



County of San Diego

ERIC GIBSON
INTERIM DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

April 9, 2008

CPUC/ BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: PROPOSED SUNRISE POWERLINK DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STUDY

To Whom It May Concern:

The County of San Diego (County) has received and reviewed the Draft Environmental Impact Report/ Environmental Impact Study (DEIR/EIS) for the Sunrise Powerlink dated January 3, 2008. The County appreciates Aspen Environmental Group's efforts to communicate with and obtain information from the County in order to provide a thorough analysis of the project impacts in the Unincorporated area. Enclosed are the County's comments in response to this document.

The County is the land use authority for the Unincorporated area of San Diego County. The public looks to the County to establish regulations that guide reasonable and environmentally sensitive growth, especially in rural communities. The County is also responsible for maintaining the quality of County road right-of-ways and public facilities, and the recreational and biological value of the parks, preserve areas, and trail systems.

Staff from the County of San Diego Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and the Department of Parks and Recreation (DPR) have reviewed and commented on the content of the DEIR/EIS. Overall, the DEIR/EIS does not establish the need for the Proposed Project. The analysis also demonstrates that the Proposed Project will degrade the quality of the environment in the Unincorporated area, particularly in terms of visual, biological, and agriculture resources, air quality, noise, traffic and numerous other elements of importance to the quality of life in the Unincorporated County of San Diego. The Proposed Project will also have extensive significant negative affects on lands purchased by the County for conservation and recreational purposes.

The enclosed comments focus on a number of general issues identified in the DEIR/EIS, including the need for the Proposed Project and the potential growth-inducing effect of the Proposed Project. Also enclosed are more detailed comments specific to the

recreational, biological, air quality and circulation or road-related impacts analyzed in this document.

Please feel free to contact Thomas Oberbauer at (858) 694-3701 with additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Gibson', with a long horizontal flourish extending to the right.

ERIC GIBSON
Interim Director, Department of Planning and Land Use

CC: Vince Nicoletti, Staff Officer, County of San Diego Land Use and Environment
Group Executive Office, MS-A6
Jeff Murphy, Deputy Director, County of San Diego Department of Planning and
Land Use, MS-0650
Thomas Oberbauer, Chief, County of San Diego Department of Planning and Land
Use, MS-0650
Trish Boaz, Chief, County of San Diego Department of Parks and Recreation,
MS-029
Nick Ortiz, Project Manager, County of San Diego Department of Public Works,
MS-0383

County of San Diego General Comments regarding the Sunrise Powerlink Transmission Line Project DEIR/EIS:**1. Need for the Proposed Project**

The DEIS/EIR does not support the need for the Proposed Project. It is unclear why this alternative was selected for analysis as the Proposed Project considering its relatively low ranking among the transmission projects and alternatives identified and the ability of the Overall Environmentally Superior Alternative (New In-Area All-Source Generation Alternative) to meet most of the project objectives. In the analysis of the "No Project/ No Action Alternative", this document explicitly states "...the No Project/ No Action Alternative would have fewer impacts than those of the Proposed Project [and several other alternatives]...and impacts equivalent to [several other alternatives]... Only about 1,000 MW of in-basin generation or transmission import capacity would be required to replace the Proposed Project, so any one of the three top ranked alternatives would provide adequate resources" (ES-4). The DEIS/EIR states that this alternative may not meet all major project objectives, including the requirement for access to renewable energy resources. However, a combination of other alternatives with fewer significant, unmitigable impacts, including New In-Area All-Source Generation, would achieve this objective.

In addition, the Proposed Project has a greater number of significant, unmitigable impacts than all other alternatives. Of particular concern to the County of San Diego are the magnitude of the significant, unmitigable impacts to visual resources (including the Santa Ysabel valley and other County communities), biological resources, air quality and County lands utilized for recreational and conservation purposes. The future expansion that is anticipated as a result of the Proposed Project will most likely result in additional significant impacts in these areas.

