Section 2 – Review of Proposed Modifications

After the Sunrise Powerlink Project was approved by the CPUC in December 2008 and the BLM in January of 2009, SDG&E began the process of completing final project design and engineering. This process included implementing mitigation measures that required additional pre-construction surveys, see for example, Mitigation Measures B-3a, Prepare and implement a Weed Control Plan; B-5a, Conduct rare plant surveys, and implement appropriate avoidance/ minimization/compensation strategies; B-7i, Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/ compensation strategies. On May 14, 2010, SDG&E submitted its Final Project Modification Report (PMR) to the CPUC and BLM. The PMR defines changes made to the project along the Sunrise Powerlink Transmission Project route after publication of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

All changes were reviewed by the lead agencies, CPUC and BLM, along with the cooperating, responsible and resource agencies, and were published on the CPUC website and made available for public review. Each proposed modification was reviewed to determine whether the changes would result in a substantial increase in the severity of a previously identified, significant environmental impact or a new significant impact and whether any additional CEQA or NEPA documentation is or is not required.

When environmental review has been completed under CEQA, no subsequent or supplemental EIR shall be required unless (1) substantial changes are proposed in the project that will require major revisions in the EIR, (2) substantial changes occur with respect to the circumstances under which the project will be undertaken that will require major revisions to the EIR, or (3) new information, which was not known and could not have been known when the EIR was certified becomes available. (Pub. Resources Code, § 21166; 14 Cal. Code Regs. § 15162.) "[A]gencies are prohibited from requiring further environmental review unless the stated conditions are met." (*Fund for Environmental Defense v. Orange County* (1988) 204 Cal.App.3d 1538, 1544; see *Moss v. County of Humboldt* (2008) 162 Cal.App.4th 1041, 1049-1050 ["after a project has been subjected to environmental review, the statutory presumption flips in favor of the developer and against further review."].) Even where a project change creates a new significant impact or increases the severity of an identified impact, supplemental review is not required if mitigation measures will reduce or eliminate the new impacts. (See, e.g., *Long Beach Sav. & Loan Ass 'n v. Long Beach Redev. Agency* (1986) 188 Cal.App.3d 249; *Snarled Traffic Obstructs Progress v. City & County of San Francisco* (1999) 74 Cal.App.4th 793,802.) Further, where the changes are considered in a prior EIR through an alternative (*City of National City v. State* (1983)140 Cal.App.3d 598) or are substantially the same as the analyzed project's impacts (*Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065), supplemental environmental review is not required. (See *Fund for Envt'l Defense v. County of Orange*, 204 Cal.App.3d at 1548 [subsequent EIR not required where addendum concluded that impacts from project changes were same as those considered in prior EIR].) Similarly, "relatively minor" changes in circumstances do not require the creation of a new EIR. (*A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1803; *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154.)

NEPA requires the preparation of a supplemental EIS if "(i) the agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." (40 CFR § 1502.9(c).) "[A]n agency need not supplement an EIS every time new information comes to light after the EIS is finalized. To require otherwise would render agency decisionmaking intractable, always awaiting updated information only to find the new information outdated by the time a decision is made." (*Marsh v. Oregon Natural Resources Council,* 490 U.S. 360, 374 (1989) [citations omitted].) Rather, NEPA requires agencies to "take a 'hard look' at the

environmental effects of their planned action, even after a proposal has received initial approval," and apply a "rule of reason" in determining whether a supplemental EIS should be prepared. (*Id*.) "A substantial change that requires an SEIS under 40 C.F.R. § 1502.9(c)(1)(I) is one that is *not* "qualitatively within the spectrum of alternatives that were discussed" in a prior FEIS." (*In re Operation of the Missouri River System Litigation v. US Army Corps of Engineers* 516 F.3d 688, 693 (2007) [citations omitted].) In other words, the modification is not a "substantial change requiring an SEIS if 'the relevant environmental impacts have already been considered.'" (*Id*.)

Introduction

Project modifications developed by SDG&E are addressed in two separate sections:

- **Section 1** (above) presents a discussion of general issues affecting multiple modifications.
- **Section 2** (this section) presents a discussion of each of the 44 separate modifications described by SDG&E in its PMR.

Section 2 presents discussion of each individual modification. Discussion on each reroute is presented below along with all relevant information and discussion regarding impacts of the modifications as compared with the environmental analysis of the FESSR from the Final EIR/EIS. However, the following information is pertinent to all project modifications.

Habitat Quality. For both the Final EIR/EIS and the review of the modified project, including all the PMR modifications, a habitat type is assumed to be of similar quality to all other areas of the same habitat type unless it was specifically labeled disturbed and/or burned. Evaluation of impacts to some disturbed habitat types, however, would be evaluated under the same significance thresholds as the corresponding, undisturbed habitat type. For example, impacts to disturbed chaparral are considered to have the same significance as impacts to chaparral that has not been disturbed, and the mitigation required is the same regardless of whether the vegetation is disturbed.

Ground Disturbance. Removal of vegetation and ground disturbance introduces noxious weeds and was addressed in the Final EIR/EIS as Impact B-3, Construction and operation/maintenance activities would result in the introduction of invasive, non-native, or noxious plant species. The introduction of non-native plant species is a special concern, especially for sensitive vegetation communities and communities that support special-status plant species. Non-native plants pose a threat to the natural processes of plant community succession, affect fire frequency, affect the biological diversity and species composition of native communities, and can affect a community's value as wildlife habitat. The impact was considered significant but mitigable to less than significant levels (Class II) with implementation of Mitigation Measures B-1a, B-2a, and B-3a that include habitat restoration/compensation, a pre-construction weed inventory, and a Weed Control Plan. This assessment remains valid for the proposed modifications to the FESSR. Overall, the modified project would decrease permanent ground disturbance from 555.20 acres with the FESSR to 298.41 acres and would decrease temporary ground disturbance from 1,261.59 acres with the FESSR to 685.12 acres. For comparison purposes, the increase or decrease of ground disturbance has been highlighted for each individual modification below.

Non-native vegetation, developed areas, and disturbed habitat. Although non-native vegetation, developed areas, and disturbed habitat have been included in the tables for each modification subunit for comparison purposes, the Final EIR/EIS does not consider these habitat types to be sensitive vegetation (with the exception of disturbed chaparrals as discussed, above) because they are man-made and support little to no wildlife diversity or special status species. The Final EIR/EIS considered impacts to these habitats as adverse but less than significant (Class III). This assessment remains valid for the proposed modifications and impacts to these habitats remain adverse but less than significant.

Affected plant species. SDG&E plant survey data, collected for the PMR is presented in Table 3-6, of Section 1. Special status plants potentially affected by the FESSR or modified project based on the PMR database, and in the modification subunit tables. However, the plant species listed in Table 3-6 (and the modification subunit tables) include a number of species that are not considered special status plants as defined in the Final EIR/EIS. As discussed in Section D.2.1.1 of the Final EIR/EIS, only CNPS List 1 and List 2 species were considered "special status" species; CNPS List 3 and List 4 species are considered less sensitive. As stated in Section D.2.1.2.5 of the Final EIR/EIS, the CNPS List 3 and List 4 species locations were recorded in the field using GPS technology, although only CNPS List 1 and List 2 species were considered in the analysis and included in the Final EIR/EIS tables reflecting the special status plant species potentially occurring or observed. SDG&E's data for the PMR include CNPS List 4 plant species and one plant that is not listed. CNPS List 4 species are considered plants of limited distribution whose vulnerability or susceptibility to threat appears relatively low at this time. For this reason, CNPS List 4 species are not considered "special status" for the proposed modifications to the FESSR, consistent with the Final EIR/EIS. Mitigation for impacts to sensitive vegetation communities would provide compensation for effects on these species. For these reasons, effects on the following species are not a new significant impact requiring additional mitigation. Additionally, as stated in Section D.2.1.1, CNPS List 3 and List 4 species are of lower sensitivity; the mitigation for impacts to sensitive vegetation communities would provide compensation for impacts to these species, so no additional mitigation for impacts to them would be required. The CNPS List 4 plant species include:

- campo pea
- Cleveland's bush monkey flower
- Fish's milkwort
- peninsular spineflower
- San Diego sunflower
- wolf's cholla
- caraway-leaved Gilia
- Engelmann oak
- Palmer's grappling hook
- rush-like bristleweed
- southern mountain misery
- yellowflower tarweed

Although these plants appear in the subunit tables as they were included by SDG&E, effects on these plant species are not addressed in the impact discussions below.

Jurisdictional Waters. The PMR treats jurisdictional waters as a water resource; the EIR/EIS evaluated impacts to jurisdictional waters as a biological resource. For the purposes of this memo, jurisdictional waters are considered as a biological resource. As stated in Section D.2.6, Jurisdictional Waters and Wetlands, impacts to jurisdictional areas were not clearly defined until a final route was selected that includes project-specific features and final engineering. At that time, a formal delineation was conducted to determine those impacts so that SDG&E could apply for permits from the ACOE, Regional Water Quality Control Board (RWQCB), and CDFG. Since a formal delineation had not been conducted at the time of publication of the EIR/EIS, the precise presence and extent of waters and wetlands was unknown. However, the EIR/EIS considered impacts to the following vegetation communities that generally occur in jurisdictional areas, some of which may be wetland: Sonoran wash scrub, disturbed wetland, freshwater, non-vegetated channel, emergent wetland, freshwater marsh, mesquite bosque, mule fat scrub, southern willow scrub, tamarisk scrub, arrowweed scrub, southern coast live oak riparian forest, southern arroyo willow riparian forest, and desert dry wash woodland. Because jurisdictional waters can occur in a variety of habitat, impacts to these habitats may also be impacts to jurisdictional waters, but not always.

Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project. Temporary impacts to waters of the

U.S. were reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts were reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project.

Cultural Resources. In the cultural resources review, Project Impact Area refers to all areas of direct, ground-disturbing, project activity (towers, roads, pull sites, construction yards, etc.). For both the FESSR and modified project, it is assumed that construction activities such as excavating and grading would result in a direct impact to any cultural resources within the Project Impact Area. It is possible that in some cases, although sites may appear to be within an area of direct impact, there is enough flexibility to protect these sites during construction, avoiding all direct impact. The EIR/EIS did not have sufficiently detailed engineering for the EIR/EIS to know that a particular site could be avoided, even though it coincided with an area of potential direct impact. Therefore, analysis in the EIR/EIS assumed that avoidance was not possible. In this analysis, the CPUC and BLM have made similar assumptions for as comparable an analysis as possible. If a site is coterminous with an impact area, it counted as a potential impact, for both the FESSR analysis and the PMR analysis. If a site was in the ROW, but not in an impact area, it was also counted as a potential impact.

In some of the cultural resources review for the modification subunits, the number of resources impacted does not coincide with the number of resources discussed in Section 4 (Unit-Level Impact Evaluation and Comparison) of SDG&E's Project Modification Report (May 14, 2010). Please refer to Table 3-13 on page 3-37 of the PMR for the most accurate counts of cultural resources within the FESSR and PMR. This is because, Section 4 of the PMR included only the number of cultural resources that the FESSR would impact, and how many of those resources the PMR would impact. The cultural resources count for each modification subunit does not state how many new resources the modified project would impact that would not be impacted by the FESSR. The CPUC and BLM comparison of project modifications to the FESSR, set forth for each modification subunit below, includes the total number of resources impacted by both the FESSR and the modified project.

Resource Areas Not Analyzed. Not all environmental resource areas are described in detail in Section 2. Some issues are excluded in Section 2 because they are addressed for the project as a whole in Section 1. These include issues regarding air emissions and air quality impacts, use of helicopters for construction, noise, and water resources. While Section 1 includes an overview of how effects to biological resources were considered, Section 2 provides a detailed explanation regarding the independent review of the biological data sources provided by SDG&E for each component of the modified project.

Other issues are not addressed in detail in Section 2 under most modification headings because they would result in no substantial change in impact and the impact remains within the same context and same or reduced intensity as addressed for the FESSR. These include public safety/hazards and traffic, as explained below:

- **Public safety/hazards**. As stated in the Final EIR/EIS Section E.1.10, public safety and hazards impacts result from soil or groundwater contamination from accidental spill or release of hazardous materials, contact with residual pesticides and/or herbicides, contact with unanticipated preexisting soil and/or groundwater contamination or unexploded ordinance. Overall, these impacts would decrease with the modified project because of the decrease in permanent and temporary ground disturbance. Permanent ground disturbance would decrease from 555.20 acres with the FESSR to 298.41 acres with the modified project. Temporary ground disturbance would decrease from 1,261.59 acres with the FESSR to 685.12 acres with the modified project. However, not all modification subunits would result in a decrease in ground disturbance. Mitigation measures presented in Section E.1.10, E.2.10, and E.4.10 of the Final EIR/EIS would be required for the modified project consistent with the Final

EIR/EIS requirements and would ensure that for the modification subunits that did not reduce ground disturbance, the impacts would not result in a substantial increase in severity or intensity. The modification subunits that increased ground disturbance are:

- PMR7
- PMR13 Rough Acres Yard
- PMR16 Thing Valley Yard
- PMR32
- PMR36 Helix Yard
- PMR42 Sycamore – Pomerado
- PMR44 Sycamore – Scripps
- PMR8 Jacumba Valley Ranch Yard
- PMR14 McCain Valley Yard
- PMR19
- PMR33 Alpine Headquarters
- PMR40 Stowe/Kirkham Yard
- PMR43 Sycamore – Elliot

- **Geology, Mineral Resources, and Soils. T**he minor alignment modifications would keep the alignment in the same geologic conditions as the FESSR alignment and would not affect or change impacts related to geology or geologic hazards. **A**dditionally, overall the project would reduce both temporary and permanent ground disturbance as stated above. A reduction in ground disturbance would result in reduced impacts associated with soil erosion and slope instability related to grading of access roads and construction of tower pads and work areas in steep terrain. Associated water contamination impacts would also decrease. While ground disturbance would increase at some of the modification subunits, overall both the permanent and temporary ground disturbance would decrease. Mitigation measures presented in Section E.1.13, E.2.13, and E.4.13 of the Final EIR/EIS would be required for the modified project and would ensure that for the modification subunits that did not reduce ground disturbance, the impacts would not result in a substantial increase in severity or intensity.

- **Traffic**. Many proposed project modifications involve increased helicopter construction of transmission towers or minor changes to the project alignment to avoid biological or cultural resources. Increased helicopter construction of project infrastructure would result in an overall decrease in the number of construction related vehicles accessing roadways in the vicinity of those structures. Shifts in the project alignment would be in the same general vicinity and context as the originally proposed project and would not substantially affect the number of construction related vehicles required to access roadways in the vicinity of such alignment changes. As discussed in Section 1, above, the use of recycled water for project construction as required by Mitigation Measure S-3b would require transport of this water to construction sites, which has the potential to increase impacts to traffic. However, the CPUC and BLM have independently reviewed the KOA Traffic Impact Study Report (April 2010) that SDG&E provided to Caltrans for approval as required under Mitigation Measure T-9a. This study considered the construction worker commuter trips, equipment deliveries, material hauling, and reclaimed water deliveries from the "worst case scenario" source location (see Appendix B to Traffic Impact Study). The vehicular trips were predicted by the project traffic engineer and incorporate the "worst case scenario" for reclaimed water deliveries, and take into account all the project modifications defined in the PMR. As with the FESSR, impacts from the modified project would be reduced and mitigated through the traffic planning and control measures in the MMCRP and applicable local regulations. Therefore the trips generated by the modifications would be consistent with the conclusions of the Final EIR/EIS and would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts.

Conclusion. None of the proposed modifications were determined to result in new significant impacts or to substantially increase the severity of a previously identified significant impact, and no additional CEQA/NEPA compliance would be required. The proposed modifications were found to be within the context of the approved FESSR and to result in a similar or reduced intensity of the impacts analyzed in the Final EIR/EIS. The discussion for each modification concludes whether the proposed modification

subunit would be environmentally superior/preferred compared to the Final Environmentally Superior Southern Route (FESSR) presented in the Final EIR/EIS.

MODIFICATION SUBUNIT 1: IMPERIAL VALLEY SUBSTATION (PMR1)

Brief Description and Purpose

The modification would result in construction of a steel building, approximately 60 feet by 120 feet by 30 feet in the southeastern portion of the substation to provide onsite storage. It would improve onsite storage capacity for parts, equipment, and emergency supplies for use during and after construction and reduce travel to and from the closest existing storage facility (Miguel Substation in Bonita, California).

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- The modification would result in a greater visual impact: it would appear as a gymnasium sized steel building in an open area.

Biological Resources. The modification would require ground disturbance on already disturbed lands at an existing substation. The CPUC and BLM have independently reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species. This modification would not create any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. As documented in Section 1, Section 1.2.1, the overall impact on biological resources is substantially reduced as a result of the modifications.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment. Commenters noted that this modification would introduce a new, large metallic structure where none is present. Although the proposed storage facility would be large it would be similar in context as the visual impact of the FESSR. The existing industrial structures at the substation are substantially taller than the proposed building-though not as massive. As such, as with the FESSR at this location, the storage facility would repeat the characteristics of the existing substation facilities and would blend in with the other complex structures of the substation. The overall level of change would be the same as for the FESSR. Therefore, PMR1 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS.

Cultural Resources. PMR1 would not affect or change impacts to cultural resources, no impacts to cultural resources are expected for either PMR1 or the FESSR subject to final confirmation during pre-construction review.

Land Use. PMR1 would be located entirely on BLM land and no change in landownership would occur. No sensitive receptors are located nearby to the proposed steel storage building.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR1 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR1 would have environmental impacts similar in context to those of the FESSR but it would improve onsite storage capacity for parts, equipment, and emergency supplies for use during and after construction.

MODIFICATION SUBUNIT 2: EP363-1 to EP333 (DUNAWAY ROAD PMR2)

Brief Description and Purpose

The modification includes three components:

- It would shift approximately 10 miles of the transmission alignment approximately 140 feet southwest to accommodate Tessera Solar (Stirling Energy) transmission line crossing and avoid sensitive biological and cultural resources.
- It includes a 4.96-acre construction yard northwest of the Imperial Valley Substation, replacing a 26.36-acre yard southwest of the substation per the FESSR. The primary purpose for this modification component is to accommodate a helicopter flight path so that it does not cross the 500 kV Southwest Powerlink (SWPL); during project construction, helicopters cannot fly steel over the existing 500 kV line.
- It includes a 9.93-acre yard east of Dunaway Road and south of Interstate 8 in place of a 30.69-acre yard, and moves the yard about one mile west of the location defined in the FESSR.

The primary purpose for this modification component is to accommodate Stirling Energy transmission line crossing, accommodate flight path restrictions, reduce impacts to sensitive vegetation and species, cultural resources, and dry washes, and to reduce ground disturbance.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Modified project specifically references the need to accommodate the Imperial Valley Solar Project but does not discuss cumulative impacts related to this project or other renewable projects.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR2 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project; acreage for each impact would be reduced by the modified project, as compared to the FESSR.

TABLE PMR2

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

(from PMR Section 4, page 4-10)

		Permanent	Temporary	Total
FESSR	Desert Scrub and Dune Habitats	21.85	101.50	123.35
	Herbaceous Wetlands, Freshwater, and Streams	0.44	1.03	1.47
	Non-native Vegetation, Developed Areas, and Disturbed Habitat[1]	8.49	106.54	115.03
	Riparian Scrubs	0.36	0.61	0.97
	FESSR Total	**31.14**	**209.68**	**240.82**
		Permanent	Temporary	Total
Modified Project	Desert Scrub and Dune Habitats	8.33	33.58	41.91
	Herbaceous Wetlands, Freshwater, and Streams	0.26	0.60	0.86
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	5.18	10.08	15.26
	Mod Proj Total	**13.77**	**44.25**	**58.03**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Flat Tailed Horned Lizard	BLM Management Area	22.26	103.25	125.51
		Distribution Area	8.88	12.96	21.84
Modified Project	Flat Tailed Horned Lizard	BLM Management Area	9.54	36.87	46.41
		Distribution Area	4.23	7.38	11.61

PMR 2 would reduce permanent and temporary impacts to sensitive vegetation communities and special status species.

PMR 2 would reduce permanent impacts to waters of the U.S. from 3.05 acres to 0.78 acres and temporary impacts to waters of the U.S. from 6.60 acres to 2.29 acres. PMR 2 would reduce permanent impacts to waters of the State from 3.08 acres to 0.81 acres and temporary impacts to waters of the State from 6.68 acres to 2.34 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands. This information and analysis demonstrates a reduction in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. PMR2 would not change long-term impacts on Visual Resources resulting from the presence of the transmission line. The reduction in ground disturbance would reduce long-term visible land scarring. However, the (temporary) Dunaway Road Construction Yard would be located

[1] Although non-native vegetation, developed areas, and disturbed habitat have been included in the tables for comparison purposes, the Final EIR/EIS does not consider them as sensitive vegetation because they are man-made and support little to no wildlife diversity or special status species. The Final EIR/EIS considered impacts to these habitats as adverse but less than significant (Class III).

approximately 0.5 miles from the Dunaway OHV Staging Area and would be prominently visible as OHV recreationists access the Yuha Desert south of I-8. The construction yard it would replace is located 1 mile from the Dunaway OHV Staging Area and was three times as large. Impacts from construction yards along this portion of the FESSR were considered significant but mitigable to less than significant with implementation of Mitigation Measure V-1a, reduce visibility of construction activities and equipment and V-1b, Reduce construction night lighting impacts. The temporary visual impact from the Dunaway Road Construction Yard would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS.

Cultural Resources. PMR2 would reduce impacts to cultural resources. There are 41 resources[2] within the FESSR Project Impact Area[3]. There are 19 resources within the Project Impact Area for the modified project, all of which would be impacted by the FESSR. The modification would avoid a prehistoric habitation site, a prehistoric trail segment, and multiple prehistoric artifact and lithic scatters. Therefore, for cultural resources, no new or more severe impacts are identified, and PMR2 is preferred over the original route segment with respect to cultural resources. Additionally, SDG&E has stated that for a portion of one site, IMP-8793, they would be able to create an Environmentally Sensitive Area for the small portion within the work area such that it would be protected to the degree possible.

Ground Disturbance/Other Affected Issue Areas. PMR2 is a minor reroute and modification to two construction yards that would reduce ground disturbance and biological resources impacts while also accommodating the Tessera Solar (Stirling Energy) transmission line crossing.

Commenters noted that although PMR2 is designed to accommodate the Tessera Solar transmission line crossing, the PMR did not address any updated cumulative projects in the region. See Section 1.9 of Section 1, which addresses the changes to cumulative projects in the project area. As explained in that section, the project modifications would not change the cumulative impact analysis and would not result in increased levels of environmental impact or new significant impacts. Therefore additional CEQA/NEPA review is not required.

Overall Conclusion for PMR2

The analysis in the Final EIR/EIS remains valid. PMR2 would not result in new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR2 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect and reduction of cultural resources affected.

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[2] All counts of cultural resources exclude isolated artifacts, which are not considered a significant resource class.

[3] Project Impact Area refers to all areas of direct, ground-disturbing, project activity (towers, roads, pull sites, construction yards, etc.). For both the FESSR and modified project, it is assumed that construction activities such as excavating and grading would result in a direct impact to any cultural resources within the Project Impact Area. It is possible that in some cases, although sites may appear to be within an area of direct impact, there is enough flexibility to protect these sites during construction, avoiding all direct impact. The EIR/EIS did not have sufficiently detailed engineering for the EIR/EIS to know that a particular site could be avoided, even though it coincided with an area of potential direct impact. Therefore, the EIR/EIS used worst case scenarios. In this analysis, the CPUC and BLM have made similar assumptions for as comparable an analysis as possible. If a site is coterminous with an impact area, it counted as a potential impact, for both the FESSR analysis and the PMR analysis. If a site was in the ROW, but not in an impact area, it was not counted as a potential impact.

MODIFICATION SUBUNIT 3: EP333 TO EP324 (PLASTER CITY PMR 3)

Brief Description and Purpose

The modification includes two components:

- It would shift 2.2 miles of the alignment approximately 450 feet to the northeast.
- It would result in a 20.27-acre yard north of Evan Hewes Highway 80 and EP 330-1 instead of 30.13-acre yard east of EP329-1 per the FESSR. The construction yard would be shifted approximately 300 feet to the east.

The primary purpose for this modification is to avoid cultural resources, a wetland, and a dry wash. Additional considerations include protecting desert pavement.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in new significant impacts or a substantial increase in a significant impact to biological resources, as illustrated in Table PMR3 below, and discussed below. Table PMR3 shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR3

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Desert Scrub and Dune Habitats	4.25	16.58	20.83
	Herbaceous Wetlands, Freshwater, and Streams	0.06	0.05	0.11
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	7.59	27.40	34.98
	FESSR Total	**11.89**	**44.03**	**55.92**
Modified Project	Desert Scrub and Dune Habitats	2.59	24.05	26.64
	Herbaceous Wetlands, Freshwater, and Streams	0.03	0.03	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	3.15	3.07	6.22
	Mod Proj Total	**5.77**	**27.15**	**32.92**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total

FESSR	Flat Tailed Horned Lizard	Distribution Area[4]	11.89	44.03	55.92
Modified Project	Flat Tailed Horned Lizard	Distribution Area	5.77	27.15	32.92

The modification would result in a 7.47-acre increase in temporary impacts to desert scrubs to avoid impacts to dry washes. While there would be an increase in temporary impacts to desert scrubs at this location, overall the modified project would result in a reduction of temporary impacts to desert scrubs from 282.13 acres to 142.27 acres. Impacts to these communities were assessed in the Final EIR/EIS (as Class I), and thus do not represent new significant effects not discussed in the EIR/EIS. Mitigation identified in the Final EIR/EIS to reduce this impact would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, identified in the Final EIR/EIS for this impact would be required for PMR3 and would be adequate to ensure that resulting impacts to sensitive vegetation would not be more severe than assessed in the Final EIR/EIS.

The modified project would reduce permanent impacts to flat tailed horned lizard at this location from 11.89 acres to 5.77 acres and the temporary impacts to flat tailed horned lizard from 44.03 acres to 27.15 acres.

PMR 3 would reduce permanent impacts to waters of the U.S. from 1.55 acres to 0.82 acres and temporary impacts to waters of the U.S. from 9.37 acres to 1.12 acres. PMR 3 would reduce permanent impacts to waters of the State from 1.56 acres to 0.82 acres and temporary impacts to waters of the State from 9.37 acres to 1.12 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided. This information and analysis demonstrates a reduction in impacts to flat tailed horned lizard and water of the U.S. and waters of the State. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The modified project represents a slight reduction in the overall impacts on Visual Resources because it would shift the location of the Plaster City Yard slightly to the east, which would reduce the view blockage of the Coyote and Fish Creek Mountains to the northwest of the Plaster City West OHV Staging Area. However, the portion of the staging area west of Structure P330-1 would still cause view blockage of the Fish Creek Mountains to the north, from the staging area. It would also slightly reduce ground disturbance, which would reduce long-term visible land scarring.

Cultural Resources. PMR3 will reduce impacts to cultural resources. The FESSR has seven resources within the Project Impact Area. The PMR3 route has one resource within the Project Impact Area, this resource would also be impacted by the FESSR. PMR3 will avoid a prehistoric lithic scatter, two historical trails, and one historical road. Therefore, for cultural resources, PMR3 is preferred.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR3 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR3 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect, reduced visual impacts, and reduction of cultural resources affected.

[4] The EIR/EIS considered two types of Flat Tailed Horned Lizard habitat, Management Areas and distribution areas, defined as potential habitat for the FTHL outside of MAs (determined by the current distribution of the species [Flat-Tailed Horned Lizard Interagency Coordinating Committee, 2003]), see Section D.2.11 Listed or Sensitive Wildlife Species.

MODIFICATION SUBUNIT 4: EP324 TO EP301 (PYRAMID MINING PMR 4)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment approximately 25 feet to the south between EP 318-1 and EP314 and approximately 50 feet south between EP303-2 and EP301 to improved construction and engineering design.
- It would eliminate an unnamed construction yard south of milepost 18, between EP304-2 and EP303-2 and access roads to EP323-1 and EP324.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR4 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR4

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Desert Scrub and Dune Habitats	8.74	42.19	50.93
	Herbaceous Wetlands, Freshwater, and Streams	1.59	2.16	3.76
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	20.69	24.83	45.52
	FESSR Total	**31.03**	**69.18**	**100.21**
Modified Project	Desert Scrub and Dune Habitats	3.50	7.42	10.92
	Herbaceous Wetlands, Freshwater, and Streams	0.18	0.62	0.80
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	7.13	10.86	17.99
	Mod Proj Total	**10.81**	**18.90**	**29.71**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total

TABLE PMR4					
FESSR	Flat Tailed Horned Lizard	Distribution Area	31.02	69.18	100.21
	Peninsular Bighorn Sheep	USFWS Occupied Habitat[5]	8.64	12.15	20.79
Modified Project	Flat Tailed Horned Lizard	Distribution Area	10.81	18.90	29.71
	Peninsular Bighorn Sheep	USFWS Occupied Habitat	3.48	6.22	9.71

This modification would result in a decrease in temporary and permanent impacts to sensitive vegetation communities and special status species.

PMR4 would reduce impact to PBS USFWS occupied habitat, and flat tailed horned lizard distribution area.

PMR4 would reduce permanent impacts to waters of the U.S. from 7.33 acres to 1.14 acres and temporary impacts to waters of the U.S. from 7.98 acres to 2.07 acres. PMR4 would reduce permanent impacts to waters of the State from 1.57 acres to 0.52 acres and temporary impacts to waters of the State from 5.23 acres to 1.31 acres.

The CPUC and BLM have independently reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided by SDG&E. This information and analysis demonstrates the reductions in impacts described above. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources because the modified project would follow the FESSR route closely. The reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment and would remain adverse but less than significant (Class III).

Cultural Resources. PMR4 will reduce impacts to cultural resources. There are 11 resources within the FESSR Project Impact Area. Only two of these resources occur within the Project Impact Area for the Modified Route. The Modified Route will avoid a prehistoric rock feature and multiple prehistoric lithic scatters. Therefore, for cultural resources, PMR4 is preferred.

Land Use. The FESSR and PMR4 would be located on BLM land and both the FESSR and PMR4 would impinge on a quarry operation (Pyramid Mining), also on BLM land, to a similar extent. SDG&E consulted with the Pyramid Mining and BLM for PMR4. (See discussion below.) The FESSR would be located approximately 1,250 feet from the nearest sensitive receptor and the PMR4 would be located 1,225 feet from the nearest sensitive receptor.

Mineral Resources. As required under Mitigation Measure G-9a, SDG&E consulted with the Pyramid Mining and the BLM for PMR4 to develop a plan to avoid or minimize interference with mining operations. In December 2008, SDG&E reviewed the current alignment with both parties and discussed how the ongoing mining operations, their access, and/or their long-range plans might be affected. As a result of this consultation, the PMR is sited such that the access roads, structures, wire stringing sites, and maintenance pads would minimize impacts to the mining operations and the operators' ability to access and extract material. If mining operators are able to maintain safety parameters, they would be able to mine beneath the ROW. The minimum clearances between structures EP291 (PMR 5) and EP302

[5] The US Fish and Wildlife Service revised the Peninsular bighorn sheep critical habitat in 2009. As stated in the PMR, SDG&E was directed to consider areas formerly designated as critical habitat for Peninsular bighorn sheep to be occupied habitat.

would be 48.61 feet. BLM played a critical role in these discussions, as the operators are mining on BLM lands under mining contracts. However, the modified route will not eliminate effects on mineral resources.

In addition, all operators affected by the transmission line route must amend their current reclamation plans with BLM and Imperial County to stay compliant under California laws related to mine reclamation (California Surface Mining and Reclamation Act; SMARA). This is a costly burden and time consuming process placed on operators in the pit. Without clarity on mining limitations within the area bounded by the 200-foot wide ROW, a final reclamation profile within the affected area cannot be developed.

As identified in MMCRP measure G-9a, SDG&E will continue to coordinate with BLM and the appropriate mining operators to reach an agreement which will ensure the safe operating rights of the Project and limit loss of mining rights to aggregate resources. The modification reduces but does not eliminate effects on mineral resources and would not result in a new significant impact.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR4 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR4 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect, reduction of cultural resources affected, and because it would reduce although not eliminate impacts to mineral resources.

