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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.

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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

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

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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.

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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.

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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.

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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.

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RECREATION

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

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- 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.
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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*
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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”.

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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.*

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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.

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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.

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

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

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1. **WR-1c Coordinate with local agencies to identify alternative recreation areas.** A0018-27
- 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** A0018-28
- 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.
3. **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.** A0018-29
- 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).*** A0018-30
- 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).*** A0018-31
- Mitigation Measure WR-3a should be modified so that coordination with the “authorized officer” for the recreation area includes looking at the “big

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- picture”, including any significant impacts on the connectivity of the trail as well as community trails. A0018-31 cont.
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** A0018-32
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** A0018-33
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** A0018-34
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** A0018-35
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

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

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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**

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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.

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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.

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