near T.15S., R.3E. Sections 3, 4, 9, 10.
- Access road to east of D-3 (private land) near Boy Scout Lake.

App 11C-72.pdf

- Access Road from Forest Service road 14S09 (Dubois Truck Trail) to S10068 crosses an unnamed tributary of Conejos Creek in T.14S., R.3E. Section 27. The truck trail may need upgrades and runs along drainages.
- Pull sites and access roads near S10065 near headwaters of Conejos Creek in T.14S., R.3E. Section 22.
- Access roads near SR2026 near headwaters of Conejos Creek in T.14S., R.3E. Section 23.

SDG&E proposes measure WQ-APM-6 #4 – which provides that SDG&E will “negotiate with affected landowner to provide alternative water supplies in the event supply wells or springs dry up directly caused by project activities.” Given that springs are developed on the Forest for multiple uses (wildlife, campgrounds, special use permits, etc.), and given that the monitoring necessary to know whether or not the spring is being affected (reduced flow) due to project impacts is significant, it is recommended that the project alignment and roads be surveyed for

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springs within ½ mile of the alignment. If the line cannot be moved to avoid springs, then springs will be monitored during construction of a facility or if the construction encounters fractured rocks that could be a part of a spring system.

A0009-45 cont.

Work in stream courses is required to have pre-implementation, implementation during construction, and post-implementation effectiveness monitoring. This requirement indicates an earth scientist representative trained in the Forest Service BMP evaluation protocol process should be on site. This requirement also requires an ongoing commitment of the permit holder to continued funding for monitoring and reporting.

A0009-46

The Forest Service will limit operations during the rainy season or during periods of wet soil conditions to reduce the potential for soil compaction, rutting, and loss of soil productivity. The BMP standard on Forest Service system lands specifies the soil is too wet for work when rutting occurs in greater than 10% of the road within an RCA and when rills more than 10 feet in length develop and lead off the road surface. Another standard operating procedure is for the operator to be informed when there is a >30% chance of rain, so additional BMPs can be added to stabilize an area if the precipitation materializes. The Forest Service Permit Administrator will have the authority to stop work and require fixes if degradation occurs.

A0009-47

Fire and Fuels Management

In my initial comment letter, I suggested the Final EIR/EIS should identify the proposed fuelbreaks associated with mitigation measure F3a, “Construct and Maintain Fuelbreaks”. These connected actions are a critical component of the long term management of the proposed project and the alternatives. Although Table D.15-26 indicates milepost locations for fuelbreaks, it is not clear where the actual fuelbreaks will be constructed, if they will be effective, and what effect fuelbreak construction will have on other resources.

A0009-48

Another aspect of the long term management of the area is the relationship between the powerline and fire suppression effectiveness as described by Impact F-3. Although the Wildfire Containment Conflict Model provides a graphical illustration of Impact F-3 in a generalized sense, some simple maps using the data built into the model would help disclose two key factors, namely where fires start (ignitions) and where fires are fought (historical fire perimeters). The Final EIR/EIS should provide a map of ignitions and a map of historical fires for each fireshed evaluated in the analysis using the data referenced in Draft EIR/EIS pages D.15-68 to D.15-69.

A0009-49

The influence of fuel type on the difficulty to control fires should also be evaluated as part of the Wildfire Containment Conflict Model. Consideration of this factor may show some significant differences between the alternatives. For example, the portions of the I-8, LEAPS, and Modified Route D alternatives on the Cleveland National Forest occur in areas of heavy fuels in steep terrain, where fires are difficult to control. The northern alternatives may have different characteristics, and quantifying this factor would add to the comparison of the proposed project and the alternatives.

A0009-50

The summary of the Wildfire Containment Conflict Model is presented in terms of the percent of the route in various conflict classes. Because the alternatives vary in length, and the analysis is

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segmented by fireshed, it would helpful if the Final EIR/EIS would display the total length of conflict areas by alternative in miles rather than percent. This would provide a more accurate disclosure of the magnitude of the conflict based on the classification system used in the analysis and facilitate comparison between the alternatives.

A0009-50 cont.

The impact of the proposed project or the alternatives on fire suppression effectiveness is a critical issue for the Forest Service. I encourage the CPUC and the BLM to host a technical workshop between the affected federal, state, and local fire agencies and SDG&E so that the agencies responsible for fire suppression in the area can discuss the analysis and mitigation in a collaborative setting prior to the release of the Final EIR/EIS.

A0009-51

Cumulative Impact Analysis of Alternatives

The cumulative effects analysis for the biological resources associated with the Southern alternatives should be quantified. Acres of habitat disturbed by the reasonably foreseeable projects listed in Table G.3 should be summarized and presented in comparison to the acres of habitat disturbed by the various alternatives. The analysis should include cumulative impacts on population and habitat trends for the Forest Service Management Indicator Species.

A0009-52

The analysis of cumulative effects on Water Resources should also be quantified in terms of the cumulative amount of disturbed area, particularly since the analysis concludes that there will be cumulatively significant impacts to water quality (Draft EIR/EIS, page G-143). For those alternatives that cross Forest Service lands, each sub-watershed (preferably at the size level of 500 to 5,000 acres) should be modeled using the Equivalent Roaded Acres method to determine the level of disturbance relative to the Watershed Threshold of Concern. Coefficients within the method are somewhat dependent on the sensitivity of the watershed and parent material to disturbance. This method combines cumulative effects of watershed and soils (dependent on geology).

A0009-53

The narrative description of the reasonably foreseeable projects for Modified Route D on Draft EIR/EIS page G-161 does not match the list of projects in Table G.3 or the projects located near the Modified Route D alignment shown on Map G-9. Some key projects that are not discussed in the Modified Route D cumulative impact analysis include the 2,100 acre Star Ranch subdivision, the Blackwater paramilitary training facility (withdrawn by Blackwater in March, 2008), and the 2,250 acre La Posta Mountain Warfare Training Facility. The Final EIR/EIS should clarify the reasonably foreseeable projects associated with Modified Route D, and revise the analysis accordingly.

A0009-54

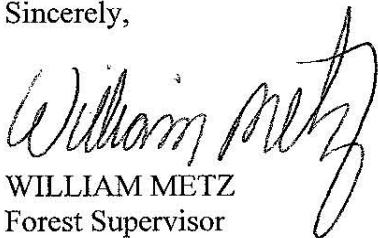
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This concludes the Forest Service comments on the Draft EIR/EIS and available supporting documents. As always, I would be glad to meet at your convenience to discuss these comments. Please contact Project Manager Bob Hawkins at 707-562-8699 or by email at rhawkins@fs.fed.us to arrange a meeting.

Sincerely,



WILLIAM METZ
Forest Supervisor

Responses to Comment Set A0009

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- A0009-1 The CPUC and BLM understand that the Forest Service intends to use the Final EIR/EIS to support its evaluation of a selected route that occupies NFS lands. It is the intent of the CPUC and BLM to provide a Final EIR/EIS that fully meets Forest Service NEPA requirements.
- A0009-2 The description of CNF's alternative screening criteria is acknowledged.
- A0009-3 The Draft EIR/EIS concluded that the CNF Alternative, where it crosses Cleveland National Forest, would be inconsistent with the applicable HIGH Scenic Integrity Objective due to the introduction of structure contrast, industrial character, view blockage, and skylining when viewed from forestlands along the CNF Alternative route. The resulting visual impact was determined to be significant and unmitigable (Class I), even after the application of Mitigation Measure V-45a, which would require implementation of various elements of the Scenery Conservation Plan including prohibiting the construction of access road on slopes greater than 15 percent and the painting of structures. This comment requested additional analysis of this Alternative based on the preparation of a visual simulation of the alternative. A separate USFS comment requested the implementation of Mitigation Measure V-45a (Scenery Conservation Plan) in any new simulations.

Figure A9-3A presents the existing view of the CNF Alternative from Key Viewpoint 86 (selected by USFS staff) on forestlands along the alternative route. Figure A9-3B presents a visual simulation of the CNF Alternative with the implementation of Measure V-45a. Specifically, at the direction of USFS staff, the structures are shown with two colors. The closest structure in the image is shown painted an olive drab color. The two more distant structures would be left a dark gray from the galvanizing treatment. Also, because some of the slopes along this segment exceed 15 percent, it is assumed that the construction of a new access road or the upgrading of the existing access road would not be permitted. Even with implementation of the measures illustrated in Figure A9-3B, the HIGH SIO would not be met and the visual impact would still be significant (Class I). Therefore, no changes to the Draft EIR/EIS analysis or conclusions regarding this alternative (see Draft EIR/EIS, pages D.3-275-276) have been made. Furthermore, at the request of USFS staff, an additional viewpoint was established on SR78, just to the west of this alternative. Figure A9-3C presents the existing view from that location, approximately 1.65 miles east of the intersection of SR78 and Old Julian Highway. The visibility of this area from SR78 is much greater now that roadside and intervening trees and vegetation have been burned as a result of the Witch Fire. As a result, the upper portions (approximately 30 to 50 feet) of several CNF Alternative steel-pole transmission structures would now be visible beyond the prominent horizontal ridge shown in the foreground of the image. However, the Proposed Project structures would be substantially more visible because they would cross the top of the ridge. Figures A9-3A through A9-3C are included at the end of this comment set.

- A0009-4 Please refer to the Recirculated Draft EIR/Supplemental Draft EIS Section 3 and to the Executive Summary of the Final EIR/EIS for a discussion of reroutes that have been proposed since the publication of the Draft EIR/EIS. The BCD South Option Revision, discussed in RDEIR/SDEIS Section 3 and shown on Figure 3-7 of the Recirculated

Draft EIR/Supplemental Draft EIS would avoid all incompatible land use zones, including the Back Country Non-motorized zones within CNF.

A0009-5 This comment requested the preparation of visual simulations of the revised BCD Alternative South Option that incorporates design elements of Mitigation Measure V-45a (Scenery Conservation Plan). Two Key Viewpoints were established for this analysis. Key Viewpoint 87 was established on La Posta Truck Trail, south of Thing Valley and north of I-8. Key Viewpoint 88 was established on westbound I-8, just east of the La Posta Road overpass.

Figure A9-5A (included at the end of this comment set) presents the existing view from KVP 87. Figure A9-5B presents a visual simulation of the BCD South Option after it diverges from the BCD route and turns southwest down La Posta Valley, generally following La Posta Truck Trail. The simulation illustrates the implementation of Mitigation Measure V-45a. Specifically, the structures are shown as a dark gray from the galvanizing treatment. Also, because some of the slopes along this segment exceed 15 percent, it is assumed that the construction of new spur roads would not be permitted on certain slopes. While the darker color of the structures enables them to blend effectively with a darker, mottled background, they tend to be slightly more prominent against a lighter, even-toned background. Even with implementation of the measures illustrated in Figure A9-5B (included at the end of this comment set), the South Option, as viewed from La Posta Truck Trail, would not be consistent with either the management emphasis of the Morena Landscape Place or the HIGH Scenic Integrity Objective (SIO) that would apply to this landscape. The resulting visual impact would still be significant (Class I).