MODIFICATION SUBUNIT 5: EP301 TO EP276-1 (SUGARLOAF PMR5)

Brief Description and Purpose

The modification has two components:

- It shifts structures within the FESSR ROW to reduce impacts to cultural resources. It would construct seven transmission structures using helicopters and would eliminate a new access road.
- It would create a 30.01-acre yard north of Imperial Highway (County Road S2) between EP287 and EP288 northwest of the 22-acre yard per the FESSR. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is to avoid a major cultural resource site and reduce dry wash impacts. Additional considerations include avoiding helicopter flights over SWPL and reducing ground disturbance.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in new significant impacts to biological resources. Table PMR5 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR5

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Desert Scrub and Dune Habitats	22.32	38.81	61.13
	Herbaceous Wetlands, Freshwater, and Streams	0.04	1.23	1.27
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	3.03	4.45	7.48
	FESSR Total	**25.40**	**44.49**	**69.89**
Modified Project	Desert Scrub and Dune Habitats	6.82	40.07	46.90
	Herbaceous Wetlands, Freshwater, and Streams	0.05	0.43	0.48
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.72	0.94	1.66
	Mod Proj Total	**7.59**	**41.45**	**49.04**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Barefoot Banded Gecko	Suitable Habitat	6.06		6.06
	Flat Tailed Horned Lizard	Distribution Area	19.37	44.49	63.86
	Peninsular Bighorn Sheep	USFWS Critical Habitat	0.12		0.12
		USFWS Occupied Habitat	9.24		9.24
Modified Project	Barefoot Banded Gecko	Suitable Habitat	2.05		2.05
	Flat Tailed Horned Lizard	Distribution Area	5.54	41.45	46.99
	Peninsular Bighorn Sheep	USFWS Critical Habitat	0.25		0.25
		USFWS Occupied Habitat	1.62		1.62

PMR5 would increase the size of the construction yard but would reduce the access roads and construct a number of the transmission towers using helicopters so overall ground disturbance would be reduced This modification would increase temporary impacts to desert scrub and dune habitats by 1.26 acres and would increase permanent impacts to herbaceous wetlands, freshwater, and streams by 0.01 acres. Impacts to sensitive vegetation, including desert scrub and dune habitats, and herbaceous wetlands, freshwater, and streams were determined to be significant and unmitigable in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, B-1c, Conduct biological monitoring, and B-1k, Re-seed disturbed areas after a transmission line–caused fire, identified in the Final EIR/EIS to reduce these impacts would also be required for the PMR. Overall, the modified project would reduce temporary impacts to desert scrub and dune habitats from 282.13 acres to 142.27 acres and would reduce permanent impacts to herbaceous wetlands, freshwater, and streams from 3.17 acres to 1.10 acres. For these reasons, this modification would not result in a new significant impact, or a substantial increase in the severity or intensity of a significant impact to sensitive vegetation communities.

PMR5 would reduce permanent impacts to waters of the U.S. from 1.56 acres to 0.51 acres and temporary impacts to waters of the U.S. from 5.19 acres to 1.24 acres. PMR5 would reduce permanent

impacts to waters of the State from 1.57 acres to 0.52 acres and temporary impacts to waters of the State from 5.23 acres to 1.31 acres.

Permanent impacts to peninsular bighorn sheep ("PBS") critical habitat would increase by 0.13 acres, but permanent impacts to occupied PBS habitat would decrease by 7.62 acres. Mitigation Measure B-7c, Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat, identified in the Final EIR/EIS for this impact would also be required for the modification. Overall, the modified project would reduce permanent impacts to PBS critical habitat from 16.04 to 5.41.

Permanent impacts to barefoot banded gecko suitable habitat would be reduced. Permanent and temporary impacts to flat tailed horned lizard distribution area would be reduced.

The CPUC and BLM have independently reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species. This information and analysis demonstrates a reduction in permanent impacts to barefoot banded gecko suitable habitat; a reduction in permanent and temporary impacts to flat tailed horned lizard distribution area, and a reduction in permanent impacts Peninsular bighorn sheep occupied habitat.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources because the modified project would follow the FESSR route closely.

Regarding the new construction yard location, the proposed modification would not substantially change overall impacts on Visual Resources though the reduction in ground disturbance would reduce long-term visible land scarring. Although, the concentration of yard activities and storage of structures in close proximity to Imperial Highway (County Road S2) would slightly increase the visual impact on County Road S2 (relative to the more dispersed yard locations previously proposed), the overall impact assessment and significance conclusions would not change for this location and there would be no substantial increase in the severity or intensity of a significant impact due to the changed locations.

Cultural Resources.

PMR5 would impact fewer resources (seven) of the eleven impacted by the FESSR, but it will still affect the largest and most sensitive archaeological site at Sugarloaf, a Prehistoric Habitation Trail (IMP-103/3710). A previous route modification that avoided this site was considered but rejected because it would have increased cultural and visual impacts in the area by adding a second, separate transmission corridor through a cultural landscape. This modified route is preferred over the route that avoided the Prehistoric Habitation Trail because, on balance, the increased impacts resulting from the addition of a separate transmission corridor were deemed greater than the benefits to be gained from avoiding the site (CA-IMP-103/3710). Additionally, this modified route is preferred over the FESSR because it will avoid a prehistoric lithic scatter and two historical sites.

The BLM has held discussions with SDG&E regarding the Prehistoric Habitation Trail resource within the Project Impact Area that would not be avoided by the PMR. As stated above, a potential route that avoided these sites was rejected after careful review of the impacts it would create, see the Cultural Resources Attachment to this section.

Land Use. The FESSR and PMR5 would be located primarily on BLM land but would briefly cross private property. There are no sensitive receptors located nearby to either route.

Geologic Resources. This minor relocation would keep the alignment in the same geologic conditions as the FESSR alignment. This modification also would increase the number of support structures to be constructed by helicopter. PMR5 does not affect or change impacts related to geology or geologic

hazards. Ground disturbance would be reduced due to increased use of helicopter construction resulting in reduced impacts associated with soil erosion and slope instability related to grading of access roads in steep terrain. See Section 1, regarding the increased use of helicopters for construction.

The FESSR route would have a pull site for the 500 kV transmission line in an existing Amex sand and gravel pit at Ocotillo, thereby causing potential impacts to aggregate extraction and mining operations. The PMR5 reroute would cross both the Amex and Calgrade aggregate pits, however, the line would span above the two pits in straight line. If the mining operators are able to maintain safety parameters and mine under the transmission line then substantially more aggregate would be available with the PMR5 reroute. The minimum clearance to ground between structures EP291 and EP302 would be 48.61 ft. The modification would reduce but not eliminate impacts to the aggregate pits. As required by MMCRP measure G-9a coordination with quarry activities that was initiated for the FESSR would continue.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR5 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR5 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect, reduction of cultural resources affected, and reduction although not elimination of impacts to mineral resources.

MODIFICATION SUBUNIT 6: EP276 TO EP255-1 (DESERT VIEW TOWER PMR6)

Brief Description and Purpose

This modification includes two components:

- It would shift the alignment approximately 500 feet to the west placing the transmission line closer to Interstate 8, but at lower elevation to reduce visual impacts from Desert View Tower.
- It would reduce the 9.91-acre AER yard (between Old Highway 80 and P257) that was considered in the Final EIR/EIS to 5-acres at the same location and eliminates the construction yard at the I-8 split and Old Highway 80.

The primary purpose for this modification was to reduce visual impacts as viewed from Desert View Tower and to move towers to areas of level, stable terrain.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- AER Construction Yard (5 acres) is proposed for mostly undisturbed area highly visible from I-8 and Historic Route 80 near In-ko-Pah. This site is also close to SDG&E's proposed ECO Substation which will lead to cumulative impacts to this transitional habitat.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR6 below shows the impacts to rare plants, sensitive vegetation communities, and special status species for the FESSR and modified project.

TABLE PMR6

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Wolf's cholla	51		51
Modified Project	Wolf's cholla	6		6

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	1.94		1.94
	Desert Scrub and Dune Habitats	22.60	29.62	52.22
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.05	0.07
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.40	0.63	2.03
	Riparian Scrubs	0.02	0.07	0.09
	FESSR Total	**25.97**	**30.38**	**56.35**
Modified Project	Desert Scrub and Dune Habitats	8.57	10.33	18.90
	Herbaceous Wetlands, Freshwater, and Streams		0.06	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.94	0.58	1.52
	Mod Proj Total	**9.51**	**10.97**	**20.48**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Barefoot Banded Gecko	Suitable Habitat	14.57	17.16	31.73
	Peninsular Bighorn Sheep	USFWS Critical Habitat	15.91	17.16	33.08
		USFWS Occupied Habitat	10.06	13.21	23.27
Modified Project	Barefoot Banded Gecko	Occupied Habitat	0.39	0.00	0.39
		Suitable Habitat	5.18	1.41	6.59
	Peninsular Bighorn Sheep	USFWS Critical Habitat	5.16	1.41	6.57
		USFWS Occupied Habitat	4.35	9.56	13.91

This modification would result in a decrease in permanent impacts to sensitive vegetation communities and total ground disturbance, and a decrease in impacts to barefoot banded gecko suitable habitat and Peninsular bighorn sheep critical and occupied habitat.

While there would be an increase in temporary impacts to ephemeral streams (of 0.01 acre), this would not be a substantial increase in the severity of this impact; the acreage is small and would not, of itself, represent a significant impact. Mitigation Measure B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the PMR and would be adequate to ensure that impacts to ephemeral streams would still be Class II consistent with the Final EIR/EIS. PMR6 would reduce permanent impacts to waters of the U.S. from 0.01 acres to 0.00 acres; temporary impacts to waters of the U.S. would remain the same. PMR6 would reduce permanent

impacts to waters of the State from 0.02 acres to 0.00 acres and temporary impacts to waters of the State from 0.08 acres to 0.07 acres.

The modified project would result in permanent impacts to 0.39 acres of occupied barefoot banded gecko habitat. For this species, "occupied" habitat is a subset of suitable habitat. "Occupied" habitat was determined by: 1) assuming all suitable habitat as identified in the Final EIR/EIS (i.e., from MP 23 through 39) is occupied by the gecko and 2) using currently available data that SDG&E gathered where the gecko was found within portions of the Final EIR/EIS suitable habitat. This data proves presence within a portion of the suitable habitat; however, it does not prove absence throughout the rest of the suitable habitat. As stated in the Final EIR/EIS, no surveys were conducted for this species. If surveys had been conducted and the species was not found, the survey result would have to be considered false negative because of the species' highly elusive nature. This is still the case. Impacts to the species were assessed as Class I. Overall, the modified project would reduce impacts to barefoot banded gecko (both occupied and suitable habitat) compared with the impacts to suitable habitat identified for the FESSR.

The CPUC and BLM have independently reviewed the data and analysis provided by SDG&E for the assessment of impacts to vegetation and species, as well as dry washes, ephemeral streams, and wetlands,[6] provided for this modification to the FESSR. This modification would not substantially increase previously identified significant impacts to biological resources. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. In spite of requiring four additional towers and being located slightly closer to Desert Tower and Interstate 8, the proposed modification would be less visually impacting to views from Desert Tower and Interstate 8 compared to the FESSR along this alignment. The FESSR would be situated higher on the ridge and would result in more occurrences of skylining (structures or conductors/shield wires extending above the horizon and being backdropped by sky). Skylining causes the components to be substantially more prominent in views. In comparison, because the proposed modification is lower on the slope, it would tend to cause less skylining and be more frequently backdropped by the high-contrast boulder slopes, which would enable the structures and conductors/wires to blend more effectively with the background and be less noticeable and visually intrusive. The one exception is a short stretch of eastbound Interstate 8 that has a direct in-line view of the proposed modification where it jogs to the west (at structure P263A-1-2) and comes in closer proximity to the highway.

Cultural Resources. PMR6 would greatly reduce direct impacts to archaeological sites. There are 17 resources within the FESSR Project Impact Area. There are nine resources within the Project Impact Area for PMR6. Five of the resources would be impacted by the FESSR and four would be new. The modified project will avoid three prehistoric habitation sites, three prehistoric rock features, a prehistoric trail, and multiple bedrock milling features.

SDG&E has stated that it would potentially be able to avoid two of the sites impacted by PMR6. The area of direct impact would be altered to avoid impact with site IMP-10897. No impacts are anticipated at site OMP-10897 once the tower staging area pad (TSAP) was removed. It may be possible to establish an Environmentally Sensitive Area and avoid impacts to site SDI-9188 which is recorded on the western edge of the proposed work area and not within the actual foundation area for the structure. An Environmentally Sensitive Area would be established prior to construction and would limit access to the mapped site area. A careful examination of the ground surface in the mapped site area and the immediate adjacent areas will be completed to assess the presence of surface artifacts. A subsurface exploration can be completed as appropriate and directed by the BLM.

[6] For this all modifications, ephemeral streams are included in the impact calculations for herbaceous wetlands, freshwater, and streams.

The number of structures that would be visible from Desert View Tower (a National Register site) would increase and towers would be closer to the Desert View Tower than under the FESSR route. However, overall visibility of the structures would be reduced by color treatment and reduction in skylining along the PMR6 route. Neither route would impair the integrity or cultural values of the Desert View Tower sufficiently to render the resource ineligible for the National Register, largely because of existing visual intrusion of the Southwest Powerlink #1 500 kV transmission line. As explained in the Final EIR/EIS, impacts to the Desert View Tower would be mitigated to less than significant with the implementation of Mitigation Measure C-6f, Reduce adverse visual intrusions to the Desert View Tower viewshed. The assessment of visual impacts is discussed under visual resources.

The AER Construction Yard, which would be visible from Historic Route 80, will be reduced in size by PMR6, thus reducing indirect visual effects on this historic property because the decrease in ground disturbance would decrease long-term visible land scarring (adverse visual impact). Impacts to portions of Historic Route 80 used for access would be temporary and would not result in significant changes to the concrete cutoff section of this historic road and impacts would remain Class II consistent with the FESSR. Mitigation Measure C-1g Avoid and protect Old Highway 80 (P-37-024023) would still be required.

Land Use. Both the FESSR and the Desert Tower PMR6 reroute would be located on both BLM and private land. The closest sensitive receptors are located west of Interstate 8 along In-Ko-Pah Road, approximately 1,600 feet west of the FESSR and 1,200 feet west of the PMR6 reroute. Although PMR6 would be located closer to the nearest sensitive receptor, the Final EIR/EIS only analyzed land uses located within 1,000 feet of the route and found that sensitive land uses (e.g., residences) located at a distance of over 1,000 feet impacts would be adverse but less than significant (Class III)due to their distance from the alternative. Therefore, impacts from PMR6 would remain less than significant, consistent with the Final EIR/EIS.

Geologic Resources. This minor alignment change encounters the same geologic conditions as the original alignment. This modification would avoid some steep terrain and also would increase the number of support structures to be constructed by helicopter. PMR6 would not affect or change impacts related to geology or geologic hazards. Ground disturbance would be reduced due to increased use of helicopter construction resulting in reduced impacts associated with soil erosion and slope instability related to grading of access roads in steep terrain.

Public Comments. Commenters noted that the alignment would be close to the ECO substation and would create cumulative impacts. The ECO Substation (referred to as the Jacumba Substation in the EIR/EIS) was addressed in the Final EIR/EIS both as a connected action and as a cumulative project. See Section 1.9 of Section 1, which addresses the modifications to the cumulative project list. As explained in that section, the changes to the list (which include both additions and deletions to the list) would not change the cumulative impact analysis and would not result in a substantial increase in existing environmental impacts or new significant impacts. Therefore additional CEQA/NEPA review is not required.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR6 would not have any new significant effects not discussed in the EIR/EIS or substantially increase the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR6 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in reduction in acreage of biological effect, reduced visual impacts, and reduction of cultural resources affected.

MODIFICATION SUBUNIT 7: EP255-1 TO EP252-1 (JADE MOUNTAIN PMR 7)

Brief Description and Purpose

This modification would relocate two towers on the slopes of Jade Mountain to approximately 250 feet south of the original towers and would add one new tower and tower staging/access pad.

The primary purpose for this modification was to reduce visual impacts of structures on Jade Mountain and reduce ground disturbance, as well as impacts to sensitive vegetation and dry washes.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in a substantial increase in previously identified significant impacts to biological resources. Table PMR7 below shows the impacts to rare plants, sensitive vegetation communities, and special status species for the FESSR and modified project.

TABLE PMR7

Table PMR7. Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Desert Scrub and Dune Habitats	4.13	5.52	9.65
	Herbaceous Wetlands, Freshwater, and Streams	0.02	0.01	0.03
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.61	0.13	0.74
	FESSR Total	**4.76**	**5.66**	**10.42**
Modified Project	Desert Scrub and Dune Habitats	1.39	4.38	5.77
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.12	0.12
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.04	0.42	0.46
	Mod Proj Total	**1.43**	**4.93**	**6.36**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Peninsular Bighorn Sheep	USFWS Occupied Habitat	2.15	2.68	4.83
Modified Project	Peninsular Bighorn Sheep	USFWS Occupied Habitat	0.71	4.25	4.96

The modified project would result in a decrease in impacts to sensitive vegetation communities and total ground disturbance, and a decrease in permanent impacts to Peninsular bighorn sheep occupied habitat.

The modified project would result in an increase in temporary impacts to Peninsular bighorn sheep occupied habitat. Impacts, both temporary and permanent, to PBS occupied habitat were determined to

be significant (Class I) in the Final EIR/EIS, and mitigation was identified to reduce these impacts. The same mitigation measures would be required for the modified project as for the FESSR. Mitigation Measure B-7c, Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat, restricts construction during lambing season and during the period of greatest water need. As analyzed in Section D.2.5 in the discussion of Impact B-1, the impacts to the PBS habitat itself were considered significant and not mitigable to less than significant levels (Class I) because suitable PBS replacement critical habitat, or other suitable habitat as determined by the Wildlife Agencies, BLM, and ABDSP, may not be available. The slight increase in temporary impacts to PBS occupied habitat would occur in the same general location as the impacts identified in the FESSR for this alignment and would be offset by the decrease in permanent impacts to PBS occupied habitat. Overall the modified project would reduce temporary impacts to PBS occupied habitat from 34.41 acres to 20.24 acres. For these reasons, this modification would not result in a substantial increase in significant impacts to PBS habitat.

PMR7 would reduce permanent impacts to waters of the U.S. from 0.01 acres to 0.00 acres and increase temporary impacts to waters of the U.S. from 0.01 acres to 0.12 acres. PMR7 would reduce permanent impacts to waters of the State from 0.02 acres to 0.01 acres and increase temporary impacts to waters of the State from 0.01 acres to 0.12 acres. This would correspond with an increase in temporary impacts to ephemeral streams (of 0.12 acre). Mitigation Measure B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the PMR, and would be adequate to ensure that the impact would still be Class II consistent with the Final EIR/EIS. Overall, the modified project would reduce impacts to ephemeral streams from 10.73 acres with the FESSR to 2.37 acres. Permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project and permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project. For these reasons, this modification would not result in a substantial increase in the severity of a previously identified significant impact.

The CPUC and BLM have independently reviewed the data and analysis provided by SDG&E for the assessment of impacts to vegetation and species, as well as dry washes, ephemeral streams, and wetlands. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species. This assessment and analysis demonstrates a reduction in area of permanent effect to sensitive vegetation communities and permanent impacts to Peninsular bighorn sheep and an increase in temporary impacts to Peninsular bighorn sheep and ephemeral streams. With respect to biological resources, PMR7 would result in impacts to biological resources similar to those of the FESSR and would not result in new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Visual Resources. The proposed Jade Mountain PMR7 modification would reduce the impact on views from Interstate 8 because the down-slope shift in alignment would eliminate the structure skylining that would occur at the eastern-most structure on Jade Mountain. However, the modification would not measurably change the impact on views from Old Highway 80 because the reduction in structure skylining would be offset by the visibility of one additional structure. Because of the reduced impacts to views from Interstate 8, the net result would be a reduction in the adverse visual impact along this route segment, but the reduced impact would not change the impact significance conclusion for this route segment.

Cultural Resources. PMR7 will reduce impacts to cultural resources. There are four resources within the FESSR Project Impact Area. Two of these are within the Project Impact Area for PMR7. The modified project will avoid a prehistoric hearth and ceramic and lithic scatter and a roasting pit and ceramic and lithic scatter. Therefore, for cultural resources, PMR7 is preferred.

Ground Disturbance/Other Affected Issue Areas. The CPUC and BLM believe that summary Table S-2 (see PMR p. 8) is incorrect for PMR 7 and that the total ground disturbance for PMR 7 is 6.36. This is based on PMR Section 4, page 4-31 and review of the MapBooks for this PMR which shows a reduction in ground disturbance based on the elimination of the access road.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR7 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR7 would have environmental impacts similar in context to those of the FESSR. Although there would be an increase in temporary impacts to occupied habitat this modification would be preferred to the FESSR due to the reductions in acreage of biological effect, including reductions in permanent impacts to PBS occupied habitat, reduced visual impacts, and reduction of cultural resources affected.

MODIFICATION SUBUNIT 8: EP252-1 TO EP239-1 (JACUMBA PMR 8)

Brief Description and Purpose

This modification includes two components:

- It would shift the alignment approximately 25 feet north and would eliminate one wire pull site and reduce temporary construction pads at all structures.
- It would create a 34.51-acre yard, south of Interstate 8, instead of a 31.02-acre yard south of the Quino reroute per the FESSR. The primary purpose of this modification is to improve engineering and replace the construction yard in PMR 9. Additional considerations are to minimize impacts to Quino checkerspot butterfly habitat, reduce impacts on Nature Conservancy land, and reduce impacts to cultural resources. See Section 1 for a detailed discussion regarding construction yards.

The PMR (dated May 14, 2010) identifies two construction yards, including a 4-acre helicopter refueling station at the Jacumba Airport, shown on Figure 8. This refueling station is no longer incorporated as part of the modification.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Recent correspondence w/ SDG&E indicated it is not longer considering Jacumba Airport storage yard shown and described in PMR 8. The commenter requested clarification regarding this yard.

Biological Resources. This modification would reduce permanent impacts to sensitive vegetation communities, but increase temporary impacts to sensitive vegetation communities and increase

permanent and temporary effects to special status wildlife (barefoot banded gecko). However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR8 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR8

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	1.62	3.53	5.15
	Desert Scrub and Dune Habitats	5.20	13.68	18.88
	Herbaceous Wetlands, Freshwater, and Streams	0.23	0.64	0.87
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	5.34	4.51	9.85
	Woodlands and Forests	0.68	1.24	1.92
	FESSR Total	**13.08**	**23.59**	**36.67**
Modified Project	Chaparrals	1.43	19.21	20.64
	Desert Scrub and Dune Habitats	5.16	22.00	27.16
	Herbaceous Wetlands, Freshwater, and Streams	0.06	0.19	0.25
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.20	5.96	7.16
	Woodlands and Forests	0.38	0.30	0.69
	Mod Proj Total	**8.23**	**47.67**	**55.90**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	None	None	0	0	0
Modified Project	Barefoot Banded Gecko	Suitable Habitat	3.22	3.12	6.34

As stated above, the modified project would create a 34.51-acre yard, instead of the previously approved 31.02-acre yard south of the Quino reroute analyzed in the FESSR.

PMR 8 would result in an increase in permanent and temporary impacts to chaparrals of 15.49 acres. Impacts to chaparrals were identified as a significant (Class I) impact in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, B-1c, Conduct biological monitoring, and B-1k, Re-seed disturbed areas after a transmission line–caused fire, identified in the Final EIR/EIS to reduce these impacts would also be required for the PMR. Overall the modified project would result in a reduction of permanent impacts to chaparrals from 294.36 acres to 181.19 acres and a reduction in temporary impacts to chaparrals from 321.44 to 223.96 acres. Impacts to chaparral at this location would also be offset by a reduction in PMR9, resulting from the elimination of a 31.02 acre construction yard from a site which includes the same vegetation community types as the added construction yard site in PMR8. For these reasons, this modification would not result in a substantial increase in previously identified significant impacts to this sensitive vegetation community.

PMR 8 would result inan increase of permanent and temporary impacts to desert scrub and dune habitats of 8.28 acres. Impacts to desert scrub and dune habitats were identified as a significant (Class I) impact in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, B-1c, Conduct biological monitoring, and B-1k, Re-seed disturbed areas after a transmission line–caused fire, identified in the Final EIR/EIS to reduce these impacts would also be required for the PMR. Overall, impacts to desert scrub and dune habitats would decrease from

91.88 to 36.37 acres for permanent impacts and from 282.13 acres to 142.27 acres for temporary impacts. As discussed above, these increases would also be offset by the elimination of a 31.02-acre construction yard within PMR9; the eliminated construction yard site included the same vegetation community types as the added site. For these reasons, this modification would not result in a substantial increase in previously identified significant impacts to this sensitive vegetation community.

PMR8 would reduce permanent impacts to waters of the U.S. from 0.01 acres to 0.00 acres. PMR8 would reduce permanent impacts to waters of the State from 0.02 acres to 0.00 acres.

The modified project would result in an increase in permanent and temporary impacts to barefoot banded gecko suitable habitat. The barefoot banded gecko was assumed to be present from Milepost 23 through 39 in the Final EIR/EIS. As stated in the Final EIR/EIS, no surveys were conducted for this species. If surveys had been conducted and the species was not found, the survey result would have to be considered false negative because of the species' highly elusive nature. Impacts to the species were assessed as Class I. While the 34.51-acre yard would result in an increase of impacts to barefoot banded gecko suitable habitat of 6.34 acres at this location, overall, the modified project would reduce impacts to barefoot banded gecko from 20.63 acres to 10.84 acres for permanent impacts and from 17.16 to 4.53 acres for temporary impacts. The modification would reduce impacts of the 31.02-acre yard to Quino checkerspot butterfly (see PMR 9).

Overall, PMR8, if considered with PMR9, would result in impacts to biological resources similar to those of the FESSR and would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS, for the reasons discussed above. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would result in an increase in the impacts on Visual Resources along this route segment by introducing a large construction yard with complex industrial character into a landscape presently lacking such character, and in a location that would be prominently visible from Interstate 8. The FESSR is located approximately 1,000 feet south of Interstate 8 and 1,000 feet from the nearest visual receptor; the nearest construction yard is approximately 0.85 miles west of the location. However, although this modification would cause an increase in the visual impacts at this location**,** the impact is not considered significant given the short-term (12 months) nature of the impact. The Final EIR/EIS concluded that construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at the construction and storage yards. The Final EIR/EIS assumed that construction impacts at these sites could last two years and the resulting visual impacts would be significant but mitigable (Class II). Mitigation Measures V-1a, Reduce visibility of construction activities and equipment and V-1b, Reduce construction night lighting impacts are required to reduce the impacts to levels that would be less than significant. Therefore, the overall impact assessment and significance conclusions would not change for this location.

Cultural Resources. PMR8 would reduce impacts to cultural resources. The FESSR has 24 resources within the Project Impact Area. The modified project has 20 resources within the Project Impact Area. Fourteen of the resources would also be impacted by the FESSR, six would be new. PMR8 would avoid a prehistoric habitation site, a prehistoric bedrock milling feature, and two quarries. Therefore, for cultural resources, PMR8 is preferred. SDG&E has stated that two of the resources, SDI-7052 and SDI-18063, would be avoided by the elimination of an access road.

Land Use. The PMR Land Use discussion for the Jacumba Valley Ranch Construction Yard states that it would be adjacent to one industrial site and access receptor. Although these receptors would be located

closer to the PMR than the FESSR, neither of these would be considered a sensitive receptor and the impacts would still be Class II (significant but mitigable) consistent with the Final EIR/EIS. Additionally, with the incorporation of the Jacumba Valley Ranch Construction Yard, impacts to lands owned by The Nature Conservancy would be reduced by moving the Construction Yard #7, located on The Nature Conservancy land in the FESSR.

Ground Disturbance/Other Affected Issue Areas. PMR8 would reduce permanent impacts to ground disturbance from 13.08 acres to 8.23 acres and increase temporary impacts to ground disturbance from 23.59 acres to 47.67 acres, resulting in the following environmental changes:

- Minor increases in noise. There are no residences within 1,000 feet from this modified route and construction yard. The nearest receptors to the construction yard would be one industrial site and access receptor. These receptors are located immediately adjacent to Interstate 8 where noise levels are the highest (over 80 dBA), see Final EIR/EIS, Section E.8.

While PMR8 would increase impacts associated with the temporary ground disturbance of the 34.51-acre construction yard, it would be offset with the elimination of a 31-acre construction yard, and would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR8 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR8 would have environmental impacts similar in context to those of the FESSR. This modification would be slightly preferred to the FESSR due to the reductions in impacts to Quino checkerspot butterfly (see PMR 9), reduction in land use impacts, and reduction of cultural resources affected.

MODIFICATION SUBUNIT 9: EP239-1 TO EP229-1 (QUINO PMR 9)

Brief Description and Purpose

The modification would shift the alignment approximately 2,400 feet to the north to avoid Quino checkerspot butterfly (QCB) occupied habitat and QCB designated critical habitat and would eliminate a new access road. Additionally, it would eliminate a construction yard that was replaced with the Jacumba Valley Yard (see PMR8).

The primary purpose for this modification is to avoid impacts to the Jacumba Quino checkerspot butterfly population. Additional considerations include avoiding an agricultural underground irrigation system on private property.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a

significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not substantially increase previously identified significant impacts to biological resources. Table PMR9 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR9

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Palmer's grappling hook		2	2
	Sticky geraea	5	2	7
Modified Project	None			

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	6.54	10.49	17.03
	Desert Scrub and Dune Habitats	2.77	34.23	37.01
	Herbaceous Wetlands, Freshwater, and Streams	0.02	0.00	0.02
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	2.29	1.59	3.88
	Woodlands and Forests	0.24	0.92	1.16
	FESSR Total	**11.86**	**47.23**	**59.09**
Modified Project	Chaparrals	3.69	2.33	6.03
	Desert Scrub and Dune Habitats		0.42	0.42
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.48	0.65	1.14
	Mod Proj Total	**4.17**	**3.41**	**7.59**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Quino Checkerspot Butterfly	USFWS Critical Habitat	8.20	10.80	19.01
		USFWS Occupied Habitat	11.05	44.29	55.33
Modified Project	Quino Checkerspot Butterfly	USFWS Critical Habitat	1.68	0.01	1.69
		USFWS Occupied Habitat	3.44	2.75	6.19

The 31-acre construction yard proposed in the FESSR at this location would be eliminated by PMR9 and replaced by the construction described in PMR8.

This modification would reduce impacts to rare plant individuals (sticky geraea), sensitive vegetation communities, and Quino checkerspot butterfly..

PMR9 would reduce permanent impacts to waters of the U.S. from 0.01 acres to 0.00 acres. PMR9 would reduce permanent impacts to waters of the State from 0.02 acres to 0.00 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands. This information and analysis demonstrates a reduction in permanent and temporary impacts to Quino checkerspot butterfly. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed PMR9 modification would reduce the impact on views from the community of Jacumba and Old Highway 80 because the shift in alignment to the north, away from the community and Old Highway 80, would reduce (though not eliminate) structure skylining at four structure locations visible from Jacumba and the road. The net result would be a reduction in the adverse visual impact along this route segment, but the reduced impact would not change the impact significance conclusion for this route segment.

Cultural Resources. PMR9 will reduce impacts to cultural resources. The FESSR has 11 resources within the Project Impact Area. The CPUC and BLM reviewed the cultural resources data and concluded that the modified project has three resources within the Project Impact Area, one of which was not within the FESSR Project Impact Area. PMR9 would avoid a prehistoric bedrock milling site, and three historical mining sites, some of which have more than one cultural resource. Therefore, for cultural resources, PMR9 is preferred.

Although there is a scatter of surface artifacts (debitage, cores) at the plotted location of one of the transmission structures for this PMR, EP236-1, the segment was revised once along this alignment (Quino Re-route) between structures EP239-1 and EP229-1 to avoid biological impacts. Due to the size and location of the cultural site, no structure relocations to avoid the site were practical.

Land Use. The modification reduces impacts to conserved lands owned by the Nature Conservancy through the elimination of access roads and the incorporation of helicopter construction, as well as reducing the span over the conserved land. Additionally, impacts to lands owned by The Nature Conservancy would be reduced by moving the Construction Yard #7 from the FESSR. PMR 9 would also avoid an underground irrigation system reducing conflicts with land use.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR9 would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR9 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect, reduction of cultural resources affected and reduction of impacts to conserved lands owned by the Nature Conservancy through the elimination of access roads and the incorporation of helicopter construction.

MODIFICATION SUBUNIT 10: EP229 TO EP221A (BANKHEAD SPRINGS PMR 10)

Brief Description and Purpose

This modification would shift the alignment approximately 400 feet to the north at P223-1 and would change construction from conventional to helicopter to avoid steep mountainsides containing large boulders and rocky outcrops. See Section 1, Section 1.4 regarding helicopter use for construction.

The primary purpose for the modification is to avoid steep mountainsides and reduce impacts to sensitive vegetation.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the

description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in substantial increase in significant impacts to biological resources. Table PMR10 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR10

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	None	0	0	0
Modified Project	Sticky geraea	25		25

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	8.03	10.69	18.72
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.04	0.07	0.10
	Woodlands and Forests	0.33	0.69	1.02
	FESSR Total	**8.40**	**11.45**	**19.84**
Modified Project	Chaparrals	2.48	1.49	3.97
	Herbaceous Wetlands, Freshwater, and Streams		0.08	0.08
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.28	0.14	0.43
	Woodlands and Forests		0.01	0.01
	Mod Proj Total	**2.76**	**1.73**	**4.49**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Quino Checkerspot Butterfly	USFWS Critical Habitat	2.75	5.13	7.88
		USFWS Occupied Habitat	0.57	1.37	1.94
Modified Project	Quino Checkerspot Butterfly	USFWS Critical Habitat	0.85	0.02	0.87
		USFWS Occupied Habitat	0.39		0.39

The modified project would reduce impacts to sensitive vegetation communities and to the Quino checkerspot butterfly when compared to the FESSR.

