

Comment Set E0002, cont.
San Diego Gas and Electric Company

Chapter #	Page #	Paragraph #	Comment
D.2	5	2	CDFG can also take jurisdiction over riparian/lacustrine vegetation and vernal swales not necessarily limited to stream-flow/wetland vegetation. SDG&E suggests that this be added to the discussion on the first full page on D.2-5.
D.2	5, 99 and 265		The EIR/EIS states that focused plant species surveys were conducted in spring/summer of 2007 where ROE permission was granted, and although some special status plant species were found, the results of the surveys are inconclusive because the poor rainfall conditions likely prevented the germination of many annual species. However, rare plant surveys for the Coastal, Inland Valley and Central were a valid survey due to: 1) high diversity of annual/perennial species observed during the 2007 survey; 2) Observation of thriving rare plant reference populations during the 2007 survey; 3) Nearly all the sensitive plant species with high potential to occur within the proposed alignment were detected during the survey; and 4) Sensitive plant species which had high potential to occur but were not detected (i.e., San Diego Thorn Mint) appear to be excluded from the proposed alignment because of the lack of suitable habitat requirements not rainfall.
D.2	37	Table D.2-3	The EIR/EIS states that San Diego Thorn-mint was regarded as having a high potential to occur for the proposed alignment based off CNDDDB records. However, these CNDDDB points are located within a specific area with associated clay soil inclusion, and although these locations are near the proposed alignment, the alignment does not have the same suitable soils. The EIR gives a false impression of the likelihood of finding this narrow endemic plant species within the alignment. The EIR/EIS should use the actual assessment (low potential) given in the SRPL 2007 Rare Plant Report which is based on field observations. Incidentally, these CNDDDB locations of San Diego thormint for the Inland Valley Link were observed during the 2007 rare plant survey, and revealed thriving stands of San Diego thormint, which would support the assumption that rainfall would not be a factor preventing the observation of this species within the alignment during 2007. Furthermore, rare plant potential assessment for many species specified in the SPRL Rare Plant Survey appears to be disregarded in DEIR/EIS.

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D.2	38	Table D.2-3	The EIR/EIS states that Wart-stemmed ceanothus was listed as not detected for the Inland Valley link. However, Wart-stemmed ceanothus was detected in the Inland Valley during 2007 rare plant surveys. The EIR/EIS should use the results given in the SRPL 2007 Rare Plant Report, which is based on field observations.	E0002-84
D.2	39	Table D.2-3	The EIR/EIS states that Variegated dudleya was regarded as having a high potential to occur. However, Variegated dudleya was regarded as having a low potential by the 2007 SRPL Rare Plant Survey, due to lack of specific habitat requirements. Rare plant potential assessment for many species specified in the SRPL Rare Plant Survey appears to be disregarded throughout the EIR/EIS document. The EIR/EIS should use the results given in the SRPL 2007 Rare Plant Report which is based on field observations.	E0002-85
D.2	39, 40, 41	Table D.2-3	The EIR/EIS states that San Diego button celery, San Diego gumplant, and Willowy monardella, were given a high potential to occur. However, San Diego button celery, San Diego gumplant, and Willowy monardella were regarded as having a low potential to occur by 2007 SRPL Rare Plant Survey, due to lack of specific habitat requirements. Rare plant potential assessment for many species specified in the SPRL Rare Plant Survey appears to be disregarded throughout the EIR/EIS document.	E0002-86
D.2	41	Table D.2-3	The EIR/EIS states that San Diego mesa mint, and Del Mar sand aster were regarded as having a high potential to occur. However, San Diego mesa mint and Del Mar sand aster were regarded as having a low potential to occur (refer to 2007 rare plant report for the SRPL). Rare plant potential assessment for many species specified in the SPRL Rare Plant Survey appears to be disregarded throughout the EIR/EIS document.	E0002-87
D.2	99	1	The EIR/EIS states an incorrect sensitive plant common name. Correct common name of Hulsea californica to read San Diego Hulsea (CNPS 1B), as it is currently labeled as San Diego sunflower which is the common name of Viguera lacinata (CNPS List 4).	E0002-88