Figure A9-5C (included at the end of this comment set) presents the existing view from KVP 88. Figure A9-5D (included at the end of this comment set) presents a visual simulation of the BCD South Option span of I-8. The simulation also illustrates the implementation of Mitigation Measure V-45a in that the lattice structure closest to I-8 is shown painted in an olive drab color, as requested by the USFS. The next tower to the north is shown in the dark gray color of the galvanizing treatment. Structure Pads and spur roads would not be visible from this location. Again, the darker colors of the structures enable them to blend more effectively with darker, mottled backgrounds, but they tend to be more prominent against lighter, even-toned backgrounds and particularly when they extend above the horizon (skyline) and are viewed against a light sky. Even with implementation of the measures illustrated in Figure A9-5D, the South Option, as viewed from I-8, would not be consistent with either the management emphasis of the Morena Landscape Place or the HIGH Scenic Integrity Objective (SIO) that would apply to this landscape. The resulting visual impact would still be significant (Class I).

A0009-6 The Interstate 8 Alternative's conflicts with Land Use Zone designations and Scenic Integrity Objectives are identified in the Draft EIR/EIS Sections E.1.3, Visual Resources and E.1.4, Land Use. These incompatibilities and the environmental impacts occurring in the Buckman Springs/Pine Valley segment of the Interstate 8 Alternative are the reasons that this alternative is found to be environmentally inferior to the Modified Route D Alternative.

Please refer to the Executive Summary of the Final EIR/EIS and RDEIR/SDEIS Section 3 for a discussion of reroutes that have been proposed since the publication of the Draft EIR/EIS for the Interstate 8 Alternative. Specifically, SDG&E suggested the “Pine Valley Non-Motorized Mitigation Reroute,” which would relocate a segment of the Interstate 8 Alternative between Buckman Springs and Descanso so as to avoid areas designated as Back Country Non-Motorized (BCNM) land use zone. However, even with avoidance of these land use zones, this route would not be feasible because it would be not be possible to connect to this portion of the alternative without traversing BCNM land use zone with the BCD Alternative to the east.

A0009-7 The conclusions in Section H.4.3 of the Draft EIR/EIS found that the Interstate 8 Alternative with the Modified Route D Alternative would be environmentally superior to the Route D Alternative (North of I-8). Among other significant impacts, the section states that the Route D Alternative would result in a much longer route through Back Country Non-Motorized (BCNM) zone within CNF and it would pass through a Designated Roadless Area. According to Forest Service documentation, major utility corridors and roads are not suitable within the BCNM land use zone and significant permitting delays could occur to address these inconsistencies within CNF.

As discussed in Response to Comment A0009-15, access roads defined in the Draft EIR/EIS represent preliminary engineering prepared by SDG&E. These roads would be revised and removed where necessary to comply with the Inventoried Roadless Area requirements in final engineering to ensure that they comply with Forest Service requirements and to eliminate roads in areas of helicopter construction.

A0009-8 The commenter’s general support for the Modified Route D Alternative is acknowledged. After publication of the Draft EIR/EIS, substantial engineering has been done by SDG&E at the direction of the CPUC and BLM to refine this route in accordance with this and other Forest Service comments. The goal of these engineering revisions has been to eliminate pull sites where feasible, eliminate new access roads where helicopter construction can be done, and modify tower color to minimize visual impacts.

The Executive Summary of the Final EIR/EIS and the Recirculated Draft EIR/Supplemental Draft EIS (Section 3) present discussions of mitigation reroutes that have been proposed and incorporated into the Modified Route D Alternative route since the publication of the Draft EIR/EIS. These revisions include the requested tower relocation to avoid a conductor crossing of a corner of BCNM land use zone at the southeast corner of the Forest. They also include numerous other refinements, based on discussion with Forest Service staff; these route refinements have been provided to the Forest Service in GIS shapefiles. An updated and detailed map of the Modified Route D Alternative is presented in the Final EIR/EIS in Section E.4.1 and also in revised Appendix 11.

A0009-9 A discussion of the history and current status of the LEAPS project is found in General Response GR-4 (Project Objectives and Feasibility of the LEAPS Project Alternatives). The CPUC acknowledges the commenter’s statement that should the LEAPS Transmission-Only Alternative be selected, a Forest Service decision on that request would be deferred until the FERC process is complete.

A0009-10 As is described in Section B.2.7 of the Draft EIR/EIS, the 500 kV and/or 230 kV future transmission system expansion is not currently needed. SDG&E stated in a response to a data request to the CPUC (dated December 13, 2006) that the ultimate build out may not be needed for decades, but at least one or two additional 230 kV circuits are possible within the first decade following completion of the Sunrise Powerlink in 2010. As time passes and additional information becomes available concerning load growth, transmission expansion, generation retirements, generation additions, Automated Metering Infrastructure (AMI) impacts, rooftop solar photovoltaic applications, energy efficiency programs, demand response initiatives, and other related matters, the timing of the need for additional 230 kV circuits out of the intermediate 500/230 kV substation will be clarified. Like the potential future 230 kV circuits described above, a potential future 500 kV circuit may connect the intermediate 500/230 kV substation to the Southern California Edison (SCE) transmission system, however, it is not currently needed.

The CPUC and BLM have identified the 500 kV future transmission system expansion as a reasonably foreseeable future action and analysis is provided in the Draft EIR/EIS. CEQA and NEPA do not require speculation as to when a foreseeable action might occur. Both the 230 kV and 500 kV future transmission system expansions were considered as part of the Proposed Project itself rather than a connected action. The potential future 230 kV and 500 kV lines were discussed in detail and analyzed using all available information in the Draft EIR/EIS under each issue area in Section D. Any future transmission line applications made by SDG&E will be subject to complete CEQA and/or NEPA analysis.

A0009-11 Because the future transmission expansion routes are not now defined, any future transmission project would require an independent permitting and environmental compliance process. During this process, alternative routes would be identified to avoid sensitive land use zones within CNF. As described in the Response to Comment A0009-10, the routes evaluated in the Draft EIR/EIS were based on SDG&E's preliminary identification of potential future routes. Definition of final corridors and impacts is premature at this time, because no proposal for use of any particular route has been made. The analysis presented in the Draft EIR/EIS adequately discloses the range of potential impacts of the connected actions and future foreseeable project components for the benefit of decision-makers.

A0009-12 There are two reasons why an underground 500 kV transmission line through Alpine is not evaluated in the EIR/EIS. First, the feasibility of longer segments of underground 500 kV lines is not yet technologically proven (see Section 4.8.1 of Appendix 1 of the Draft EIR/EIS). Second, an underground 500 kV line through Alpine would require construction of a major substation west of Alpine in order to convert the 500 kV to 230 kV and lower voltages. Alpine is at the eastern edge of developed San Diego County, and the availability of space for a major (40- to 80-acre) substation is very limited.

The commenter is correct that the LEAPS Project is proposing use of a 500 kV Gas Insulated Line (GIL) for a 3-mile underground segment. However, at this time, underground installation of a 500 kV underground transmission line is very rare in the United States. As discussed in Section 4.8.1 in Appendix 1 of the Draft EIR/EIS (for the Buckman Springs Underground Option), gas insulated technology has been primarily used in substation design. GIL does have installations as part of transmission line

design but typically only for short distances such as substation or power plant getaways. The large diameter design of this technology would allow the need for only one cable per phase but a fourth cable would be installed as a spare in case of emergency. Typical concerns with GIL installations revolve around the need for gas management, and insulator reliability under certain dynamic site conditions. The flexibility of such technology to adjust to the topography to avoid tunneling would need to be investigated further but the lack of experience and reliability would be even more of a concern than either the Solid Dielectric Cable (XLPE) or Self-Contained Fluid Filled (SCFF) cable technologies. Applications of GIL to date have been for distances less than the 2 miles, therefore, it may not be technically feasible to construct the 8.8-mile segment as an underground 500 kV GIL line.

- A0009-13 Please see Response to Comment A0009-7 regarding impacts of the Route D Alternative. While this alternative has not been eliminated from consideration in the EIR/EIS, its numerous impacts and plan inconsistencies are acknowledged. Please refer to Response to Comment A0009-11 regarding future expansion and its independent permitting and environmental compliance process.
- A0009-14 The CPUC and BLM, with SDG&E, investigated a potential substation location south of the current Modified Route D Alternative Substation, as described in Section E.4.1 (under heading for Modified Route D Alternative Substation). The only feasible location (with relatively flat land, access for construction vehicles, and not on Forest land) is a parcel owned by the City of San Diego for watershed protection for Barrett Lake. After investigation by the CPUC and BLM, the City determined that the land needed to remain in protected status and should not be developed as a substation. As a result, the Modified Route D Substation as currently defined was found to be the most appropriate substation site.
- A0009-15 Access roads as presented in the Draft EIR/EIS were identified by SDG&E based on preliminary engineering. In response to this comment and other Forest Service comments, SDG&E, the CPUC and BLM, and Forest staff have been working to identify refined tower locations, and to minimize new access roads and pull sites. The result of this refined engineering effort is shown in the modified detailed maps in Appendix 11.
- A0009-16 Based on an agreement with USFS staff, new simulations prepared as part of the Responses to Comments (FEIR/FEIS) have incorporated components of Mitigation Measure V-45a (Scenery Conservation Plan). Specific components of Measure V-45a that have been included in subsequent simulations and incorporated into the visual analysis include consideration of structure colors, depiction of access/spur roads on slopes less than 15 percent and prohibition of access/spur roads on slopes greater than 15 percent. New simulations incorporating these mitigation components include Figures: A9-3B, A9-5B, A9-5D, A9-38B, A9-38D, and A9-38F (included at the end of this comment set).
- A0009-17 Similar to the process in which new access roads have been reduced, route refinements for the Modified Route D Alternative, as well as the BCD Alternative and BCD South Option have been completed to avoid sensitive areas on USFS lands. This effort has been completed in conjunction with SDG&E, the CPUC and BLM, and Forest staff, and the result of this refined engineering effort is shown in the modified detailed maps in Appendix 11 and

specific reroutes are included in Section 3 of the Recirculated Draft EIR/Supplemental Draft EIS.