The modified project would impact 25 individuals of sticky geraea (*Geraea viscida,* CNPS List 2).The Final EIR/EIS states that the sticky geraea had a moderate to high potential to occur along the alternative based on the habitats present and/or documented CNDDB, USFWS, and USDA Forest Service records. The species was not found during focused plant species surveys; however, as stated in the Final EIR/EIS the results of the surveys are inconclusive because the poor rainfall conditions may have prevented special status plants from germinating or resprouting so they could not be observed. Impacts to special status plant species, including the sticky geraea were assessed in the Final EIR/EIS (as Class I) and require the mitigation to conduct rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies. Therefore, impacts to sticky geraea as a result of this modification would not

represent new significant impacts, and would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. Overall, the modified project would reduce impacts to sticky geraea from 2,412 individuals to 248 individuals.

PMR10 would increase temporary impacts to waters of the U.S. from 0.00 acres to 0.02 acres. PMR7 increase temporary impacts to waters of the State from 0.00 acres to 0.08 acres. This would correspond with a0.08-acre increase in temporary impacts to ephemeral streams from this modification, this type of impact was assessed (as Class II) in the Final EIR/EIS and would not represent new significant impact. Mitigation Measure B-2a, Provide restoration/compensation for affected jurisdictional areas identified in the Final EIR/EIS for the FESSR, including biological monitoring and restoration/compensation for affected jurisdictional areas, would also be required for the PMR and would be adequate to ensure that this impact would still be (as Class II) consistent with the Final EIR/EIS. Overall temporary impacts to herbaceous wetlands, freshwater, and streams decreased from 10.73 acres to 2.37 acres with the modified project. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands. This information demonstrates a reduction in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed PMR10 modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR10 would eliminate impacts to cultural resources. The FESSR has one resource (a historical mining site) within the Project Impact Area. PMR10 would avoid this resource. Therefore, for cultural resources, the modified project is preferred.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR10 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR10 would have environmental impacts similar in context to those of the FESSR. This modification would be preferred to the FESSR due to the reductions in acreage of effect, reduced visual impacts, and reduction of cultural resources affected.

MODIFICATION SUBUNIT 11: EP221A TO EP219-1 (JACKSON-GATLIN PMR 11)

Brief Description and Purpose

The modified project has two components:

- It would shift the alignment approximately 800 feet to the south to avoid coast live oak trees, existing structures on private property, and herbaceous wetlands.
- It also eliminates one construction yard on Lansing Industries Inc. property south of I-8, which is one of the three yards replaced with the Rough Acres yard addressed in PMR 13, below.

The primary purpose for this modification is to accommodate a request from landowners (Jackson and Gatlin), in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts. Additional considerations include avoiding live oak trees and non-vegetated channels.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR11 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR11

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Desert beauty	5		5
	Sticky geraea	16		16
Modified Project	Desert beauty	2		2
	Sticky geraea	30		30

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	2.00	4.09	6.09
	Coastal and Montane Scrub Habitats	0.27	0.91	1.18
	Grasslands and Meadows	0.08	14.14	14.23
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.12	0.13
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.14	25.63	25.76
	Woodlands and Forests		0.77	0.77
	FESSR Total	**2.51**	**45.66**	**48.17**
Modified Project	Chaparrals	1.79	2.95	4.74
	Coastal and Montane Scrub Habitats		0.14	0.14
	Grasslands and Meadows		0.09	0.09
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.02	0.02
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.44	0.05	0.49
	Mod Proj Total	**2.24**	**3.25**	**5.49**

This modification would reduce impacts to desert beauty rare plant individuals and increase impacts to sticky geraea rare plant individuals. It would reduce impacts to sensitive vegetation communities.

Analysis in the Final EIR/EIS states that the sticky geraea had a moderate to high potential to occur along the FESSR based on the habitats present and/or documented CNDDB, USFWS, and USDA Forest Service

records. The species was not found during focused plant species surveys; however, analysis in the Final EIR/EIS determined that the results of the surveys were inconclusive because the poor rainfall conditions may have prevented special status plants from germinating or resprouting such that they could not be observed. Impacts to special status plant species, including the sticky geraea, were assessed in the Final EIR/EIS (as Class I). Mitigation to reduce impacts to special status plant species was identified in the Final EIR/EIS and would also be implemented for the PMR. Mitigation Measure Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies would required rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies; Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would require compensation for the vegetation community. Overall, the modified project would reduce impacts to sticky geraea from 2,412 individuals to 248 individuals. Therefore, impacts to sticky geraea as a result of this modification would not result in any new significant effects not discussed in the EIR/EIS or result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

PMR11 would reduce permanent impacts to waters of the U.S. from 0.08 acres to 0.00 acres and temporary impacts to waters of the U.S. from 24.27 acres to 0.01 acres. PMR11 would reduce permanent impacts to waters of the State from 0.09 acres to 0.00 acres and temporary impacts to waters of the State from 24.27 acres to 0.02 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of rare plant species, vegetation and species, as well as dry washes, ephemeral streams, and wetlands. This information and analysis demonstrates a reduction in impacts to sensitive vegetation communities. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed PMR11 modification would not noticeably change overall impacts on Visual Resources though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR11 would not increase impacts to cultural resources. The FESSR has two prehistoric resources within the Project Impact Area. Originally, the modified project route had five resources (two prehistoric and three historical) within the Project Impact Area, none of which would have been impacted by the FESSR. However, SDG&E made design revisions after the publication of the PMR for other project issue areas which avoid all cultural resources within this route modification, see the Cultural Resources Attachment to this section. Therefore, PMR11 does not affect or change impacts to cultural resources.

Land Use. PMR 11 was designed at the request of two landowners, per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts. It would reduce land use conflicts on the Jackson-Gatlin property by avoiding coast live oak trees and existing structures on private property. .

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR11 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR11 would have environmental impacts similar in context to those of the FESSR. Although PMR11 would have greater potential impacts to cultural resources, the modification would be preferred to the FESSR due to the reductions in acreage of effect and the reduction to land use impacts.

MODIFICATION SUBUNIT 12: EP219-1 TO EP206-1 (STATE CORRECTIONS PMR 12)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment approximately 75 feet to the north where it parallels I-8 and 75 feet to the east between Structures EP213 and EP211 to improve engineering design.
- It would eliminate a construction yard north of I-8 and west of EP215 replacing it (and the construction yard eliminated in PMR11) with the construction yard in PMR13.

The primary purpose for this modification is to improve engineering. It would also reduce ground disturbance and impacts to waters of the U.S. and State waters.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns related to this modification:

- The Wuest Ranch is used for a water source to fight fires in this remote area. How will the Sunrise Powerlink's proximity interfere with this important current use of a scarce surface water source?
- EP2909 Structure 107 is extremely close to the historic McCain Tule Ranch house that sits on the banks of Tule Creek in McCain Valley, north of I-8, on State land at the McCain Valley Conservation Camp. The house is eligible for historic designation and should be protected along with the Tule Creek viewshed.

Biological Resources. This modification would reduce the acreage of affected biological resources. Table PMR12 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR12

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Campo pea	1		1
	Jacumba milk-vetch	25	3	28
	Sticky geraea	33	46	79
Modified Project	Jacumba milk-vetch	14	16	30
	Sticky geraea	11	77	88

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

TABLE PMR12

		Permanent	Temporary	Total
FESSR	Chaparrals	4.24	15.92	20.17
	Coastal and Montane Scrub Habitats	3.60	16.74	20.34
	Grasslands and Meadows	0.40		0.40
	Herbaceous Wetlands, Freshwater, and Streams	0.03	0.22	0.25
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.67	1.42	2.09
	Woodlands and Forests		0.87	0.87
	FESSR Total	**8.94**	**35.18**	**44.12**
Modified Project	Chaparrals	1.77	6.79	8.55
	Coastal and Montane Scrub Habitats	2.50	5.04	7.54
	Grasslands and Meadows	0.34	0.65	0.99
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.00	0.01
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.16	0.49	1.65
	Mod Proj Total	**5.76**	**12.97**	**18.74**

This modification would reduce permanent impacts to sensitive vegetation communities. Permanent impacts to grasslands and meadows would decrease by 0.06 acres and temporary impacts to grasslands and meadows would increase by 0.65 acres.

This modification would increase impacts to Jacumba milk-vetch and sticky geraea rare plant individuals. Analysis in the Final EIR/EIS determined that sticky geraea and Jacumba milk-vetch had a moderate to high potential to occur along the FESSR based on the habitats present and/or documented in CNDDB, USFWS, and USDA Forest Service records. Sticky geraea was found along this alignment during focused plant species surveys but Jacumba milk-vetch was not. The number of individual species noted above are from pre-construction surveys. However, as stated in the Final EIR/EIS, the results of the surveys are inconclusive because the poor rainfall conditions may have prevented special status plants from germinating or resprouting so they could not be observed and as such, an assumption was made that 34 special status plant species, including Jacumba milk-vetch, were present and impacted by this alignment, see Section E.2.2.2, BCD Alternative Biological Resources. Overall, the modified project would reduce impacts to sticky geraea from 2,412 individuals to 248 individuals and would increase impacts to Jacumba milk-vetch from 593 individuals to 987 individuals.

Impacts to special status plant species, including the sticky geraea and Jacumba milk-vetch, were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants without giving a specific number of individual loss. The severity of the impact to special status plant species in the FESSR project area was determined to be significant (Class I). The same mitigation identified in the Final EIR to reduce this impact would also be required for the PMR: Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies, would be required to mitigate this impact through reseeding (with locally collected seed stock) or relocation to temporarily disturbed areas, and Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. Overall, the modified project would reduce the number of special status plant species and individuals affected, compared with the FESSR; see Table 3-6 in the PMR. The Final EIR/EIS requires mitigation for impacts to conduct rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies as well as providing restoration/ compensation for affected vegetation communities. For these reasons, this modification would not result in a substantial increase in the severity of a previously identified significant impact.

PMR12 would reduce temporary impacts to waters of the U.S. from 0.13 acres to 0.01 acres. PMR12 would reduce permanent impacts to waters of the State from 0.03 acres to 0.00 acres and temporary impacts to waters of the State from 0.22 acres to 0.01 acres.

Neither the FESSR nor the project modification would impact special status wildlife species along this portion. The modified project would reduce impacts to ephemeral streams, and wetlands and as such to waters of the U.S. and of the State.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of rare plant species, vegetation and wildlife species, as well as dry washes, ephemeral streams, and wetlands; this information and analysis demonstrates a reduction in permanent impacts to sensitive vegetation communities, wetlands, and does not substantially increase significant impacts to rare plants species or substantially increase significant impacts to sensitive vegetation communities (grasslands and meadows) for the reasons discussed above. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment because the modified project would follow the FESSR route closely, though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR12 would slightly reduce impacts to cultural resources. Whereas the FESSR Project Impact Area contains three historical resources (a prehistoric bedrock milling site, a prehistoric lithic scatter, and a historical mine/structure), the modified project will avoid the historical mine structure. However, of the two resources potentially impacted, SDG&E has stated the temporary work area at EP207 would be staked as an Environmentally Sensitive Area to avoid work within the mapped limits of SDI-4788, as required by Mitigation Measure C-1e, Monitor construction at known ESAs. The work area can be restricted to the permanent work area on the northwest portion of the designated area which will result in no impacts within the mapped boundary of SDI-4788. There are no surface artifacts recorded within the temporary or permanent work areas for EP206-1. The area will be carefully examined during the evaluation effort. Subsurface testing can be completed as determined necessary by the BLM.

Public Comments. Commenters noted that this alignment is approximately 800 feet from the McCain Ranch, a National Register eligible property. The modified project does not alter the original FESSR location of Structure 107 the structure nearest to the McCain Ranch. Impacts to register-eligible archaeological sites such as the McCain Ranch were addressed in the Final EIR/EIS and direct and indirect impacts were analyzed as less than significant with mitigation. Mitigation measures require SDG&E to protect and monitor NRHP and/or CRHR-eligible properties, and reduce the impacts to less than significant.

Other Affected Issue Areas. The route in this area would be approximately 2,300 feet southwest of a lake on Wuest Ranch, which is used as a water source to fight fires. Water features that were within ¼ mile (1,320 feet) of the transmission line were considered in the Wildfire Containment Conflict model. (See Final EIR/EIS Section D.15 for further discussion of the Wildfire Containment Conflict model.) This lake is more than 1,320 feet away from the line so there would be no conflict to firefighting because it is beyond the conflict parameters and the modified project would not have an effect on the water source. Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR12 results in an overall reduction of acreage of project effects on biological resources. It would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of an impact previously examined in the EIR/EIS. PMR12 would have environmental impacts similar in context to those of the FESSR. While PMR12 would affect more Jacumba milk-vetch and sticky geraea, it would be preferred to the FESSR due to the reductions in acreage of effect, reduced visual impacts, and reduction of cultural resources affected and overall, the modified project would reduce the number of special status plant species and individuals affected, compared with the FESSR.

MODIFICATION SUBUNIT 13: EP206-1 TO EP196-1 (ROUGH ACRES PMR 13)

Brief Description and Purpose

This modification has two components:

- It would shift the alignment approximately 150 feet to the west, west of McCain Valley Road, and would eliminate two previously-proposed structures to accommodate a request from a property owner.
- It would also create a 92.46-acre yard (Rough Acres) north of Interstate 8 off of McCain Valley Road instead of 3 separate yards totaling 91.72 acre under the FESSR. The three yards it would replace include one south of and one north of I-8 and an additional yard north of the Rough Acres yard, adjacent to EP-199-3. This construction yard would comprise a main staging area for construction of the 500 kV line and would include use of a landing strip.

The primary purpose for this modification is to accommodate a landowner request, in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts, and consolidate yard functions. Additionally, the use of the Rough Acres construction yard would allow for use of an already existing landing strip on already disturbed land, allowing for an increase use of helicopters for construction and a resulting decrease in ground disturbance.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- 400 Jacumba milk-vetch plants have been identified. Commenters assert this is a substantial increase over the severity disclosed in FEIR/EIS.
- Impacts of having large construction yard at Rough Acres was not analyzed in EIR/EIS and has the potential to create significant impacts (noise, community character, dust, traffic, etc.)
- Notification. Landowners were not notified about Rough Acres impacts during EIR/EIS.

- There are a significant number of cultural resources in this area. Native American monitors apparently informed commenter Backcountry Against Dumps that they were blocked from certain areas of the ranch property while doing the cultural resource surveys for Sunrise Powerlink and / or the Tule Wind project. A former resident of the ranch also apparently informed Backcountry Against Dumps that there is an ancient Indian village site located on this property near the area where the monitors were allegedly prevented from accessing. Impacts to groundwater resources and surface water from storage of materials, spills, fluid leaks, etc.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. It would not result in new significant impacts to biological resources. Table PMR13 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR13

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Desert beauty		2	2
	Jacumba milk-vetch	33	509	542
	Sticky geraea	26	211	237
Modified Project	Desert beauty	1		1
	Jacumba milk-vetch	13	928	941
	Sticky geraea		15	15

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	4.21	22.40	26.62
	Coastal and Montane Scrub Habitats	0.05	17.83	17.88
	Grasslands and Meadows		1.38	1.38
	Herbaceous Wetlands, Freshwater, and Streams		0.49	0.49
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.10	0.79	0.88
	Riparian Forests and Woodlands		2.52	2.52
	Woodlands and Forests		2.34	2.34
	FESSR Total	**4.36**	**47.75**	**52.11**
Modified Project	Chaparrals	4.30	49.54	53.83
	Coastal and Montane Scrub Habitats	0.47	28.42	28.89
	Herbaceous Wetlands, Freshwater, and Streams		0.05	0.05
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.06	22.59	22.65
	Woodlands and Forests		1.18	1.18
	Mod Proj Total	**4.82**	**101.78**	**106.60**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Peninsular Bighorn Sheep	USFWS Occupied Habitat	0.32	6.58	6.90
Modified Project	Peninsular Bighorn Sheep	USFWS Occupied Habitat	0.17	0.10	0.27

This modification would reduce impacts to grasslands and meadows, herbaceous wetlands, freshwater, and streams, and woodlands and forests.

This modification would result in an approximately 27.15-acre increase in temporary impacts to chaparrals, an approximately 0.09 acre increase in permanent impacts to chaparrals, and an approximately 10.5-acre increase in temporary impacts to coastal and montane scrub habitats compared to the FESSR. These increases are accounted for by the addition of a new 92.46-acre construction yard (Rough Acres). This construction yard would replace construction yards eliminated from PMR11, PMR12, and PMR13, totaling 91.72 acres. The eliminated construction yards would have been in the same general area as the Rough Acres and would have impacted chaparrals, coastal and montane scrub habitats. Impacts to chaparrals and coastal and montane scrub habitats were assessed as Class I in the Final EIR/EIS and would require mitigation to reduce these impacts including restoration/compensation for affected sensitive vegetation communities (Mitigation Measure B-1a). Overall, the modified project would reduce temporary impacts to chaparrals from 321.44 acres to 223.96 acres and to coastal and montane scrub habitats from 114.56 to 66.94. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact to these vegetation communities previously examined in the EIR/EIS.

This modification would reduce permanent and temporary impacts to Peninsular bighorn sheep occupied habitat.

This modification would also impact more individuals of Jacumba milk-vetch (California Native Plant Society List 1B [CNPS], BLM Sensitive, Forest Service Sensitive) than the FESSR (941 versus 542) at this location by the addition of a new 92.46-acre construction yard (Rough Acres). Overall, the impact to the Jacumba milk-vetch would increase from 593 individuals to 987 individuals, or 66 percent more individuals. The Jacumba milk-vetch would be impacted primarily within the Rough Acres construction yard. As this species is located throughout a substantial portion of the yard, individuals would be difficult to avoid.

Analysis in the Final EIR/EIS determined that Jacumba milk-vetch had a moderate to high potential to occur along the alternative based on the habitats present and/or documented CNDDB, USFWS, and USDA Forest Service records. Jacumba milk-vetch was not found along this alignment during focused plant species surveys for the EIR/EIS. They were found during pre-construction surveys. However, as stated in the Final EIR/EIS, the results of the surveys are inconclusive because the poor rainfall conditions may have prevented special status plants from germinating or resprouting so they could not be observed and as such, the assumption was made that special status plant species were present and impacted by this alignment. Impacts to special status plant species, including Jacumba milk-vetch, were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants without giving a specific number of individual loss. The severity of the impact to special status plant species in the FESSR project area was determined to be significant in the Final EIR/EIS, and the increase in impacts to Jacumba milk-vetch individuals does not substantially increase the resulting severity. Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies, would be required to mitigate this impact through reseeding (with locally collected seed stock) or relocation to temporarily disturbed areas, and Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. Overall, the number of special status plant species and individuals would decrease with the modified project; see Table 3-6 in the PMR. The Final EIR/EIS requires mitigation for impacts, including rare plant surveys and implementation of appropriate avoidance/minimization/mitigation strategies as well as providing restoration/compensation for affected vegetation communities. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact to special status plant species, including Jacumba milk vetch, previously identified in the Final EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

PMR13 would reduce temporary impacts to waters of the U.S. from 0.13 acres to 0.04 acres. PMR13 would reduce temporary impacts to waters of the State from 0.49 acres to 0.09 acres.

Visual Resources. The proposed modification would not substantially change overall impacts on Visual Resources. Although the modification would cause a greater degree of view blockage of McCain Valley and ridges to the southwest and west when viewed from southbound McCain Valley Road (along the 1.5-mile stretch of road immediately adjacent to the modification), the two route options would generally exhibit similar structure visibility and prominence and would result in comparable overall visual impairment and landscape impression, when viewed from a variety of other vantage points. Furthermore, even when viewed from southbound McCain Valley Road, the very close proximity of the FESSR to the road would cause the FESSR structures to remain in the broader field of view when viewing to the southwest. This visible presence (along with the resulting structural dominance) would substantially offset much (though not all) of the visual benefit that could be achieved by the FESSR (by avoiding the view blockage of McCain Valley associated with the modification). Also, the two route options would be equally consistent with BLM's newly established Visual Resource Management (VRM) Class IV management objectives. Therefore, while the modification represents a slight increase in impacts over the FESSR when viewed from southbound McCain Valley Road immediately adjacent to the modification, the FESSR and the modification would appear essentially equal from all other vantage points and viewing perspectives.

Although the proposed modification would result in an increase in ground disturbance at the Rough Acres construction yard (which would increase long-term visible land scarring), the consolidation of construction yards from three to one (two of which would be within view of Interstate 8 and one which would overlap McCain Valley Road), would reduce the overall prominence of yards along this route segment. As a result, this modification would not substantially change overall impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change for this location.

Cultural Resources. PMR13 would not increase impacts to cultural resources. The FESSR has six prehistoric resources within the Project Impact Area. The modified project has eight prehistoric resources within the Project Impact Area. However, all sites within PMR13 will be avoided, with the exception of three. The three prehistoric sites that will be impacted are within the Project Impact Area of both the FESSR and the modified project, and the impact to these sites would be the same under both. Therefore, PMR13 does not affect or change impacts to cultural resources.

SDG&E has stated that the area of impact within the mapped limits of one resource, SDI-19301, is in an area of the site with a single surface artifact identified as debitage in the southerly portion of the site. An ESA would be established at the edge of the permanent work area to limit activity to the southern portion of the site area to minimize the potential for impacts, as required by Mitigation Measure C-1e, Monitor construction at known ESAs.

Land Use. The modified project was designed in part to accommodate a landowner request per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts. The reroute would be slightly farther from the western edge of the In-Ko-Pah Mountains ACEC and would be at the extreme western edge of BLM's land.

The Rough Acres construction yard would be proposed at a new location and, as such, would incorporate the use of 92.46 acres of private land including an already disturbed landing strip. However, the land owner has confirmed that the landing strip is not in operation at this time and neither land nor recreation uses would be impacted by the project's use. As stated in the Final EIR/EIS, construction

along this alignment would create temporary disturbance area as a result of heavy construction equipment on temporary and permanent access roads and the moving building materials to and from construction staging areas. Mitigation including a preparation of a construction plan was required to reduce this impact to less than significant. See Section 1 regarding the analysis of construction yards in the FESSR and in the PMR.

The landowners surrounding the Rough Acres construction yard were notified during the EIR/EIS process regarding other project components in addition to the elimination of the prior construction yards (see PMR 11 and 12).

Other Affected Issue Areas.

Minor increases in noise. One sensitive receptor would be located within 1,000 feet of the construction yard and would have an increase in noise impacts. This receptor is also within the 1,000 feet of the FESSR; however, the duration and extent of the construction noise would increase with the use of the Rough Acres construction yard. Based on a review of the PMR mapbook, the sensitive receptor would be located approximately 200 feet from the modified project and construction yard and approximately 400 feet from the FESSR. Section E.2.8 describes noise impacts for the BCD Alternative (where the construction yard is proposed). The bulk of the noise analysis is in Section D.8, which discusses use of heavy equipment required for construction on page D.8-16, stating that "Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA." Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant because the noise increase from either the FESSR or the modified project would be significant and could not be reduced to less than significant levels, even with implementation of mitigation. The severity of the noise impact in the FESSR project area was determined to be significant in the Final EIR/EIS, and the relocation of the construction yard does not substantially increase the severity of this impact.

Public Comments. Regarding the comment that Native American monitors were blocked from certain areas of the ranch property while doing the cultural resource surveys, access to areas outside the proposed yard was likely restricted because the Rough Acres construction yard is located on private property and the property owners have the right to restrict access to the areas used for the construction yard. The CPUC and BLM inquired about the situation at Rough Acres after reading the comment. A definitive answer about what (if anything) happened when the ASM team surveyed the property was not provided. However, the site mentioned above was not found on the area designated for the construction yard. It is likely that there is or was a sensitive site in the Rough Acres region but it is either beyond the construction yard site and therefore would not be impacted by this modification or may have been previously disturbed.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR13 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR13 would have environmental impacts similar in context to those of the FESSR. Although the Rough Acres construction yard would require use of a greater amount of private land in this location, it is slightly preferred over the FESSR because it would consolidate three other construction yards, consolidating the temporary impacts of the construction yards and the modified project would be slightly farther from the western edge of the In-Ko-Pah Mountains ACEC. Additionally, the use of the Rough Acres construction yard would allow for use of an existing landing

strip on disturbed land, allowing for an increase use of helicopters for construction and a resulting decrease in ground disturbance.

MODIFICATION SUBUNIT 14: EP196-1 TO EP170 (McCain Valley PMR 14)

Brief Description and Purpose

The modification would have two components:

- It would shift the alignment approximately 150 feet to the east and would add temporary work areas (200 feet by 200 feet) to each transmission structure to facilitate construction. It would eliminate a long new access road by instead grading existing roads and building a new spur road.
- It would shift the 32.93-acre fly yard identified in the FEIR/FEIS east to EP178 in the southwestern portion of the Carrizo Gorge Wilderness Area.

The primary purpose for this modification is to improve engineering design. It would also reduce visual impacts.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR14 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR14

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Desert beauty	2	1	3
	Jacumba milk-vetch	15	8	23
	Sticky geraea	64	3	67
Modified Project	Desert beauty	1	1	2
	Jacumba milk-vetch	2	14	16
	Sticky geraea	40	12	52

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	21.61	37.48	59.09

TABLE PMR14

	Coastal and Montane Scrub Habitats	1.16	1.71	2.86
	Herbaceous Wetlands, Freshwater, and Streams	0.03	0.05	0.09
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.02	0.03	0.06
	FESSR Total	**22.82**	**39.28**	**62.10**
Modified Project	Chaparrals	16.62	49.03	65.65
	Coastal and Montane Scrub Habitats	0.91	0.64	1.55
	Herbaceous Wetlands, Freshwater, and Streams	0.12	0.03	0.15
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.22	0.02	1.24
	Mod Proj Total	**18.87**	**49.72**	**68.59**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	None				
Modified Project	Peninsular Bighorn Sheep	USFWS Occupied Habitat	0.03	0.11	0.14

This modification would result in an approximately 11.5-acre increase in temporary impacts to chaparrals compared to the FESSR due to an increase in the size of the McCain Valley construction yard. Impacts to chaparrals would be located in the same region as in the FESSR. Impacts to chaparrals were identified as Class I in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also be required for the PMR to mitigate this impact and would be adequate to ensure that this increase is not substantial. . Permanent impacts to chaparrals at this location would be reduced by approximately 4.5 acres. The May 2010 Modified Project, as a whole, would result in a net decrease in permanent and temporary impacts to chaparrals by approximately 211.0 acres compared to the FESSR, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS

PMR14 would increase permanent impacts to waters of the U.S. from 0.02 acres to 0.12 acres and decrease temporary impacts to waters of the U.S. from 0.04 acres to 0.02 acres. PMR14 would increase permanent impacts to waters of the State from 0.03 acres to 0.24 acres and decrease temporary impacts to waters of the State from 0.05 acres to 0.03 acres. This would correspond with an increase in permanent impacts to herbaceous wetlands, freshwater, and streams would increase from 0.03 to 0.12 acres and decrease in temporary impacts to this vegetation would from 0.05 to 0.03 acres. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. The May 2010 Modified Project, as a whole, would result in a net decrease in permanent and temporary impacts to herbaceous wetlands, freshwater, and streams from 3.17 acres to 1.10 acres and from 10.73 acres to 2.37 acres, respectively, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

This modification would reduce permanent impacts to rare plant individuals, desert beauty, Jacumba milk-vetch, and sticky geraea, and increase temporary impacts to Jacumba milk-vetch and sticky geraea. . Impacts to special status plant species, including Jacumba milk-vetch, were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive

plants without giving a specific number of individual loss. Impacts to special status plant species in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS. Mitigation identified in the Final EIR/EIS to reduce this impact would also be required for the PMR. Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies, would be required to mitigate this impact through reseeding (with locally collected seed stock) or relocation to temporarily disturbed areas, and Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. Overall fewer sticky geraea plant individuals would be impacted by the modified project (from 2,412 individuals to 248 individuals). Overall, the modified project would increase impacts to Jacumba milk-vetch from 593 individuals to 987 individuals. Overall, the modified project would reduce the number of special status plant species and individuals affected, compared with the FESSR; see Table 3-6 in the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact to rare plant species, including sticky geraea and Jacumba milk vetch, previously examined in the EIR/EIS.

The modified project would also reduce impacts to coastal and montane scrub habitat. It would increase impacts to Peninsular bighorn sheep occupied habitat analyzed as Class I in the Final EIR/EIS, and this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of an impact previously examined in the EIR/EIS. Overall, the modified project would reduce permanent impacts to Peninsular bighorn sheep habitat from 30.41 acres to 10.36 acres and from 34.64 to 20.24 acres for temporary impacts.

The CPUC and BLM have independently reviewed the information and analysis for the impact assessment of rare plant species, vegetation and species, as well as dry washes, ephemeral streams, and wetlands; this impact analysis demonstrates an increase in impacts to sensitive vegetation communities, however this impact would be mitigated and would therefore not result in a substantial increase in the severity of a previously identified significant impact. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed PMR14 modification would not substantially change overall impacts on Visual Resources. Although the modification would cause a slight increase in visible ground disturbance (adverse change), the shift of some structures to locations slightly lower on some slopes would result in a slight reduction in structure skylining (beneficial change). The net visual effect would not warrant a change in the original impact assessments, significance determinations, or VRM Class consistency determinations.

Cultural Resources. PMR14 would increase impacts to cultural resources. There are 12 resources (seven prehistoric, one historical, three sites with both prehistoric and historical components, and one unknown) within the FESSR's Project Impact Area. There are 16 resources (10 prehistoric, one historical, four sites with both prehistoric and historical components, and one unknown) within the modified project's Project Impact Area. However, all sites within PMR14 will be avoided, with the exception of six prehistoric sites. Of these six sites, five are within the Project Impact Area of both the FESSR and the modified project and one site is within the modified project only. This site is similar in site type (artifact scatter) and sensitivity to the prehistoric sites within the FESSR.

SDG&E has stated that three of the six resources impacted by PMR 14 would be partially avoided, see the Cultural Resources Attachment to this section. The mapped boundary of resource SDI-19364 would be impacted by the access road from McCain Valley Road to the proposed structure. There are no surface artifacts noted on the site record for this area which can be delimited during preconstruction staking to maintain a minimal path to the construction area. However, a portion of the temporary work area would be removed from the construction drawings such that the area will not be part of the work

area and an exclusion area can be established to protect this portion of the site during construction. The location and elevation of this structure is necessary to safely span McCain Valley Road with the appropriate clearance.

Resource, SDI-19018, would be impacted by a transmission structure that is part of the McCain Valley Reroute. This is an angle structure at the northcentral edge of the mapped site boundary of SDI-19018. There is one milling feature mapped near the permanent work area for this structure and it can be protected in an ESA during construction. The concentration of surface artifacts at this site is more than 90 meters to the south of the proposed structure.

One additional resource would potentially be avoided, SDI-19874. This resource would be impacted by a stringing site which may be relocated as these are temporary work areas and access and use will generally be drive/crush. The area needed for stringing that corresponds to the mapped site boundary can be protected in an ESA and the drive/crush access to the stringing location can be re-routed around the limits of the site area.

While direct impacts could be minimized on either route, even within site boundaries, by avoiding sensitive areas within those sites, destructive testing may be required to design the avoidance measures. In addition, testing may be required to determine site eligibility. Any ground disturbance within a site is destructive. Therefore, even though construction impacts could be avoided in many cases, the planning/site evaluation needed to define the avoidance area, and design avoidance measures, would, itself, do some minor site damage. However, site evaluation is guided by the Historic Properties Treatment Plan, Mitigation Measure C-1c.

Although an additional resource is potentially being impacted at PMR 14, the type of impact to cultural resources within the PMR is much the same as the FESSR, and can be mitigated to a level that is less than significant as stated in the EIR/EIS for the FESSR. In addition, although in the most conservative estimate, PMR14 would impact one more cultural resource than the FESSR, on the whole, the modified project contains fewer impacts to cultural resources than the FESSR.

Other Affected Issue Areas.

Minor increase in noise due to increased ground disturbance in this area. However, the modification would not relocate the transmission line within 1,000 feet of any sensitive receptors and construction would not involve equipment that would substantially increase ambient noise levels at any sensitive receptor (Impact N-1, Class III).

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR14 would not have any new significant effects not discussed in the EIR/EIS or result in a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR14 would have environmental impacts similar in context to those of the FESSR. Although temporary ground disturbance would be greater with PMR14, permanent ground disturbance would be reduced, and the modified project would be neutral compared with the FESSR. As illustrated in Section 1, there would be an overall reduction in effect to biological resources with the modified project.