The DEIR/EIS also does not establish need for the following alternatives; LEAPS Transmission-Only Alternative (3), Environmentally Superior Southern Route (SWPL) Alternative (4), Environmentally Superior Northern Route Alternative (5), LEAPS Generation and Transmission Alternative (7).

Based on the DEIS/EIR (ES-66), the least impactful alternatives that still meet all or most of the project objectives include the (1) New In-Area All-Source Generation Alternative, (2) New In-Area Renewable Generation and the No Project/ No Action Alternative. Any of these three alternatives eliminate or substantially reduce significant impacts of concern to the County of San Diego.

In addition, the (1) New In-Area All-Source Generation Alternative and the No Project/ No Action Alternative would imply that planning to meet regional energy needs would continue primarily through existing venues such as local jurisdictions and established, successful regional energy partnerships. The County recognizes the need to establish long-term energy capacity, reliability, and access to renewable energy sources. The County has been involved in local and regional energy planning through these mediums and supports these ongoing efforts.

Additionally, existing state programs encourage the development of local renewable energy through the Million Solar Roofs Plan. This plan is in process, the associated technology has been proven to be effective, and the project will not result in significant biological impacts because it would be constructed on existing development. The Stirling Energy Systems solar facility and the La Rumorosa wind project from which the Proposed Project would obtain renewable energy would have a range of significant biological impacts affecting thousands of acres of land containing ecosystems and recreational areas connected to those in the Unincorporated area (B.6.1).

2. F.2 Growth-Inducing Effects

The County concurs and is concerned with the conclusion that the Proposed Project "...*would facilitate growth indirectly by removing obstacles to population growth through the additional increased capacity of electric power that it would make available...*" (F.2.2). Growth-inducing impacts could affect Unincorporated San Diego County particularly along the Central Link and Inland Valley Link. Planned growth in these areas is minimal and population capacity is currently constrained by physical, geographical and other factors including limited access to infrastructure and services. Development of the Proposed Project would extend the capacity for electrical power in these areas and, more significantly, could facilitate the expansion of other infrastructure into these locations, such as water and sewer facilities.

The statement that "...*Growth in the Proposed Project areas is expected to occur with or without implementation of the Proposed Project...*" (F.2.2) does not adequately convey the very limited scope of the growth expected in some areas of the Proposed Project located within Unincorporated San Diego County. The County of San Diego General Plan provides limited growth capacity in this area. In addition, the General Plan Update that is currently in process proposes very low density in the rural communities potentially affected by the Proposed Project.

3. Impacts to Visual Resources/ Community Character

Impacts to visual resources within the County are of great concern to the County. As noted in previous comments pertaining to the scoping phase of this project, the community character of rural communities would be

significantly impacted by the Proposed Project and all of the transmission-only alternatives. Should the need for the Proposed Project or another transmission-based alternative be established, complete undergrounding of visually impactful lines should be incorporated into all alternatives. Permanent visual impacts within the Unincorporated area would be eliminated by undergrounding all lines within the County's jurisdiction. Of particular importance would be undergrounding of transmission lines proposed within or visible from rural communities, and proposed within other notable vistas such as the Santa Ysabel valley. Undergrounding of these lines should only occur solely along existing transmission line easements and/ or in road Right-Of-Way (ROW) (in coordination with the respective jurisdiction) to avoid additional temporary or permanent impacts to biology and community character.

4. Impacts to Biological Resources

The Proposed Project will have a range of significant, unmitigable biological impacts to lands within the jurisdiction of the County of San Diego, including lands within the adopted Multiple Species Conservation Program (MSCP) South County Subarea Plan and within the North and East County MSCP Plan currently under development. This includes impacts to biological resources planned primarily for conservation through the County of San Diego Multiple Species Conservation Program (MSCP) as further described in the detailed comments below regarding biological resources.