A0009-18 The CPUC and BLM explored the option of Integrated Vegetation Management (IVM) as a fire mitigation measure, however two substantial barriers arose. First, because vegetation management should occur only where it can partially or fully mitigate a fire hazard, the EIR/EIS simulated fire behavior before and after IVM treatments along the transmission line within 0.25 miles of the centerline in each direction. There was no measurable difference in the severity of fires in the post-IVM scenario, so this measure was eliminated from consideration. The reasons for the failure of a transmission corridor IVM treatment to reduce the rate of fire spread and the number of acres burned in the modeling scenario is a result of several factors: fuel treatments on steep slopes, in areas of extremely low fuel moisture, and/or in locations with low-humidity and high-wind conditions tend to have little effect on fire behavior. These factors, which prevail over a majority of the San Diego County landscape, dominated the IVM treatment in the modeling results.

The CPUC and BLM sought to develop a measure that was targeted at the significant Wildfire Containment Conflict areas created by the transmission line, and therefore developed Mitigation Measure F-3a. This measure would require fuelbreaks to be created in the project ROW at the location of significant impact to firefighting operations. Notably, the measure gives discretion to the landowning agency to dictate offsite fuelbreak creation where, for example, the location of the transmission line ROW is inappropriate because of slope conditions or the presence of sensitive habitat or species. However, based on a large number of comments from agencies and natural resources protection groups, Mitigation Measure F-3a has been eliminated and replaced with a measure that requires funding support to fire protection agencies. Mitigation Measure F-3a, as presented in the Draft EIR/EIS, would not have reduced the significant impact to a less than significant level, and it would have resulted in potentially significant impacts to biological resources. Mitigation Measure F-3a has been revised; the new Mitigation Measure F-3a is as follows:

F-3a Contribute to Powerline Firefighting Mitigation Fund. The Applicant shall contribute an annual sum to local, State, and federal fire protection districts in the project vicinity through the mechanism of a new Powerline Firefighting Mitigation Fund, which shall be organized and carried out by SDG&E, and shall be subject to the oversight of the CPUC for the life of the Fund. Funding shall be used toward fire prevention measures and protection equipment and services, as appropriate to each jurisdiction. An increase in funding for fire prevention and suppression services and equipment will increase the probability of a fire being successfully contained, especially during normal weather conditions, and will therefore partially mitigate the significant barrier the transmission line poses to firefighting operations. The annual sum shall be based on an equivalent fuelbreak mitigation (presented as Mitigation Measure F-3a in the Draft EIR/EIS), which is an alternative means of partially mitigating the significant effect that the presence of the transmission line on firefighting operations, but which would be jurisdictionally infeasible. This shall be \$1,000 per acre for the first year plus \$250 per acre for each subsequent year for the life of the project (in 2008 United

States Dollars), based on the number of miles of Wildfire Containment Conflict listed in Table D.15-26. Should CAL FIRE wish to take over administrative authority for the Powerline Firefighting Mitigation Fund, an administrative transfer shall not be in violation of Mitigation Measure F-3a.

Table D.15-26. Mitigation Measure F-3a Compliance Locations

<u>Segment Identification</u>	<u>Location of Significant Conflict</u>	<u>Length of Significant Conflict (miles)</u>	<u>Area of Significant Conflict (acres)</u>
<u>Environmentally Superior Northern Alternative</u>	<u>MP 104-105.5, MP 110-112.5, MP 114-115.5, MP 126-128.5, MP 130.5-131.5, MP 131.5-133</u>	<u>11.5</u>	<u>418</u>
<u>Environmentally Superior Southern Alternative</u>	<u>MRD 10.5-13, MRD 15-16.5, and MP 131.5-133</u>	<u>6.5</u>	<u>236</u>
<u>SDG&E "Enhanced" Northern Route Alternative</u>	<u>MP 85-86.5, MP 90-91, MP 104-105.5, MP 110-112.5, MP 114-115.5, MP 126-128.5, MP 130.5-131.5, and MP 131.5-133</u>	<u>14.5</u>	<u>527</u>
<u>LEAPS Transmission-Only Alternative</u>	<u>LEAPS 2-4</u>	<u>2</u>	<u>73</u>
<u>LEAPS Generation and Transmission Alternative</u>	<u>LEAPS 2-4</u>	<u>2</u>	<u>73</u>

A0009-19 Please see Response to Comment A0009-18.

A0009-20 CPUC and BLM intend for this EIR/EIS to provide all necessary information for the Forest Service's approval of a route on its land, should such a route be selected by CPUC and BLM decision-makers. Please see Responses A0009-21 through A0009-27.

A0009-21 The Forest Service recommends the identification of Riparian Conservation Areas (RCAs) for alternatives on NFS lands and disclosure of the results of the 5-step screening process in the Final EIR/EIS. The screening process has been described in the Final EIR/EIS for all alternatives that cross NFS lands (see Appendix 8Q). The RCA analysis includes an evaluation of the project design elements and mitigation measures to determine if the project effects are consistent with RCA direction.

A0009-22 The commenter states that a Biological Evaluation (BE) and Biological Assessment (BA) will be required for the BLM selected alternative if it includes National Forest Service (NFS) lands. The BE is an internal USDA Forest Service document that analyzes that preferred alternative's effects on USDA Forest Service Sensitive Species. The commenter also states that the results of the Endangered Species Act (ESA) consultation, the results of any BAs, and any Biological Opinions (BOs) issued be incorporated into the Final EIR/EIS. A BLM preferred alternative is included in the Final EIR/EIS and it includes NFS lands, but the results of ESA consultation, BE, BA, and BO will not be included because the Section 7 ESA consultation will not be complete prior to publication of the Final EIR/EIS. It is anticipated that the BLM will initiate the Section 7 consultation following the publication of the Final EIR/EIS. It is also anticipated that the BE and BA will be completed concurrent with the Section 7 consultation and that the U.S. Fish and Wildlife Service will issue a BO when the Section 7 consultation has been

completed. Forest Service personnel attended an interagency meeting with the USFWS, CDFG, BLM, SDG&E and consultants on July 17, 2008 and are aware of the process.

- A0009-23 The following language has been added to Section D.12.3 of Volume 3 of the Draft EIR/EIS to clarify the role of the Forest Service in water quality management:

Forest System Lands

The SWRCB designated the Forest Service as the Water Quality Management Agency for Forest System lands in California in 1981. The Forest Service meets its obligations for compliance with water quality standards by implementing state-certified and EPA-approved BMPs. Practice 7-5 requires that Special Use Permits include measures to protect water quality, including conformance with other water quality agency permit requirements.

- A0009-24 The commenter recommends identification of jurisdictional waters and consultation with the ACOE and RWQCB, and that the results of the consultation be reported in the Final EIR/EIS. Please see General Response GR-15 (Biological Resources Jurisdictional Delineations).

- A0009-25 The Draft EIR/EIS provides a qualitative air quality impact evaluation of the dispersed construction emissions and potential effects on wilderness (for example, in Section D.11.6, p. D.11-24). Almost all direct emissions caused by the Proposed Project or any transmission alternative would be short-term during construction of the transmission line, and as described in the Draft EIR/EIS, operation and maintenance activity would cause minor emissions unlikely to result in any significant impact.

The Draft EIR/EIS (Section D.11.3.3, p. D.11-12) shows that New Source Review (NSR) requirements subject new stationary sources to Federal Land Manager (FLM) review for air quality impacts that might occur to specially protected federal Class I wilderness areas, and this is interpreted to apply to major stationary sources within 100 kilometers of federal Class I areas (as in U.S. EPA, New Source Review Workshop Manual, Draft October 1990). However, there are no NSR requirements applicable to project construction activities, and no notable permanent stationary sources would be associated with the Proposed Project or transmission alternatives. Non-Wires Alternatives with permanent stationary sources, such as fossil fueled power plants, are subject to NSR as described in Sections E.5.11 and E.6.11.

The comment requests additional information regarding effects on wilderness Air Quality Related Values. Although no project-related activities would occur within 10 kilometers of any federal Class I areas, additional information is provided in the Final EIR/EIS to show the quantities of emissions related to construction activities within 10 kilometers of any federal or State-designated wilderness (i.e., Class II areas).

The Final EIR/EIS includes updated tables that reorganize the emissions data from Appendix 10 of the Draft EIR/EIS to show the construction emissions over the two-year construction duration by alternative, by air pollution control district, and within 10 kilometers (approximately six miles) of wilderness areas. The discussion of Overall Construction Impacts (Section D.11.13.1, p. D.11-49) addresses how BLM would make findings under the General Conformity rule, and Mitigation Measure AQ-1h

identifies possible methods of offsetting construction emissions to ensure they remain below the applicability thresholds of the rule.

Tables Ap.10-1 through Ap.10-3 provide estimated levels of emissions by transmission alternative for the two-year construction period split by each of the local air districts. Table Ap.10-4 shows estimated levels of emissions for the transmission alternatives within 10 kilometers of wilderness areas. Appendix 10 of the Draft EIR/EIS also includes revisions to show the reorganized emissions data.

Table Ap.10-1. Annual Emissions from Construction Activities in Imperial County

Alternative	NOx (ton/year)	VOC (ton/year)	PM10 (ton/year)	PM2.5 (ton/year)	CO (ton/year)	SOx (ton/year)	CO ₂ (ton/year)
Proposed Project	199.2	25.8	345.9	48.1	109.7	3.2	21,282.0
SDG&E's "Enhanced" Northern	186.7	24.2	324.2	45.1	102.8	3.0	19,949.3
Environmentally Superior Northern	196.6	25.5	341.3	47.4	108.2	3.2	21,005.0
Environmentally Superior Southern	100.8	13.1	175.1	24.3	55.5	1.6	10,775.5
General Conformity <i>de minimis</i> Threshold	100	100	70	70	—	—	—

Source: EIR/EIS Appendix 10.

Table Ap.10-2. Annual Emissions from Construction Activities in San Diego County

Alternative	NOx (ton/year)	VOC (ton/year)	PM10 (ton/year)	PM2.5 (ton/year)	CO (ton/year)	SOx (ton/year)	CO ₂ (ton/year)
Proposed Project	311.5	40.4	540.9	75.2	171.5	5.0	33,287.3
SDG&E's "Enhanced" Northern	337.8	43.8	586.5	81.5	186.0	5.4	36,090.7
Environmentally Superior Northern	436.5	56.6	757.9	105.4	240.3	7.0	46,636.9
Environmentally Superior Southern	342.9	44.4	595.5	82.8	188.8	5.5	36,644.1
LEAPS Transmission-Only	190.1	24.6	330.1	45.9	104.7	3.0	20,313.3
LEAPS Generation and Transmission	190.1	24.6	330.1	45.9	104.7	3.0	20,313.3
General Conformity <i>de minimis</i> Threshold	100	100	—	—	—	—	—

Source: EIR/EIS Appendix 10.