MODIFICATION SUBUNIT 15: EP170 TO EP141 (JAM PMR 15)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment 4,650 feet to the south to avoid the JAM Investments, Inc., private property and would reduce the length of the ROW by 3,600 feet and by approximately five towers. Construction of the remaining 11 towers would be by helicopter.
- It would eliminate a construction yard on JAM properties, north of EP142-1.

The primary reason for this modification was to comply with Mitigation Measure WR-2a, Develop a reroute for the BCD Alternative Revision to reduce effects on recreation. Additionally, the modified project would avoid live oak woodland.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification results in the reduction of overall acreage affected by the project. It would not result in new significant impacts to biological resources. Table PMR15 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR15

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	5.74	3.57	9.31
	Grasslands and Meadows	2.93	18.28	21.21
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.00	0.25	0.25
	Woodlands and Forests	0.49		0.49
	FESSR Total	9.17	27.09	31.26
Modified Project	Chaparrals	5.25	5.72	10.97

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Suitable Habitat in CNF	0.44	1.09	1.53
	Laguna Mountains Skipper	USFS Suitable Habitat in CNF		0.01	0.01
	San Bernardino Bluegrass	USFS Suitable Habitat in CNF		0.01	0.01
Modified Project	Arroyo Toad	USFS Suitable Habitat in CNF	0.27	0.00	0.27

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total

TABLE PMR15			
FESSR (2008 RCA data)	0.44	1.09	1.53
FESSR (2010 RCA data)	0.44	1.09	1.53
Modified Project (2010 RCA data)	0.27		0.27

PMR 15 would eliminate impacts to grasslands and meadows, and woodlands and forests. It would reduce permanent impacts to sensitive chaparrals and would reduce total ground disturbance.

Temporary impacts to chaparrals would increase by 2.15 acres. Impacts to chaparrals were identified as Class I in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also be required for the PMR to mitigate this impact and would be adequate to ensure that this increase is not substantial. The May 2010 Modified Project, as a whole, would result in a net decrease in permanent and temporary impacts to chaparrals by approximately 211.0 acres compared to the FESSR, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS

It would eliminate impacts to Laguna Mountains Skipper and San Bernardino bluegrass, and would reduce impacts to arroyo toad. Permanent and temporary impacts to riparian conservation area (RCA) on the Cleveland National Forest (CNF) would be reduced. The Final EIR/EIS analyzed impacts of the project on RCAs for each of the alternatives that would cross the CNF and included a detailed discussion of the RCA calculations in Appendix 8Q, Riparian Conservation Area Analysis. Discussion in the Final EIR/EIS included FESSR impacts to RCAs. Since the Final EIR/EIS, in connection with the preparation of the Preliminary Jurisdictional Delineation report and evaluation of potential reroutes on CNF lands, the US Forest Service recommended that the RCA database be updated and used to assess potential impacts of the FESSR and proposed modification. For purposes of analysis in this document, both the 2008 and 2010 data sets are used to compare the PMR with the FESSR; PMR 15 would reduce impacts to RCAs when compared to the FESSR using either dataset. For a further discussion of the different RCA calculations, see Section 1.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for the impact assessment of rare plant species, vegetation and wildlife species, as well as dry washes, ephemeral streams, and wetlands; this information and analysis demonstrates a decrease in impacts to sensitive vegetation communities and special status species. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would reduce the visual impact along this route segment. By diverging from McCain Valley Road sooner, the modification would impact views from the road at the northern extent of this segment somewhat less than the FESSR. Also, by turning the line sooner, the route would be kept further to the south from Cottonwood Campground (though the modification would still be prominently visible from the campground as the route ascends and crosses Tecate Divide). However, the slight visual improvement would not warrant a change in the original impact assessments, significance determinations, or VRM Class consistency determinations.

Cultural Resources. PMR15 will slightly reduce impacts to cultural resources. The FESSR has three resources within the Project Impact Area. The modified project has two resources within the Project Impact Area. Neither of the resources within PMR15 would be impacted by the FESSR. For cultural resources, the modified project is preferred.

Land Uses. Mitigation Measure WR-2a required that SDG&E relocate the overhead 500 kV transmission line along the southern boundary of JAM properties to shorten the route and minimize effects on BLM land, Forest land, and private property. The mitigation measure also required that the reroute and its

ground-disturbing components avoid Back Country Non-Motorized land use zones of the Cleveland National Forest, while minimizing towers and disturbance on private property.

PMR15 would shift the alignment south of the FESSR and would locate one transmission structure on Forest land in a Back County Non-Motorized (BCNM) land use zone. As described in the Final EIR/EIS Chapter D.17, utility corridors are not suitable uses in this designation and would require a Land Management Plan amendment. This Land Management Plan amendment has been implemented with the USFS approval of the project. The Forest Service provided public notice of the need for this amendment on May 15, 2010.[7]

The CPUC and BLM have reviewed the relocation of the transmission line as described in PMR15 and concluded that the PMR would reduce impacts analyzed in the Final EIR/EIS and would comply with Mitigation Measure WR-2a. This is because, although the modification would not avoid the Back Country Non-Motorized land use zone, the Forest Service issued a Record of Decision on the SDG&E Special Use Authorization for the Sunrise Powerlink Transmission Line Project on July 9, 2010 which included amending the Cleveland National Forest Land Management Plan to permit construction of a transmission line tower in a Back County Non-Motorized land use zone.[8] As stated in the Record of Decision, the location of the transmission tower was necessary to avoid impacts to private lands and sensitive resource areas. No roads are authorized in this area and access to the support tower will be by helicopter and foot travel. Given the Forest Service's land use amendment, the provision of the measure to avoid BCNM land use is no longer necessary.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR15 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR15 would have environmental impacts similar in context to those of the FESSR. PMR 15 would be preferred to the FESSR due to the reductions in acreage of effect and the reduction to land use impacts. However, one structure would be located in the Back County Non-Motorized land use zone within CNF and this issue would require a Land Management Plan amendment which would be implemented by the USFS and was included as part of the Record of Decision issued by the Forest Service on the Sunrise Powerlink Project on July 9, 2010.

MODIFICATION SUBUNIT 16: EP141 TO EP122 (THING VALLEY PMR16)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment up to 750 feet to the west and would add two structures, spur roads, and larger temporary work areas to avoid steep hillside.
- It would add a 21.64 -acre yard north of Interstate 8 near EP130, instead of a yard north of EP 141 and south of Interstate 8 along La Posta Truck Trail per the FESSR. See Section 1 for a detailed discussion regarding construction yards.

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[7] See Forest Service to Complete Additional Work on Sunrise Powerlink Proposal at <http://www.fs.fed.us/r5/cleveland/news/2010/05/05-15-2010-fs-complete-add-work-sunrise-powerlink.shtml>

[8] See Forest Service Record of Decision at: <http://www.fs.fed.us/r5/cleveland/projects/sunrise-powerlink/fs-rod-july-09-2010.pdf>

The primary purpose for the modified project is to avoid a steep hillside. It would also accommodate US Forest Service requests, primarily to avoid skylining.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- The Forest Service commented that when the CNF was given access to the grading plans for the Pull Sites near EP 125, EP 130, and EP 141 A and B, these were shown with major cuts and fills. Large work areas are indicated in the Map Book for Towers 141-MS 63, 131-MS 66, 130-MS 66, 127-MS 67, 114-MS70, 39-MS 91, 36-MS 92, 1-MS 107, and CP 99 and 100 on MS-109. These are former pad areas that were eliminated during the Forest Service coordination in November and December of 2009 and are not shown on the grading plans the Forest Service has seen. They still appear as work areas that will result in temporary disturbance.
- PMR 16 states that impacts to sensitive receptors at Thing Valley will be addressed in PMR 17, this is not the case.
- The newly proposed Thing Valley Construction Yard (21.64 acres) is located in an undisturbed area of the Cleveland National Forest off of La Posta Truck Trail that serves adjacent properties and ranches. In the event of a fire, the local residents could end up competing with construction equipment to evacuate. CAL Fire representatives have informed us that this area will be difficult to defend due to their policies to avoid high-power lines, no retardant drops within 1,000 feet of powerlines energized or de-energized, no firefighting under lines, and most likely, no vehicle traffic on roads that pass under these lines.
- A private ranch (APN 52817001) has another scarce surface water source / lake that is accessed by fire fighters and helicopter. Due its proximity to the Sunrise Powerlink, will this source no longer be available? These private properties may no longer be deemed as defensible space due to the proximity of Sunrise to their homes and La Posta Truck Trail

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impacts previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR16 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR16

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Sticky geraea	0	26	26

TABLE PMR16

Modified Project	None	0	0	0

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	8.67	14.80	23.47
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.29	0.29
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.11	3.62	3.72
	Woodlands and Forests	0.03	0.57	0.60
	FESSR Total	**8.82**	**19.27**	**28.09**
Modified Project	Chaparrals	8.28	29.55	37.83
	Herbaceous Wetlands, Freshwater, and Streams	0.06	0.00	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	9.81	0.13	9.94
	Riparian Forests and Woodlands	0.03		0.03
	Woodlands and Forests	0.44	1.09	1.53
	Mod Proj Total	**18.61**	**30.78**	**49.39**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Suitable Habitat in CNF	0.72		0.72
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.13		0.13
Modified Project	Arroyo Toad	USFS Occupied Habitat in CNF	0.23		0.23
		USFS Suitable Habitat in CNF	2.55	0.01	2.56
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	3.05	0.01	3.05

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.77		0.77
FESSR (2010 RCA data)	1.29		1.29
Modified Project (2010 RCA data)	9.06	0.17	9.23

This modification would result in an approximately 14.8-acre increase in temporary impacts to chaparrals compared to the FESSR due to the inclusion of the new 21.64-acre Thing Valley construction yard, which replaces construction yards eliminated from PMR15 and PMR17. PMR17 would result in a corresponding decrease in temporary impacts to chaparrals by approximately 22.0 acres by eliminating the construction yard from the FESSR.

While this modification would increase temporary impacts to chaparrals in this location, impacts to chaparrals were assessed in the Final EIR/EIS as Class I and the impacts overall to chaparrals would decrease, so it would not present new significant impacts to these communities. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also be required for the PMR to mitigate this impact and would be adequate to ensure that this increase is not substantial. As a whole, the modified project would result in a net decrease in permanent impacts to chaparrals from 294.36 to 181.19 and a decrease in temporary impacts to chaparrals from 312.44 acres to 223.96 acres. For these reasons, thus modification would not result in a substantial increase in the severity of a significant impact to chaparrals.

PMR16 would increase permanent impacts to waters of the U.S. from 0.00 acres to 0.05 acres and decrease temporary impacts to waters of the U.S. from 0.08 acres to 0.00 acres. PMR14 would increase permanent impacts to waters of the State from 0.00 acres to 0.07 acres and decrease temporary impacts to waters of the State from 0.29 acres to 0.00 acres. This would correspond with an increase in permanent impacts to herbaceous wetlands, freshwater, and streams would increase from 0.00 to 0.06 acres and decrease in temporary impacts from 0.29 to 0.00 acres. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II (i.e., would be less than significant with mitigation) consistent with the Final EIR/EIS. The May 2010 Modified Project, as a whole, would result in a net decrease in permanent and temporary impacts to herbaceous wetlands, freshwater, and streams from 3.17 acres to 1.10 acres and from 10.73 acres to 2.37 acres, respectively, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

This modification would also result in increased impacts to arroyo toad USFS Suitable Habitat in the CNF (i.e., an increase of 1.83 acres of permanent impacts and 0.01 acre of temporary impacts) and would result in increased impacts to 0.23 acre of arroyo toad USFS Occupied Habitat in CNF compared to the FESSR. Overall, the modified project would reduce impacts to arroyo toad habitat for suitable habitat for both temporary and permanent impacts, as defined in Section 1. Similarly, this modification would result in increased impacts to southwestern willow flycatcher USFS Suitable Habitat in CNF (i.e., an increase of 2.92 acres of permanent impacts and 0.01 acre of temporary impacts) compared to the FESSR. Compared with the FESSR 2010 RCA data, this modification would increase permanent and temporary impacts to RCAs (7.77 acres and 0.17 acre, respectively); compared with the FESSR 2008 RCA data, permanent impacts would increase by 8.29 acres but there would be no increase in temporary impacts. Impacts of the modification using 2008 data were not compiled. The increases in impacts to RCAs (and, therefore, toad and flycatcher habitat since these three habitats overlap) are the result of modifications to improve engineering and avoid a steep hillside and to respond to USFS requests to avoid skylining. Significant impacts to arroyo toad habitat, to suitable southwestern willow flycatcher habitat, and to RCAs in this location were assessed in the Final EIR/EIS as Class I for RCAs and Class II for the toad and flycatcher (Class II is significant but mitigable to less than significant levels), and therefore would not represent new significant impacts. For purposes of analysis in this document, both the 2008 and 2010 data sets are used to compare the PMR16 with the FESSR; PMR 16 would increase impacts to RCAs when compared to the FESSR using either dataset. Overall, permanent impacts to RCAs increased by 1.01 acres and temporary impacts to RCAs decreased by 47.38 acres. Mitigation for temporary and permanent impacts to RCAs was incorporated into the Final EIR/EIS and would be required for the modified project as well, and would be adequate to ensure that a substantial increase in the severity of impacts to RCAs does not occur.

As required by Mitigation Measure B-7e, Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/minimization/compensation strategies, A USFWS protocol survey for the southwestern willow flycatcher was conducted in potential habitat for this species in 2009 in the area of this modification (i.e., along Antone Creek; a tributary to La Posta Creek), and the species was not found (RECON 2009a). Additionally, an arroyo toad habitat assessment (using USFWS criteria for suitable habitat; USFWS 2005) was conducted in this same area in 2009, and the habitat was found to be inappropriate for the arroyo toad, so a protocol survey was not warranted or conducted (RECON 2009b). The May 2010 Modified Project, as a whole, would result in a net decrease in impacts to each of these resources as compared to the FESSR using either the 2008 database or the

2010 database, as shown in Table 3-7 of the PMR. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed modification would not substantially change overall impacts on Visual Resources though the increase in ground disturbance associated with the modification would result in increased long-term visible land scarring (adverse visual change) and an increase in visual impacts at this location.

The Forest Service has stated that initial plans for some of the pull sites and work areas along this alignment appear to require larger amounts of grading than needed for the construction of the modified project. However, under Mitigation Measure V-2f, the amount of grading and ground disturbance will be limited to the minimum amount necessary. As stated in the Final EIR/EIS, SDG&E is required to comply with Mitigation Measure V-2f, Reduce land scarring and vegetation clearance impacts on USFS-administered lands along this alignment. Mitigation Measure V-2 states that Vegetation within the right of way and ground clearing at the foot of each tower and between towers will be limited to the clearing necessary to comply with electrical safety and fire clearance requirements. Mitigation will be incorporated to reduce the total visual impact of all vegetation clearing performed for the power line **(**USFS Scenery Conservation Plan). In addition, SDG&E has stated in their response to the Forest Service (dated July 2, 2010), that minimizing the disturbed areas is advantageous to the contractor as well and provided updated data that indicated reductions in disturbance along stringing sites at structures EP108, EP113-114, EP125, EP130, EP141, EP36-1 and EP9-1 shown in the PMR.

The modified construction yard location would result in an increase in the impacts on Visual Resources along this route segment by introducing a large construction yard with complex industrial character into a landscape presently lacking such character. However, this location is preferred over one of the more prominent construction yards it replaces located along La Posta Truck Trail, south of Interstate 8 for the FESSR because of its distance from Interstate 8. Construction yards, including the yard south of La Posta Truck Trail proposed for the FESSR, were assessed in the Final EIR/EIS as significant but mitigable to less than significant through mitigation that would reduce visibility of the construction activities and equipment and reduce construction night lighting impacts and given the short-term (8 months) nature of the impact (see Section E.2.3 of the Final EIR/EIS). The mitigation for the construction yard ensures that it would not result in a substantial increase in severity of the impact, and the inclusion of this construction yard instead of the construction yard in PMR 17 contributes to an overall reduction in impacts to visual resources. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. Modification 16 would not increase impacts to cultural resources. The FESSR has two resources (historical road segment and prehistoric artifact scatter) within the Project Impact Area. The modified project has three resources (historical road segment, prehistoric bedrock milling site, and prehistoric ceramic scatter) within the Project Impact Area. While the modified project has more resources within the Project Impact Area, SDG&E has made recent design revisions for other project issue areas which avoid all cultural resources. Therefore, PMR16 does not affect or change impacts to cultural resources.

Land Use. The FESSR and Thing Valley PMR16 would be located entirely on USFS land. See PMR 17 for a discussion regarding the residential receptors near EP 122.

Other Affected Issue Areas.

Increased impacts to noise. The FESSR analyses construction noise, including from the construction yards and concludes that it would be significant and unmitigable. Although the duration and extent of the noise at the construction yard would increase, it would replace two other construction yards and

would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Fire risk. As a commenter pointed out, the route in this area would be approximately 2,800 feet west of a lake on the Starkey Ranch, which could be used as a water source to fight fires. Water features that were within ¼ mile (1,320 feet) of the transmission line were considered in the Wildfire Containment Conflict model. (See Final EIR/EIS Section D.15 for further discussion of the Wildfire Containment Conflict model.) This lake is more than 1,320 feet away from the line so there would be no conflict to firefighting because it is beyond the conflict parameters and the modified project would not have an effect on the water source. Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR16 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR16 would have environmental impacts similar in context to those of the FESSR. Although ground disturbance would be greater with PMR16 there would be a corresponding decrease elsewhere due to construction yards eliminated from PMR15 and PMR17, the modified project would reduce construction yards elsewhere in would be neutral compared with the FESSR.

MODIFICATION SUBUNIT 17: EP122 TO EP108-2 (LA POSTA PMR17)

Brief Description and Purpose

The modification would have two components:

- It would shift the alignment approximately 300 feet to the east until the I-8 crossing and then the modification would shift the alignment up to 1,400 feet northwesterly to reduce visual impacts, avoid impacts to the USFS RCA.
- It would eliminate one construction yard.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- PMR 17, EP 121A-1, will prohibit firefighting and aerial fire support in this area and will endanger residents of Sandy Creek Lane. Line was moved adjacent to the Berglund property and crosses the La Posta Truck Trail. The line so close and crossing the La Posta Truck Trail will eliminate any possibility of fire protection for their properties and their neighbors. This is an extreme fire danger area.

- Over a year ago the La Posta neighborhood met with SDG&E/Sempra and proposed a realignment that would enable firefighting around properties and along La Posta Truck Trail. The community has never heard back. SDG&E/Sempra stated informally that have to stay outside of FS non-motorized lands and off of mountain ridgelines. In case of Berglund property, SDG&E could simply move 500-700 yards west and restore minimum fire protection.

Biological Resources. This modification would not result in a substantial increase in the severity of a significant impact to biological resources. Table PMR17 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR17

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	14.74	25.60	40.34
	Coastal and Montane Scrub Habitats	2.62	17.93	20.55
	Grasslands and Meadows	3.44	10.33	13.76
	Herbaceous Wetlands, Freshwater, and Streams	0.06	0.01	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.26	0.47	0.73
	Woodlands and Forests	0.08		0.08
	FESSR Total	**21.19**	**54.33**	**75.52**
Modified Project	Chaparrals	4.66	2.96	7.62
	Coastal and Montane Scrub Habitats	1.18	0.85	2.03
	Grasslands and Meadows	0.25	1.24	1.49
	Herbaceous Wetlands, Freshwater, and Streams	0.00		0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.46	0.01	0.48
	Woodlands and Forests	0.05	0.00	0.05
	Mod Proj Total	**6.60**	**5.07**	**11.67**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Occupied Habitat in CNF	1.99	5.37	7.37
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	4.51	14.19	18.70
Modified Project	Arroyo Toad	USFS Occupied Habitat in CNF	0.44		0.44
		USFWS Proposed Critical Habitat	0.16		0.16
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.58	0.73	1.31

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	5.36	15.23	20.59
FESSR (2010 RCA data)	7.18	15.90	23.08
Modified Project (2010 RCA data)	2.02	1.00	3.03

This modification would reduce permanent and temporary impacts to chaparrals, coastal and mountain scrub habitats, and herbaceous wetlands, freshwater and streams. Permanent impacts to woodland forests would be reduced. Impacts to special status species, arroyo toad habitat, and RCAs would be reduced. PMR17 would reduce permanent impacts to waters of the U.S. from 0.04 acres to 0.01 acres and temporary impacts to waters of the U.S. from 0.01 acres to 0.00 acres. PMR17 would reduce permanent impacts to waters of the State from 0.06 acres to 0.02 acres and temporary impacts to

waters of the State from 0.01 acres to 0.00 acres. A discussion regarding arroyo toad habitat can be found in Section 1. The CPUC and BLM have independently reviewed the impact assessment of rare plant species, vegetation and species, as well as dry washes, ephemeral streams, and wetlands. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would reduce visual impacts along this route segment. The alignment modification would reduce structure prominence, view blockage and skylining. However, these visual benefits would still not warrant a change in the original impact assessments or significance determinations.

Cultural Resources. PMR17 would reduce impacts to cultural resources. However, as noted by commenters, this modification would not alter the indirect visual impacts to the historic La Posta Ranch. Mitigation measures approved in the Final EIR/FEIS would reduce indirect visual impacts to this property.

The FESSR has six resources within the Project Impact Area. The modified project has four resources within the Project Impact Area. Two of these resources would also be impacted by the FESSR, two would be new. The modified project will avoid a prehistoric rock feature and a prehistoric habitation site. Therefore, for cultural resources, PMR17 is preferred.

SDG&E has stated that all impacts to cultural resources within the Forest Service would be avoided by the establishment of an Environmentally Sensitive Area (exclusion zone). Although sites may appear to be within an area of direct impact, there is enough flexibility to protect these sites during construction, avoiding all direct impact. The Final EIR/EIS did not have the benefit of a commitment to avoiding sites during construction nor was there sufficiently detailed engineering for the EIR/EIS to know that a particular site could be avoided, even though it coincided with an area of potential direct impact. Therefore, the EIR/EIS used the worst case scenarios. In this analysis, the EIR/EIS Team has completed as comparable an analysis as possible. If a site is coterminous with an impact area, it counted as a potential impact, for both the FESSR analysis and the PMR analysis. If a site was in the ROW, but not in an impact area, it was not counted as a potential impact. Based on this data, the modified project has four resources within the Project Impact Area as stated above and is preferred to the FESSR.

Land Use. As with the FESSR, project structures would be located within 1,000 feet of 6 sensitive receptors. Project structures would be moved approximately 300 feet closer to the Berglund properties from approximately 900 feet to approximately 600 feet. While this modification would move the project closer to the Berglund properties, it would not change the original impact assessment or significance determination. For any construction within 1,000 feet regardless of the distance to the sensitive receptor, the Final EIR/EIS concluded that impacts would be significant but mitigable to less than significant through mitigation that would prepare a Construction Notification Plan, in addition to mitigation provided to reduce noise impacts and impacts from traffic.

Dennis and Connie Berglund commented on the PMR and were concerned that the proposed alignment would prohibit firefighting along this alignment and endanger residents along La Posta Road. The comment letter stated that they had spoken with SDG&E and proposed a modification that would have placed the alignment over 1,000 feet from their property.

SDG&E has stated that a modification to the project alignment was proposed for routing the alignment further to the west on Forest Service property. The location in question would be on the west side of the foothills where the alignment is currently proposed to be located on the east side. This proposal was presented to the Forest Service; however, it created several concerns related to land use zones and impacts to the U.S. Border Patrol facility on the south side of I-8. In addition, there were visual concerns raised by the Forest Service visual representative and the CPUC/BLM visual representative. The

alignment represented in the PMR describes the alignment that was identified after extensive coordination efforts between all parties involved. Fire risk is discussed below.

Fire Risk. The modified project would not change the conclusion or the severity of impacts regarding a reduction of the effectiveness of firefighting. This is because, while the modified project would move the route 300 feet east, to approximately 600 feet of the nearest residence (see APM 60505014), the FESSR was already within 1,000 feet of this residence. The Final EIR/EIS concluded that no significant conflict areas were identified along this alignment because it was already largely indefensible. This is because as shown in Section E.2.15 of the Final EIR/EIS, the Wildfire Containment Conflict Model indicated that for the length of this alignment through the La Posta Fireshed, 21% would present a high conflict, 72% a moderate conflict, and 7% a low conflict (see Figure E.2.15-10). No significant conflict areas along this alignment were identified by the model, due to the alternative route being located in a largely indefensible landscape with steep topography, abundant fuels, and a low population density at the WUI requiring fire protection. Therefore, while the modified route would move the project closer to the nearest property, the location would remain indefensible, as with the FESSR.

Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results along this alignment. The residential property in question lies within the burn perimeter of the Fire Behavior Trend Model for the modified route (see Figure 2 of Section 1 of this memorandum), which is used as the basis of the Defensible Space Grants Fund (Mitigation Measure F-1e). Defensible space and home fire-proofing are the best means of protecting structures during a wildfire in indefensible landscapes. Grants for the creation and maintenance of defensible space and fire-safe structural modifications will be allocated to residents by SDG&E in cooperation with local and regional fire agencies. The commenter would be potentially eligible to receive grants from this fund. Information regarding grant distribution will be available prior to the start of project construction. In addition, the Forest Service included a clarification to Mitigation Measure F-1e in the Record of Decision Forest Service Clarifications and Revisions to Mitigation Measures as follows. “In addition to the requirements imposed by F-1e, SDG&E will be responsible to fund planning, design, construction, and maintenance of fuels treatments on National Forest System lands adjacent to structures or communities at risk when those treatments will contribute to effective defensible space around those structures or communities, as directed by the Forest Service. The initial treatment area is estimated at 1000 acres for a cost of $1,500/acre. Funding for these treatments will be independent of the mitigation fund created by the CPUC.”

Transportation and Traffic. The modified project would not substantially change traffic safety in this area. However, the Forest Service requested a clarification regarding the speed identified in Attachment C Tables 1a and 1b of the PMR. La Posta Road North of Interstate 8 is listed with a speed of 45 mph. The Forest Service has stated that the speed of the native surfaced portion of this road is at most in the 20 to 25 mph range. SDG&E has responded that it and its contractors would be required to abide by the speed limit of 15 mph on all native surface, including La Posta Road.

Ground Disturbance/Other Affected Issue Areas. PMR17 would reduce temporary and permanent ground disturbance, resulting in the following beneficial environmental changes:

- Reduced impacts associated with soil erosion and slope instability related to grading of access roads in steep terrain.
- Reduced potential to disturb unknown cultural resources with less ground disturbance.
- Decreased ground disturbance reduces impacts to vegetation and wildlife and less removal of vegetation could decrease the chance of noxious weed introduction as well as the removal of less native desert vegetation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR17 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR17 would have environmental impacts similar in context to those of the FESSR. PMR 17 would be preferred to the FESSR due to the reductions in acreage of effect, the reduction to visual impacts, and the reduction to cultural impacts.

MODIFICATION SUBUNIT 18: EP108-2 TO EP99-2 (LENAC PMR18)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment as much as 650 feet to the east at the request of a landowner (Lenac) and would reduce structure height, as requested by the Department of Defense (DOD).
- It would eliminate two construction yards on US Forest Service and Tulloch properties and would eliminate an access road.

The primary purpose of this modification is to accommodate a landowner, in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts, and accommodate a DOD request.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would reduce impacts to sensitive vegetation communities, but would increase effects on Quino checkerspot butterfly habitat, as defined below. Table PMR18 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR18

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	9.56	17.09	26.65
	Coastal and Montane Scrub Habitats	0.17		0.17
	Grasslands and Meadows	1.03	32.12	33.14
	Herbaceous Wetlands, Freshwater, and Streams		0.04	0.04
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.57		1.57
	Woodlands and Forests		9.21	9.21
	FESSR Total	**12.32**	**58.46**	**70.78**

TABLE PMR18

Modified Projecct	Chaparrals	5.07	10.36	15.42
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.13	0.07	0.20
	Mod Proj Total	**5.19**	**10.43**	**15.62**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Occupied Habitat in CNF	0.08	13.07	13.15
	Quino Checkerspot Butterfly	USFWS Critical Habitat	0.51	1.00	1.51
Modified Project	Quino Checkerspot Butterfly	USFWS Critical Habitat	1.91	1.56	3.47

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.08	13.52	13.60
FESSR (2010 RCA data)	0.14	14.82	14.97
Modified Project (2010 RCA data)		0.12	0.12

The modified project would reduce impacts to sensitive vegetation communities. For purposes of analysis in this document, both the 2008 and 2010 RCA data sets are used to compare the PMR18 with the FESSR; PMR 18 would reduce impacts to RCAs when compared to the FESSR using either dataset. PMR18 would reduce temporary impacts to waters of the U.S. from 22.81 acres to 0.00 acres. PMR18 would reduce temporary impacts to waters of the State from 22.84 acres to 0.00 acres. There would be no permanent impacts to jurisdictional waters with either the FESSR or PMR18.

PMR18 would increase permanent and temporary impacts to Quino checkerspot butterfly critical habitat. Impacts to Quino checkerspot butterfly were analyzed in the Final EIR/EIS for the FESSR and determined to be significant (Class I). Mitigation was required, including quino checkerspot butterfly surveys and implement appropriate avoidance/minimization/compensation strategies. Overall, the modified project would reduce permanent and temporary impacts to Quino checkerspot butterfly critical habitat from 11.46 to 4.45 and from 16.93 to 1.59, respectively. Therefore, impacts to Quino checkerspot butterfly would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed PMR18 modification would not substantially change visual impacts along this route segment. The alignment modification would move several structures further to the east, away from residences and Cameron Truck Trail (beneficial visual change). However, several of the structures would still partially skyline (extend above the horizon) in spite of the reduced structure heights requested by the Department of Defense. Therefore, even with the slight reduction in structure skylining, the visual impact would not be substantially changed and would not warrant a change in the original impact assessments or significance determinations.

Cultural Resources. PMR18 does not affect or change impacts to cultural resources, as neither the FESSR nor the modified project would affect the one cultural resource site within the alignment.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR18 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact

previously examined in the EIR/EIS. PMR18 would have environmental impacts similar in context to those of the FESSR. Although PMR18 would be slightly closer to the LaPosta Mountain Warfare Training Facility, structure height was reduced to avoid impacts to helicopter operations of the DOD. PMR18 would be preferred to the FESSR due to the reductions in acreage of effect on biological resources, reduced visual impacts, and reduced land use impacts.

MODIFICATION SUBUNIT 19: EP105-2 (REES PMR19)

Brief Description and Purpose

To accommodate the request of a landowner (Rees), in compliance with Mitigation Measure L-2b, modification PMR19 would revise project elements to minimize land use conflicts, and relocate the access road to EP105-2 west of the structure to spur off of Cameron Truck Trail.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR19 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR19

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	0.44		0.44
Modified Project	Chaparrals	2.26	0.07	2.33
	Herbaceous Wetlands, Freshwater, and Streams	0.02		0.02
	Mod Proj Total	**2.28**	**0.07**	**2.36**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	None				
Modified Project	Arroyo Toad	USFWS Proposed Critical Habitat	0.23		0.23

This modification would increase permanent impacts by 1.82 acres and temporary impacts to chaparral would increase by 0.07 acres, and permanent impacts to herbaceous wetlands, freshwater, and streams

would increase by 0.02 acres. Impacts to chaparrals were identified as Class I in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also be required for the PMR to mitigate this impact and would be adequate to ensure that this increase is not substantial. The May 2010 Modified Project, as a whole, would result in a net decrease in permanent and temporary impacts to chaparrals by approximately 211.0 acres compared to the FESSR, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS

For herbaceous wetlands, freshwater, and streams, the May 2010 Modified Project, as a whole, would result in a net decrease in permanent impacts to herbaceous wetlands, freshwater, and streams from 3.17 acres to 1.10 acres, as shown in Table 3-3 of the PMR. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

PMR19 would increase permanent impacts to waters of the U.S. from 0.00 acres to 0.02 acres. PMR19 would increase permanent impacts to waters of the State from 0.00 acres to 0.02 acres. Temporary impacts would not occur with either the FESSR or PMR19. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project. Temporary impacts to waters of the U.S. were reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts were reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project.

PMR19 would increase permanent and temporary impacts to USFWS proposed critical habitat for arroyo toad by 0.23 acres for the modified project compared with no impacts to arroyo toad along this portion of the route for the FESSR. The USFWS[9] stated that proposed critical habitat is not considered in the Section 7 consultation and would not be pertinent to analyze in the EIR/EIS. Therefore, analysis in the EIR/EIS considered impacts to designated critical habitat in place at the time the FEIR/FEIS was published. No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was finalized, however, impacts to the arroyo toad were analyzed using suitable habitat and were fully evaluated regardless of habitat designation. Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the FEIR/FEIS. Mitigation Measure B-7j, Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies, identified in the Final EIR/EIS would also be required for the PMR, and is adequate to ensure that impacts to arroyo toad as a result of this modification would be less than significant. Project impacts to arroyo toad proposed critical habitat would not result in any new significant impacts. Additional mitigation is not expected to be necessary to comply with the USFWS' Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological Opinion is.