5. Reliability

"Maintain Reliability" is stated as one of the primary goals of the Proposed Project (ES-19). The DEIS/EIR does not demonstrate how the Proposed Project satisfies the reliability mandate with respect to 1) the reliance on other connected actions outside of the United States and 2) the high fire-risk associated with proposed powerlines through the backcountry of San Diego County.

International Power Generation Sources:

The DEIS/EIR indicates that renewable wind energy from this source will be distributed via the SWPL based on the ability of the Proposed Project to transmit some of the power now carried by the Southwest Powerlink (SWPL).

Fire:

The location of the Proposed Project within high fire risk areas raises concerns regarding the potential for these lines to be impacted during the event of one or more simultaneous fires throughout the region. Fire hazard is significant in the eastern portion of San Diego County in much of the Proposed Project location. This could have serious impacts with regard to the reliability of this powerline. In addition, the DEIS/EIR

indicates that Fire Prevention and Response Plans (FPRPs) will be created for the Proposed Project. This does not address the fundamental issue of fire hazard from downed powerlines. Also, the fact that two power lines into the County in widely separate locations had simultaneous fires in October would seem to negate or reduce their claim about the problems with lines that are close together. It now seems that it is just as likely that two separate lines would be threatened by burning as two lines with close proximity.

6. Air Quality

The DEIR/EIS states that "...because total construction GHG [Greenhouse gas emissions] emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact..." (ES-25). The County is involved with ongoing programs and efforts to improve air quality and is concerned that the increase in GHGs from the Proposed Project would be higher than the continued operation of in-basin power plants even though one of the basic concepts of the project was that it would provide for renewable energy with reduced greenhouse gases.

7. Agriculture

Agriculture is the fifth largest industry in San Diego County. The County Board of Supervisors has adopted Board Policy I-133, "Support and Encouragement of Farming in San Diego County" (<http://www.sdcountry.ca.gov/cob/policy/I-133.pdf>). The Proposed Project would have significant, unmitigable impacts to hundreds of acres of Department Of Conservation mapped Farmland, Active Agricultural Operations, and Williamson Act Lands (D.6-46). Negative impacts to farmland via the Proposed Project conflict with Board Policy I-133. No significant, unmitigable impacts to farmland should be allowed to occur.

8. Need for Additional Inter-Agency Coordination

The County appreciates SDG&E's ongoing communication with the County and SDG&E's efforts to meet with County staff at key junctures of the project. This has provided County staff with the opportunity to ask basic questions regarding the project and the structure of the environmental analyses. However, elements of the stated project impacts require further description, analysis and coordination with the County in order to establish an adequate assessment of impacts (particularly stated "significant unmitigable" impacts) and/ or mitigation measures. These elements are described further in the detailed comments below.

In addition, the DEIS/EIR states that the Bureau of Land Management (BLM) "...has not yet defined its Agency Preferred Alternative, so the

determinations presented in the Draft DEIR/EIS represent the overall Environmentally Superior Alternative as determined by the CPUC only..." (ES-38). The County would like information regarding the BLM's Agency Preferred Alternative when this information is determined. The County would also like information regarding the effect that it would have on the analysis or the ranking or evaluation of alternatives in the analysis should the BLM's Agency Preferred Alternative differ from that of the CPUC. This information should be provided prior to the publication of the Final EIS/EIR if it has bearing on the overall project analysis in order to ensure that stakeholders such as the County have adequate opportunity to evaluate the project with this new information.

County of San Diego Detailed Comments regarding the Sunrise Powerlink Transmission Line Project DEIR/EIS