Table Ap.10-3. Annual Emissions from Construction Activities in South Coast Air Basin

Alternative	NOx (ton/year)	VOC (ton/year)	PM10 (ton/year)	PM2.5 (ton/year)	CO (ton/year)	SOx (ton/year)	CO ₂ (ton/year)
LEAPS Transmission-Only	104.9	13.6	182.2	25.3	57.8	1.7	11,212.4
LEAPS Generation & Transmission	109.0	14.1	189.3	26.3	60.0	1.7	11,649.2
General Conformity <i>de minimis</i> Threshold	25	25	70	70	100	—	—

Source: EIR/EIS Appendix 10.

Table Ap.10-4. Annual Emissions from Construction Activities within 10 Kilometers of Wilderness

Alternative	NOx (ton/year)	VOC (ton/year)	PM10 (ton/year)	PM2.5 (ton/year)	CO (ton/year)	SOx (ton/year)	CO ₂ (ton/year)
Proposed Project	167.3	21.7	290.5	40.4	92.1	2.7	17,874.3
SDG&E's "Enhanced" Northern	169.7	22.0	294.6	41.0	93.4	2.7	18,129.1
Environmentally Superior Northern	217.6	28.2	377.9	52.5	119.8	3.5	23,254.7
Environmentally Superior Southern	302.9	39.2	525.9	73.1	166.8	4.9	32,363.0
LEAPS Transmission-Only	195.9	25.4	340.2	47.3	107.9	3.1	20,935.8
LEAPS Generation & Transmission	200.0	25.9	347.3	48.3	110.1	3.2	21,372.7

Source: EIR/EIS Appendix 10.

A0009-26 As stated by the Forest Service, Section D.7.7 discusses the need for compliance with Section 106 of the National Historic Preservation Act (NHPA). The following passage has been added to the section to clarify two details. The Section 106 process would be implemented under a Programmatic Agreement that would be drafted to include all relevant provisions of the mitigation measures set forth in the Final EIR/EIS that ensure avoidance of or reduction of adverse effects to historic properties. The added text also clarifies that the USFS could be the lead federal agency for purposes of Section 106 compliance. Such would be the case if a selected project crosses more land administered by the USFS than by the BLM.

If and when the Proposed Project or one of the alternatives is approved, the Section 106 process will be completed for the selected route prior to construction. This phased approach to Section 106 would be implemented under a Programmatic Agreement (pursuant to 36 CFR 800.14(b)) among the lead federal agency (BLM, or USFS for some alternatives), the California State Historical Preservation Officer (SHPO), the Advisory Council, and any affected Native American tribes.

A0009-27 Please see individual responses above that address the specific issues in this summary paragraph.

A0009-28 Please see individual responses above that address the specific issues in this summary paragraph, as well as Responses to Comments A0009-29 through A0009-54.

A0009-29 The commenter states the need for the Final EIR/EIS to disclose effects of each alternative on endangered species and Forest Service sensitive species in a context that supports the findings required by law, regulation, and policy. See Response A0009-22.

The commenter also states that the Final EIR/EIS must disclose how the project and alternatives will affect population and habitat trends for the Forest Service Management Indicator Species (MIS). The MIS analysis (Appendix 8M of the Draft EIR/EIS) has been updated to disclose project effects on MIS population and habitat trends.

A0009-30 It is acknowledged that night lighting associated with project construction and operation could adversely affect the "night sky," particularly as it relates to those activities and facilities that depend on dark night sky conditions such as Palomar and Mount Laguna Observatories. Night lighting impacts are addressed in the EIR/EIS. Because of concerns in areas like Palomar and Mount Laguna, and to minimize light scatter on nearby landscapes and uses, Mitigation Measure V-1b (page D.3-48 in the Draft EIR/EIS) and

Mitigation Measure V-21a (page D.3-125 in the Draft EIR/EIS) are required to prevent adverse night lighting impacts during construction and operation, respectively.

A0009-31 This comment requested a viewshed analysis to assess visibility of the Proposed Project and Alternatives from a number of sensitive viewing areas on Cleveland National Forest including public stopping points, overlooks, major travel corridors, and recreation areas and sites such as campgrounds, truck trails, trailheads, trails and wilderness areas. That study is included as Appendix 14 to this Final EIR/EIS. A summary of the findings of that study is presented in the following paragraph and attached table.

Twenty-four sensitive viewing areas were identified in consultation with CNF staff and a twenty-fifth sensitive viewing area was added during the course of the analysis. The twenty-five view areas are listed in Table A9.31-1 (attached at the end of this comment set) and are located within portions of five Landscape Places of the CNF including the Upper San Diego River, Sweetwater, Laguna, Morena, and Pine Creek Landscape Places. Of the 25 sensitive viewing areas, the views from 19 would be sufficiently adversely affected such that the resulting view impairment would not be consistent with either the management emphasis for the applicable Landscape Place or Scenic Integrity Objective (SIO). The following six sensitive viewing areas would experience varying degrees of consistency with the applicable management emphasis and SIO.

Sensitive Viewing Area No. 5: Interstate 8 Eastbound Overlook. The Interstate 8 Alternative could be considered consistent with the management emphasis of the Sweetwater Landscape Place because it would be partially screened and it would not impair the panoramic viewing directions of interest from the Overlook. However, it would not be consistent with the HIGH SIO that would apply to this landscape. The Modified Route D Alternative would not be consistent with either the management emphasis or the HIGH SIO that would apply to this landscape.

Sensitive Viewing Area No. 8: Sunrise Highway Overlooks. At Overlooks 1 and 2, the Interstate 8 Alternative would not be consistent with either the management emphasis of the Laguna Landscape Place or the HIGH SIO that would apply to this landscape. However, at Overlook 7, it would be consistent with both the management emphasis and SIO because of lack of visibility due to substantial screening by terrain and/or vegetation and the extended viewing distance.

Sensitive Viewing Area No. 15: Morena Lake Campground. The Interstate 8 Alternative West Buckman Springs Option, Interstate 8 South Buckman Springs Option, and Modified Route D Alternative would be consistent with both the management emphasis of the Morena Landscape Place and the HIGH SIO that would apply to this landscape, primarily due to lack of visibility because of screening of the routes by terrain and/or vegetation and the extended viewing distance.

Sensitive Viewing Area No. 16: Pacific Crest Trail Near Morena Lake Campground. The Interstate 8 Alternative West Buckman Springs Option and Interstate 8 South Buckman Springs Option would be consistent with both the management emphasis of the Morena Landscape Place and the HIGH SIO that would apply to this landscape, primarily due to lack of visibility because of screening of the routes by terrain and/or vegetation and the extended viewing distance. However, the Modified Route D Alternative

would not be consistent with either the management emphasis or the HIGH SIO that would apply to this landscape.

Sensitive Viewing Area No. 24: Hauser Wilderness / Corral Canyon OHV Area. The Modified Route D Alternative and the Modified Route D Alternative USFS PCT Option would be consistent with both the management emphasis of the Pine Creek Landscape Place and the HIGH SIO that would apply to this landscape, primarily due to lack of visibility because of screening of the routes by terrain and/or vegetation and the extended viewing distance.

Sensitive Viewing Area No. 25: Los Piños Mountain. The Modified Route D Alternative and the Modified Route D Alternative's PCT Route Option C/D would be consistent with both the management emphasis of the Morena Landscape Place and the HIGH SIO that would apply to this landscape, primarily due to lack of visibility because of screening of the routes by terrain and/or vegetation and the extended viewing distance.

- A0009-32 Mitigation Measure V-2d (Construction by helicopter) requires construction by helicopter for those route segments where standard construction techniques and access would result in long-term visible scarring and vegetation discontinuities. Those site-specific locations and any other locations on slopes over 15 percent would be identified as project design proceeds and access requirements are refined. The appropriate agency would be consulted and specific segments to be constructed by helicopter would be stipulated. However, much of this task has been incorporated into the refinement of the Modified Route D Alternative and elimination of many access roads that has been completed since publication of the Draft EIR/EIS; see detailed maps in Appendix 11C.
- A0009-33 Please see also Response to Comment A0009-32 above.
- A0009-34 In this case, inappropriate access road orientation can cause the transmission structures to appear considerably more prominent if the structures are situated in the primary cone of vision on approach to the structure. Increased structure prominence can exacerbate the visible characteristics of the structure that contrast with the adjacent and background landscape. Thus, improper access road orientation can, in effect, result in an apparent increase in structure contrast. That is the basis for referring to both towers and conductors (the non-specular component of the measure) in the title of the mitigation measure.
- A0009-35 It is understood that the Forest Service position is that all structures and conductors crossing the National Forest shall be of a non-specular type unless otherwise treated or painted to reduce visibility and contrast, as required under Mitigation Measure V-45a (Scenery Conservation Plan).
- A0009-36 Although Mitigation Measure V-45a (Scenery Conservation Plan) has been identified as mitigation at specific but representative Key Viewpoints, it is the intent of the CPUC and BLM that Mitigation Measure V-45a would apply to all elements of the project that cross Cleveland National Forest (CNF) lands.
- A0009-37 The Draft EIR/EIS's discussion of visual impacts analyzed the efficacy of mitigation measures. Based on detailed analyses conducted at representative Key Viewpoints, the EIR/EIS concluded that neither the Proposed Project nor any of the alternatives or

options would be consistent with the established CNF Scenic Integrity Objectives. While the resulting significant visual impacts could be reduced by applying the identified mitigation measures, including the implementation of a Scenery Conservation Plan (Mitigation Measure V-45a), the impacts could not be reduced to levels that would be less than significant.

A0009-38 The commenter identified the proposed Eagle Peak Wilderness Area and stated that impacts to the wilderness character of the subject area should be considered. Please refer to Response to Comment E0003-162.

This comment requested the preparation of additional visual simulations of the revised Modified Route D Alternative including both the original route (Option A) and the new USFS PCT Option C/D. Further, all of the new simulations were to incorporate design elements of Mitigation Measure V-45a (Scenery Conservation Plan). Three Key Viewpoints were selected for this analysis in consultation with Cleveland National Forest staff. Key Viewpoints 89 and 90 were established on the Pacific Crest Trail on South Boundary Road, just south of Hauser Canyon. Key Viewpoint 91 was established on Corral Canyon Road, approximately 1.5 miles southwest of Corral Canyon Campground.