The CPUC and BLM have independently reviewed information and analysis provided by SDG&E for the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands for this modification to the FESSR. This modification would result in a minor increase in impacts to

[9] Personal communication between Chris Otahal and the EIR/EIS Team on June 27, 2007.

biological resources. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR19 does not affect or change impacts to cultural resources, neither the modification nor the FESSR would impact cultural resources.

Land Use. The modification was designed to accommodate a landowner request per Mitigation Measures L-2b, Revise project elements to minimize land use conflicts. As such, it would reduce impacts to land use.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR19 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR19 would have environmental impacts similar in context to those of the FESSR. Although PMR19 would slightly increase temporary ground disturbance at the new access road, it is slightly preferred over the FESSR because it would decrease permanent ground disturbance and accommodate a landowner request.

MODIFICATION SUBUNIT 20: EP99-2 TO EP79 (BARTLETT PMR20)

Brief Description and Purpose

This modification has two components:

- It would shift the alignment approximately 50 feet to the east and would add temporary construction pads to some of the structures to improve engineering design and facilitate construction.
- It would reduce the 37.23-acre yard south of Big Potrero Truck Trail and P83 and P84 to 28.57 acres, in the same location described for the FESSR.

The primary purpose for this modification is to improve engineering design and constructability.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR20 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR20

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Sticky geraea	105	31	136
Modified Project	Sticky geraea	4	31	35

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	15.09	19.77	34.86
	Coastal and Montane Scrub Habitats	0.74	7.81	8.55
	Grasslands and Meadows	1.10	16.00	17.10
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.01	0.02
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.08	42.69	42.77
	Riparian Forests and Woodlands		0.11	0.11
	Woodlands and Forests		0.37	0.37
	FESSR Total	**17.02**	**86.75**	**103.77**
Modified Project	Chaparrals	12.00	11.99	23.98
	Coastal and Montane Scrub Habitats	0.74	8.30	9.03
	Grasslands and Meadows	1.09	2.62	3.71
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.01	0.02
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.53	29.02	29.55
	Woodlands and Forests		0.14	0.14
	Mod Proj Total	**14.37**	**52.07**	**66.43**

The modified project would reduce impacts to rare plant individuals, chaparrals, and grasslands and meadows and woodlands and forests. Impacts of this modification to herbaceous wetlands, freshwater, and streams would remain the same as the FESSR along this alignment. Temporary impacts to coastal and montane scrub habitats would increase along this alignment but, overall, the modified project would reduce impacts to coastal and montane scrub from 114.56 acres to 66.94 acres. The Final EIR/EIS analyzes impacts to sensitive vegetation including coastal and montane scrub and concludes this impact would be significant (Class I) and incorporates mitigation to reduce this impact. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

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PMR20 would increase temporary impacts to waters of the U.S. from 0.00 acres to 0.01 acres. PMR20 would increase permanent impacts to waters of the State from 0.01 acres to 0.02 acres and increase temporary impacts to waters of the State from 0.00 acres to 0.01 acres. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project. Temporary impacts to waters of the U.S. were reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts were reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project. See

Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR20 does not affect or change impacts to cultural resources. There are no known cultural resources in PMR20 or the FESSR ROW.

Other Affected Issue Areas. Because of the increased helicopter use, residents would be exposed to increased helicopter noise. However, the Final EIR/EIS evaluated noise impacts from helicopter construction and mitigation was included adopted to reduce this impact, as discussed further in Section 1.4 of Section 1. The overall impact assessment and significance conclusions would not change for this location (Class I). Neither the FESSR nor the modified project would be located within 1,000 feet of residents along this alignment. Use of helicopter construction would reduce the time required for construction of this alignment and would reduce truck traffic on the roadways in the immediate area of the line.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR20 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR20 would have environmental impacts similar in context to those of the FESSR. PMR20 would be slightly environmentally preferred to the FESSR due to the reductions in acreage of effect.

MODIFICATION SUBUNIT 21: EP79 TO EP67 (PACIFIC CREST TRAIL PMR21)

Brief Description and Purpose

The modified project would follow the northern alignment approved as part of the FESSR that results in three crossings of the Pacific Crest Trail as described and analyzed in the Final EIR/EIS. The modification would move the ROW approximately 50 feet south to be off of CNF. The Pacific Crest Trail PMR21 reroute would follow the route identified for the FESSR and analyzed in the Final EIR/EIS as PCT Option A. Based on consultation with the BLM and USFS, this route is viewed as the least impactful alignment to the Pacific Crest Trail.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not substantially increase significant impacts to biological resources. Table PMR21 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR21

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	None			
Modified Project	Sticky geraea	3		3

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	5.75	11.34	17.09
	Coastal and Montane Scrub Habitats	0.21	0.35	0.56
	Herbaceous Wetlands, Freshwater, and Streams	0.02	0.03	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.49	0.76	1.25
	Riparian Forests and Woodlands	0.16	0.33	0.49
	Woodlands and Forests	0.28	0.15	0.43
	FESSR Total	**6.92**	**12.95**	**19.87**
Modified Project	Chaparralsfs	3.07	1.59	4.66
	Coastal and Montane Scrub Habitats	0.12	1.41	1.53
	Herbaceous Wetlands, Freshwater, and Streams		0.02	0.02
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.44	0.08	0.52
	Riparian Forests and Woodlands	0.03	0.01	0.04
	Woodlands and Forests		0.02	0.02
	Mod Proj Total	**3.66**	**3.13**	**6.79**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Least Bell's Vireo	USFS Occupied Habitat in CNF	0.24		0.24
		USFS Suitable Habitat in CNF	0.19		0.19
		USFWS Occupied Habitat	0.21		0.21
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.33	3.87	5.19
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.43		0.43
Modified Project	Arroyo Toad	USFWS Proposed Critical Habitat	0.15		0.15
	Least Bell's Vireo	USFWS Occupied Habitat		0.01	0.01
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	0.83	1.56	2.38

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.60		0.60
FESSR (2010 RCA data)	0.73	0.52	1.25
Modified Project (2010 RCA data)	0	0	0

This modification would increase impacts to sticky geraea individuals, and decrease total impacts to sensitive vegetation communities, and special status wildlife species. The modified project would impact 0.15 acres of arroyo toad habitat; permanent impacts to Least Bell's vireo would decrease and

temporary impacts to Least Bell's vireo would increase to 0.01 acres. Both temporary and permanent impacts to Quino checkerspot butterfly occupied habitat would decrease.

No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was finalized but impacts to the arroyo toad were analyzed using suitable habitat. As stated in the Final EIR/EIS, the arroyo toad was assumed to be present at this location because surveys could not be conducted in 2007 because of a lack of surface water. All habitat within 1 km of this site is assumed to be occupied by the species, in accordance with USFWS. Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the FEIR/FEIS. Project impacts to arroyo toad habitat regardless of its designation were fully evaluated in the EIR/EIS and this would not result in any new significant impacts. Additional mitigation is not expected to be necessary to comply with the USFWS' Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological Opinion.

This modification would result in an increase in temporary impacts to Coastal and Montane Scrub Habitats along this alignment but overall, the modified project would reduce impacts to coastal and montane scrub from 114.56 acres to 66.94 acres. For purposes of analysis in this document, both the 2008 and 2010 RCA data sets are used to compare the PMR21 with the FESSR; PMR 21 would reduce impacts to RCAs when compared to the FESSR using either dataset. PMR21 would reduce permanent impacts to waters of the U.S. from 0.19 acres to 0.00 acres and temporary impacts to waters of the U.S. from 0.08 acres to 0.02 acres. PMR21 would reduce permanent impacts to waters of the State from 0.20 acres to 0.00 acres and temporary impacts to waters of the State from 0.09 acres to 0.02 acres.

This modification would impact 3 individuals of sticky geraea (*Geraea viscida*), the FESSR would not impact any sticky geraea along this alignment; however, overall permanent impacts to sticky geraea would decrease from 254 individuals with the FESSR to 88 individuals with the modified project. Impacts to special status plant species were assessed in the Final EIR/EIS (as Class I). For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not increase the visual impact on the Pacific Crest Trail along this route segment. The alignment modification would move the route approximately 50 feet south and would follow the same general route as the FESSR. The visual impact would not be substantially different from that previously analyzed and would not warrant a change in the original impact assessments or significance determinations.

Cultural Resources. PMR21 does not affect or change impacts to cultural resources, as both the FESSR and the modified route would impact the same three resources.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR21 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR21 would have environmental impacts similar in context to those of the FESSR. PMR21 would be slightly environmentally preferred to the FESSR due to the reductions in acreage of effect.

MODIFICATION SUBUNIT 22: EP67 TO EP62A-1 (LONG POTRETO PMR22)

Brief Description and Purpose

This minor modification would shift the structures east within the FESSR alignment and would remove some structures and access roads to improve engineering design and constructability.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR22 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR22

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Tecate tarplant		26	26
Modified Project	Tecate tarplant		43	43

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	2.46	6.71	9.17
	Coastal and Montane Scrub Habitats	0.00	0.09	0.09
	Grasslands and Meadows	0.25	0.43	0.68
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.11	0.24	0.35
	Woodlands and Forests	0.32		0.32
	FESSR Total	**3.15**	**7.47**	**10.62**
Modified Project	Chaparrals	1.18	4.46	5.64
	Coastal and Montane Scrub Habitats		0.06	0.06
	Grasslands and Meadows	0.08	0.84	0.92
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.10	0.00	0.10
	Mod Proj Total	**1.36**	**5.36**	**6.72**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Occupied Habitat in CNF		0.66	0.66

TABLE PMR22

	Quino Checkerspot Butterfly	USFWS Occupied Habitat	2.10	7.47	9.58
Modified Project	Arroyo Toad	USFS Occupied Habitat in CNF	0.00		0.00
		USFWS Proposed Critical Habitat	0.63	5.36	5.99
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	0.90	5.36	6.27

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)		0.66	0.66
FESSR (2010 RCA data)		0.66	0.66
Modified Project (2010 RCA data)	0.00		0.00

This modification would reduce permanent impacts to grasslands and meadows and increase temporary impacts to grasslands and meadows. Impacts to grasslands and meadows were analyzed as Class I in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also be required for the PMR to mitigate this impact and would be adequate to ensure that this increase is not substantial. Overall the modified project would reduce temporary impacts to grasslands and meadows from 161.49 acres to 48.41 acres and would not represent a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. For purposes of analysis in this document, both the 2008 and 2010 RCA data sets are used to compare the PMR22 with the FESSR; PMR 22 would reduce impacts to RCAs when compared to the FESSR using either dataset.

The modified project would increase impacts to arroyo toad proposed critical habitat. As discussed above, no designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was finalized, however, impacts to the arroyo toad were analyzed using suitable habitat. As stated in Section E.4-2, suitable habitat is present at MRD-14.4 (Potrero Creek). Arroyo toad is assumed to be present at MRD-14.4 and all habitat within 1 km is assumed to be occupied by the species, in accordance with USFWS (1999). Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the FEIR/FEIS. Mitigation Measure B-7j, Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies, identified in the Final EIR/EIS would also be required for the PMR, and is adequate to ensure that impacts to arroyo toad as a result of this modification would be less than significant. Project impacts to arroyo toad proposed critical habitat would not result in any new significant impacts. Additional mitigation is not expected to be necessary to comply with the USFWS' Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological.

This modification would result in an increase in temporary impacts to Tecate tarplant (CNPS List 1B, BLM Sensitive, Forest Service Sensitive) by 17 individuals compared to the FESSR (i.e., 43 individuals compared to 26 individuals). According to SDG&E's impact shapefiles, the increase in impacts is due to a modification of the configuration of a wire stringing site. Overall, the modified project would impact 47 Tecate tarplant individuals compared with the FESSR which would impact 36 individuals. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, and Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies, would also be required to mitigate this impact and would be adequate to ensure that this increase is not substantial. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources, as the modified project and the FESSR are in the same general location, and the modified project would have fewer transmission towers than the FESSR.

Cultural Resources. PMR22 does not affect or change impacts to cultural resources, as both the FESSR and modified project would impact the same cultural resources.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR22 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR22 would have environmental impacts similar in context to those of the FESSR. Although PMR22 would increase impacts to biological resources, it would be preferred to the FESSR due to the reductions in acreage of effect and reduced structures.

MODIFICATION SUBUNIT 23: EP62A to EP47-2 (POTRERO PMR23)

Brief Description and Purpose

The modified project has two components:

- It would shift the alignment approximately 2,000 to 4,000 feet north to straighten and shorten the FESSR alignment by 0.34 miles.
- It would reduce the 94.01-acre yard south of EP53-2 and EP54 off of Round Potrero Road to 30.62 acres, in the same location described for the FESSR. The PMR states that this yard would be in the same location and same size as for the FESSR; however, the draft PMR stated that this would be a reduced construction yard. The CPUC and BLM reviewed the size of the construction yard as proposed for the FESSR using Appendix 11; see Figure Ap. 11C-78. The construction yard has been reduced to 30.62 acres.

The primary purpose of the modification is to improve engineering design and constructability.

Environmental Impact Discussion.

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR23 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR23
Impacts to Rare Plants (number of individuals detected in impact areas)

TABLE PMR23

		Permanent	Temporary	Total
FESSR	Tecate tarplant	10		10
Modified Project	Tecate tarplant	4		4

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	Chaparrals	11.78	18.17	29.95
	Coastal and Montane Scrub Habitats		0.42	0.42
	Grasslands and Meadows	0.52	1.85	2.38
	Herbaceous Wetlands, Freshwater, and Streams	0.01		0.01
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	4.12	30.91	35.02
	Woodlands and Forests	0.00		0.00
	FESSR Total	**16.43**	**51.35**	**67.79**
Modified Project	Chaparrals	3.77	2.10	5.87
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.37	34.16	35.53
	Mod Proj Total	**5.14**	**36.27**	**41.41**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Quino Checkerspot Butterfly	USFWS Occupied Habitat	8.49	10.41	18.90
Modified Project	Quino Checkerspot Butterfly	USFWS Occupied Habitat	2.50	0.02	2.52

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)			
FESSR (2010 RCA data)			
Modified Project (2010 RCA data)	0.09		0.09

This modification would reduce impacts to rare plant individuals (Tecate tarplant), reduce impacts to sensitive vegetation communities and reduce impacts to special status species (Quino checkerspot butterfly). It would increase impacts to RCAs from 0 to 0.09 acres in the CNF, using either the 2008 or the 2010 data for comparison. Overall, permanent impacts to RCAs would be increased by 1.01 acres, and temporary impacts to RCAs decreased by 47.38 acres, using the 2010 data for comparison. Permanent impacts would increase using the 2008 dataset as well. Mitigation for temporary and permanent impacts to RCAs was incorporated into the Final EIR/EIS and would be required for the modified project as well and would be required for the modified project as well, and would be adequate to ensure that a substantial increase in the severity of impacts to RCAs does not occur. As such, impacts would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and RCAs for this modification to the FESSR.

PMR23 would reduce permanent impacts to waters of the U.S. from 0.03 acres to 0.01 acres. PMR23 would reduce permanent impacts to waters of the State from 0.03 acres to 0.01 acres and increase temporary impacts to waters of the State from 0.00 acres to 0.01 acres. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological

monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project, and temporary impacts to waters of the U.S. were reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Overall, permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts were reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project. For these reasons, this modification would not result in a new significant impact or a a substantial increase in a significant impact to waters of the U.S. or waters of the State.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed modification would reduce the visual impact along this route segment. The alignment modification would reduce the number of structures and extent of visible ground disturbance between EP62A-1 and EP47-2. The reduced visual impact would not be substantially different from that previously analyzed and would not warrant a change in the original impact assessments or significance determinations.

Cultural Resources. As a result of the Class III survey effort for the PMR23, additional cultural resources have been identified along both the FESSR route and PMR23. The FESSR has seven resources within the Project Impact Area. The modified project has four resources within the Project Impact Area. Two of these resources would overlap with the resources identified for the FESSR, and two resources would be new. In compliance with Mitigation Measure C-1b (Avoid and protect potentially significant resources) SDG&E is continuing to modify the engineering of the FESSR to avoid the resources within the PMR23. SDG&E and tribal groups have meet to discuss means to avoid additional resources along PMR23. Relocation of one pole approximately 200 feet north of the current location and adding one tower staging access pad to PMR23 will be a condition of the Notice to Proceed to avoid an additional cultural resource. The Notice to Proceed process will also review all cultural resources mitigation to ensure SDG&E's compliance with the measures. Relocation of PMR 23 will further reduce cultural resource impacts along this proposed modified alignment.

Although different individual resources would be impacted, no new significant cultural resources impacts would be created with the PMR. The type of impact to cultural resources within the PMR is much the same as the FESSR, and can be mitigated to a level that is less than significant as stated in the EIR/EIS for the FESSR. PMR23 would also impact fewer cultural resources than the FESSR. Therefore, for cultural resources, PMR23 is preferred.

Ground Disturbance/Other Affected Issue Areas. PMR23 would place one new transmission line structure within the alluvial valley fill of Round Potrero; the ten remaining structures of PMR23 would be founded on bedrock, like the FESSR route. This modification would decrease the number of support structures from 14 to 11 and would increase by two the number of structures to be constructed by helicopter. Much of the access for PMR23 would use existing roads, significantly decreasing the amount of permanent (from 16.6 to 4.9 acres) and temporary ground disturbance (20.8 to 5.7 acres). PMR23 would not increase impacts or introduce new significant impacts related to geology or geologic hazards, erosion, or slope stability. The potential for liquefaction or corrosive soil in the alluvial area (proposed structure EP54) should be evaluated prior to final design of the foundation. Ground disturbance would be reduced due to increased use of helicopter construction and decreased road construction resulting in reduced impacts associated with soil erosion and slope instability related to grading of access roads in steep terrain.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR23 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR23 would have environmental impacts similar in context to those of the FESSR. It would be preferred to the FESSR due to the reductions in acreage of effect, reduced structures, and reduced impacts to known cultural resources and visual resources..

MODIFICATION SUBUNIT 24: EP47-2 TO EP39-1 (BARRETT LAKE PMR24)

Brief Description and Purpose

The modified project has two components:

- It would eliminate eight structures by increasing the span length between structures. Access would be removed and replaced with tower staging/access pads and two temporary work areas would increase in size.
- It would increase the Barrett Canon construction yard to 1.59 acres at P42, in the same location described for the FESSR. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is improved engineering.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in new significant impacts, or a substantial increase in significant impacts to biological resources. Table PMR24 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR24

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Dean's milk-vetch		8	8
	San Diego sunflower	11	23	34
Modified Project	San Diego sunflower	13	15	28

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	6.98	10.30	17.28

TABLE PMR24				
Modified Project	Chaparrals	4.61	2.42	7.04

This modification would reduce temporary and permanent impacts to Dean's milk vetch and sensitive vegetation communities. Neither the modified project nor the FESSR would impact special status wildlife species along this route.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands for this modification to the FESSR. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would reduce visual impacts along this route segment. The elimination of eight towers and the reduction in ground disturbance (which would reduce long-term visible land scarring) would achieve a slight reduction in the adverse visual impact along this route segment. However, the reduced impact would not change the overall impact assessment or significance conclusion for this route segment.

Cultural Resources. PMR24 would not affect or change impacts to cultural resources, there are no cultural resources impacted by either the modified project or the FESSR along this route.

Other Affected Issue Areas.

Because of the increased helicopter use, residents would be exposed to increased helicopter noise. However, the Final EIR/EIS evaluated noise impacts from helicopter construction and mitigation was included adopted to reduce this impact, as discussed further in Section 1.4 of Section 1. The overall impact assessment and significance conclusions would not change for this location (Class I). Neither the FESSR nor the modified project would be located within 1,000 feet of residents along this alignment. Use of helicopter construction would reduce the time required for construction of this alignment and would reduce truck traffic on the roadways in the immediate area of the line.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR24 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR24 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR due to the reductions in acreage of effect and reduced structures.

MODIFICATION SUBUNIT 25: EP39-1 TO EP22-1 (HERMES PMR25)

Brief Description and Purpose

This modification would have two components:

- It would shift the alignment up to 4,300 feet east to a straight northerly route, reducing impacts to the Hermes copper butterfly habitat and occupied Quino checkerspot butterfly habitat.
- It would reduce the 17.34-acre yard east of EP26-1 to 15.88 acres in the same location described for the FESSR. See Section 1 for a detailed discussion regarding construction yards.

The primary reason for the modification is due to a request from the USFS to move structures and avoid Hermes copper butterfly habitat and occupied Quino checkerspot butterfly habitat.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Commenters were concerned with structures near private property. Figure 25 shows structure Str. 273, 274, then Str. 276. Commenter requested information regarding whether Str. 275 was a future expansion or did SDG&E mis-number the structures. Concerned with a number of structures and access roads from MP79 to MP82. This comment was not relevant to the PMRs because the structures the commenter refers to, Str. 273, 274 and 276 are from the FESSR, not the modified project. Str. 275 is underneath EP 37-2, from the modified project.
- Modification created new fire risk at FS land 60112002 and 60118001. This comment is not relevant to the PMR because the modified project would not cross parcel 60118001, the FESSR would. The modified project would cross parcel 60112002 as would the FESSR. Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results.
- Concerned with noise and traffic in Cinnamon and concerned with noise from helicopters and earth moving equipment.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR25 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR25

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Caraway-leaved Gilia		28	28
	Cleveland's bush monkey flower	2	133	135
	Dunn's mariposa lily	20		20
	Felt-leaved monardella		537	537
	Fish's milkwort		6	6
	Gander's ragwort	188	2455	2643
	Robinson’s pepper-grass	7		7
	Southern mountain misery	15	15	30
	Sticky geraea	5	1839	1844
	Tufted pine-grass		7	7

TABLE PMR25

Modified Project	Rush-like bristleweed	7	5	12

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	7.50	16.65	24.15
	Grasslands and Meadows	0.66	25.22	25.88
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.15	0.17
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.19	0.37	0.56
	Riparian Forests and Woodlands	0.09		0.09
	Woodlands and Forests		1.00	1.00
	FESSR Total	**8.46**	**43.40**	**51.86**
Modified Project	Chaparrals	5.17	7.19	12.37
	Coastal and Montane Scrub Habitats	1.13	0.90	2.03
	Grasslands and Meadows	0.88	17.67	18.54
	Herbaceous Wetlands, Freshwater, and Streams	0.00		0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.99	0.07	2.06
	Woodlands and Forests	0.01		0.01
	Mod Proj	**9.18**	**25.83**	**35.01**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.48	0.63	1.12
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	4.10	15.40	19.50
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.07	0.20	0.27
Modified Project	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.10	0.01	0.11
	Least Bell's Vireo	USFS Suitable Habitat in CNF	0.07	0.00	0.07
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	3.65	4.59	8.24
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.24	0.00	0.24

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.19	1.67	1.86
FESSR (2010 RCA data)	1.32	8.41	9.73
Modified Project (2010 RCA data)	1.58	2.40	3.99

This modification would reduce permanent and temporary impacts to rare plant individuals from 5 species (Dunn's mariposa lily, felt-leaved monardella, Gander's ragwort, Robinson pepper-grass, and sticky geraea.). SDG&E data, presented in the table above, includes a number CNPS List 4 plant species (Caraway-leaved Gilia, Cleveland's bush monkey flower, Fish's milkwort, Southern mountain misery, Tufted pine-grass, and Rush-like bristleweed); CNPS List 4 species are considered plants of limited distribution whose vulnerability or susceptibility to threat appears relatively low at this time. As discussed in above, although these plants appear in the subunit tables as they were included by SDG&E, effects on these plant species are not considered significant impacts.

The modification would reduce permanent and temporary impacts to two sensitive vegetation communities (chaparrals and riparian forests and woodlands), and to coastal California gnatcatcher and Quino checkerspot butterfly.

This modification would result in permanent and temporary impacts to coastal and montane scrub habitat that the FESSR did not along this alignment. Permanent impacts to grasslands and meadows would increase by 0.22 acres; temporary impacts to grasslands and meadows would decrease by 7.55 acres. The Final EIR/EIS analyzes impacts to sensitive vegetation including coastal and montane, grasslands and meadows, and scrub and concludes this impact would be significant (Class I). Mitigation identified in the Final EIR/EIS would also be required for the PMR, specifically Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities would reduce impacts to sensitive vegetation communities. Overall, however, the modified project would reduce permanent impacts to coastal and montane srub habitat from 53.56 acres to 27.46 and would reduce temporary impacts to coastal and montane scrub from 114.56 acres to 66.94 acres. For these reasons, this modification would not result in new significant impacts, or a substantial increase in significant impacts to these sensitive vegetation communities.

This modification would result in increased permanent impacts to southwestern willow flycatcher USFS Suitable Habitat in CNF (an increase of 0.17 acres) and in decreased temporary impacts (a decrease of 0.2 acres) compared to the FESSR. Compared with the FESSR, this modification would increase permanent impacts to Least Bell's vireo; permanent impacts would increase by 0.07 acres but there would be no increase in temporary impacts. Significant impacts to suitable southwestern willow flycatcher habitat and Least Bell's vireo were assessed in the Final EIR/EIS as Class II (Class II is significant but mitigable to less than significant levels), and therefore would not represent new significant impacts. Mitigation Measure B-7e, Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/minimization/compensation strategies, would be required for the modification to reduce any impacts and would be adequate to ensure that a substantial increase in the severity of impacts to southwestern willow flycatcher habitat and Least Bell's vireo does not occur.

PMR25 would increase permanent impacts to RCAs using either the 2008 or 2010 FESSR database for comparison, from 0.19 acres (1.32 acres using the 2010 FESSR database) to 1.58 acres. It would increase temporary impacts to RCAs using the 2008 FESSR database from 1.67 acres to 2.40 acres and decrease temporary impacts to RCAs using the 2010 database from 8.41 acres to 2.40 acres. Overall, permanent impacts to RCAs would be increased by 1.01 acres, and temporary impacts to RCAs decreased by 47.38 acres, using the 2010 FESSR data for comparison. Permanent impacts would increase using the 2008 dataset for comparison, as well. Mitigation for temporary and permanent impacts to RCAs was incorporated into the Final EIR/EIS and would be required for the modified project as well and would be adequate to ensure that a substantial increase in the severity of impacts to RCAs does not occur.. As such, impacts would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

PMR25 would reduce permanent impacts to waters of the U.S. from 0.01 acres to 0.00 acres and temporary impacts to waters of the U.S. from 0.11 acres to 0.00 acres. Permanent impacts to waters of the State would remain the same and temporary impacts to waters of the State would decrease from 0.15 acres to 0.00 acres.

For these reasons, PMR25 would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed Hermes PMR25 modification would not noticeably change overall impacts on Visual Resources along this route segment. Although the route would be moved approximately 4,000 feet farther to the east, and would not parallel Lyons Valley Road directly over the road as proposed in the FESSR (beneficial effect). Instead of passing directly over the Lyons Valley Road, the new route would now pass through the center of Lyons Valley (primary visual draw along this route

segment) east of Lyons Valley Road. Travelers on Lyons Valley Road that would have had a view of the FESSR would still have a view of the modified project. The modified project would be further from the travelers but as with the FESSR would be highly visible. As a result, views from Lyons Valley Road would still be substantially affected and the overall impact assessment and significance conclusions would not change for this route segment.

The proposed construction yard modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. The overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR25 will eliminate impacts to cultural resources. The FESSR has two resources within the Project Impact Area. The modified project will avoid these resources. Therefore, for cultural resources, the modified project is preferred.

Other Affected Issue Areas. .

The Forest Service is concerned about the access road from Lyons Road to PMR Structures EP24-1, EP23-2, EP22-1 (shown on Mapbook pages MS-97 and MS-98). This is a steep 69 kV transmission line road (TL 625) from the 1950s that does not meet the USFS's current requirements. The Final PMR indicates that the existing access road would require improvements and SDG&E will need to work with USFS to determine what specific improvements are necessary to meet USFS's current requirements. No additional impacts due to the road improvements are expected because it would not increase ground disturbance and because there are no sensitive receptors within 1,000 feet.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR25 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR25 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR due to the reductions in temporary acreage of effect, reduced impacts to cultural resources, and reduced impacts to special status species.

MODIFICATION SUBUNIT 26: EP22-1 TO EP12-3 (GASKILL PEAK NORTH PMR26)

Brief Description and Purpose

Based on improved engineering design, the PMR26 modification would shift the alignment up to 800 feet to the east and would eliminate two structures and most access roads.

The primary purpose for the modified project was to improve engineering.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a

significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in substantial increase in previously identified significant impacts to biological resources. Table PMR26 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR26

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Rush-like bristleweed		11	11
Modified Project	None			

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	5.67	12.08	17.75
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.01	0.01
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.32	0.02	0.34
	FESSR Total	**6.00**	**12.11**	**18.11**
Modified Project	Chaparrals	3.91	0.64	4.55
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.01	0.01	0.02
	Mod Proj Total	**3.92**	**0.65**	**4.58**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.10		0.10
	Stephens' Kangaroo Rat	USFS Suitable Habitat in CNF	0.10		0.10
Modified Project	None				

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)			
FESSR (2010 RCA data)	0.52	1.08	1.60
Modified Project (2010 RCA data)	0.57	0.18	0.76

This modification would reduce impacts to sensitive vegetation (chaparrals and herbaceous wetlands, freshwater and streams), special status species (coastal California gnatcatcher and Stephen's kangaroo rat).

Impacts to RCAs would be reduced when compared using the 2010 RCA data, although would increase if compared with the FESSR 2008 data. Overall, permanent impacts to RCAs increased by 1.01 acres and temporary impacts to RCAs decreased by 47.38 acres for the modified project using the FESSR 2010 RCA data. Permanent impacts to RCAs would also increase using the 2008 data, although as stated above, impacts to RCAs as a result of the modified project were not calculated using the 2008 data. Mitigation for temporary and permanent impacts to RCAs was incorporated into the Final EIR/EIS and would be required for the modified project as well and would be adequate to ensure that a substantial increase in the severity of impacts to RCAs does not occur.

As such, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Neither the FESSR nor PMR26 would impact waters of the U.S. PMR26 would not result in permanent impacts to waters of the State and would decrease temporary impacts to waters of the State from 0.01 acres to 0.00 acres.

The CPUC and BLM have independently reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands made for this modification to the FESSR. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. Although the proposed modification would result in the elimination of two structures and a reduction in permanent and temporary ground disturbance, this slight reduction in visual impact would not noticeably change the overall visual impacts on Visual Resources along this route segment. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR26 does not affect or change direct impacts to cultural resources, neither the modified project nor the FESSR would impact any cultural resources along this alignment.

Noise. Four sensitive receptors would be located approximately 600 feet from the modification, approximately 200 feet closer than to the FESSR. The EIR/EIS considered noise impacts to any sensitive receptors within 1,000 feet of the alignment as significant and unmitigable and did not identify increases or decreases in severity based on distance within the 1,000 foot buffer zone. Therefore, although there would be slightly increased overall construction noise impacts, this type of impact was assessed in the Final EIR/EIS, which found it to be significant and unavoidable (Class I). Therefore, the PMR26 modification would not create new significant impacts or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. Much of the construction would be done using helicopters which would increase the level of noise but would decrease the length of time required for this construction. See Section 1, regarding helicopter use.

Land Use. The modified route would decrease permanent impacts to private lands by eliminating one structure on private lands, structure Str. 302 from the FESSR.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR26 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR26 would have environmental impacts similar in context to those of the FESSR. Although there may be an increase in temporary construction noise impacts to sensitive receptors off of Lost Trail and roadway improvements would be required to the access road to meet USFS requirements, the modification would be preferred to the FESSR due to the reductions in temporary acreage of effect and reduced impacts to special status species.

MODIFICATION SUBUNIT 27: EP12-3 TO EP9-1 (CEDAR RANCH PMR27)

Brief Description and Purpose

The modification would shift the alignment up to 180 feet to the southeast and would reduce the number of structures and one construction yard.

The primary purpose for the modification was to improve engineering.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR27 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR27

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	3.05	9.04	12.09
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.12	4.80	4.93
	FESSR Total	**3.18**	**13.84**	**17.02**
Modified Project	Chaparrals	2.64	1.80	4.45
	Grasslands and Meadows	0.13		0.13
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.01		0.01
	Mod Proj Total	**2.78**	**1.80**	**4.58**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.37	2.39	2.75
Modified Project	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.02		0.02

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)			
FESSR (2010 RCA data)	0.00	0.00	0.01
Modified Project (2010 RCA data)			

This modification would reduce permanent and temporary impacts to chaparral and special status wildlife species.