BIOLOGY

1. D.5-23 Local Regulations, Plans and Standards. As was stated in County comments provided on the Notice of Preparation/Intent (NOP) dated October 20, 2006, the County has enrolled in the Natural Community Conservation Planning (NCCP) process by adopting the Multiple Species Conservation (MSCP) South County Subarea Plan and has entered into a planning agreement with the United States Fish and Wildlife Service and the California Department of Fish and Game for the North County MSCP and East County MSCP. Discussion of the effects of the Proposed Project on the existing and planned MSCP plans should be included in this section. MSCP plans that are in place or in plan preparation will address several hundred species of plants and animals that have a high potential for being listed as endangered or threatened by either State or Federal wildlife agencies. This Proposed Project and its alternatives would result in a major disruption to the completion and implementation of these plans.
2. As was stated in County comments provided on the NOP dated October 20, 2006 the DEIR/EIS should examine impacts to areas designated as high biological value areas or Pre-Approved Mitigation Area within the existing and proposed MSCP plans. Consistency with the MSCP needs to be demonstrated. In particular, impacts to species covered under the South County Subarea Plan or proposed for coverage under the North or East County MSCP Plans must be adequately analyzed and mitigation must be identified sufficient to maintain or not to preclude the County's take authorization for these species under these plans. This includes significant, unmitigable impacts to a wide range of species to be impacted by the Proposed Project as outlined in the DEIR/EIS such as; various bird and bat species; flat-tailed horned lizard, Peninsular bighorn sheep, and the Quino checkerspot butterfly. The MSCP plans and/ or proposed

sensitive and covered species lists may be found online at:
<http://www.sdcounty.ca.gov/mscp/index.html>.

3. "Compensation for loss of critical habitat..." [B-7c(CA)]and "...implement appropriate compensation strategies..." [B-7i(CA)] do not adequately define mitigation measures for all species impacted by the Proposed Project. Compensation (preservation/ acquisition) as a mitigation measure must be further defined in the case of impacts to sensitive or listed species, including identification of the specific species and general locations where such compensation may satisfactorily occur and specific measures that may be taken to "...minimize impacts..." [B-7i(CA)]. The issue of the introduction of roads and tower platforms into preserve areas also needs to be addressed in a manner that there is compensation for the impact that is generated by the overall edge effects. The impacts of such physical modifications in preserve and undisturbed habitat lands are multiples greater than simply the acreage of surface that is disturbed.
4. Alternative Routes- All transmission alternatives would have significant, unmitigable biological impacts (D.2-269), particularly the Environmentally Superior Northern Route Alternative and the Environmentally Superior Southern Route Alternative. This includes direct or indirect loss of native vegetation, sensitive plants, and native bird species. These impacts would likely have a similar negative affect as the Proposed Project with regard to the County of San Diego adopted and proposed MSCP plans.
5. The Top of the World substation element of the Proposed Project would impact a total of approximately 115 acres. This disturbance would cause significant and, in some cases, unmitigable impacts to sensitive plant and wildlife species (D.2-493-508). This area is currently included in the Study Area for the East County MSCP. Impacts to species proposed for coverage under the East County MSCP should not be permitted to occur. Should the need be established for the Proposed Project or a similarly impactful alternative, these impacts should be mitigated to a level that does not preclude completion of the East County MSCP plan based on the proposed covered species list.

CULTURAL RESOURCES

1. The Proposed Project will have significant unmitigable impacts to cultural resources within the Unincorporated area (D.7-26). Significant unmitigable impacts to these resources should not be allowed to occur.

RECREATION

1. Impact WR-3. Presence of a transmission line would permanently preclude recreational activities. The mitigation measure WR-3a says: Co-

ordinate tower and road locations with the authorized officer for the recreation area. The proposed mitigation measure is not sufficient to mitigate for the permanent preclusion of recreational activities. Actual acreage of park/preserve loss needs to be calculated and an equal amount needs to be preserved so that there is a no-net-loss of park/preserve lands. Additionally, if the park/preserve were dedicated for mitigation for another project then a 1:1 ratio will not suffice to meet a no-net-loss and additional mitigation will be required. Acreage calculations will include tower locations and ROW, new access roads, widening of existing trail to access road widths or the relocation of trails.