Figure A9-38A presents the existing view from KVP 89. Figure A9-38B presents a visual simulation of the Modified Route D Alternative Option A as it crosses the mouth of Hauser Canyon following an existing wood-pole transmission line. This route option would span the Pacific Crest Trail (PCT) three times as the line ascends the ridge along the south side of the canyon. The landscape of rounded hills and low-growing vegetation is natural in appearance and there is no visible evidence of industrial structures or character. Panoramic views are open and unobstructed. The simulation illustrates the implementation of Mitigation Measure V-45a. Specifically, all but one of the structures are shown painted in an olive drab color. The furthest ridge-top structure is shown in a dark gray from the galvanizing treatment. Also, because some of the slopes along this segment exceed 15 percent, it is assumed that the construction of new spur roads would not be permitted on certain slopes. Cleared structure pads are also shown. While the darker color of the structures enables them to blend effectively with a darker, mottled background, they tend to be more prominent against a lighter, even-toned background. Even with implementation of the measures illustrated in Figure A9-38B, this alternative, as viewed from the PCT, would not be consistent with the BLM's Visual Resource Management (VRM) Class III management objective, which allows for a moderate or lower degree of visual change that, while it may attract attention, should not dominate the view of the casual observer. The route would also not be consistent with the USFS management emphasis of the Morena Landscape Place, or the HIGH Scenic Integrity Objective (SIO) that would apply to the landscape immediately adjacent and to the north. The resulting visual impact would still be significant (Class I).

Figure A9-38C presents the existing view from KVP 90, which is located on the PCT and South Boundary Road, just south of the existing wood-pole transmission line span of the trail and road. Figure A9-38D presents a visual simulation of the Modified Route D Alternative USFS PCT Option C/D as it traverses a southern ridge after diverging from the existing route of the wood-pole transmission line. This route option would span the Pacific Crest Trail (PCT) one time as the line ascends and then

traverses the ridge along the south side of the canyon. The landscape of rounded hills and low-growing vegetation is natural in appearance and there is no visible evidence of industrial structures or character. Panoramic views are open and unobstructed. The simulation illustrates the implementation of Mitigation Measure V-45a. Specifically, the transmission line structure is shown painted in an olive drab color. Also, because some of the slopes along this segment exceed 15 percent, it is assumed that the construction of new spur roads would not be permitted on certain slopes. A cleared structure pad is only partially visible from the viewing perspective available from this location. While the darker color of the structures enables them to blend effectively with a darker, mottled background, they tend to be more prominent against a lighter, even-toned background such as the sky in this simulation. Even with implementation of the measures illustrated in Figure A9-38D, this option, as viewed from the PCT and South Boundary Road, would not be consistent with the BLM's Visual Resource Management (VRM) Class III management objective. The route would also not be consistent with the USFS management emphasis of the Morena Landscape Place, or the HIGH Scenic Integrity Objective (SIO) that would apply to the USFS-administered landscape to the north. The resulting visual impact would still be significant (Class I).

Figure A9-38E presents the existing view from KVP 91, which is located on Corral Canyon Road, approximately 1.5 miles southwest of Corral Canyon Campground. Figure A9-38F presents a visual simulation of the Modified Route D Alternative as it passes south of Hauser Wilderness, parallel to an existing wood-pole transmission line. The landscape of rocky, angular ridges and hills and low-growing vegetation is natural in appearance though the large structures of the existing chicken ranch are visible in the distance. Panoramic views are open and unobstructed. The simulation illustrates the implementation of Mitigation Measure V-45a. Specifically, the transmission line structures are shown in a dark gray color from the galvanizing treatment. Also, because some of the slopes along this segment exceed 15 percent, it is assumed that the construction of new spur roads would not be permitted on certain slopes. Cleared structure pads are also simulated. While the darker color of the structures enables them to blend effectively with a darker, mottled background, they tend to be slightly more prominent against a lighter, even-toned background such as the sky in this simulation. However, at a substantial viewing distance ranging from 3.5 to 4.5 miles, the transmission line is minimally noticeable and generally limited to the three structures that skyline along a distant ridge. The minimal view impairment that would result would be consistent with both the management emphasis of the Pine Creek Landscape Place and the HIGH Scenic Integrity Objective (SIO) that would apply to the landscape where KVP 91 is located, even though the route is not located on USFS land. The resulting visual impact would be adverse but not significant from this distant viewing location (Class III).

The commenter also stated that the location of the PCT was incorrect on Figure Ap.11C-77 of Volume 6 of the Draft EIR/EIS. Based on revised information received from the Forest Service in late December 2007, the figure has been revised to show the correct location of the PCT in relation to the MRD Alternative.

The commenter states that the Final EIR/EIS should disclose impacts to the outstandingly remarkable values (ORVs) and water quality of Cottonwood Creek, which was identified in the CNF Land Management Plan as eligible for the Wild and Scenic River System.

Reference to the high value of the water quality of Cottonwood Creek has been added to Section E.4.12, as shown below. Numerous mitigation measures are presented in the water resources section to protect water quality; these measures would protect Cottonwood Creek as well as other local and regional streams.

The first paragraph of Section E.1.12.1 of Volume 4 of the Draft EIR/EIS has been modified in response to the comment as follows:

The Interstate 8 Alternative takes a southern route from the Imperial Valley Substation to a point near Milepost (MP) 130 on the proposed route. Much of this alternative is along Interstate 8, and much of this alternative crosses Forest Service land. Climate and terrain are typical of the desert links (Imperial Valley and Anza-Borrego) from MP I8-0 to approximately I8-40, typical of the Central Link from approximately MP I8-40 to I8-70, and of the Inland Valley Link west of I8-70. There are 17 major water crossings in this alternative (Table E.1.12-1), including several large perennial or intermittent streams such as the San Diego River, the Sweetwater River, Pine Valley Creek, La Posta Creek, San Vicente Creek, Kitchen Creek, and Cottonwood Creek. Cottonwood Creek is eligible for the Wild and Scenic River System. The Cleveland National Forest Land Management Plan directs the Forest Service to protect water quality in eligible watercourses. There are 79 watercourse crossings identified for this alternative (Table E.1.12-1). There may be other incidental watercourses that were not identified.

A0009-39 The cultural report was provided to the CNF archaeologist on May 20, 2008.

A0009-40 The Forest Service requests quantification in miles of existing roads that would be used or upgraded and new roads that would be constructed for each project alternative. They also request quantification of the miles of trails that would be used as roads, noting that these would need to be return to their prior configuration as trails. Plans for alternative trails during construction are also requested. The Forest Service asks that this information be included in the Final EIR/EIS.

The maps in Appendix 11 have been modified to illustrate the modified routing of all alternatives, much of which has been implemented in response to Forest Service concerns. The Forest Service has also been provided with GIS shapefiles for these routes, as well as maps prepared by SDG&E that illustrate proposed use of existing Forest Service roads and trails.

It is recognized that it is in the interests of all parties to maximize the use of existing roads and minimize construction of new roads. SDG&E and the Forest Service are coordinating on the placement of towers to minimize impacts to biological, cultural, physical, visual, and recreational resources. In turn, the final locations of towers determine potential access routes.

The area in acres of initially identified access road required for each alternative is listed below. No distinction is made in the GIS data between existing and new roads, and between roads that are currently suitable and roads that would need to be upgraded for use during construction.

The Forest Service would need to concur with tower locations and access routes, and would impose final conditions regarding disturbance and restoration that protect Forest resources. These conditions would include requirements for site-appropriate restoration and revegetation of disturbed land, roads, and trails not otherwise needed for ongoing operation, maintenance, and inspection; provision of alternative trail routes during construction, if required; implementation of seasonal restrictions to protect wildlife life cycles, if required; and implementation of techniques to prevent sediment transport from disturbed areas to streams. Plans for the restoration of disturbed sites would be approved by the Forest Service, and would include erosion control, grading, treatment for compaction, types of vegetation to use in revegetation, and similar provisions. In addition, CPUC and BLM would impose mitigation measures on SDG&E. The full text of CPUC/BLM mitigation measures is provided in Appendix 12. Examples pertinent to Forest Service land, and elsewhere, include:

- B-1a Provide restoration/compensation for affected sensitive vegetation communities.**
- B-1g Build access roads at right angles to streambeds and washes.**
- B-1i Restrict the construction of access and spur roads.**
- B-2c Avoid sensitive features.**
- B-15a Permanently close access roads along the transmission alignment.**
- B-15b Develop and implement an Invasive Weed Management Plan.**
- H-1f Develop and implement construction Best Management Practices.**
- H-1g Stream crossings at low flow periods.**
- H-1k Comply with Forest Service conditions.**

A0009-41 The Forest Service asks that the number and acreage of pull sites be quantified, and the land use modification needed at each site be described, including soil compaction and potential sedimentation. Information on distance to tributaries and on restoration plans is also requested.

Based on consultation with Forest Service staff, route revisions have been made to eliminate pull sites where possible, and to minimize access roads. The remaining pull sites are identified on maps in Appendix 11. As with roads, trails, and other disturbed lands discussed in Response to Comment A0009-41, conditions regarding the location, use, and restoration of these sites would be imposed by the Forest Service. CPUC/BLM-imposed mitigation measures would also apply.

A0009-42 The Forest Service states that on the BCD South Option, placing a tower so as to avoid placing a tower in Caltrans ROW results in an alignment that may be inconsistent with the LMP land use zone in the area north of I-8. The commenter also notes that the alignment south of I-8 appears to be on a ridge top, exacerbating a concern of “skylining” in this visible area. The commenter also encourages collaboration among all parties (CPUC, BLM, Forest Service, Caltrans, and SDG&E) to develop a route that address these issues; this route revision has been prepared based on this collaboration.

Mitigation Measure T-10b (Revise BCD South Option), which revised the BCD South Option to avoid placing a tower in the Caltrans right of way, is no longer necessary due

to the redesign of the BCD South Option, which replaced the original alignment. The revised Option was further evaluated in Response to Comment A0009-5 (see above) and included the preparation of two visual simulations (included at the end of this comment set) to support the analysis.

A0009-43 The Forest Service notes that the Route D Alternative would pass through approximately 3 miles of Inventoried Roadless Area (IRA), not 1.5 miles as stated in the Draft EIR/EIS. This would occur in the Sand Hill IRA and the No Name IRA. The Forest Service requests that the Final EIR/EIS disclose the effect of the Route D alternative on the Roadless Area Characteristics outline by the Roadless Area Conservation Rule.¹ The Forest Service also requests disclosure of the effect of the alternative relative to the State of California's roadless area policy.