This modification would result in permanent impacts to grasslands and meadows along this alignment (0.13 acres)which the FESSR would not. Impacts to grasslands and meadows were analyzed as Class I in the Final EIR/EIS. The affected acreage is small, and Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communitie**s,** identified in the Final EIR/EIS would also be required for the PMR and would be adequate to ensure that this increase is not substantial. Overall the modified project would reduce permanent impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would not substantially increase the severity of a significant impact to grasslands and meadows. For these reasons, this modification would not result in a substantial increase in a previously identified significant impact to grasslands and meadows.

The CPUC and BLM have independently reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands made for this modification to the FESSR. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR27 does not affect or change direct impacts to cultural resources.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR27 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR27 would have environmental impacts similar in context to those of the FESSR. Although there would be impacts to grasslands and meadows at the modification, the modification would be preferred to the FESSR due to the reductions in temporary acreage of effect and reduced impacts to special status species.

MODIFICATION SUBUNIT 28: EP9-1 TO EP1-3 (JUST PMR28)

Brief Description and Purpose

The modification would shift the alignment up to 400 feet northwest and would reduce the number of access roads to accommodate a landowner request (Just), in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR28 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR28

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	3.12	7.35	10.47
	Coastal and Montane Scrub Habitats	2.62	3.64	6.25
	Grasslands and Meadows	0.06		0.06
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.03	0.03
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.66		0.66
	FESSR Total	**6.46**	**11.01**	**17.47**
Modified Project	Chaparrals	2.69	2.83	5.52
	Coastal and Montane Scrub Habitats	0.85		0.85
	Herbaceous Wetlands, Freshwater, and Streams		0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.13	0.00	0.13
	Mod Proj Total	**3.67**	**2.83**	**6.50**

Impacts to Special Status Species (acres)

FESSR	Arroyo Toad	USFS Suitable Habitat in CNF	0.14	0.01	0.15
	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.79	3.10	3.89
	Stephens' Kangaroo Rat	USFS Suitable Habitat in CNF	0.02	0.02	0.05
Modified Project	Arroyo Toad	USFS Suitable Habitat in CNF	0.00		0.00
	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.61	0.59	1.21
	Least Bell's Vireo	USFS Suitable Habitat in CNF	0.12		0.12
	Southwestern Willow Flycatcher	USFS Suitable Habitat in CNF	0.12		0.12

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.14	0.01	0.15
FESSR (2010 RCA data)	0.49	2.83	3.32
Modified Project (2010 RCA data)	0.28	0.87	1.16

This modification would reduce temporary and permanent impacts to sensitive vegetation, some sensitive status species (arroyo toad, coastal California gnatcatcher and Stephen's kangaroo rat).

Using the FESSR 2010 RCA data for comparison, impacts to RCAs would be reduced by this modification. Impacts to RCAs would increase using the FESSR 2008 data for comparison. However, as stated above,

overall impacts to RCAs as a result of the modified project were not calculated using the FESSR 2008 data. Overall, using either FESSR 2008 or 2010 RCA data for comparison, permanent impacts to RCAs would increase (by 1.01 acres using the 2010 database) and temporary impacts to RCAs would decrease (by 47.38 acres using the FESSR 2010 database) for the modified project. Mitigation for temporary and permanent impacts to RCAs was incorporated into the Final EIR/EIS and would be required for the modified project as well. As such, this modification would not result in a substantial increase in the severity of a significant impact to RCAs, previously examined in the EIR/EIS.

Neither the FESSR nor PMR28 would result in permanent impacts to jurisdictional waters. PMR28 would reduce temporary impacts to waters of the U.S. from 0.01 acres to 0.00 acres. PMR28 would reduce temporary impacts to waters of the State from 0.03 acres to 0.00 acres.

This modification would result in 0.12 acres of impact to Least Bell's vireo ("LBV") and southwestern willow flycatcher ("SWF") habitat which the FESSR would avoid. Impacts to LBV and SWF were determined to be Class II in the Final EIR/EIS and mitigation was identified that would reduce this impact to less than significant (Mitigation Measure B-7e, Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/minimization/compensation strategies). The same mitigation measures would also be required for the PMR and are adequate to mitigate this increase, as well, such that impacts would remain less than significant consistent with the Final EIR/EIS. Overall the modified project would decrease permanent impacts to Least Bell's vireo and southwestern willow flycatcher suitable habitat from 1.32 acres to 0.19 acres and from 5.14 acres to 3.98 acres, respectively. For these reasons, this modification would not create new significant impacts or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for this modification for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR28 does not affect or change direct impacts to cultural resources.

Land Use. This impact would reduce impacts to land use because it would move the project west, off of the Just property. It was designed to accommodate landowner requests per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR28 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR28 would have environmental impacts similar in context to those of the FESSR. Although there would be slight impacts to USFS suitable LBV and SWF habitat (less than one acre) at this alignment that would not be present at this location for the FESSR, the modification would be preferred to the FESSR because it would reduce ground disturbance and other vegetation and land scarring impacts, and it would reduce impacts to land uses.

MODIFICATION SUBUNIT 29: SUNCREST SUBSTATION AND ACCESS ROAD (PMR29)

Brief Description and Purpose

The modification has two components:

- It would reduce grading around the Suncrest Substation (formerly called the Modified Route D Substation in the Final EIR/EIS), and would move the Bell Bluff Truck Trail (access road) to accommodate a landowner request (Slaughter/Wilson).
- It would reduce the 19.78-acre yard south of Bell Bluff Truck Trail to 10.78 acres in the same location described for the FESSR. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is to accommodate two landowner requests, in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts, and reduce impacts from the substation footprint.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Please verify fuel modification zone around perimeter of Suncrest Substation. The draft Construction Fire Prevention Plan did not include a fire buffer.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR29 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR29

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Engelmann oak	341	28	369
	Felt-leaved monardella	657		657
	Dean's Milk-vetch	1		1
	Peninsular spineflower	270		270
	Rush-like bristleweed	151		151
Modified Project	Engelmann oak	216	2	218
	Felt-leaved monardella	106		106
	Rush-like bristleweed	52		52

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

TABLE PMR29

		Permanent	Temporary	Total
FESSR	Chaparrals	102.55	14.79	117.34
	Coastal and Montane Scrub Habitats	4.60	14.39	18.99
	Grasslands and Meadows	2.23	6.52	8.75
	Herbaceous Wetlands, Freshwater, and Streams	0.35	0.20	0.55
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	3.62	7.75	11.37
	Woodlands and Forests	14.84	9.78	24.62
	FESSR Total	**128.18**	**53.44**	**181.63**
Modified Project	Chaparrals	68.06		68.06
	Coastal and Montane Scrub Habitats	1.28	9.82	11.10
	Grasslands and Meadows	1.18	0.99	2.17
	Herbaceous Wetlands, Freshwater, and Streams	0.23		0.23
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.73		1.73
	Woodlands and Forests	3.19		3.19
	Mod Proj Total	**75.66**	**10.81**	**86.47**

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)			
FESSR (2010 RCA data)		6.39	6.39
Modified Project (2010 RCA data)			

This modification would reduce temporary or permanent impacts to rare plant individuals or sensitive vegetation communities, and would not increase temporary or permanent impacts to RCAs compared to the FESSR using the FESSR 2008 RCA data for comparison and would decrease impacts to RCAs using the FESSR 2010 data for comparison.

PMR29 would reduce permanent impacts to waters of the U.S. from 0.29 acres to 0.18 acres and temporary impacts to waters of the U.S. from 0.72 acres to 0.00 acres. PMR29 would reduce permanent impacts to waters of the State from 0.38 acres to 0.23 acres and temporary impacts to waters of the State from 0.85 acres to 0.00 acres.

Neither the modification nor the FESSR would impact special status wildlife species.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands made for this modification to the FESSR. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR29 would slightly reduce impacts to cultural resources. The FESSR has five resources within the Project Impact Area. The Modified Substation has four of these resources within the Project Impact Area and will avoid a prehistoric bedrock milling site. Therefore, for cultural resources, the Modified Substation (PMR29) is preferred.

Fire Risk. San Diego County requested that the EIR/EIS Team verify the fuel modification zone around perimeter of Suncrest Substation. The EIR/EIS discusses the potential vegetation impacts associated with

fuel modification with respect to particular structures and in mitigation measures. The EIR/EIS's discussion of the Suncrest Substation, referred to in the EIR/EIS as the Modified Route D Substation, contains a discussion of the fuel modification and vegetative management around it. The EIR/EIS notes in Section E.4.2 that construction of the Modified Route D Substation would result in "clearing and grading for the substation site and several access roads" and discusses impacts and mitigation resulting from such clearing. Impacts of the Modified Route D Substation fuel modification were incorporated into the biological analysis of the Modified Route D Alternative, as discussed in EIR/EIS Section E.4.2.

The PMR indicates that the acreage of the Modified Route D substation will be decreased from the proposed 128.18 acres to 75.66 acres, a 41% decrease. As such, the EIR/EIS examined greater impacts to vegetation than would be required with the modified project. Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR29 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR29 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce ground disturbance and other vegetation and land scarring impacts and impacts to cultural resources.

MODIFICATION SUBUNIT 30: CP109-1 TO CP106-1 (BELL BLUFF PMR30)

Brief Description and Purpose

The modification would shift the alignment up to 300 feet to the north and eliminate five wire stringing sites. Additional towers would be built using helicopters.

The primary purpose of the modified project would be to improve engineering design.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR30 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR30

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total

TABLE PMR30

FESSR	Rush-like bristleweed	3	6	9
Modified Project	None			

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	1.85	2.91	4.76
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.02	0.01	0.03
	FESSR Total	**1.87**	**2.92**	**4.79**
Modified Project	Chaparrals	0.87		0.87

This modification would reduce permanent and temporary impacts to sensitive vegetation communities (chaparrals).

Neither the modified project nor FESSR would impact sensitive wildlife species.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and the impact acreage. This information and analysis demonstrates a reduction in impacts to sensitive vegetation communities (chaparrals) and area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment. Therefore, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR30 will eliminate impacts to cultural resources in this location. The FESSR has one resource (bedrock milling site) within the Project Impact Area. The modified project will avoid this site. Therefore, for cultural resources, the modified project is preferred.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR30 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR30 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce ground disturbance and impacts to sensitive vegetation and impacts to cultural resources.

MODIFICATION SUBUNIT 31: CP106-1 TO CP98-1 (JERNEY/LORITZ PMR31)

Brief Description and Purpose

The modification would shift the alignment up to 400 feet to the south at the western end, would eliminate three towers on USFS land, and would change two towers, CP99-2 and CP98-1, from lattice to steel poles. The visual discussion for the modified project (pg. 4-118) indicates that tower CP100-1 would be a steel mono pole structure. This text is incorrect; CP100-1 would remain a lattice structure to reduce visual impacts.

The primary purpose of the modification would be to accommodate landowner requests in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would reduce impacts to biological resources. Table PMR31 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR31

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	4.53	9.77	14.30
Modified Project	Chaparrals	3.43	1.16	4.59
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.15		0.15
	Mod Proj Total	**3.58**	**1.16**	**4.74**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.08		0.08
Modified Project	None				

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)			
FESSR (2010 RCA data)	0.05		0.05
Modified Project (2010 RCA data)			

This modification would reduce permanent and temporary impacts to sensitive vegetation and special status species and would not increase permanent or temporary impacts to RCAs compared to the FESSR using the FESSR 2008 RCA data for comparison, and would decrease impacts to RCAs using the FESSR 2010 data for comparison.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided. This information and analysis demonstrates reductions in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations for effects on sensitive plant and animal species.

Visual Resources. The proposed modification would not substantially change overall impacts on Visual Resources along this route segment, though the change of two towers from lattice to steel pole structures would make the structures more prominent. The Final EIR/EIS considered viewpoints from Star Valley Road and nearby residents in Section E.4, Impact V-86, Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 70 on Star Valley Road. The EIR/EIS concluded that the towers would be very prominent, industrial additions to a landscape that presently lacks such features, which would substantially compromise landscape integrity. The resulting visual contrast was found to be high and the severity of the visual impact in the FESSR project area was determined to be significant. (Final EIR/EIS, Section E.4.) The change from lattice to steel poles does not substantially increase the severity of this impact because as stated above, the visual contrast was already found to be high. The reduction in ground disturbance would reduce long-term visible land scarring. However, the overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR31 would eliminate impacts to cultural resources in this location. The FESSR has one resource (bedrock milling site) within the Project Impact Area. The modified project will avoid this site. Therefore, for cultural resources, the modified project is preferred.

Land Use. The modified project would accommodate two landowners' requests, reducing impacts to land use per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR31 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR31 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce ground disturbance and impacts to sensitive vegetation, reduce impacts to cultural resources, and would reduce impacts to land uses.

MODIFICATION SUBUNIT 32: CP98-1 TO CP95-1 (230 kV UG/LORITZ DRIVEWAY PMR32)

Brief Description and Purpose

The modification would shift the alignment approximately 50 feet to the west, would relocate an access road through a driveway on the Loritz property, and would revise the 230 kV overhead-to-underground transition location.

The primary purpose for this modified project would be to accommodate a landowner request in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts

resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR32 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR32

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	1.47	2.09	3.56
	Coastal and Montane Scrub Habitats		0.22	0.22
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.04	0.04
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.05	0.70	0.74
	Riparian Forests and Woodlands		0.00	0.00
	FESSR Total	**1.52**	**3.05**	**4.58**
Modified Project	Chaparrals	2.64	1.69	4.33
	Coastal and Montane Scrub Habitats	0.18	0.16	0.34
	Herbaceous Wetlands, Freshwater, and Streams	0.02	0.03	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.04	0.18	1.22
	Riparian Forests and Woodlands	0.19	0.06	0.25
	Mod Proj Total	**4.08**	**2.12**	**6.20**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	None				
Modified Project	Arroyo Toad	USFWS Proposed Critical Habitat	0.57		0.57

This modification would result in an increase in permanent impacts to chaparrals. The modified project would increase permanent impacts to 2.64 acres, which would be a 1.17-acre increase. This type of impact to chaparrals was assessed in the FEIR/FEIS (as Class I). This modification would also result in increases in permanent and temporary impacts to coastal and montane scrubs (0.18 acre) and increases in permanent and temporary impacts to riparian forest and woodland (0.19 acre increases). Impacts to these vegetation communities were assessed in the FEIR/FEIS (as Class I); increases in impacts to these sensitive vegetation communities would not represent new significant impacts. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, required for the FESSR would also be required for the PMR and would be adequate to ensure that this increase is not

substantial. Overall, compared with the FESSR, the modified project would: reduce permanent impacts to chaparrals from 294.36 acres to 181.19 acres; would decrease permanent impacts to coastal and montane scrubs from 53.56 acres to 27.47 acres; would decrease temporary impacts to coastal and montane scrubs from 114.56 acres to 66.94 acres; would decrease permanent impacts from 0.88 acres to 0.25 acres; would decrease temporary impacts to riparian forest and woodlands from 2.96 acres to 0.10 acres. For these reasons, the modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

This modification would result in a 0.57-acre increase in permanent impacts to proposed critical habitat for the arroyo toad. The USFWS[10] stated that proposed critical habitat is not considered in the Section 7 consultation and would not be pertinent to analyze in the EIR/EIS. No designated critical habitat for the arroyo toad had been designated in San Diego County at the time the Final EIR/EIS was finalized, therefore impacts to the arroyo toad were analyzed using suitable habitat. Suitable habitat for the arroyo toad was expected to occur along this segment (at MP SV-1.5, Sweetwater River). The species is assumed to be present at SV-1.5 because focused surveys were not completed, and all habitat within 1 km of SV-1.5 is assumed to be occupied by the species, in accordance with USFWS (1999).Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the FEIR/FEIS. Project impacts to arroyo toad proposed critical habitat would not result in any new significant impacts, because the proposed critical habitat was part of the suitable habitat for the FESSR in this region. Additional mitigation is not expected to be necessary to comply with the USFWS's Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological Opinion.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

PMR32 would increase permanent impacts to waters of the U.S. from 0.01 acres to 0.09 acres and decrease temporary impacts to waters of the U.S. from 0.03 acres to 0.02 acres. PMR32 would increase permanent impacts to waters of the State from 0.01 acres to 0.02 acres and reduce temporary impacts to waters of the State from 0.04 acres to 0.03 acres. Impacts to jurisdictional waters were considered significant but mitigable for the FESSR. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. were reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project. Temporary impacts to waters of the U.S. were reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Permanent impacts to waters of the State were reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts were reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project.

Visual Resources. The proposed modification would not substantially change overall impacts on Visual Resources along this route segment though the increase in ground disturbance would increase long-term visible land scarring. The Final EIR/EIS considered viewpoints from Star Valley Road and nearby residents in Section E.4, Impact V-86, Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 70 on Star Valley Road. The EIR/EIS concluded that the towers would be very prominent, industrial additions to a landscape that presently lacks such features. This would substantially compromise landscape integrity. The resulting visual contrast was found to be high and the severity of the visual impact in the FESSR project area was determined to be significant in the Final EIR/EIS. The increase in long-term visible scarring would not substantially increase the severity

[10] Personal communication between Chris Otahal and the EIR/EIS Team on June 27, 2007.

of this impact because as with the FESSR, Mitigation Measure V-2a, Reduce in-line views of land scars and Mitigation Measure V-2b, Reduce visual contrast from unnatural vegetation lines, would be required and would be adequate to ensure that this increase is not substantial. The overall impact assessment and significance conclusions would not change for this route segment.

Cultural Resources. PMR32 does not affect or change direct impacts to cultural resources, neither the modified project nor FESSR would impact cultural resources.

Land Use. The modification would remove the ROW from the Jerney property and relocate it entirely on the Loritz property. Modifications would reduce impacts to the Jerney property and increase impacts to the Loritz property with their consent and would revise the 230 kV overhead-to-underground transition location in consultation with the landowner per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts. The modified project would not change impacts of the FESSR to any other landowners.

Other Affected Issue Areas.
Minor increases in noise. The modified project structures would not be closer to sensitive receptors than the FESSR. However, the modified project would result in increased ground disturbance compared with the FESSR due to the modification of the 230 kV transition location and associated noise. Section E.1.8 describes noise impacts for the Interstate 8 Alternative (where the undergrounding was proposed). The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for underground construction on page D.8-16, stating that "Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA." Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant because both the FESSR and the modification would create a substantial noise increase over existing conditions from construction, including the undergrounding, which would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR32 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR32 would have environmental impacts similar in context to those of the FESSR. Although there would be slightly increased overall permanent ground disturbance and an increase in biological resources impacts, the modification would be preferred to the FESSR because it would reduce impacts to land uses.

MODIFICATION SUBUNIT 33: 230 kV UNDERGROUND FROM INTERSECTION OF ALPINE BLVD/LORITZ DRIVEWAY TO CP88-1/CP87-1 (230 kV UG PMR33)

Brief Description and Purpose

The modification has three components:

- It would include an additional access road on the Bauer property to accommodate a Caltrans request to avoid a drainage easement.
- It would add a 10.58-acre field office headquarters north of Interstate 8 off of Tavern Road.

- It would add a 28.36-acre construction yard north of Interstate 8 off of Tavern Road. This construction yard would serve as the main staging area for construction of the 230 kV line and construction headquarters. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose of the modified project would be to accommodate a private landowner in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts, as well as to respond to a request from Caltrans and to establish a field office headquarters for the project. Portions of this modification, the field office headquarters and construction yard, are included in Notice to Proceed (NTP) 3 and Notice to Proceed 4.[11] The CPUC reviewed the NTP requests submitted by SDG&E and verified that they comply with all applicable mitigation measures.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Mitigation Measure L-2b requires SDG&E to notify property owners and requires opportunity for parties to identify impacts and potential measures to reduce impacts. PMR states that for the new facilities, such as construction yards, owners were notified regarding availability of DEIR. This is not adequate because no facilities were proposed adjacent to these landowners. Now, there may be impacts to these landowners.
- The Alpine Headquarters would result in new noise impacts to sensitive receptors, over 30 residences located near just one new construction yard, land owners not identified in FEIR/EIS.
- Summary Table S-1 Land Use/Noise does not mention new locations for storage yards and office complex in Alpine will be directly adjacent to 30 homes. Result in temporary noise, aesthetic, lighting, and air quality impacts not previously addressed. Severity of impacts cannot be determined by information provided.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR33 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR33

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total

[11] For copies of the Notices to Proceed, see http://www.cpuc.ca.gov/environment/info/aspen/sunrise/ntps.htm.

TABLE PMR33			
FESSR	**None**		
Modified Project	Chaparrals	1.27	1.27
	Coastal and Montane Scrub Habitats	1.89	1.89
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	35.77	35.77
	Mod Proj Total	**38.94**	**38.94**

There would be a 1.27-acre increase in temporary impacts to chaparrals and a 1.89-acre increase in temporary impacts to coastal and montane scrub habitats. Impacts to these communities were assessed in the FEIR/FEIS (as Class I), so the increases in impacts by this modification would not represent new significant impacts. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, required for the FESSR would also be required for the PMR and would be adequate to ensure that this increase is not substantial. Overall the modified project would result in a reduction in temporary impacts to chaparrals from 321.44 to 223.96 acres and a reduction of temporary impacts to coastal and montane scrub habitats from 114.56 to 66.94 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would increase the visual impact along this route segment due to the visibility of the new access road on the Bauer property from Interstate 8 and residences south of Interstate 8. However, other graded access roads are visible on the slopes and ridges in the landscape to the north of Interstate 8 and the overall impact assessment and significance conclusions (significant, unavoidable impact) would not change for this route segment.

The primary concern for PMR33 is the use of substantial night lighting at the headquarters and construction yard, which is located adjacent to several residential areas in the Community of Alpine that would not have been impacted by the construction yard in the FESSR. As stated in Section 1.1.3, the Final EIR/EIS acknowledges that the exact locations had not yet been determined and that exact locations would be finalized following final engineering and negotiations with landowners. Night-lighting at construction yards was considered a significant but mitigable (Class II) impact in the Final EIR/EIS. Mitigation Measure V-1b, Reduce construction night lighting impacts, was required to reduce this impact. With the information provided to date, the Alpine HQ/yard would cause a significant but mitigable (Class II) visual impact on residential views as a result of considerable night lighting. The elevations of the headquarters and yard sites range from approximately 1,650 feet to approximately 1,850 feet. The site is surrounded by residential areas to the north, east, and south (south side of I-8). These areas range in elevation from approximately 1,650 feet to approximately 1,900 feet. Thus, residential views (sightlines) are available from elevations above, equal to, and below the site, making consistent lamp shielding very challenging. Further, because views are available from three sides, lamp shields tilted away from one viewing direction would result in lamp exposure to views from an opposing direction.

No new significant visual impacts would occur at these locations. This is because, as with the construction yards analyzed in the Final EIR/EIS, the construction yard identified in the modification would have a significant but mitigable (Class II) visual impact. Mitigation measures would consist of : (1) modified lamp shielding (custom or stock), (2) strategic lamp orientation, (3) restriction on light numbers, placement, and heights, (4) automated lighting controls, (5) perimeter screening, and (6) limitations on hours of operation (and use of lights) as detailed in the Construction Lighting Plan associated with the Notice to Proceed 3. Use of lighting at the construction yard is also required to

comply with the County Light Pollution Code, Ordinance #9716. The Notice to Proceed 3 also incorporates plans should any complaints relevant to lighting be received.

Cultural Resources. Modification 33 does not affect or change impacts to cultural resources.

Ground Disturbance. PMR33 would increase ground disturbance, thereby increasing temporary impacts to air quality, noise, hazardous materials related to environmental contamination, and geologic resources related to soil erosion and slope instability. The potential to disturb unknown cultural resources and impact vegetation and wildlife is also increased with more ground disturbance. Increased disturbance and vegetation removal could increase the chance of noxious weed introduction and proliferation as well as impacts to native vegetation. Fire risk would remain the same with PMR33 and the FESSR.

Traffic: The proposed modification would result in the addition of a 10.58-acre field office headquarters and a 28.36-acre construction yard. These features would result in additional levels of construction-related traffic on local roadways and intersections along Link 4 (Segment 15). Temporary lane closures and/or congestion could result during the delivery of construction materials and equipment along Victoria Park Terrace and Tavern Road; however, as discussed in the Final EIR/EIS, impacts would be reduced and mitigated through the traffic planning and control measures in the MMCRP and applicable local regulations. Mitigation Measures identified in the Final EIR/EIS to reduce impacts include restricting lane closures (measure T-1a) and preparing a Construction Transportation Management Plan (measure T-9a). PMR 33 was analyzed in the KOA Traffic Study which concluded that no significant impact would occur in this area. Therefore this modification would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts. Additionally, as stated in the Notices to Proceed, appropriate permits and any subsequent required Plans shall be acquired and submitted to the CPUC in addition to verification of coordination with emergency service providers.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR33 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR33 would have environmental impacts similar in context to those of the FESSR. Although there would be slightly increased overall visual resources impacts and traffic impacts, the modified alignment would be preferred to the FESSR because it would reduce direct impacts to a Caltrans drainage easement and impacts to all identified utilities would be avoided. The Alpine Headquarters Construction Yard and Alpine Yards Construction Yard are additional yards, and do no replace the specific yard presented for the FESSR. These yards would not create any new significant effects not discussed in the EIR/EIS or a substantial increase in severity of a significant impact previously examined in the EIR/EIS. Overall, as stated in Section 1.1.3, the number of construction yards and the total acreage of construction yards have been reduced by close to 50 percent from the FESSR and would reduce overall impacts from construction yards.

MODIFICATION SUBUNIT 34: CP88-1/CP87-1 TO CP64-2 (CHOCOLATE CANYON PMR34)

Brief Description and Purpose

The modification has two components:

- It would shift the alignment west, eliminate six structures, reduce the ROW by nearly 0.5 miles and would modify the access roads to improve engineering design.
- It would reduce the 19.87-acre yard south of P66-2 and P67-1 and north of Interstate 8 to 16.53 acres in the same location described for the FESSR and would eliminate the Chocolate Mountain Ranch Construction Yard. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is to improve engineering and would minimize impacts to oak trees and the San Diego River.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- The PMR is close to the El Capitan Reservoir and the narrow El Monte Valley residential / agricultural area. This raises fire fighting issues related to access to reservoir water to fight fires, and the Powerlink's proximity to homes impeding fire fighting abilities. This area has already been devastated in the recent firestorms. El Monte Road is a narrow two-lane dead end road.
- **PMR34**: placement of towers at higher elevations would increase visual impacts, PMR fails to consider how important the visual impact in this particular valley is significant to the entire community. It is also noteworthy that the “record of decision” required that the towers be kept low in the valley in order to mitigate the visual impact.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR34 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR34

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Delicate clarkia	154		154
	San Diego sunflower	16		16
Modified Project	Delicate clarkia	1		1
	San Diego sunflower	8		8

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total

TABLE PMR34

FESSR	Chaparrals	10.96	7.75	18.70
	Coastal and Montane Scrub Habitats	10.03	21.09	31.12
	Grasslands and Meadows		1.69	1.69
	Herbaceous Wetlands, Freshwater, and Streams	0.05	1.30	1.35
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	5.12	15.92	21.04
	Riparian Forests and Woodlands	0.24		0.24
	Woodlands and Forests	0.58	2.66	3.24
	FESSR Total	**26.97**	**50.41**	**77.38**
Modified Project	Chaparrals	4.05	1.29	5.34
	Coastal and Montane Scrub Habitats	5.45	2.61	8.07
	Grasslands and Meadows		0.89	0.89
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.03	0.03
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.70	15.62	16.32
	Riparian Forests and Woodlands		0.01	0.01
	Woodlands and Forests	0.16	0.73	0.89
	Mod Proj Total	**10.38**	**21.18**	**31.55**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Arroyo Toad	USFS Occupied Habitat in CNF	0.46	0.32	0.78
	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.83	0.95	1.77
		USFWS Critical Habitat	9.07	5.67	14.74
	Least Bell's Vireo	USFS Suitable Habitat in CNF	0.46	0.32	0.78
	Stephens' Kangaroo Rat	USFS Suitable Habitat in CNF	0.59	0.00	0.59
Modified Project	Arroyo Toad	USFS Occupied Habitat in CNF		0.00	0.00
		USFWS Proposed Critical Habitat	0.69	17.16	17.85
	Coastal California Gnatcatcher	USFS Suitable Habitat in CNF	0.39		0.39
		USFWS Critical Habitat	3.63	0.48	4.11
	Stephens' Kangaroo Rat	USFS Suitable Habitat in CNF	0.18	0.00	0.19

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total
FESSR (2008 RCA data)	0.60	0.32	0.91
FESSR (2010 RCA data)	0.80	0.32	1.12
Modified Project (2010 RCA data)	0.08	0.00	0.08

This modification would reduce impacts to rare plant individuals (delicate clarkia, L1B)[12] and would reduce temporary and permanent impacts to sensitive vegetation, RCAs, coastal California gnatcatcher, least bell's vireo, and Stephens' kangaroo rat.

This modification would increase temporary impacts to riparian forests and woodlands from 0.0 to 0.01 acres. The increase in acreage is small and would not, of itself, represent a significant impact, although overall impacts to sensitive vegetation in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. . For these

[12] See introduction to Section 2 of the memorandum for a discussion regarding impacts to CNPS List 4 species, including San Diego sunflower.

reasons, this increase in impacts to riparian forests and woodlands does not substantially increase the severity of this significant impact.

PMR34 would reduce permanent impacts to waters of the U.S. from 0.03 acres to 0.02 acres and temporary impacts to waters of the U.S. from 0.88 acres to 0.00 acres. PMR34 would reduce permanent impacts to waters of the State from 0.05 acres to 0.03 acres and temporary impacts to waters of the State from 1.26 acres to 0.00 acres.

The modified project would include impacts to 16.53 acres of arroyo toad proposed critical habitat. The USFWS stated that proposed critical habitat is not considered in the Section 7 consultation and would not be pertinent to analyze in the EIR/EIS. No designated critical habitat for the arroyo toad had been designated in San Diego County at the time the Final EIR/EIS was finalized but impacts to the arroyo toad were analyzed using suitable habitat. Suitable habitat for the arroyo toad was expected to occur along this segment of the FESSR (at MP CC-3.4, along the Chocolate Canyon Option). Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the Final EIR/EIS and mitigation was identified that would reduce this impact to less than significant (Mitigation Measure B-7j, Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/ compensation strategies). The same mitigation measures would also be required for the PMR and are adequate to mitigate this increase, as well, such that impacts would remain less than significant consistent with the Final EIR/EIS. Additional mitigation is not expected to be necessary to comply with the USFWS' Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological Opinion.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would result in the elimination of six structures and a decrease in ground disturbance, which would reduce long-term land scarring (beneficial impact). However, the modification would also result in the higher elevation placement of several structures, which would increase their visibility. Analysis in EIR/EIS Section E.1.3 for this alignment states that the introduction of prominent built structures with substantial industrial character into a predominantly natural appearing landscape would cause long-term, operational visual impacts, which would be experienced by viewers on I-8 and Capitan Reservoir and a few residences off of Peutz Valley Road to the east. The severity of the visual impact in the FESSR project area was determined to be significant in the Final EIR/EIS, and the modification does not substantially increase this severity. Overall, the modification would not substantially change the impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would remain significant and unmitigable (Class I) and the analysis of the Final EIR/EIS remains valid.

Cultural Resources. PMR34 would reduce impacts to cultural resources. The FESSR has eight resources within the Project Impact Area. The modified project has five resources within the Project Impact Area. Three of the resources would be the same as those potentially impacted by the FESSR. Two resources would be new for the modified project. In compliance with Mitigation Measure C-1b (Avoid and protect potentially significant resources) SDG&E is continuing to modify the engineering of the FESSR to avoid the resources within PMR34. Relocation of one pole approximately 50 feet north of the current location will be a condition of the Notice to Proceed to avoid an additional cultural resource in response to a request from the Tribes. The Notice to Proceed process will also review all cultural resources mitigation to ensure SDG&E's compliance with the measures. Relocation of PMR34 will further reduce cultural resource impacts along this proposed modified alignment.

Although different individual resources are potentially being impacted, no new significant cultural resources impacts would be created with the PMR. The type of impact to cultural resources within the

PMR is much the same as the FESSR, and can be mitigated to a level that is less than significant as stated in the EIR/EIS. PMR34 would impact fewer cultural resources than the FESSR and would avoid a prehistoric temporary camp. Therefore, for cultural resources, the modified project is preferred.

Transportation and Traffic. The proposed modification would result in reduced number of structures along Link 5 and would result in an increase of helicopter construction, 14 structures would be changed from conventional to helicopter construction. These modifications would reduce the amount of construction-related roadway traffic on local roadways and would therefore result in an incremental decrease in traffic related impacts discussed in the Final EIR/EIS.

Noise. Residents in the area of construction would be exposed to increased helicopter noise. However, the location where helicopters would be used for construction would be beyond 1,000 feet from the nearest sensitive receptor. As stated in EIR/EIS Section D.8, beyond 1,000 feet, noise levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA. Additionally, mitigation was included in the Final EIR/EIS to reduce this impact, which would also be implemented to mitigate impacts of the modified route. Mitigation measure N-1a (Implement Best Management Practices for construction noise) requires SDG&E to employ specified noise-suppression techniques. The overall impact assessment and significance conclusions would not change for this location nor would the modification result in a substantial increase in severity (Class I). See Section 1 for further discussion of an increased in helicopter use.