2. It is not clear in Table D.5-2 what WR-2GT and WR-2LR mean. The impact description under both categories is the same.
3. D.5-49 Impact WR-3. The proposed mitigation measure, WR-3a, will not mitigate the preclusion of the use of recreational amenities within the Inland Valley Link to less than significant. Additional mitigation is required to meet a no-net-loss standard.
4. D.5-58 500 kV Future transmission System Expansion. Noise levels will be higher at the ROW resulting in additional acreage of permanent recreational preclusion. Mitigation measure N-3A will not be adequate to address the noise levels that will be higher at the edge of ROW.

TRAILS

General Trail Comments

The Proposed Project and Project Alternatives will have significant impacts to proposed and existing community and regional trails. Some impacts cannot be mitigated such as decommissioning a trail because of the presence of a transmission line. The Mitigation Measure WR-3a is not a workable solution because the mitigation measure still requires the trail to be closed. There will be cumulative affects to the regional or community trail systems connectivity if sections of regional trails are closed. Connectivity is very important for the success of any trails plan.

The County's Regional Trails Plan is contained in the County's General Plan. Any decommissioning or major reroutes of any regional trail will require a General Plan Amendment. As is already mentioned in the preceding comments, any alternative which includes transmission lines that would permanently preclude recreational activities requires the identification of a suitable reroute as well as mitigation for impacts to habitat.

Specific Trail Comments

1. **Page D.5-1 Wilderness and Recreation** – *A recreation area is any site or facility that is used for recreational activities, including but not limited to a*

national, State, county or city park or trails; refuge or preserve; open space; cultural center or museum; area of critical environmental concern (ACEC); campground; or a private recreational site such as a golf course. Include in the definition "trails".

The following are trails mentioned in Section D.5 and should also be identified as the County of San Diego Regional Trails:

- Jaun Bautista De Anza National Scenic Trail
- Trans County Trail
- Pacific Crest National Scenic Trail
- San Dieguito River Park

Add: California Riding and Hiking Trail

There is no mention of the 1945 Historic California Riding and Hiking Trail (CRHT), a state trail that is also a designated Millenium Trail. This trail is the most significant regional trail in the County connecting to 6 of the 9 County regional trails. This trail is not only significant to San Diego County but also regionally as it traverses Riverside and San Bernardino Counties. Sections of the CRHT are used by other regional trails including the Trans County Trails and Pacific Crest Trail. Those trail sections are not identified in the EIR/EIS.

2. **D.5-23 San Diego County General Plan**

The following statement is incorrect: *The Recreation Element of the general plan is directive of County officials and provides for the creation of a system of public parks and riding and hiking trails.*

The Recreation Element was amended January 12, 2005. The General Plan Amendment relocated the discussion of "trails", the County Trails Program and Community Trails Master Plan to the Public Facilities Element of the General Plan.

3. **Table D.5-2 Impacts Identified – Proposed Project – Wilderness and Recreation**

Decommissioning designated regional, historic or scenic trails is not an acceptable option. Other mitigation such as relocation and construction should be required.

4. **D.5-27 Mitigation Measures for Impact WR-1: Construction activities would temporarily reduce access and visitation to recreation or wilderness areas**

Include the California Riding and Hiking Trail in the list of trails.

5. **D.5-28 WR-1b Provide temporary detours for trail users**

Include the California Riding and Hiking Trail in the list of trails.