The use of helicopter construction, as required T-11a (No new roads shall be created in Inventoried Roadless Areas) would prevent new road construction and would have no effect on the rules and policies cited. The text in Section E.3.9.2, Impact T-11, has been revised as follows:

Impact T-11: Creation of new roads in Inventoried Roadless Area (IRA) (Class II)

~~A 1.5 mile segment of~~ Approximately 3 miles of Alternative Route D would pass through ~~an IRA~~ north of Descanso in the CNF. Construction would be completed using existing roads and with helicopter assistance in order to adhere to the Roadless Area Conservation Policy, which prohibits road-building and timber harvesting in IRAs. By adhering to Mitigation Measure T-11, impacts will be reduced to less than significant (Class II).

The values or features that often characterize inventoried roadless areas include:

- High quality or undisturbed soil, water, and air
- Sources of public drinking water
- Diversity of plant and animal communities
 - Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land
 - Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation
 - Reference landscapes
 - Natural appearing landscapes with high scenic quality
 - Traditional cultural properties and sacred sites
 - Other locally identified unique characteristics.

Impacts to these values and features are avoided by using helicopter construction techniques and existing roads for erecting towers in Roadless Areas.

¹ The legal status of the Roadless Area Conservation Rule continues in flux, based on conflicting decisions in the courts. On September 22, 2006, the U.S. District Court for the Northern District of California reinstated the 2001 Roadless Rule. However, on August 13, 2008, U.S. District Judge Brimmer in Wyoming issued a permanent injunction against the Clinton-era roadless rule, saying it violated the National Environmental Policy Act and the Wilderness Act.

With regard to a State of California Roadless Area policy, EIR/EIS preparers were unable to identify a specific State policy. Remarks by the Governor and the Secretary for Resources have included reference to such a “policy” over the last several years. This appears related to the State Petition process formerly in place, in which California petitioned USFS and USDA to implement a California-specific roadless policy. In any event, the use of helicopter-based construction as described above would not be contrary to such a policy.

A0009-44 The watercourse crossings of particular concern noted by the Forest Service are acknowledged. Mitigation Measures H-1k (Comply with Forest Service Conditions and H-1l (Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment Control Plan), which would be required for the portion of the Interstate 8, BCD, and Route D Alternatives on Forest System Lands, would ensure compliance with the Forest Service conditions noted, including application of required best management practices (BMP). In addition, the Forest Service will have the opportunity to require additional conditions upon issuance of a Special Use Permit for the project, should it choose to do so.

With regard to impacts on the PCT and other recreational trails, these are evaluated in Sections E.1.5, E.2.5, and E.3.5. It should be noted that Mitigation Measure WR-3a, relating to access roads and towers being located on or across the PCT, has been modified as follows:

WR-3a Coordinate tower and road locations with the authorized officer for the recreation area. Where the Proposed Project crosses the recreation areas listed below, SDG&E shall coordinate with the authorized officer for the recreation area to determine specific tower site and spur road locations in order to minimize impacts to recreational resources. If it is not feasible to site structures outside of a park/preserve, compensation shall be required for permanent impacts (i.e., structure footings, access roads not dually used as trails) to park/preserve land at a 1:1 ratio. However, this mitigation measure is superseded by biological resource Mitigation Measure B-1a, which specifies restoration and compensation ratios for affected vegetation. In cases where the impacts to recreational resources occur on lands already in use as mitigation for other projects, the mitigation ratios shall be doubled, as is standard practice in San Diego County.

In consultation with the authorized officer of the trail or recreation area, access roads shall not be located on trails (~~i.e.e.g.~~, PCT, Trans-County Trail) unless the authorized officer determines that the construction of new access roads would result in greater impacts than modifying the trail for use as an access road. If it is not feasible to site transmission structures off of a trail, SDG&E shall provide full funding for relocation of trail segments, including planning and trail construction, at location(s) identified by the authorized officer of the trail or recreation area. Trail segment relocation shall maintain the connectivity of regional and community trails.

In addition, the Forest Service requests that the Final EIR/EIS disclose the effects of the Proposed Project and the alternatives on the beneficial uses and water quality objec-

tives listed in relevant Basin Plans for the affected watercourses, and any project effects on Water Quality Limited Segments. With regard to water quality limited streams, none would be crossed by the Proposed Project, the LEAPS Generation and Transmission Alternative would uptake water from and discharge water to a water quality limited lake (Lake Elsinore), and no other alternative would affect a water quality limited waterbody or watercourse. With regard to beneficial uses and water quality objectives for affected watercourses, Sections D.12, E.1.12, E.2.12, E.3.12, and E.4.12 of the Draft EIR/EIS have been updated to include beneficial uses and water quality objectives for each stream crossing. Although all of the text changes to the Draft EIR/EIS sections are not reproduced here, a representative sample of the changes that have been made based on the Forest Service comments are provided here. Please see Sections D.12, E.1.12, E.2.12, E.3.12, and E.4.12 for further detail. The following text has been added to Section D.12.3 under the heading "State":

State Water Resources Control Board

The Proposed Project is within the San Diego and Colorado River Regional Boards of the California State Water Resources Control Board. Each Regional Board adopts a Basin Plan intended to designate beneficial uses for surface and groundwaters, and sets narrative and numerical objectives for protection of the beneficial uses. Beneficial use designations include: Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Industrial Process Supply (PROC), Industrial Service Supply (IND), Groundwater Recharge (GWR), Freshwater Replenishment (FRSH), Navigation (NAV), Hydropower Generation (POW), Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Commercial and Sport Fishing (COMM), Aquaculture (AQUA), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), Inland Saline Water Habitat (SAL), Estuarine Habitat (EST), Marine Habitat (MAR), Wildlife Habitat (WILD), Preservation of Biological Habitats of Special Significance (BIOL), Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or Early Development (SPWN), and Shellfish Harvesting (SHELL) (CRWQCB, 1994 and 2005).

In addition to a general antidegradation water quality objective which basically states that water quality that is better than stated objectives shall be maintained, the San Diego Regional Board has specific inland water quality objectives for water temperature, agricultural supply beneficial use, ammonia, bacteria, biostimulatory substances (e.g. nitrogen and phosphorus), boron, chlorides, color, dissolved oxygen, floating material, fluoride, pH, inorganic chemicals, iron, manganese, methylene blue, nitrate, oil and grease, organic chemicals, sodium, pesticides, phenolic compounds, radioactivity, drinking water, sediment, suspended solids, sulfate, taste and odor, total dissolved solids, toxicity, toxic pollutants, trihalomethanes, and turbidity (CRWQCB, 1994). There are also specific groundwater objectives listed by groundwater basin.

The Colorado River Regional Board also has a general antidegradation policy, as well as general objectives for aesthetic qualities, tainting substances, toxicity, temperature, pH, dissolved oxygen, suspended and settleable solids, total dissolved solids, bacteria, biostimulatory substances, sediment, turbidity, radioactivity, chemical constituents, and pesticide wastes. There are also specific objectives for

the Colorado River, the New River, Irrigation Supply Canals, and the Salton Sea. Groundwater objectives include taste and odor, bacteria, chemical and physical quality, brines, radioactivity, and overdraft (CRWQCB, 2005).

In compliance with the federal Clean Water Act, each Regional Board has identified Section 303(d) water quality limited streams, lakes and coastal waters for development of TMDL criteria. A TMDL is a quantitative assessment of water quality problems, contributing sources, and load reductions or control actions needed to restore and protect bodies of water.

In addition, Table D.12-1 and all subsequent tables in the updated sections of the Draft EIR/EIS have been modified to include information about beneficial uses. In addition, water resources impacts in all updated sections have been revised to identify when beneficial uses for surface water and groundwater could be adversely affected through violation of RWQCB water quality objectives.

A0009-45 Mitigation Measure H-4b has been added to address damage to water supply wells and springs, as follows:

H-4b Avoid blasting where damage to groundwater wells or springs could occur. Blasting shall be managed with a Blasting Plan for each site. The Plan shall include the blasting methods, distance calculations to estimate the area of effect of the blasting, and surveys for wells and springs within the blast influence area (no less than ½ mile from the blasting location). Blasting shall not be allowed where damage to wells or springs could occur according to the Applicant's Blasting Plan, and a rock anchoring or mini-pile system shall be used if these resources could be damaged as a result of blasting or any earthworking method used as an alternative to blasting. Where inadvertent damage to wells within an EPA-designated Sole Source Aquifer occur as a result of earthwork, the Applicant shall compensate the landowner in the form of well repair or replacement, and shall provide the landowner with a water storage tank and sufficient potable water within 48 hours and throughout the interim between damage and repair or replacement. Where inadvertent damage to other wells or springs occurs as a result of earthwork, the Applicant shall compensate the landowner in the form of remedial cash payment, repair, or replacement, as appropriate. The burden of proof of no impact shall rest with the Applicant.

A0009-46 As the Forest Service has the authority to specify Special Use Permit conditions, pre-implementation, implementation-during-construction, and post-implementation effectiveness monitoring requirements for work in streams would be specified by the Forest Service should it choose to issue a Special Use Permit for the project on Forest System Lands.

A0009-47 As the Forest Service has the authority to specify Special Use Permit conditions, restrictions on work during the rainy season or during periods of wet soil conditions would be specified by the Forest Service should it choose to issue a Special Use Permit for the project on Forest System Lands.

A0009-48 Please see Response to Comment A0009-18.

A0009-49 The Forest Service requests the addition of historic fire lines and ignitions to the Wildfire Containment Conflict maps. Adding 50 years of fire lines and 13 years of ignition points will be visually confusing as hundreds of fires have burned in various configurations over the landscape and there have been thousands of ignitions. As a result, no change to the maps was made. However, the Wildfire Containment Conflict model is an index of data-rich attributes, two of which are historic fire lines and ignitions, and the Wildfire Containment Conflict segments therefore reflect these values even though these values are not displayed on any figure.

A0009-50 The Forest Service suggests including fuel type, in addition to fuel load, in the Wildfire Containment Conflict Model. The following fuel characteristics were indexed in the Wildfire Containment Conflict Model: No fuel, Moderate fuel, and Heavy fuel. As discussed in General Response GR-9, fuel type does directly influence fire line heat intensity. Therefore, this characteristic was not indexed into the model. No changes to the model have been made. As noted by the Forest Service, the attribute of hill slope has a strong influence on wildfire behavior, and this attribute was indexed in the Wildfire Containment Conflict model.

With regard to the comment on presentation of the Conflict Model results in terms of the route percentage in conflict versus the number of miles in conflict, please see General Response GR-9, which presents a mile-by-mile comparison between routes.

A0009-51 We appreciate the suggestion that the CPUC & BLM host a technical workshop, but due to time constraints and continuing intense firefighting activities throughout the State, this will not be possible. The mitigation measures in the Fire and Fuels Management section have been revised based on consideration of comments from all parties.