Ground Disturbance/Other Affected Issue Areas.

As a commenter noted, the modified project is close to the El Capitan Reservoir and the narrow El Monte Valley residential / agricultural area. The modified project increases the distance from the project to the El Capitan Reservoir and access to reservoir would be available for fighting fires along all points except within the ¼ mile buffer from the modified project. As such, neither the FESSR nor the modified project would impact access to this water source for fire fighting. Based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR34 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR34 would have environmental impacts similar in context to those of the FESSR. Although there would a slight increase in noise due to helicopter construction, the modification would be preferred to the FESSR because it would reduce ground disturbance, impacts to cultural resources, and vehicle transportation.

MODIFICATION SUBUNIT 35: CP64-2 TO CP53-1 (MORGAN PMR35)

Brief Description and Purpose

This modification would shift the ROW upslope locally, increase helicopter construction, eliminate two pull sites, reduce work area size, and remove approximately 2,000 feet of access road.

The primary purpose for this modification is to accommodate land owner requests in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts and would also improve engineering.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- PMR doesn't address impacts to the Van Ommering Dairy.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR35 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR35

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Delicate clarkia	400		400
Modified Project	None			

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	4.85	1.55	6.40
	Coastal and Montane Scrub Habitats	9.38	5.13	14.51
	Herbaceous Wetlands, Freshwater, and Streams	0.08	0.01	0.09
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	7.17	0.00	7.18
	Riparian Forests and Woodlands	0.35		0.35
	FESSR Total	**21.84**	**6.69**	**28.54**
Modified Project	Chaparrals	1.70	1.73	3.44
	Coastal and Montane Scrub Habitats	2.42	0.00	2.42
	Herbaceous Wetlands, Freshwater, and Streams	0.01	0.00	0.01
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.63		0.63
	Riparian Forests and Woodlands		0.01	0.01
	Woodlands and Forests		0.00	0.00
	Mod Proj Total	**4.77**	**1.75**	**6.51**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFWS Critical Habitat	0.99	12.17	13.17
		USFWS Occupied Habitat		1.22	1.22
Modified Project	Coastal California Gnatcatcher	USFWS Critical Habitat	0.24		0.24

This modification would reduce impacts to rare plant individuals (delicate clarkia), reduce temporary and permanent impacts to sensitive vegetation, and coastal California gnatcatcher habitat.

There would be a 0.18- acre increase in temporary impacts to chaparrals. Impacts to sensitive vegetation communities (including chaparrals) in the FESSR project area was determined to be significant, Class I in the Final EIR/EIS. This increase in impacts to chaparrals does not substantially increase the severity of this significant impact. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts and would be adequate to ensure that this increase is not substantial. Overall the modified project would result in a reduction in temporary impacts to chaparrals from 321.44 to 223.96 acres. For these reasons, this modification would not result in a substantial increase in the severity of significant impacts to sensitive vegetation communities.

PMR35 would reduce permanent impacts to waters of the U.S. from 0.04 acres to 0.01 acres and temporary impacts to waters of the U.S. from 0.01 acres to 0.00 acres. PMR35 would reduce permanent impacts to waters of the State from 0.08 acres to 0.01 acres and temporary impacts to waters of the State from 0.01 acres to 0.00 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for this impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided, documenting changes in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would result in a decrease in ground disturbance, which would reduce visible long-term land scarring. However, the modification would also result in the higher elevation placement of several structures, which would increase their visibility. Analysis in EIR/EIS Section E.1.3 for views along this alignment concludes that the structures would be prominently visible to nearby residences and equestrians, particularly along the foothills at the base of the ridge. Skylining would exacerbate structure prominence, and the facilities would introduce structural complexity and industrial character into the landscape. The resulting visual contrast would be moderate. The subordinate-to-co-dominant structures would also cause a moderate degree of view blockage of the background ridge and sky. The severity of the visual impact in the FESSR project area was determined to be significant in the Final EIR/EIS, and the modification does not substantially increase the severity of this impact. Overall, the modification would not substantially change the impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR35 will eliminate impacts to cultural resources. The FESSR has two resources (prehistoric habitation site and a rock shelter) within the Project Impact Area. The modified project will avoid these two sites. Therefore, for cultural resources, the modified project is preferred.

Land Use. The modified project would be within one-quarter mile of 23 residential structures and two commercial structures; however, it would be located either farther or at the same distance from the residential structures as the FESSR. Van Ommering Dairy Farm in El Monte Valley is located south of the FESSR and PMR35 alignments; however, the structures for PMR35 would be slightly farther north from the existing dairy operations buildings. The FESSR would be located 1,800 feet from the dairy operations building, whereas the modified project would be located 1,900 feet from the buildings. Existing access roads would be utilized in the area and impacts of the modified project would be similar to those of the FESSR.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR35 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS.PMR35 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce some biological resource impacts and impacts to cultural resources.

MODIFICATION SUBUNIT 36: CP53-1 TO CP44-1 (HIGH MEADOW RANCH PMR36)

Brief Description and Purpose

This modification has two components:

- It would straighten the FESSR ROW, replace the access road with small/shorter spur roads off of existing roads, and eliminate one structure.
- It would create a 20.97-acre yard south of CP55 and CP54-1 instead of the 11.69-acre yard on the north edge of the upper San Diego River that was described for the FESSR. See Section 1 for a detailed discussion regarding construction yards.

The purposes for this modification include accommodation of land owner request and integration of improved engineering design.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Increase in Helix construction yard will increase visual impacts. PMR fails to consider is that this area runs directly over the San Diego River, and therefore the analysis should consider the potential impact that a construction site will have on ground water

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR36 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR36

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total
FESSR	Lakeside ceanothus	6		6

TABLE PMR36

	San Diego sunflower	2	2
Modified Project	Lakeside ceanothus	5	5

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	8.71	2.29	11.00
	Coastal and Montane Scrub Habitats	3.58	1.12	4.70
	Herbaceous Wetlands, Freshwater, and Streams	0.08	0.01	0.09
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.41	11.69	13.09
	Riparian Forests and Woodlands	0.03		0.03
	FESSR Total	**13.82**	**15.10**	**28.91**
Modified Project	Chaparrals	1.75	0.04	1.79
	Coastal and Montane Scrub Habitats	2.15	2.79	4.93
	Grasslands and Meadows	0.00	21.58	21.58
	Herbaceous Wetlands, Freshwater, and Streams	0.02	0.04	0.06
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.43	0.46	0.89
	Mod Proj Total	**4.35**	**24.91**	**29.25**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFWS Occupied Habitat	1.02	0.61	1.62
Modified Project	Arroyo Toad	USFWS Proposed Critical Habitat	0.03	21.71	21.75
	Coastal California Gnatcatcher	USFWS Critical Habitat		21.09	21.09
		USFWS Occupied Habitat	0.03	0.00	0.03

PMR36 would reduce permanent impacts to rare plant individuals (lakeside ceanothus), sensitive vegetation communities and special status wildlife species (coastal California gnatcatcher).

PMR36 would result in an approximately 22-acre temporary impact to grasslands and meadows along this alignment that would not occur with the FESSR. It would also result in a 1.67-acre increase in temporary impacts to coastal and montane scrub habitats, and a 0.03-acre increase in temporary impacts to herbaceous wetlands, freshwater, and streams compared to the FESSR due to relocating a construction yard off of Helix Water District property and an increase in the size of the yard. Impacts to grasslands and meadows, coastal and montane scrub habitat in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS. Mitigation identified in the Final EIR for this impact would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Mitigation Measure B-2a, Provide restoration/compensation for affected jurisdictional areas, would provide mitigation for this impact. The modified project, as a whole, reduces temporary impacts to grasslands and meadows from 161.49 acres to 48.40 acres, reduces temporary impacts to coastal and montane scrub habitat from 114.56 acres to 66.94 acres, and reduces temporary impacts to herbaceous wetlands, freshwater, and streams from 10.73 acres to 2.73 acres. For these reasons, this modification would not result in a substantial increase in previously identified significant impacts to sensitive vegetation communities.

This modification would result in 21.71 acres of temporary impacts to proposed critical habitat for the arroyo toad. While the location for this yard was not specifically considered in the Final EIR/EIS, the yards it would replace was also within proposed critical habitat for the arroyo toad. See Section 1 for

additional details regarding construction yards along the modified project. The USFWS stated that proposed critical habitat is not considered in the Section 7 consultation and would not be pertinent to analyze in the EIR/EIS. No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was finalized but impacts to the arroyo toad were analyzed using suitable habitat. Suitable habitat for the arroyo toad was expected to occur along the San Diego River although it was not identified specifically for the Helix construction yard. Impacts to the arroyo toad and its habitat were assessed as Class II (significant but mitigable to less than significant levels) in the Final EIR/EIS and mitigation was identified that would reduce this impact to less than significant (Mitigation Measure B-7j, Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/ compensation strategies). The same mitigation measures would also be required for the PMR and are adequate to mitigate this increase, as well, such that impacts would remain less than significant consistent with the Final EIR/EIS. Additional mitigation is not expected to be necessary to comply with the USFWS' Biological Opinion because impacts of the modified project are within the take threshold for critical, suitable, and occupied habitat identified in the Biological Opinion is.

Impacts to jurisdictional waters and wetlands in the FESSR project area was determined to be significant but mitigable to less than significant in the Final EIR/EIS. PMR36 would reduce permanent impacts to waters of the U.S. from 0.03 acres to 0.00 acres; temporary impacts would remain the same. PMR36 would reduce permanent impacts to waters of the State from 0.09 acres to 0.00 acres and increase temporary impacts to waters of the State from 0.01 acres to 0.04 acres. Mitigation Measure B-1c, Conduct biological monitoring, and B-2a, Provide restoration/compensation for affected jurisdictional areas, identified in the Final EIR/EIS for this impact would also be required for the modified project and would be adequate to ensure that impacts to jurisdictional waters would still be Class II consistent with the Final EIR/EIS. Overall, permanent impacts to waters of the U.S. would be reduced from 14.49 acres with the FESSR to 3.77 acres with the modified project; temporary impacts to waters of the U.S. would be reduced from 80.21 acres with the FESSR to 11.02 acres with the modified project. Overall, permanent impacts to waters of the State would be reduced from 15.39 acres with the FESSR to 4.14 acres with the modified project, and temporary impacts to waters of the State would reduced from 82.81 acres with the FESSR to 12.01 acres with the modified project.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed route modification would result in a slight decrease in ground disturbance, which would reduce visible long-term land scarring. However, the modification would still result in the considerable structure skylining along the ridgeline, which exacerbates structure visibility and prominence.

By introducing a larger construction yard than originally proposed, modified project would result in an increase in the impacts on Visual Resources along this route segment. Also, the new yard would be shifted to the south side of the San Diego River, into the center of the valley. This new location would place the facility in a more spatially prominent location within the primary cone of vision of travelers on El Monte Road. The increased scale and locational prominence of the facility would increase visual contrast and result in an adverse visual impact. The Final EIR/EIS concluded that construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at the construction and storage yards. The Final EIR/EIS assumed that construction impacts at these sites could last two years and the resulting visual impacts would be significant but mitigable (Class II). Mitigation Measures V-1a, Reduce visibility of construction activities and equipment and V-1b, Reduce construction night lighting impacts are required to reduce the impacts to levels that would be less than significant. Given the relatively short-term duration of this visual impact (approximately 12 months), the impact is not considered significant. Therefore, overall the modification

would not substantially change the impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR36 does not affect or change direct impacts to cultural resources.

Transportation and Traffic: The proposed modification would result in helicopter construction of 10 structures along Link 5 and would increase the size of a construction yard by approximately 9 acres. Helicopter construction would reduce the amount of construction-related roadway traffic on local roadways and would therefore result in an incremental decrease in traffic related impacts discussed in the Final EIR/EIS. The increased size of the construction yard would allow for an incremental increase in the amount of construction traffic to access the yard over the duration of construction activities but is not expected to result in substantially increased traffic. Construction-related traffic would be required to adhere to the requirements of mitigation measures discussed in the Final EIR/EIS. Therefore this modification would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts. See Section 1 for additional analysis regarding helicopter construction.

Water Resources. The Final EIR/EIS analyzed an 11.69-acre yard on the north side of the San Diego River. The modification would relocate the temporary construction yard to the south side of the San Diego River for approximately 12 months; however, applicant proposed measures and a Stormwater Pollution Prevention Plan were included in the Final EIR/EIS to reduce impacts to water resources through marking sensitive areas for avoidance and providing employee training (WQ-APM-3); using erosion control best management practices (WQ-APM-4); complying with the State of California General Permit for Storm Water Discharge Associated with Construction Activity (WQ-APM-14); and situating access roads away from stream channels and minimizing stream disturbance, including to the San Diego River. With the implementation of these measures, the overall impact assessment and significance conclusions would not change with temporary use of the Helix Construction Yard.

Other Affected Issue Areas.

No substantial change in noise impacts. The modified alignment (transmission line) would not be located nearer to any sensitive receptors than the FESSR. The Helix Construction Yard would be located nearer to some sensitive receptors (approximately 600 feet) than the previously proposed construction yards (located over 1,000 feet from the same receptor) However, it would also be located farther from some sensitive receptors (approximately 700 feet) than the previously proposed construction yards (less than 100 feet from the closest receptor). EIR/EIS Section E.1.8 describes noise impacts for the Interstate 8 Alternative (where the Helix Construction Yard is proposed). The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for construction. On page D.8-16, the EIR/EIS states that “Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA.” Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains the same as with the FESSR, significant (Class I), above baseline levels from either the FESSR or PMR16 from construction, including the undergrounding, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR36 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of significant impact

previously examined in the EIR/EIS. PMR36 would have environmental impacts similar in context to those of the FESSR. Although it would increase temporary ground disturbance, the modification would be preferred to the FESSR because it would reduce permanent ground disturbance, associated permanent biological impacts and permanent visual impacts.

MODIFICATION SUBUNIT 37: CP44-1 TO CP37-2 (COUNTY AQUEDUCT PMR37)

Brief Description and Purpose

This modification would straighten the FESSR ROW and reduce the length and number of access roads. The primary purpose for this modification is to avoid encroachment in the San Diego County Aqueduct ROW.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR37 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR37

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	6.65	3.21	9.86
	Coastal and Montane Scrub Habitats	0.35		0.35
	Grasslands and Meadows		1.19	1.19
	Herbaceous Wetlands, Freshwater, and Streams		2.54	2.54
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.37	6.74	8.11
	FESSR Total	**8.37**	**13.68**	**22.05**
Modified Project	Chaparrals	1.19	1.54	2.73
	Coastal and Montane Scrub Habitats	0.41	0.01	0.42
	Herbaceous Wetlands, Freshwater, and Streams		0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.26	0.13	0.39
	Mod Proj Total	**1.86**	**1.68**	**3.54**

Impacts to Special Status Species (acres)

TABLE PMR37

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFWS Occupied Habitat	0.25		0.25
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	5.83		5.83
Modified Project	Coastal California Gnatcatcher	USFWS Occupied Habitat	0.06		0.06
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.27	1.67	2.95

This modification would reduce temporary and permanent impacts to chaparrals, grasslands and meadows, and herbaceous wetlands, freshwater, and streams. It would result in a 0.06-acre increase to permanent impacts to coastal and montane scrub and a 0.01-acre increase to temporary impacts to coastal and montane scrub.

Permanent impacts to coastal California gnatcatcher and Quino checkerspot butterfly habitat would decrease; temporary impacts to Quino checkerspot butterfly ("QCB") would increase by 1.67 acres. Impacts to QCB in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS. Mitigation Measure B-7i, Conduct quino checkerspot butterfly surveys and implement appropriate avoidance/minimization/compensation strategies, would also provide habitat-based mitigation for these impacts. Overall, the modified project would reduce temporary impacts to QCB from 85.76 acres to 17.49 acres. For these reasons, this increase in temporary impacts to QCB would not represent a substantial increase in the severity of a previously identified significant impact.

Impacts to coastal and montane scrub habitats were assessed as Class I in the Final EIR/EIS and would require mitigation to reduce these impacts including restoration/compensation for affected sensitive vegetation communities. The same mitigation requirements would apply to the PMR. Overall, the modified project would reduce temporary impacts to coastal and montane scrub habitats from 114.56 to 66.94. For these reasons, this modification would not result in any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Neither the FESSR nor the PMR37 would result in permanent impacts to jurisdictional waters. PMR 37 would reduce temporary impacts to waters of the U.S. and temporary impacts to waters of the State from 1.24 acres to 0.00 acres.

The CPUC and BLM have independently reviewed the information and analysis provided by SDG&E for this impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided, documenting changes in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR37 does not affect or change impacts to cultural resources.

Geology/Mineral Resources. The modified project would move the ROW closer to the Hanson Aggregates Pacific Southwest Inc. property which would increase impacts to mineral resources. The severity of the impact to the access to known mineral resources in the FESSR project area was determined to be significant but mitigable in the Final EIR/EIS, and the increase in impacts does not

substantially increase the severity of this significant impact. Mitigation Measure G-9a, Coordinate with quarry operations, would also provide compensation for these impacts. Hanson Aggregates has been provided mapping information, an easement document, and an offer of compensation. Excavation for mining operations within the easement corridor would be allowed, with certain exceptions, such as near tower footings, etc. SDG&E and Hanson Aggregates continue to work toward reaching a mutually acceptable agreement in this regard.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR37 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR37 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce permanent ground disturbance, associated permanent biological impacts and permanent visual impacts.

MODIFICATION SUBUNIT 38: CP37-2 TO CP31-2 (SCHMIDT PMR38)

Brief Description and Purpose

This modification has two components:

- It would move the FESSR ROW up to 1,000 feet west, straighten the ROW, eliminate two structures, and reduce the number and length of access roads.
- If would eliminate a construction yard west of San Vicente Road.

The primary purpose for this modification is to accommodate landowner requests in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would not result in a substantial increase in the severity of previously identified significant impacts to biological resources. Table PMR38 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR38

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Chaparrals	2.05		2.05
	Coastal and Montane Scrub Habitats	3.63	0.53	4.16

TABLE PMR38				
	Grasslands and Meadows	1.03	32.34	33.37
	Herbaceous Wetlands, Freshwater, and Streams	0.00	0.00	0.01
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.71		0.71
	Woodlands and Forests	0.01		0.01
	FESSR Total	**7.42**	**32.87**	**40.30**
Modified Project	Chaparrals	0.88	0.01	0.89
	Coastal and Montane Scrub Habitats	1.45	0.01	1.46
	Grasslands and Meadows	0.20		0.20
	Herbaceous Wetlands, Freshwater, and Streams		0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.28		0.28
	Mod Proj Total	**2.81**	**0.02**	**2.83**

This modification would reduce temporary and permanent impacts to sensitive vegetation, except temporary impacts to chaparrals. There would be a 0.01-acre increase in temporary impacts to chaparrals. Impacts to chaparrals in the FESSR project area were determined to be significant in the Final EIR/EIS. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. Overall the modified project would result in a reduction in temporary impacts to chaparrals from 321.44 to 223.96 acres. For these reasons, the increase in impacts to chaparrals does not substantially increase the severity of this previously identified significant impact.

Neither the modified project nor the FESSR would impact special status species along this alignment.

The CPUC and BLM have independently reviewed the impact assessment of vegetation and species documenting a reduction in area of effect on vegetation. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. Although the proposed modification would result in a slight decrease in ground disturbance, which would reduce visible long-term land scarring, it would also result in a higher-elevation shift of structures west of State Route 67. The relocation of these structures to higher elevations on the ridges would increase visible structure skylining and prominence (from SR 67). This change represents an increase in the adverse visual impact along this route segment. Analysis in EIR/EIS Section E.1.3 for views of this portion of the route concluded that the structures would be prominently visible. Skylining would exacerbate structure prominence and the facilities would introduce structural complexity and industrial character into the landscape. The severity of the visual impact in the FESSR project area was determined to be significant and unavoidable (Class I) in the Final EIR/EIS, and the modification does not substantially increase the severity of this impact. The overall impact assessment and significance conclusions (significant and unavoidable) would not change.

Cultural Resources. PMR38 does not affect or change impacts to cultural resources.

Land Use. PMR 38 was designed to accommodate a landowner request per Mitigation Measure L-2b, Revise project elements to minimize land use conflicts. It would reduce impacts to one land owner (APN: 32405107) by moving the land upslope and off the flat areas of the property. However, the realignment would still impact the same property owners as the FESSR. Other property owners impacted by this modification include the County of San Diego, Richard Najor, Oscar Gavieres and the Clapp family. Each of these entities was contacted regarding this reroute by SDG&E through the easement negotiation process and have been cooperative through the process. The modification would not substantially change impacts to most land owners as it would still be on their property although at a slightly different location than with the FESSR; however, it would reduce impacts to one land owner.

Geology/Mineral Resources. The modified project would move the ROW closer to the Hanson Aggregates Pacific Southwest Inc. property. Both the original alignment and current revised alignment would impact future plans to mine underlying aggregate on the Hanson properties, although neither the FESSR nor the modified project would impact current quarry operations. After being notified of the modified project, Hanson Aggregates expressed a preference for the original alignment but understood and accepted the rationale for the alignment change.

PMR38 would result in a loss of aggregate because of an inability to extract due to tower, tower staging access pad/platform (TSAP) and the connecting footpath locations. The appraisers are proceeding with calculations to provide a fair valuation of the loss at this time, and SDG&E continues to coordinate this item with Hanson Aggregates.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR38 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR38 would have environmental impacts similar in context to those of the FESSR. Although, the higher-elevation shift of structures west of SR 67 would result in an increase in the adverse visual impact along SR 67, the modification would be preferred to the FESSR because it would reduce permanent and temporary ground disturbance, associated permanent biological impacts and would reduce land use impacts to one property owner.

MODIFICATION SUBUNIT 39: CP31-2 TO CP12-1 (SYCAMORE PRESERVE PMR39)

Brief Description and Purpose

This modification would move structures within the proposed ROW slightly, change access road locations, and reduce the length and number of access roads.

The primary purpose for this modification is to improve engineering design.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR39 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR39
Impacts to Rare Plants (number of individuals detected in impact areas)

TABLE PMR39

		Permanent	Temporary	Total
FESSR	Yellowflower tarweed	488		488
Modified Project	Yellowflower tarweed	363		363

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Coastal and Montane Scrub Habitats	7.24	3.74	10.98
	Herbaceous Wetlands, Freshwater, and Streams	0.00		0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.97	0.07	1.04
	FESSR Total	**8.21**	**3.81**	**12.01**
Modified Project	Coastal and Montane Scrub Habitats	3.82	3.53	7.35
	Grasslands and Meadows		0.27	0.27
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.95	0.55	1.50
	Woodlands and Forests		0.44	0.44
	Mod Proj Total	**4.76**	**4.79**	**9.56**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Coastal California Gnatcatcher	USFWS Occupied Habitat	0.19		0.19
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.97	1.95	3.93
Modified Project	Coastal California Gnatcatcher	USFWS Occupied Habitat	0.07		0.07
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.18	1.54	2.72

This modification would reduce impacts to coastal and montane scrub habitats and special status species.

The modification would result in a 0.27 acre temporary impact to grasslands and meadows and a 0.44-acre temporary impact to woodlands at this location, which would not occur with the FESSR. Impacts to these communities were assessed in the FEIR/FEIS (as Class I), so these increases would not represent new significant impacts. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would also provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to woodlands and forests from 17.89 acres to 4.24 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR39 will slightly reduce impacts to cultural resources. The FESSR has three resources within the Project Impact Area. The modified project has two of these resources within the

Project Impact Area and will avoid remnants of a historical structure. Therefore, for cultural resources, PMR39 is preferred.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR39 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR39 would have environmental impacts similar in context to those of the FESSR. Although, it would increase temporary ground disturbance, the modification would be preferred to the FESSR because it would reduce permanent ground disturbance, associated permanent biological impacts and would reduce impacts to cultural resources.

MODIFICATION SUBUNIT 40: CP12-1 TO CP3 (STONEBRIDGE PMR40)

Brief Description and Purpose

This modification has two components:

- It would shift structures slightly within the FESSR ROW, resulting in the elimination of two structures as well as minor reductions of permanent and temporary ground disturbance and a change from lattice to steel-pole structures along the route segment. The primary purposes for this modification are to accommodate landowner request and avoid the San Diego County Water Authority parcel.
- It would create a new 20.87-acre construction yard south of Kirkham Road between CP6-1 through CP9-1. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is to accommodate landowner requests in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts and support assembly of structures between Highway SR 67 and the existing Pomerado Substation.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR40 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR40

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total

TABLE PMR40

FESSR	Nuttall's scrub oak	10	10
Modified Project	Nuttall's scrub oak	17	17
	San Diego sunflower	1	1

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Coastal and Montane Scrub Habitats	3.07	0.93	4.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.24		0.24
	FESSR Total	**3.31**	**0.93**	**4.24**
Modified Project	Coastal and Montane Scrub Habitats	2.23	0.01	2.24
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.46	20.87	21.32
	Mod Proj Total	**2.69**	**20.87**	**23.56**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Quino Checkerspot Butterfly	USFWS Occupied Habitat	0.71		0.71
Modified Project	Coastal California Gnatcatcher	USFWS Occupied Habitat		8.11	8.11
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.00		1.00

This modification would impact approximately 70 percent more individuals of Nuttall's scrub oak (CNPS List 1B) than the FESSR (17 versus 10). The Final EIR/EIS states that Nuttall's scrub oak is a perennial shrub that was observed along portions of the alignment. Overall, the modified project would increase impacts to Nuttall's scrub oak from 10 individuals to 17 individuals. Impacts to special status plant species, including Nuttall's scrub oak, were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants without giving a specific number of individual loss. Impacts to special status plant species in the FESSR project area were determined to be significant but mitigable to less than significant for special status perennial shrubs such as the Nuttall's scrub oak in the Final EIR/EIS and implementation of Mitigation Measure B-5a and B-1a would be adequate to ensure that this increase is not substantial. Mitigation Mitigation Measure B-5a, Conduct rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies, would also provide habitat-based restoration and compensation mitigation for these impacts. Overall, the number of special status plant species and individuals would decrease with the modified project; see Table 3-6 in the PMR. For these reasons, the increase in impacts to Nuttall's scrub oak individuals does not represent a substantial increase in the severity of this previously identified significant impact.

This modification would permanently impact approximately 0.29 acres more Quino checkerspot butterfly occupied habitat than the FESSR. Impacts to Quino checkerspot butterfly ("QCB") in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS, and this increase in impacts does not substantially increase the severity of this significant impact. Mitigation Measure B-7i, Conduct QCB surveys and implement appropriate avoidance/minimization/compensation strategies, would also provide habitat-based mitigation for these impacts. Overall, the modified project would reduce permanent impacts to QCB occupied habitat from 36.16 acres to 15.16 acres. For these reasons, this increase in impacts to QCB does not represent a substantial increase in the severity of this previously identified significant impact

This modification would also result in an increase in temporary impacts to 8.11 acres of USFWS occupied coastal California gnatcatcher habitat due to the proposed Stowe/Kirkham construction yard which was

not proposed in the FESSR. In 2009, SDG&E concluded the area now proposed for this construction yard did not meet criteria for suitable gnatcatcher habitat and did not conduct USFWS protocol surveys (Chambers Group, Inc. 2009). However, the January 22, 2010 Draft SRPL/FESSR Modification Document stated that the area (i.e., the western portion of the proposed construction yard according to the PMR Database) was previously identified as USFWS occupied gnatcatcher habitat, and SDG&E has incorporated this assumption in the Final PMR report. The January 22, 2010 Draft SRPL/FESSR Modification Document, also stated that this construction yard (and the USFWS occupied habitat) occurs on graded pads, which the CPUC and BLM have independently reviewed via aerial photography in preparing comments on the draft PMR document. Impacts to the gnatcatcher were determined to be Class II in the Final EIR/EIS, so this modification would not result in a new significant impact to the species. The Final EIR/EIS identified Mitigation Measure B-7l, Conduct coastal California gnatcatcher surveys and implement appropriate avoidance/minimization/compensation strategies, as well as B-1a, Provide restoration/compensation for affected sensitive vegetation communities, which would reduce impacts to gnatcatcher to less than significant. These mitigation measures would also be required for the PMR. Overall, impacts to gnatcatcher would decrease for both temporary and permanent impacts. For these reasons, the modified project would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS

Impacts to non-native vegetation, developed areas, and disturbed habitat were considered an adverse but less than significant impact in the Final EIR/EIS because the communities are not sensitive, and no mitigation would be required unless they occur within designated critical habitat for a federal listed species; an increase in impacts would not change this determination and the impact would remain Class III consistent with the Final EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed route modification would result in a change from lattice to steel-pole structures along this route segment per a landowner request. This would increase structure prominence when viewed from the Stonebridge residential development. The route modification would also result in a reduction in ground disturbance, which would reduce long-term visible land scarring. Although the modification would result in a slight increase in project visibility along this route segment (an adverse visual change), the overall visual impact would not change substantially and the visual impact would remain significant and unavoidable consistent with the Final EIR/EIS.

The proposed Stowe/Kirkham Construction Yard would result in an increase in the impacts on Visual Resources along this route segment by introducing a temporary construction yard into an area not previously considered. This new location would place the facility in a visibly prominent location relative to the new residential developments along the hilltops immediately south of the site. The Final EIR/EIS concluded that construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at the construction and storage yards. The Final EIR/EIS assumed that construction impacts at these sites could last two years and the resulting visual impacts would be significant but mitigable (Class II). Mitigation Measures V-1a, Reduce visibility of construction activities and equipment and V-1b, Reduce construction night lighting impacts are required to reduce the impacts to levels that would be less than significant. Given the relatively short-term duration of this visual impact (approximately 12 months), the impact is not considered significant. Therefore, overall the modification would not substantially change the impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR40 does not affect or change impacts to cultural resources.

Land Use. The modified project would accommodate a landowner request and would avoid the San Diego County Water Authority parcel. However, there has been new residential and commercial development in the area since the publication of the Final EIR/EIS within the Stonebridge residential development. Property owners adjacent to the Stowe/Kirkham construction yard, north of the alignment, were notified through newspaper circulars and public venue postings throughout the EIR/EIS process, but were not individually noticed.

Transportation and Traffic: The modification would shift structures slightly within the ROW, eliminate two structures, eliminate a new access road, and add a 20.87-acre construction yard south of Kirkham Road. The addition of construction traffic to local roadways in the vicinity to travel to and from the new construction yard was analyzed in the Traffic Impact Report and would not result in substantially increased congestion on these roadways. This is because construction-related traffic would be required to adhere to the requirements of mitigation measures discussed in the Final EIR/EIS, including restricting land closures (mitigation measure T-1a) and preparing a Construction Transportation Management Plan (mitigation measure T-9a). Therefore this modification would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts at this revised location.

Other Affected Issue Areas.

Minor increases in impacts to noise. The modified alignment would not move the project closer to any sensitive receptor. The Stowe/Kirkham Construction Yard would be located adjacent to existing commercial structure and would be new. The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for construction. Page D.8-16 of the EIR/EIS states that "Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA." Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant for either the FESSR or PMR40 because the substantial noise increase above baseline levels from construction, including the undergrounding, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR40 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR40 would have environmental impacts similar in context to those of the FESSR. Although, it would increase temporary ground disturbance, the modification would be preferred to the FESSR because it would reduce permanent ground disturbance, would also avoid land use conflicts with the San Diego County Water Authority parcel, and would accommodate a landowner request.

MODIFICATION SUBUNIT 41: CP3 TO CP1A (SYCAMORE SUBSTATION PMR41)

Brief Description and Purpose

This modification has two components:

- It would add a temporary work area around one structure (CP3) without changing access, add three wire stringing sites along the borders of the Sycamore Canyon Substation, and add three structures within the existing substation.
- It would eliminate a construction yard north of Pomerado Road.

The primary purpose for this modification is to improve engineering design.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Stonebridge Powerlink Action Reroute Committee would like SDG&E to modify the configuration of the line within the existing right of way (ROW) such that it will more directly mirror existing lines
- Review and research clearances to help eliminate the need for aerial markers
- Review and confirm that fire evacuation routes from Stonebridge are adequate
- Review and confirm that standard fire fighting measures, including the use of aerial tankers, are not negatively impacted
- Stonebridge Powerlink Action Reroute Committee has also requested that SDG&E review the approach route to Sycamore Canyon Substation, and look at an approach that follows existing 230kV lines to the slightly to the south.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR41 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR41

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Coastal and Montane Scrub Habitats	0.24		0.24
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.05	10.74	10.79
	FESSR Total	**0.29**	**10.74**	**11.03**
Modified Project	Coastal and Montane Scrub Habitats	0.19	0.01	0.20
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.04	0.06	0.10
	Mod Proj Total	**0.23**	**0.07**	**0.30**

This modification would reduce permanent impacts to sensitive vegetation communities (coastal and montane scrub habitats), however, temporary impacts to coastal and montane scrub habitats would increase by approximately 0.01 acres. Impacts to these communities were determined to be significant (Class I) in the FEIR/FEIS. Mitigation identified in the Final EIR/EIS would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to coastal and montane scrub habitats from 53.56 acres to 27.47 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Neither the modified project nor the FESSR would impact special status species along the alignment.