6. **WR-1c Coordinate with local agencies to identify alternative recreation areas.**
- Include the California Riding and Hiking Trail in the list of trails.
 - Include the County of San Diego Department of Parks and Recreation in any coordination and noticing of any work affecting regional or community trails, existing or proposed alignments.
7. **D.5-29 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**
The Juan Bautista de Anza is a National Historic Trail. A historic trail/route cannot be relocated. Other transmission line locations or mitigations measures need to be provided.
8. **D.5-30 Mitigation Measure for Impact WR-3: Presence of a transmission line would permanently preclude recreational activities. WR-3a Coordinate tower and road locations with the authorized officer for the recreation area.**
The California Riding and Hiking should be included as a potentially affected trail. Please note, placement of a transmission tower on any regional trail thus precluding its use is not considered acceptable and regional trails should be excluded from the placement of transmission towers. Additionally, it is unlikely that a sixty-day coordination notice prior to construction is adequate when involving multiple agency jurisdictions—the timing of the coordination notice should be increased potentially up to 6 months. Please include the County of San Diego Department of Parks and Recreation in any coordination and noticing of any work affecting regional or community trails, existing or proposed alignments.
9. **D.5-35 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities *The Proposed Project would be located along a 3-mile segment of the Trans-County Trail within Grapevine Canyon (near MP 80).***
This section of the Trans County Trail uses the California Riding and Hiking, a state trail. It should be noted that this is an existing state trail which is the backbone of the San Diego County Trails Program and regional trail system. No portions of it should be closed. Additionally, major rerouting of the trail will require a General Plan Amendment.
- Potential preclusion of the use of the Trans-County Trail, and other trails within ABDSP would be mitigated to a less than significant level through implementation of Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area).***
Mitigation Measure WR-3a should be modified so that coordination with the “authorized officer” for the recreation area includes looking at the “big

picture”, including any significant impacts on the connectivity of the trail as well as community trails.

10. **D.5-36 Impact WR-4: Presence of a transmission line in a designated wilderness or wilderness study area would result in loss of wilderness land**

The CRHT traverses this area and may be impacted by the expansion of the right of way.

11. **D.5-49 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**

If transmission support structures were sited on or immediately adjacent to the Trans-County Trail and trails within the San Dieguito River Park and Mt. Gower Open Space Preserve, recreationists would be precluded from these locations.

Suitable reroutes must be included in the mitigation as Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area). It seems this mitigation measure still allows for the trail to be closed. Shutting down and disconnecting two popular County regional trails would not be acceptable. In addition to the regional trails, there is potential for a significant number of community trails both existing and proposed that connect or are planned to connect to the regional trails would also be affected. Community trails systems could be rendered useless due to disconnects and thus there would be cumulative impacts.

12. **D.5-58 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**

If future transmission system support structures were sited on or immediately adjacent to trails, recreationists would be precluded from these locations (e.g., Trans-County trail and San Dieguito River Park trails).

Mitigation Measure for Impact WR-3 is not viable if it results in the loss of the trail. Preclusion of the use of the Juan Bautista de Anza National Historic trail could be mitigated to a less than significant level through implementation of mitigation measures listed below. **(WR-1b; WR-1c; WR-3b)**

13. **D.5-64 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**

This impact analysis, however, conservatively assumes that structures would be sited on or adjacent to the Trail. Impacts to existing recreational resources that resulted from locating project facilities on or immediately adjacent to the trail would be significant (Class II). Preclusion of the use of the Juan Bautista de Anza National Historic trail could be mitigated to a

less than significant level through implementation of mitigation measures listed below. (WR-1b; WR-1c; WR-3b)

Mitigation Measure for Impact WR-3: Presence of a transmission line would permanently preclude recreational activities

WR-3a Coordinate tower and road locations with the authorized officer for the recreation area.

As stated previously this is not a mitigation measure if it results in the closure of the trail. This mitigation should include reroute and construction of any sections decommissioned.

14. **D.5-109 Table D.5-5. Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure : WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area.
 Add the California Riding and Hiking Trail to the list of affected areas.
15. **D.5-110 Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure: WR-1b: Provide temporary detours for trail users.
 Add the California Riding and Hiking Trail to the list of affected areas.
16. **Mitigation Measure: WR-1c: Coordinate with local agencies to identify alternative recreation areas.**
 Add the California Riding and Hiking Trail to the list of affected areas.
17. **D.5-111 Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure: WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.
 Add the California Riding and Hiking Trail to the list of affected areas.
18. **Mitigation Measure WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities.**
 Add the California Riding and Hiking Trail to the list of affected areas.