Mitigation Measure F-3b has been clarified to require adoption of the MOU prior to energizing the transmission line, to allow the affected agencies and the Applicant to discuss project-related fire risk and mitigation prior to energizing the project. The text of Section D.15 and Appendix 12, Mitigation Measure F-3b, have been modified as follows:

F-3b Prepare and implement a Multi-agency Fire Prevention MOU. A Memorandum of Understanding (MOU) for the SRPL shall be created and implemented between SDG&E and the CAL FIRE San Diego Unit, Cleveland National Forest, and other agencies as appropriate using the existing Southwest Powerlink MOU as a template. The MOU shall be adopted prior to energizing the new transmission line. The purpose of this Multi-agency Fire Prevention MOU is to efficiently coordinate all aspects of agency and utility fire prevention plans and practices...

A0009-52 The commenter states that the cumulative effects analysis be quantified for biological resources associated with the southern alternatives. The commenter requests that the amount of habitat disturbed by all the reasonably foreseeable projects in Table G-3 be presented in comparison to the acres of habitat disturbed by the various alternatives. The project's cumulative biological impacts can be determined without quantifying the acreage of habitat disturbed, as is presented in Draft EIR/EIS Section G. In particular, Section G.3.1 presents the cumulative impact analysis for biological resources, and Section G.4.2.1 presents cumulative impact analysis for the Interstate 8 Alternative. Both

sections identify and describe several significant and unmitigable cumulative impacts. Further, the approach to cumulative impact analysis is additive, not comparative. Also, many of the projects in the cumulative scenario have not been fully developed and do not have defined project footprints. Therefore, it is not appropriate or feasible to quantify habitat disturbance to determine cumulative impacts. No additional analysis has been performed.

The commenter states the cumulative analysis should include impacts on population and habitat trends for MIS. Please see the Cumulative Impact section of the revised MIS Analysis, presented as Appendix 8M in this Final EIR/EIS.

- A0009-53 The Forest Service suggests that cumulative effects on water resources on Forest System lands be quantified in terms of the cumulative amount of disturbed area for the Interstate-8 Alternative. Due to the extent of construction effects, combined with other past and present projects, the Interstate 8 Alternative was found to create a cumulatively considerable impact for Impact H-1 (Construction activity could degrade water quality due to erosion and sedimentation). Given this disclosure of the significant impact to water quality, a quantitative analysis was not considered necessary.
- A0009-54 The commenter states that the description of projects considered in the cumulative scenario for Modified Route D (Section G.4.2.4 in Volume 5 of the Draft EIR/EIS) did not match the list of projects in Table G-3 or the projects shown on Figure G-9. Specifically, the commenter identifies the Star Ranch subdivision, Blackwater Paramilitary Training Facility, and the La Posta Mountain Warfare Training Facility as missing from the discussion. First, note that the Blackwater facility application has been withdrawn from consideration by the County of San Diego. For other projects, although these projects are not specifically named in Section G.4.2.4, they are listed considered and incorporated by reference to Table G-3, where they are described. As described in the introduction to Section G.4, the projects listed in Table G-3 represent known and anticipated activities that may occur in the vicinity of the alternative route that have the potential to contribute to a cumulative impact on the environment.

Figure A9-3A. Key Viewpoint 86 CNF Alternative – Existing View

[CLICK HERE TO VIEW](#)

Figure A9-3B. Key Viewpoint 86 CNF Alternative – Visual Simulation

[**CLICK HERE TO VIEW**](#)

Figure A9-3C. State Route 78 CNF Alternative – Existing View

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Figure A9-5A. Key Viewpoint 87 BCD South Alternative – Existing View

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Figure A9-5B. Key Viewpoint 87 BCD South Alternative – Visual Simulation

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Figure A9-5C. Key Viewpoint 88 BCD South Alternative – Existing View

[CLICK HERE TO VIEW](#)

Figure A9-5D. Key Viewpoint 88 BCD South Alternative – Visual Simulation

[**CLICK HERE TO VIEW**](#)

Figure A9-38A. Key Viewpoint 89 MRDA PCT Option A – Existing View

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Figure A9-38B. Key Viewpoint 89 MRDA PCT Option A – Visual Simulation

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Figure A9-38C. Key Viewpoint 90 MRDA PCT Option C/D – Existing View

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Figure A9-38D. Key Viewpoint 90 MRDA PCT Option C/D – Visual Simulation

[**CLICK HERE TO VIEW**](#)

Figure A9-38E. Key Viewpoint 91 Corral Canyon – Existing View

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Figure A9-38F. Key Viewpoint 91 Corral Canyon – Visual Simulation

[CLICK HERE TO VIEW](#)