The CPUC and BLM have independently has reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided, documenting a reduction in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR41 does not affect or change direct impacts to cultural resources.

Other Affected Issue Areas. As noted above, the Stonebridge Powerlink Action Reroute Committee included a number of comments regarding the transmission line. As the commenter notes, this neighborhood was still being developed in 2006 and 2007 and was not in existence during the time of the proceeding. The EIR/EIS anticipated that land development projects such as the Stonebridge neighborhood would be continually entering local development approval processes and for this reason, considered pending and future development as part of the project's impact analysis. (See EIR/EIS, Section D.4 Land Use.) As stated in Section D.4, if a transmission route is approved by CPUC and BLM decisionmakers, ROW acquisition and detailed design would begin soon after approval. Prior to this process, new land development projects may have been proposed or constructed by landowners on land parcels across which the transmission line would pass. Identical mitigation to that applicable to the existing development is required for the pending and future development. For example, mitigation measure L-1a (Prepare Construction Notification Plan) requires SDG&E to notify property owners prior to the commencement of construction in the area, regardless of whether the property was developed prior to or following adoption of the mitigation measure. Mitigation measure L-1b requires SDG&E to coordinate with all landowners to revise the route, where feasible, to minimize land use conflicts between the transmission line and existing/planned development. Regarding fire concerns, as stated above, based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results. Marker balls are addressed in Section 1.

The approved approach route to Sycamore Canyon Substation is within an the existing SDG&E ROW, parallel to an existing 69 kV transmission line and entirely on military lands (MCAS Miramar).

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR41 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR41 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce

permanent and temporary ground disturbance, and would reduce permanent impacts to biological resources.

MODIFICATION SUBUNIT 42: SYCAMORE CANYON TO POMERADO SUBSTATION (TL6915/TL6924) RECONDUCTORING (PMR42)

Brief Description and Purpose

The PMR42 modification would:

- replace an existing conductor with a higher capacity conductor,
- replace insulators, circuit breakers, and related equipment at the Pomerado Substation, all within the existing fence-line of the substation,
- replace 4 existing transmission poles, requiring two new wire pull sites north and south of structure 171667, and removal of existing poles and foundations, and
- replace hardware and insulators on 15 existing poles.

No new access roads or widening of existing roads is required; minor grading of existing roads may be required. The EIR/EIS analyzed reconductoring the existing Sycamore Canyon–Pomerado 69 kV circuit entirely on existing structures.

The primary purpose of the modification is to increase power delivery/export capacity at the Sycamore Canyon Substation.

As stated in the PMR, elimination of the proposed Coastal Link in the Final EIR/EIS necessitated additional system upgrades to improve overall reliability of the system because the two new Sunrise 230kV transmission lines both terminate into the Sycamore Canyon Substation. The power flowing from Sunrise into Sycamore Canyon Substation will be dispersed to adjoining substations via the existing 69kV, 138kV and 230kV transmission lines connecting Sycamore Canyon Substation to other substations in the SDG&E grid. The amount of power flowing on each of these lines is determined by each lines electrical resistance characteristics (or impedance), and not by its voltage or the size of the conductors themselves. A study of the operating conditions after the addition of the Sunrise 230kV lines demonstrated that in addition to TL639 (PMR43 – Elliott), which was already identified as experiencing an overload even with the Coastal Link, three additional 69kV lines at Sycamore Canyon Substation experienced overloads (TL's 6915, 6924 (PMR42 – Pomerado), and 6916 (PMR44 – Scripps)). The power flowing in these lines exceeded the rating of the conductors. Therefore, the lines are being reconductored to relieve these overloaded conditions.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR42 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR42
Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	**None**	Permanent	Temporary	Total
Modified Project	Coastal and Montane Scrub Habitats		0.09	0.09
	Grasslands and Meadows		1.56	1.56
	Non-native Vegetation, Developed Areas, and Disturbed Habitat		1.26	1.26
	Mod Proj Total		**2.91**	**2.91**

There would be a 1.56-acre temporary impact to grasslands and meadows and a 0.09-acre temporary impact to coastal and montane scrub habitats that would not occur at this location with the FESSR. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS for these impacts would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. Under this project modification, existing steel pole structures Z171687, Z171688, Z171690 and Z171691 would be replaced with steel pole structures approximately 6 feet taller that include marker balls and warning lights to meet Federal Aviation Authority (FAA) requirements. See Section 1 regarding marker balls and warning lights. Although this would increase the adverse visual impacts that would occur along this route segment under the FESSR, this adverse visual effect would not substantially change overall impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions (adverse but less than significant) would not change. This is because the upgrade to existing transmission facilities would not introduce substantially different structures. Operational impacts would be minimally noticeable because the new components (insulators, conductors, and new poles) would appear similar to identical when compared to the components that would be replaced.

Cultural Resources. PMR42 does not affect or change direct impacts to cultural resources.

Land Use. SDG&E states that the activities would not alter and otherwise impact land uses along the ROW. This is because all of the modification impacts would occur within an existing right-of-way and the modification would not result in a modification to any project component such that it is nearer to any sensitive receptors. Impacts of the modification would not result in new significant impacts, and while the increased construction activity in the area would temporarily disrupt existing land uses, applicant proposed measures and Mitigation Measure L-1a would be adequate to ensure that this increase is not substantial. **Transportation and Traffic.** This modification would result in replacement of existing conductors and four existing transmission poles, and upgrades to Pomerado Substation. This

modification would require two new wire pull sites, and removal of existing poles and foundations. Temporary lane closures may occur along Stowe Road, Blaisdell Place, Scripps Poway Parkway, Kirkham Way, Beeler Canyon Road, and Stonebridge Parkway. Lane closures would be limited to off-peak traffic periods. Traffic speeds along arterial/collector roadways such as Stowe Road, Scripps Poway Parkway, Kirkham Way, and Stonebridge Parkway may need to be reduced and some traffic may experience brief delays during the reconductoring process. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways caused by construction vehicles and/or equipment would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4 (Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan) to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts or a substantial increase in the existing impact.

Other Affected Issue Areas. Disposal of the 4 existing poles would slightly increase impacts to waste facilities/landfills, but impacts would remain less than significant consistent with the Final EIR/EIS. As stated in Section D.14, there would be adequate landfill capacity for the systems upgrades because construction of this short alternative would represent a fraction of the overall public service requirements of the FESSR or existing facilities supply.

The CPUC and BLM agree with SDG&E that temporary impacts to adjacent residents would occur from increased construction noise to the sensitive receptors along the reconductored line. Sensitive receptors are located approximately 100 feet from the reconductoring. However, sensitive receptors would be no closer to PMR42 than they would be to the FESSR. Impacts caused by construction noise were evaluated in the Final EIR/EIS depending on the proximity to sensitive receptors and determined to be Class I, so increases in impacts by this modification would not represent new significant impacts. The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for construction. Page D.8-16 of the EIR/EIS states that “Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA.” Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant for either the FESSR or PMR40 because the substantial noise increase above baseline levels from construction, including the undergrounding, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR42 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR42 would have environmental impacts similar in context to those of the FESSR. Although the PMR42 reroute would slightly increase biological, waste and noise impacts with the replacement of 4 existing poles with taller structures and two new pull sites, the modifications are preferred to the FESSR because they would be necessary for the installation of higher capacity conductor allowing for the elimination of the Coastal Link and would occur entirely within an existing SDG&E ROW.

MODIFICATION SUBUNIT 43: SYCAMORE CANYON TO ELLIOTT SUBSTATION (TL639) RECONDUCTORING (PMR43)

Brief Description and Purpose

This modification would:

- replace transmission conductors on 84 poles in an 8.2-mile ROW,
- replace 7 wooden poles in addition to the 10 wooden poles identified in the Final EIR/EIS for a total of 17 wooden poles, requiring 8 wire pulls along the ROW, and
- replace an existing underground cable.

No new access roads or widening of existing roads would be required; minor grading of existing access roads would be required. The Final EIR/EIS analyzed replacement of 11 existing poles.

The primary purpose for the modification is to meet all clearance requirements for the upgraded circuit and increase power capacity at the Sycamore Canyon Substation. See Modification Subunit 42 for information regarding the Coastal Link upgrades.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- The PMR proposes the replacement of 16 poles with 17 poles for reconductoring of 69 kV lines from Sycamore Canyon Substation, including replacing six poles not originally considered for replacement in the EIR/EIS. Replacing six poles would affect visual resources, especially if materials used would contrast rather than blend with the surrounding environment.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR43 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR43

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	**None**	Permanent	Temporary	Total
Modified	Chaparrals		0.10	0.10

TABLE PMR43			
Project	Coastal and Montane Scrub Habitats	0.08	0.08
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.52	1.52
	Mod Proj Total	**1.70**	**1.70**

There would be a 0.1-acre increase in temporary impacts to chaparrals and a 0.08-acre increase in temporary impacts to coastal and montane scrub habitats. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS to reduce these impacts would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres and would not represent a substantial increase in the severity of an impact previously examined in the EIR/EIS. For these reasons, this modification would not result in a substantial increase in the severity of a previously identified significant impact to these vegetation communities.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would result in an increase in structure height at eight locations and the reduction in structure height at three locations. The modification would also result in a slight increase in ground disturbance. However, the overall visual impact along this route segment would not substantially change, and the overall impact assessment and significance conclusions (adverse but less than significant) would not change. This is because the increase in existing transmission structure height would not introduce substantially different structures. Operational impacts would be minimally noticeable because the new components (insulators, conductors, and new poles) would appear similar to identical when compared to the components that would be replaced.

Cultural Resources. PMR43 does not affect or change direct impacts to cultural resources.

Transportation and Traffic. This modification would include replacing transmission conductors on 84 poles in an 8.2-mile ROW, replacing 16 wooden poles with 17 wooden poles, adding and using 8 wire pulls along the ROW, and replacing an existing underground cable. Temporary lane closures may occur along Scripps Lake Road, Scripps Ranch Boulevard, Ironwood Road, Pomerado Road, and Rue Biarittz. Lane closures would be limited to off-peak traffic period. Traffic speeds along arterial/collector roadways such as Scripps Ranch Boulevard and Pomerado Road may need to be reduced and some traffic may experience brief delays during the reconductoring process. Due to the temporary nature of the lane closures, operation and access by emergency services would not be affected. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4, Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan, to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts nor a substantial increase in the severity of an existing impact.

Ground Disturbance/Other Affected Issue Areas.

Disposal of the 16 existing poles would slightly increase impacts to waste facilities/landfills compared with the 11 poles removal as analyzed in the Final EIR/EIS, but impacts would remain less than significant consistent with the Final EIR/EIS.

Overall Conclusion.

The analysis in the Final EIR/EIS remains valid. PMR43 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR43 would have environmental impacts similar in context to those of the FESSR. Although there would be an increase in ground disturbance and noise impacts, PMR43 reconductoring would be similar to the FESSR and would meet all clearance requirements of the upgraded circuit and increase power capacity at the Sycamore Canyon Substation.

MODIFICATION SUBUNIT 44: SYCAMORE CANYON TO SCRIPPS SUBSTATION (TL6915) RECONDUCTORING (PMR44)

Brief Description and Purpose

This modification would:

- replace transmission conductors on 48 poles in a 6.4 mile ROW, requiring 8 wire pulls along the ROW,
- require two underground upgrades: a new 900-foot-long double circuit 69 kV duct package and a 7,725 replacement cable within existing underground cable ducts,
- upgrade work within the Scripps Substation to accommodate the increased circuit flows, including replacement of circuit breakers and disconnects and other associated equipment.

No new access roads or widening of existing roads would be required; minor grading of existing access roads would be required.

The primary purpose for the modification is to increase power capacity at the Sycamore Canyon Substation. See Modification Subunit 42 for information regarding the Coastal Link upgrades.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR44 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR44

TABLE PMR44

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	None	Permanent	Temporary	Total
Modified Project	Chaparrals		0.10	0.10
	Coastal and Montane Scrub Habitats		0.16	0.16
	Grasslands and Meadows		0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat		1.33	1.33
	Mod Proj Total		**1.59**	**1.59**

There would be a 0.1-acre increase in temporary impacts to chaparrals and a 0.16-acre increase in temporary impacts to coastal and montane scrub habitats. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS for impacts to sensitive vegetation communities would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres. For these reasons, this modification would not result in a substantial increase in the severity of an impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR44 would not increase impacts to cultural resources. The FESSR has no resources within the Project Impact Area. The modified project has one resource (prehistoric lithic scatter) within the Project Impact Area. While the modified project has one more resource within the Project Impact Area, SDG&E has made recent design revisions for other project issue areas which avoid all cultural resources. Therefore, PMR44 does not affect or change impacts to cultural resources.

Transportation and Traffic. This modification would include replacing transmission conductors on 48 poles, eight new wire pull sites along the ROW, two underground upgrades, and upgrades at the Scripps Substation. Temporary lane closures may occur along Scripps Lake Road, Scripps Ranch Boulevard, Ironwood Road, Pomerado Road, and Rue Biarittz. Lane closures would be limited to off-peak traffic period. Traffic speeds along arterial/collector roadways such as Scripps Ranch Boulevard and Pomerado Road may need to be reduced and some traffic may experience brief delays during the reconductoring process. Due to the temporary nature of the lane closures, operation and access by emergency services would not be affected. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4, Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan, to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts nor in a substantial increase in severity of an existing impact.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR44 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR44 would have environmental impacts similar in context to those of the FESSR. Although there would be an increase in ground disturbance and noise impacts, PMR44 reconductoring would be similar to the FESSR, would meet minimum clearance requirements over Highway SR 52, and would increase power capacity at the Sycamore Canyon Substation.

References

Avery, M. and T. Clement. 1972. Bird mortality at four towers in eastern North Dakota: Fall 1972. Prairie Naturalist 4:87-95.

Chambers Group, Inc. 2009. Final Sunrise Powerlink Project 2009 California Gnatcatcher Report. December.

Crawford, R.L. and W.W. Baker. 1981. Bats killed at a north Florida television tower: a 25-year record. Journal of Mammalogy 62:651-652.

Ganier, A.F. 1962. Bird casualties at a Nashville TV tower. Migrant 33:58-60.

Gollop, M.A. 1965. Bird migration collision casualties at Saskatoon. Blue Jay 23:15-17.

RECON. 2009a. 2009 Riparian Bird Survey Report for the SDG&E Sunrise Powerlink Project. December 31.

2009b. 2009 Arroyo Toad Survey Report for the SDG&E Sunrise Powerlink Project. December 22.

Sleep, D. and R. Brigham. 2003. An experimental test of clutter tolerance in bats. Journal of Mammalogy. 84(1): 216-224.

Taylor, W. K. and B. H. Anderson. 1973. Nocturnal migrants killed at a central Florida TV tower: Autumns 1969-1971. The Wilson Bulletin 85(1): 42-51.

U.S. Fish and Wildlife Service. 2005. Endangered and Threatened Wildlife and Plants; Final Designation of Critical Habitat for the Arroyo Toad (Bufo californicus); Final Rule. Federal Register 70: 19562-19633.

Van Gelder, R.G. 1956. Echo-location failure in migratory bats. Transactions of the Kansas Academy of Science 59:220-222.

Zinn, T.L. and W.W. Baker. 1979. Seasonal migration of the hoary bat, Lasiurus cinereus, through Florida. Journal of Mammalogy 60:634-635.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-8793	BLM	Prehistoric Artifact Scatter	Structure was placed to parallel (soldier) SWPL to minimize visual impacts and to minimize new access roads. The potential area of site impact is estimated to be 1169 square meters. The site is recorded as 4 pieces of debitage and one core and three ceramic sherds. Will be able to create an ESA for a portion of the site area, small potion within the work area will be protected to the degree possible and evaluated prior to construction to determine the presence of surface and subsurface artifacts.	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the northwest side of the structure.
10B	IMP-1015/4348/8744	BLM	Prehistoric Artifact Scatter	The structure was placed to parallel (soldier) SWPL to minimize visual impact and to minimize new access roads. A series of dry washes surround this area, limiting the choice of structure location within the approved ROW. The cultural resource sites occupy a large area to the south and east of the structure. Impacts are within the temporary work area and may be able to be avoided through establishing an ESA at the edge of the work areas and on the perimeter of the access road without changing the proposed location. The Sunrise survey resulted in an expansion of the various artifact scatter areas to link these smaller areas into one larger overall site. There are extensive areas of open space between surface artifacts and evaluation efforts will provide the opportunity to define the areas of potential direct impact, if any.	An effort was made to adjust the locations from the proximity of the cultural sites and dry washes. Due to the size and locations of the sites, tower locations could not be relocated to maintain conductor to ground clearances.
10B	IMP-3784/3785/4340/4341/4344	BLM	Prehistoric Artifact Scatter	The structure was placed to parallel (soldier) SWPL to minimize visual impacts and to minimize the creation of new access roads. A number of dry washes surround this location limiting the choice of placement within the approved ROW that will not result in impacts to dry washes. The archaeological sites occupy a large area surrounding the structure. The overall site is sufficiently large to not allow a shift within the approved ROW without significant changes in other structures and additional, significant impacts to biological resources from ground disturbance and possible addition of more structures to span a greater distance between structures.	An effort was made to adjust the locations from the proximity of the cultural sites and dry washes. Due to the size and locations of the sites, structures could not be relocated to maintain conductor to ground clearances.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-4237	BLM	Prehistoric Artifact Scatter	Structure was placed to parallel (soldier) SWPL to minimize visual impacts and to avoid dry washes to the degree possible. This location also minimizes the creation of new access roads. The terrain in this area becomes more undulating and erosion areas are significant limiting the number of areas that are suitable for the placement of a structure. The placement of the structures within the approved ROW is limited by load capacity of the towers not exceeding approximately 1/4 mile between structures without the need to add additional structures or change the overall structure type to withstand greater loads. The recorded archaeological site is large and the two proposed structures are at opposite edges of the recorded limits in an east/west direction. The structure was placed as far outside the site as possible with the access road traversing the site over the shortest possible distance from the existing SWPL access road to minimize ground disturbance and minimize biological impacts.	The Sunrise centerline was relocated to the extent possible to avoid the cultural site and dry washes. Both structures were adjusted along the relocated centerline to avoid and/or minimize impacts to the cultural site and dry washes but still maintain conductor to ground clearances.
10B	IMP-10898	BLM	Prehistoric Lithic Scatter, Changed to an isolated find by ASM Inventory	Not a direct impact as the site was reclassified as an isolated find of one metavolcanic flake	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the southwest side of the structure.
10B	IMP-10372	BLM	Prehistoric Artifact Scatter	Structure was placed to soldier SWPL line to minimize visual impacts and use the existing access to this area to minimize new ground disturbance. Limits to the location of the structure are because of the change in altitude approaching Sugarloaf. A significant dry wash is west of this location and the ROW was approved across the Sugarloaf Peak to be consistent with SWPL. An ESA may be established at the northern portion of the work area to avoid surface artifacts and a careful examination of the ground surface within the site area that corresponds with the work area will be completed prior to construction to ensure that no additional surface artifacts are present. If determined necessary a subsurface exploration can be completed to assess the presence of buried or masked archaeological materials. If the Sugarloaf re-route is selected this resource area will not be impacted.	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the southwest side of the structure.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-3708	BLM	Prehistoric Artifact Scatter and trail segment	Structure was placed to soldier SWPL line to minimize visual impacts and use the existing access to this structure. Very short segment of new road will be required, existing access road will not be changed, area of impact is small and the overall site area has been disturbed by existing roads. Limits of existing road will be staked and not altered for project. If the Sugarloaf re-route is selected this resource area will not be impacted.	Pursuant to the recommendation of the site visit report, the Sugarloaf Re-route was designed.
10B	IMP-103/3710	BLM	Prehistoric Habitation, Trial	Structure was placed to soldier SWPL and use the same disturbed areas. Limitations of re-location based on terrain and clearance requirements for I-8 crossing. Visual impacts are reduced to some degree by maintaining consistent pattern with SWPL across this corridor and creating the shortest exposure to the visual intrusion in this corridor. Structure is well back from the I-8 corridor to the north and above the viewshed to the south. Maximum span with minimal number of structures, terrain considerations. Area of the structure placement does not have any evidence of surface artifacts although it is within the site boundary as mapped. This area will be carefully examined prior to construction to determine if any artifacts are present. A subsurface exploration can also be completed. The limits of construction activity will be maintained to the absolute minimum and the previously disturbed areas will be used to the extent possible for construction activity. If the Sugarloaf re-route is selected this resource area will not be impacted.	Pursuant to the recommendation of the site visit report, the Sugarloaf Re-route was designed.
10A	IMP-4228	BLM	Prehistoric Habitation	Both structures are helicopter construction with disturbance at the foundation area including work zone. Mapped site area covers several hundred meters and is made-up of 12 separate site areas that were joined into one large site in 2007. The size is s**u**fficiently large that there is no way to shift structures out of the site area and maintain the approved ROW alignment or span the site. If the Sugarloaf re-route is chosen this resource area would not be impacted. The impact to the site will be specific to the foundation and work areas only and the presence of artifacts is not necessarily specific to these areas of the site. A careful examination of the ground surface at the plotted locations of these structures will be completed prior to construction to determine the presence of cultural resources. A subsurface exploration can be completed if appropriate prior to construction.	Pursuant to the recommendation of the site visit report, the structure was relocated 100-feet north. Due the size of the cultural site and the topography, no other adjustments were possible.
10A	IMP-10897	BLM	Prehistoric Artifact Scatter	Area of direct impact altered to avoid impact with IMP-10897. No impacts anticipated at this site as the TSAP was removed.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
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9C	SDI-9188	Private	Prehistoric Bedrock Milling	It may be possible to establish an ESA and avoid impacts to this site which is recorded on the western edge of the proposed work area and not within the actual foundation area for the structure. ESA will be established prior to construction and will limit access to the mapped site area. A careful examination of the ground surface in the mapped site area and the immediate adjacent areas will be completed to assess the presence of surface artifacts. A subsurface exploration can be completed as appropriate and directed by the BLM.	Pursuant to the site visit report, the existing road was utilized to the extent practical with minor improvements for curve widening and construction pads.
9C	SDI-7073/7083/8306	Private	Prehistoric Artifact Scatter	A significant consideration in the area between structures in this area is the exceptional density of recorded sites, many of which occupy an expansive footprint. The ROW passes through this area as part of the partnering with SWPL and the lines diverge just west of Jade Peak, with Sunrise maintaining a more northern rather than southern path. The approved ROW would require a significant reroute across the Jacumba Plateau to avoid sites. The presence of the Interstate, Old Highway 80, natural features and resources, endangered species and visual considerations and maintaining placement on public land to the degree possible are all factors in the consideration of the ROW across this area and the placement of the specific structures. The foundation for one structure is outside the site area as mapped. The impacts could come from the work areas and stringing sites, one of which is completely within the site and one is only partially in the mapped site area. This structure has been re-located three times to minimize impacts and maintain proper engineering in this section of the ROW. The area chosen soldiers an existing SWPL tower to minimize visual impacts and maximizes the use of existing access roads to limit the need to construct new roads. The use of ESAs may be effective in limiting the potential for ground disturbance and may allow for a more limited need for evaluation. This is an angle structure and the location is difficult to adjust within the ROW in order to maintain the proper angle and accommodate the two stringing sites that are necessary outside the ROW at an angle structure to pull and tension conductor.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
9C	SDI-7074/7075/7076/15879	Private	Prehistoric Bedrock Milling	The foundation for this structure is at the site boundary with approximately 1/2 of the work area within the site. There are no artifacts mapped on the surface in this area based on the Inventory report and the work area can be staked to minimize the activity within the site area. There are no surface artifacts mapped in this area of the large site and a careful survey of the proposed structure location will be completed prior to construction to determine the presence of artifacts. Subsurface evaluation can be conducted as directed by the BLM. The structure will be constructed by helicopter which will reduce the overall ground disturbance footprint.	Cultural site visit notes indicated that there were no resources affected by the foundations.
9C	SDI-7060	BLM	Prehistoric Artifact Scatter	This site is mapped over a large area that includes the locations of two structures. The structure is at the eastern edge of the site and a portion of the work area and the foundation for the structure are within the site area. The location of this structure is within the approved ROW and there is a drainage close by and Old Highway 80 is a short distance to the south. The ROW crosses OH 80 between structures and spacing in proximity to the roadway incurs some limitations. There is limited space in this area that does not have a recorded cultural resource in addition to natural resource considerations. One structure is completely within the mapped site area including the access road. There are two drainages that require avoidance and an existing access road contributed to minimizing the amount of new ground disturbance. There is no place along this segment, within the approved ROW, where this structure could be moved and not impact a cultural resource site. The area selected for structure placement appears to have a minimal surface presence of cultural resource items.	Relocations of two structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-6776/7051/7059/19035	BLM	Prehistoric Artifact Scatter	This is a large site created by linking a number of smaller surface artifact concentrations together. The ROW in this area is between I-8 and Old Highway 80 on public land. The large size of the site and the presence of a number of natural features such as drainages, washes, and undulating terrain limit the areas where structures can be placed within the approved ROW and completely avoid cultural resources.	Relocations of two structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-7052	BLM	Prehistoric Lithic Scatter	This access road was eliminated.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
9C	SDI-19304	BLM	Prehistoric Lithic Scatter	The location of this structure was determined by the maximum distance between three structures which were placed to minimize disturbance to biological resources and to minimize visual impacts. There are a number of drainages and washes in this area with some terrain considerations for construction, access, and required clearance for the conductor.	Relocations of several structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-18063	BLM	Historic Refuse	This access road was eliminated.	
9C	SDI-7043/7044	Private/BLM	Prehistoric Lithic Scatter	There are a number of significant drainage features in this area and terrain considerations. The placement of two structures was based on the maximum span (minimize ground disturbance with additional structure) and maintaining placement within the approved ROW. There are also considerations of visual impacts to I-8 and Old Highway 80 as well as private property concerns in this area of the project.	Relocation of structures was considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-19281	Private	Prehistoric Lithic Scatter	This tower location was optimized for best location to reduce impacts to the property and impacts to the County landing strip to the south of this location. The visual impacts would be reduced by the present location as it matches up with the SWPL structure location.	Relocation of structures was considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-19303	Private	Prehistoric Bedrock Milling	These will be helicopter structures, there is an existing access road that will not be changed for the project, but will be driven on. There is a stringing area proposed within the mapped site boundary and guard structures to protect the road during stringing. Surface artifact mapping does not show artifacts at the proposed location of the structure or the stringing site. There is a scatter of surface artifacts (debitage, cores) at the plotted location of the structure. The segment was revised once (Quino Re-route) between structures to avoid biological impacts.	Due to the size and location of the cultural site, no structure relocations were practical.
9C	SDI-7030/7951/9153/19268	Private	Prehistoric Bedrock Milling	The size of this site coupled with the size of CA-SDI-19303, immediately adjacent to the east, creates difficulty in relocation of structures to avoid impacts. The segment was revised once (Quino Re-route) between structures to avoid biological impacts.	Due to the size and location of the cultural site, no structure relocations were practical.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
9B	SDI-4788	BLM	Prehistoric Bedrock Milling	The temporary work area at this structure can be staked as an ESA to avoid work within the mapped limits of SDI-4788. The work area can be restricted to the permanent work area on the northwest portion of the designated area which will result in no impacts within the mapped boundary of SDI-4788. There are no surface artifacts recorded within the temporary or permanent work areas for this structure. The area will be carefully examined during the evaluation effort. Subsurface testing can be completed as determined necessary by the BLM.	The site visit report did not indicate any impact to cultural resources.
9B	SDI-19301	Private	Prehistoric Bedrock Milling	This structure was placed in proximity to McCain Valley Road to minimize the need for new road construction. The Rough Acres re-route is described in the PMR as motivated by a request from a property owner. This re-route eliminated two structures. The area of impact within the mapped limits of SDI-19301 is in an area of the site with a single surface artifact identified as debitage in the southerly portion of the site. An ESA can be established at the edge of the permanent work area to limit activity to the southern portion of the site area to minimize to potential for impacts.	The site visit report did not indicate any impact to cultural resources.
9B	SDI-19851	BLM	Prehistoric Lithic Scatter	This is an angle structure that was part of the Rough Acres re-route. Relocation of angle structures is complex and in this case would result in impacts to biological resources with an increase in ground disturbance.	The structure site was located to maintain close proximity to the existing road.
9B	SDI-19001/19003	Private/BLM	Prehistoric Habitation	This is an angle structure that was part of the Rough Acres re-route. Relocation of angle structures is complex. The large mapped prehistoric site in this area is primarily to the north of this structure with the southernmost portion overlapping the location of this structure. There are a couple of surface artifacts in the vicinity of the proposed structure and an ESA can be established to limit the activity within the portion of the site with surface artifacts. The area identified for ground disturbance will be carefully examined for evidence of surface artifacts and a subsurface evaluation will be accomplished as directed by the BLM.	
9B	SDI-19293	BLM	Prehistoric Bedrock Milling	The site in this work area is recorded as four ceramic sherds and one piece of debitage. The location of this structure is designed to maximize the use of the landform for clearance of the conductor and also to minimize visual impacts from skylined structures.	
9B	SDI-19853	BLM	Prehistoric Lithic Scatter	This site is recorded as seven pieces of debitage and a metate fragment. The metate fragment is mapped within the temporary work area and can be avoided within an ESA. This structure is on a hillside and critical to the clearance of conductor across the span to the north and south. The use of high points reduces the number of structures that are necessary to achieve the required span above the ground surface.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
9B	SDI-19364	BLM	Prehistoric Lithic Scatter	The mapped boundary of this site will be impacted by the access road from McCain Valley Road to the proposed structure. There are no surface artifacts noted on the site record for this area which can be delimited during preconstruction staking to maintain a minimal path to the construction area. The corner of the temporary work area can be removed from the construction drawings such that the area will not be part of the work area and an exclusion area can be established to protect this portion of the site during construction. The location and elevation of this structure is necessary to safely span McCain Valley Road with the appropriate clearance.	
9B	SDI-19018	BLM	Prehistoric Habitation	This structure is part of the McCain Valley Reroute. This is an angle structure at the north-central edge of the mapped site boundary of SDI-19018. There is one milling feature mapped near the permanent work area for this structure and it can be protected in an ESA during construction. The concentration of surface artifacts at this site is more than 90 meters to the south of the proposed structure.	
9B	SDI-19874	BLM	Prehistoric Artifact Scatter	The location of this stringing site may be movable as these are temporary work areas and access and use will generally be drive/crush. The area needed for stringing that corresponds to the mapped site boundary can be protected in an ESA and the drive/crush access to the stringing location can be re-routed around the limits of the site area.	
8D/8C	SDI-19279	Private/CNF	Prehistoric Bedrock Milling	This is an angle structure at the edge of the CNF. The portion of the site on Forest property will not be impacted by the project and will be protected in an ESA.	This structure site could not be relocated due to steep terrain and since no surface artifacts were noted, the centerline was not realigned.
8C	SDI-17987	BLM/Private	Prehistoric Bedrock Milling	This is a helicopter construction location. The TSAP was located outside the site area and the foundation for the structure and one-half of the permanent work area are immediately inside the eastern limits of the mapped site. The surface map shows three debitage artifacts in the vicinity of this construction activity. The location of this structure is tied to the presence of a private property and maintaining a safe clearance of the conductor in this area. The tower was placed on the high point of this formation within the ROW to achieve this necessary clearance.	This structure site could not be relocated due to steep terrain.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
8C	SDI-8440	BLM/Private	Prehistoric Bedrock Milling	The location of this structure was determined by selecting a location that keeps a low profile so as not to skyline. It was also selected in order to minimize the angle of the line in order to reduce the number of structures, pull sites, and construction impacts. The location also minimizes the boulders that impact the structure.	This structure site was not relocated due to steep terrain.
Suncrest Sub.	SDI-19779	SDG&E	Historic Refuse	The location of the substation was chosen by the CPUC and there is no way to avoid this resource and retain the location of the Substation as approved.	
Suncrest Sub.	SDI-19036/19037	SDG&E	Prehistoric Bedrock Milling	The location of the substation was chosen by the CPUC and there is no way to avoid this resource and retain the location of the Substation as approved.	
5	SDI-19769	City of SD	Prehistoric Bedrock Milling	The alignment through Chocolate Canyon was designed to keep a low profile in order to reduce the visual impacts. Moving the structure would introduce clearance issues due to the difficult terrain. An ESA can be established to protect the cultural resource during construction.	This structure site was not relocated due to steep terrain.