E.1 Interstate 8 Alternative

19. **E.1.5-1 Environmental Setting**
 The Juan Bautiste de Anza Nacional Historic Trail, Pacific Crest Trail, California Riding and Hiking Trail, and Trans County Trail are considered San Diego County Regional Trails and should be designated as such.
20. **E.1.5-6 Construction Impacts**
 Please include the California Riding and Hiking Trail. Construction would also impact this trail. Mitigation measures should be detailed.

21. **E.1.5-7 Operational Impacts**

The California Riding and Hiking Trail is not mentioned. Operations would also impact this trail. Mitigation measures should be detailed.

One of the access roads required for construction and continued maintenance of the overhead transmission line along the Interstate 8 route near MP 18-83 would be collocated with the Trans-County Trail for approximately 0.6 miles. Along this segment, the Trans-County Trail would be graded and widened for use as a 20-foot-wide access road.

The Trans County Trail is a non-motorized trail for hiking, horseback riding and mountain biking only. Security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles and should be included as a mitigation measure.

22. **E.1.5-8 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**

The Interstate 8 Alternative would cross the Juan Bautista de Anza National Historic Trail (MP 18-12), PCT (MP 18-55), Secret Canyon Trail (MP 18-63.5), and Trans-County Trail (MP 18-82.6 and MPI8-91.3). If transmission support structures were sited on the trail, recreationists would be precluded from these locations. Preclusion of the use of trails would be mitigated to a less than significant level through implementation of Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area).

As stated previously this is not a mitigation measure (WR-3a) if it results in closure of the trails. It will affect three (3) regional trails. Regional trails provide connections to communities and other regional trails. Any disconnect would greatly affect the entire San Diego County Trails System. Mitigation should include rerouting the trail and construction of new segments to any sections decommissioned. Mitigation Measure WR-1c: Coordinate with local agencies to identify alternative recreation areas and WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities (i.e. trails) should be incorporated into the mitigation.

23. **Chocolate Canyon Option**

E.1.5-11...*the aboveground route would head northeast up Chocolate Canyon, roughly parallel to El Monte Road*

Note the San Diego River Regional Trail roughly runs parallel to El Monte Road. This should also be reviewed for mitigation measures.

Interstate 8 Alternative with Modified Route D alignment and west of Forest alignment

24. **E.1.5-14** *“Once outside the CNF, the route would traverse primarily open unincorporated communities. It would follow the Loveland Reservoir site of the reservoir is not used for recreational purposes.”*

This statement is incorrect and should be revised. The California Riding and Hiking Trail is located to the west and north of Loveland Reservoir as indicated in Figure E.1.5-1, which also indicates the Loveland Substation on the trail. Please indicate mitigation measures for this Substation.

E.2 BCD Alternative

25. **E.2.5-3 Operational Impacts**

One of the access roads required for construction and continued maintenance of the overhead transmission line along the BCD route near MP BCD-16.5 would be collocated with the PCT for approximately 1.6 miles. Along this segment, the PCT would be graded and widened for use as a 20-foot-wide access road.

The PCT is a non-motorized trail for hiking and horseback riding only. A mitigation measure that includes security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles.

26. **E.2.5-4** *The BCD Alternative would cross the PCT at MP BCD-16.5. If transmission support structures were sited on the trail, recreationists would be precluded from these locations.*

Mitigation should include reroute and construction of any sections decommissioned. Mitigation Measure WR-1c: Coordinate with local agencies to identify alternative recreation areas and WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities (**i.e. trails**) should be incorporated into the mitigation

E.3 Route D Alternative

27. **E.3.5-3** *The Route D Alternative would cross the California Riding and Hiking Trail near MP D-1.2 and the Trans-County Trail three times near MP D-9.4. If transmission support structures were sited on the trails, recreationists would be permanently precluded from these locations.*

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction if any sections of trail decommissioned.