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
1	Inaja Monument Park Overlook	Upper San Diego River	HIGH	Proposed Project	The steel-pole structures would be prominently visible and would introduce substantial industrial character into the rural, pastoral landscape, which would degrade the visual quality of the existing landscape and adversely affect the viewing experience from the Overlook.
2	Thornbush Road Trailhead.	Upper San Diego River	HIGH	Route D Alternative	The lattice structures would be visible though minimally noticeable because of (a) the partial screening provided by intervening terrain, (b) the presence of a mottled background that would help the structures to blend with the landscape, and (c) the substantial viewing distance of 2.5 to 3 miles. The resulting view impairment would be low but, to the extent that any introduction of industrial character is apparent from the trailhead or trail, the existing landscape would be visually degraded and the viewing experience would be adversely affected.
3	Intersection of Boulder Creek Road and Cedar Creek Road	Upper San Diego River	HIGH	Route D Alternative	The lattice structures would be prominently visible and would cause view blockage of the background slopes and ridges and would introduce substantial industrial character into the natural appearing landscape along Boulder Creek and Cedar Creek Roads. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from Boulder Creek and Cedar Creek Roads.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
4	El Capitan Dam / Access	Upper San Diego River	HIGH	I-8 Alternative	The transmission line would have limited visibility from the boat launch area and would not be particularly noticeable at a viewing distance of approximately two miles. Therefore, the route would have a minimal impact on views from the boat launch area and dam. However, the more northerly portions of the I-8 Alternative would be more visible from the reservoir as the route crests ridges to the southwest of the reservoir. The resulting view impairment would degrade the visual quality of the existing landscape and adversely affect the viewing experience from the reservoir.
				I-8 Alternative Chocolate Canyon Option	The transmission line would be prominently visible and would introduce substantial industrial character into the natural appearing landscape south of the access road. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from the boat launch area and reservoir.
5	Interstate 8 Eastbound Overlook/ Viewpoint	Sweetwater	HIGH	I-8 Alternative	At a viewing distance of approximately one mile, the transmission line would have limited visibility from the Overlook due to screening by intervening terrain. Although the visible portion of the transmission line would cause some view blockage of the background slopes as well as introduce industrial character into a natural appearing landscape, it would also be located in the opposite direction of the primary viewing directions of interest from the Overlook. Therefore, while the transmission line would degrade the visual quality of the existing landscape visible from the overlook, it would only slightly adversely affect the viewing experience from the Overlook and parking lot.
			HIGH	Modified Route D	The transmission line would be prominently visible at a viewing distance of approximately one mile to the southwest of the Overlook and would cause view blockage of the background slopes and ridges and introduce substantial industrial character into the natural appearing landscape. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from the Overlook.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
6	Interstate 8 / Park-N-Ride Lot Near SR79	Sweetwater	HIGH	I-8 Alternative	The transmission line would be prominently visible north of the Park-N-Ride lot at a viewing distance of approximately 0.8 miles and would cause view blockage of the background slopes and ridges and introduce substantial industrial character into the predominantly natural appearing landscape. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from this location.
7	Interstate 8 / Pine Valley Creek Bridge	Sweetwater	HIGH	I-8 Alternative	The transmission line would be prominently visible to the north of the Pine Valley Creek Bridge at a viewing distance ranging from approximately 0.25 to 0.5 miles and would cause substantial view blockage of background ridges and introduce considerable industrial character into the natural appearing landscape. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from the bridge.
8A	Sunrise Highway Turnout (approximately 1 road mile north of I-8)	Laguna	HIGH	I-8 Alternative	The transmission line would be slightly visible from the first Sunrise Highway turnout at a direct line-of-sight viewing distance (to the I-8 span) of approximately 2.2 miles and would cause a slight introduction of industrial character into the predominantly natural appearing landscape in the vicinity of I-8 span. The resulting view impairment would slightly degrade the visual quality of the existing landscape and adversely affect the viewing experience from the first turnout.
8B	Sunrise Highway Turnout (approximately 1.7 road miles north of I-8)	Laguna	HIGH	I-8 Alternative	The transmission line would be slightly visible from the second Sunrise Highway turnout at a direct line-of-sight viewing distance (to the I-8 span) of approximately 2.7 miles and would cause a slight introduction of industrial character into the predominantly natural appearing landscape in the vicinity of I-8 span. The resulting view impairment would slightly degrade the visual quality of the existing landscape and adversely affect the viewing experience from the second turnout though only slightly.
8C	Sunrise Highway Turnout (approximately 6.4 road miles north of I-8)	Laguna	HIGH	I-8 Alternative	The transmission line could be visible from the seventh Sunrise Highway turnout at a direct line-of-sight viewing distance (to route segments north and south of the I-8 span) ranging from 5.7 to 6.3 miles. However, the transmission line would not be noticeable at this viewing distance and would neither noticeably degrade the visual quality of the existing landscape nor adversely affect the viewing experience from the seventh turnout.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
9	Bear Valley Road	Morena	HIGH	I-8 Alternative	The transmission line would be prominently visible in the foreground of views from both the upper (ridge) and lower (meadow) elevations of Bear Valley Road. The transmission line would cause substantial view blockage of background ridges and landforms and introduce industrial character into the natural appearing landscape of the Bear Valley area. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience along Bear Valley Road.
10	Boulder Oaks Campground	Morena	HIGH	I-8 Alternative	The transmission line would be partially visible from Boulder Oaks Campground, though only from those perimeter campsites with unobstructed views to the east where the route descends into Cottonwood Valley (viewing distance of approximately 0.75 mile) and the north where the route would span I-8 to the west (viewing distance of slightly less than 4 miles). The transmission line would cause view blockage of background slopes and introduce industrial character into the predominantly natural appearing landscape. The resulting view impairment would slightly degrade the visual quality of the existing landscape and adversely affect the viewing experience from the affected campsites.
				I-8 Alternative West Buckman Springs Option	The transmission line would be prominently visible in the foreground of views from the perimeter campsites (including the Horse Circle sites) with unobstructed views to the south and west. The transmission line would cause substantial view blockage of background ridges and landforms and introduce industrial character into the natural appearing landscape that characterizes the southern portion of Cottonwood Valley in the vicinity of Boulder Oaks Campground. The resulting view impairment would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from Boulder Oaks Campground.
11	Pacific Crest Trail (PCT) Trailhead Adjacent to Boulder Oaks Campground	Morena	HIGH	I-8 Alternative West Buckman Springs Option	The transmission line would be a prominent industrial feature and would cause view blockage of the background hills and ridges as well as introduce substantial industrial character into a landscape that is natural in appearance and presently lacking built industrial features. The transmission line would degrade the visual quality of the existing landscape and adversely affect the viewing experience from the PCT and PCT trailhead adjacent to Boulder Oaks Campground.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
12	Buckman Springs Road	Morena	HIGH	I-8 Alternative	The transmission line would be visible at the span of I-8 at the north end of Cottonwood Valley (a viewing distance of approximately 2 miles) but would not be prominent. The contribution of additional view blockage of background features and introduction of industrial character would be slight as would be the overall degradation of visual quality and viewing experience.
				I-8 Alternative West Buckman Springs Option	The transmission line would be a prominent industrial feature and would cause view blockage of the background hills and ridges as well as introduce substantial industrial character into a landscape that is natural in appearance and generally lacking built industrial features. The transmission line would substantially degrade the visual quality of the existing landscape and adversely affect the viewing experience from Buckman Springs Road.
13	PCT Near Crossing of Buckman Springs Road	Morena	HIGH	I-8 Alternative West Buckman Springs Option	The transmission line would be prominently visible to the north from the PCT as the alternative route makes an east-west crossing of Cottonwood Valley, before turning north to parallel Buckman Springs Road. The transmission line would introduce substantial industrial character into Cottonwood Valley and would significantly degrade the visual quality of the valley landscape and the viewing experience from the PCT.
				I-8 Alternative South Buckman Springs Option	The transmission line would be highly visible from the PCT as the route converges on and then spans the PCT adjacent to Buckman Springs Road. The South Buckman Springs Option would introduce substantial industrial character into Cottonwood Valley, significantly degrading the visual quality of the valley landscape and viewing experience from the PCT.
14	Cameron Valley / Cameron Truck Trail Viewing toward the Narrows	Morena	HIGH	I-8 Alternative South Buckman Springs Option	The transmission line would be highly visible within Cameron Valley and from Cameron Truck Trail as the route passes down the valley and then turns west through the Narrows. The South Buckman Springs Option would cause substantial view blockage of the background slopes and ridges and introduce substantial industrial character into Cameron Valley, significantly degrading the visual quality of the valley landscape and viewing experience from Cameron Truck Trail and nearby residences.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
15	Morena Lake Campground	Morena	HIGH	I-8 Alternative West Buckman Springs Option	The transmission line would be a partially visible feature, though at a viewing distance of approximately 3.25 miles with substantial screening by intervening terrain, would not be a prominent feature. To the extent that it is noticeable, the transmission line would cause only a slight degree of view blockage of the background hills and introduce a low degree of industrial character into the landscape, minimally degrading the visual quality of the landscape and viewing experience from Morena Lake Campground.
				I-8 Alternative South Buckman Springs Option	The transmission line would be a partially visible feature, though at a viewing distance of approximately 2.4 miles with substantial screening by intervening terrain, would not be a prominent feature. To the extent that it is noticeable, the transmission line would cause only a slight degree of view blockage of the background hills and introduce a low degree of industrial character into the landscape, minimally degrading the visual quality of the landscape and viewing experience from Morena Lake Campground.
				Modified Route D Alternative	The transmission line would not be visible from the Campground area due to the screening of views to the south by trees and vegetation within and on the southern perimeter of the campground. Therefore, the Modified Route D Alternative would not degrade the visual quality of the landscape visible from the campground or the campground viewing experience.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
16	PCT Near Morena Lake Campground	Morena	HIGH	I-8 Alternative West Buckman Springs Option	The transmission line would be a partially visible feature, though at a viewing distance of approximately 3.4 miles with substantial screening by intervening terrain, would not be a prominent feature. To the extent that it is noticeable, the transmission line would cause only a slight degree of view blockage of the background hills and introduce a low degree of industrial character into the landscape, minimally degrading the visual quality of the landscape and viewing experience from the Pacific Crest Trail.
				I-8 Alternative South Buckman Springs Option	The transmission line would be a partially visible feature, though at a viewing distance of approximately 2.6 miles with substantial screening by intervening terrain, would not be a prominent feature. To the extent that it is noticeable, the transmission line would cause only a slight degree of view blockage of the background hills and introduce a low degree of industrial character into the landscape, minimally degrading the visual quality of the landscape and viewing experience from the Pacific Crest Trail.
				Modified Route D Alternative	The transmission line would be visible from the PCT on the ridge crest and to the south of the crest that is located just south of Morena Lake. However, at a viewing distance of approximately 2.5 miles, with much of the route being screened by intervening terrain and vegetation, the transmission line would not be a prominent feature. However, the transmission line would cause a slight degree of view blockage of the background hills and introduce a low degree of industrial character into a landscape presently lacking such characteristics, which would slightly degrade the visual quality of the landscape and the viewing experience from the Pacific Crest Trail.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
17	La Posta Road – North	Morena	HIGH	BCD Alternative	The transmission line would be highly visible from La Posta Road as the route crosses La Posta Valley and La Posta Road. The BCD Alternative would cause substantial view blockage of background slopes and ridges and introduce considerable industrial character into a natural appearing landscape absent built industrial features. The transmission line would significantly degrade the visual quality of the valley landscape and viewing experience from La Posta Road.
				BCD Alternative South Option	The transmission line would be highly visible from La Posta Road as the route diverges from the BCD Alternative and passes down La Posta Valley to converge on I-8. The BCD Alternative South Option would cause substantial view blockage of background slopes and ridges and introduce industrial character into a natural appearing landscape absent built industrial features. The transmission line would significantly degrade the visual quality of the valley landscape and viewing experience from La Posta Road.
18	La Posta Road I-8 Bridge	Morena	HIGH	BCD Alternative South Option	The structures at the I-8 span would be prominently visible and would introduce substantial industrial character into the landscape and cause considerable view blockage of the background slopes and ridges. The transmission line would significantly degrade the visual quality of the ridgeline and valley landscape and adversely affect the viewing experience from I-8.
19	La Posta Road – South	Morena	HIGH	BCD Alternative South Option	The transmission line would be prominently visible west of La Posta Road and would introduce substantial industrial character into the landscape and also cause considerable view blockage of the valley landscape and the ridges to the west. The transmission line would significantly degrade the visual quality within the valley and adversely affect the viewing experience from La Posta Road and the nearby residence.
20	PCT at Kitchen Creek Road	Morena	HIGH	BCD Alternative	The BCD Alternative would not be visible from the trailhead on Kitchen Creek Road because of screening by intervening terrain. However, further to the west, the PCT ascends a slope and achieves a sufficient increase in elevation to view the BCD Alternative, which would cross Kitchen Creek Road approximately 2.5 miles to the north. Although the transmission line would not be prominent at that viewing distance, the structures would be noticeable, particularly where they skyline as they crest ridgelines. The transmission line would significantly degrade the visual quality of the existing, natural landscape and adversely affect the viewing experience from the PCT.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
View Area	Location				
21	Cibbets Flat Campground	Morena	HIGH	BCD Alternative	The transmission line would be a prominent structural feature with considerable industrial character. The portion of the transmission line ascending the western ridge would be most noticeable, particularly where it skylines as it crests the ridgeline. The transmission line would significantly degrade the visual quality of the existing, natural landscape and adversely affect the viewing experience from the eastern portion of Cibbets Flat Campground and associated trails heading east out of the campground.
22	North End of Kitchen Creek Road	Morena	HIGH	BCD Alternative	At a viewing distance of less than one-quarter of a mile, the BCD Alternative would be prominently visible from the north end of Kitchen Creek Road (at the first locked gate). The transmission line would introduce substantial industrial character into the landscape and cause considerable view blockage of the narrow valley below and the ridges to the east and west. The transmission line would significantly degrade the visual quality of the existing, natural landscape and adversely affect the viewing experience from Kitchen Creek Road.
23	PCT Near Hauser Wilderness	Pine Creek	HIGH	Modified Route D Alternative	At viewing distances ranging from less than 0.1 miles to 1.5 miles, the Modified Route D Alternative would be prominently visible from the Pacific Crest Trail, which the alternative would span three times. The transmission line would introduce substantial industrial character into the landscape and cause considerable view blockage of the canyon mouth and bordering slopes and ridges to the north and south. The transmission line would significantly degrade the visual quality of the existing, natural landscape and adversely affect the viewing experience from the PCT and South Boundary Road in the vicinity of Hauser Canyon.
				Modified Route D Alternative USFS Option	At viewing distances ranging from less than 0.4 miles to 1.5 miles, the Modified Route D Alternative USFS PCT Option would be prominently visible from the PCT, which the alternative would span once. The transmission line would introduce substantial industrial character into the landscape and cause considerable view blockage of the slopes and ridges to the south of the canyon mouth and Hauser Canyon. The transmission line would significantly degrade the visual quality of the existing, natural landscape and adversely affect the viewing experience from the PCT and South Boundary Road in the vicinity of Hauser Canyon.

Table A9.31-1 Inventory of Sensitive Viewing Areas on/or Adjacent to the Cleveland National Forest Affected by the Proposed Project and/or Alternatives

Sensitive Viewing Area		Cleveland NF Landscape Place	SIO	Affecting Route	Visibility Summary
Area	Location				
24	Hauser Wilderness / Corral Canyon OHV Area	Pine Creek	HIGH	Modified Route D Alternative	At a considerable viewing distance of approximately four miles, the Modified Route D Alternative would be only slightly visible as it traverses the distant horizontal ridges and considerably less so when backdropped by mottled landforms and vegetation. The transmission line would introduce minimal industrial character into the landscape and cause minimal view blockage of background landforms to the south of the alternative. Therefore, the transmission line would minimally degrade the visual quality of the existing, natural landscape and would not noticeably affect the viewing experience from the Corral Canyon OHV Area.
25	Los Piños Mountain	Morena	HIGH	Modified Route D Alternative and MRDA USFS Option	With considerable viewing distances ranging from approximately 5½ to 6½ miles, and mottled landform and vegetated backgrounds that would help the lattice structures to blend with the landscape, the Modified Route D Alternative (MRDA) and MRDA USFS PCT Option would not be prominent features in the landscape and would only be minimally noticeable under certain ambient lighting circumstances. The transmission line would introduce minimal industrial character into the landscape and cause minimal view blockage of background landforms to the south and west of the alternative. Therefore, the transmission line would minimally degrade the visual quality of the existing, natural landscape and not noticeably affect the viewing experience from Los Piños Mountain.