E.4 Modified Route D Alternative

28. **E.4.5-4** *The Modified Route D Alternative would intersect the PCT three times between MP MD-12 and -13 in new ROW. If transmission support structures were sited on the PCT, recreationists would be precluded from these locations.*

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction of any sections decommissioned.

E.5 New In-Area Renewable Generation

29. **E.5-129** Options 1 and 2 may impact the following four regional trails:
- California Riding and Hiking Trail which crosses SR78 and runs North/South through San Felipe Valley on the north-east side of San Felipe Rd. (S2)
 - Coast to Crest Trail proposed West/East alignment crossing San Felipe Valley at San Felipe Rd. (S2).
 - Trans County Trail which crosses SR78 at Plum Canyon and continues up Grapevine Canyon
 - PCT which crosses SR78 just east of the S2 intersection

CIRCULATION & ROADS

The Proposed Project may potentially have significant impacts to County roads and intersections. These current comments are intended to augment and in some cases reiterate the County's general comments submitted previously for the project Notice of Preparation (NOP):

1. The DEIR/EIS indicates that the Proposed Project will result in temporary construction impacts to several County maintained roads. The temporary impacts include road and lane closures, disruption to pedestrian and bike circulation, elimination of parking spaces, road damage, added traffic to LOS E/F roads, and access restrictions to properties and businesses. It should be noted that road and lane closures along County Circulation Element roads should be avoided.
2. The DEIR/EIS indicates that the Proposed Project could result in temporary road and closures during construction. The DEIR/EIS should more clearly identify which County Circulation Element roads may be subject to a potential road and lane closure. For example, Table D.9.18 identifies several County Circulation Element roads such as Del Dios Highway and Wildcat Canyon Road that would be impacted by the future transmission system expansion and page 9.53 identifies impacts caused by temporary road and lane closures. It is not clear if road and lane closures could occur along to all County roads listed in Table D9-18. The DEIR/EIS should more clearly identify which County Circulation Element

roads could be subject to road and lane closures. Tables D.9-2, D9-3, D9-14, D9-15, D9-16, D9-18, and D9-19 all identify County Circulation Element roads that would be impacted by the Proposed Project

3. SDG&E should coordinate very closely with the County's DPW Traffic staff in the development of the following types of plans: 1) Construction Transportation Plans; 2) Transportation Management Plans; and 3) Traffic Control Plans. On a project-by project basis, the plans should attempt to ensure that all feasible measures are implemented to minimize the project's significant traffic impacts to the extent possible.
4. The construction impact plan should identify the length of the potential road and lane closures and feasible alternate routes.
5. For any overhead crossings, SDG&E must obtain the proper traffic control permits and encroachment permits for work conducted along County maintained roads.
6. For any underground running of transmission lines within the public right of way, SDG&E will have to provide detailed traffic control plans tied to encroachment permits that detail how the roads will stay in operation simultaneously with the installation of undergrounding work.
7. The DEIR/EIS mentions the construction of several miles of access roads. The DEIR/EIS should identify where the proposed access roads would traverse and/or connect to County maintained public roads.
8. The DEIR/EIS should clearly identify where Proposed Project's access roads would require a new driveway along County maintained public roads.
9. The DEIR/EIS should provide an operational assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.
10. For the Proposed Project and all future system expansions, SDG&E should consider impact thresholds for roads operating at LOS F. For example Wildcat Canyon Road and San Vicente Road (Pg.D9-39/52) currently operate at LOS E/F. The Proposed Project should avoid measures during construction that would potentially worsen traffic operations by adding traffic and/or restricting traffic flow along roads that currently experience substantial daily traffic congestion.
11. The DEIR/EIS should clearly identify where transmission lines would traverse existing and planned County roads. The construction of transmission lines should not preclude the planned future construction of the County Circulation Element roads.

12. SDG&E should follow all regional standards regarding construction within the County right of way and that the DPW road cut policy would be observed.
13. SDG&E should reference the County's Guidelines for Determining Significance adopted September 26, 2006 and revised December 5, 2007.