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D.2	99	3	The EIR/EIS states that rare plant surveys for the proposed alignment are inconclusive because the . . . Habitat for special status species may also occur where ROE permission was not granted. However, only a small portion of the Coastal, Inland Valley, and Central Links were not surveyed due to ROE issues. Furthermore restricted areas in the Central Link were dominated by heavily disturbed areas with very limited potential for sensitive species. The EIR/EIS could acknowledge that only a small portion of the proposed alignment was not surveyed because of ROE issues, and that the rare plant surveys in 2007 are valid.
D.2	100	2 - Global	The EIR/EIS states that impacts to Borrego bedstraw are expected within the proposed alignment through Grapevine Canyon. Also, impacts to Del Mar manzanita are expected within coastal link. However, through project design direct impacts to Borrego Bedstraw and Del Mar manzanita can/and should be eliminated. additionally, the number of individuals occurring in the areas of impacts appears greater than estimates given in the SPRL 2007 Rare Plant Report. Solution: EIR/EIS should use data provided by the 2007 Rare Plant Survey, and provide accurate assessments of predicted impacts. There appears to be a global over estimation of impacts to sensitive species throughout the document.
D.2	100-103		The EIR/EIS estimates impacts to CNPS listed sensitive plant species. However, although certain unavoidable impacts to many CNPS Listed sensitive plant species will occur, through project design (i.e. using existing access roads and moving structure locations to avoid impacts) the number of individuals impacted appears to be grossly over estimated for the proposed project. For example, the EIR/EIS's Proposed Project Biological Resource Maps used for illustration of potential impacts to sensitive plant species employs sensitive plant polygons generated from the 2007 SRPL Rare Plant Survey; however, many of these polygons extend past the ROW, but show up on the bio resource maps as existing completely in the ROW, giving an over estimate of impacts to sensitive plants. Because project design will eliminate direct impacts to sensitive species, or at least limit impacts to an extremely low level, impacts would appear to be mitigable through habitat restoration/compensation, and of a Class II nature. Instead, EIS/EIR could use data provided by the 2007 Rare Plant Survey.

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Chapter #	Page #	Paragraph #	Comment	
D.2.5	79	1	This discussion assumes all soil alterations (i.e. grading) results in the loss of seed banks in topsoil and topographic alterations which impair the establishment of native vegetation. Topsoil can and often is salvaged for use in revegetation efforts because of the seedbank present in the topsoil and topography changes resulting from soil alterations can enhance or inhibit the establishment of native plant species. SDG&E already salvages topsoil and native whole plants where applicable for use in revegetation efforts which are subject to temporary impacts. The Draft EIR/EIS also incorrectly assumes that disturbed conditions only favor non-native plant species. Many native plant species benefit from disturbance.	E0002-92
D.2.5	80	2	Impact acreages and mitigation ratios are assumed based on preliminary project design and assumed requirements by the regulatory agencies. Revise ratios and acreages to account for no temporal loss of habitat and allowances for final proposed impact acreages based on final project design.	E0002-93
D.2.5	80	3	Impact acreages are proposed based on preliminary project design but actual impact acreages will likely be significantly less with the project final design. The Draft EIR/EIS should state that the acreages are anticipated impact acreages based on the preliminary project design and mitigation acreages will be based on final project design and any impacts to sensitive habitats, plant and animal species, and state and federal waters outside of the final design footprint will be mitigated as appropriate.	E0002-94
D.2.5	80	6	Vernal pools are naturally occurring habitat types which have distinct floral and faunal components distinctly different from adjacent upland habitat types. There are no vernal pools, by the strict ecological definition, which will be impacted by the Proposed Project. The Draft EIR/EIS should state that the majority of the impacts from the Project are to potential San Diego fairy shrimp habitat.	E0002-95
D.2.5	81	1, 2, and bullet points	The number of trees projected to be impacted by trimming and removal is inflated. Trimming of native trees and removal of non-native trees do not by default equate with significant impacts. Mitigation for impacts to native trees should be based on final design specifications with definitions and mitigation ratios for various levels of significance for removal and trimming of native and non-native trees along with a firm definition of the term 'tree'.	E0002-96

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Chapter #	Page #	Paragraph #	Comment	
D.2.5	82	1	This discussion assumes any tree with 70% of its crown will die. Many native and non-native tree species can survive greater than 30% trimming or natural fall. Tree mitigation should be based on final design specifications and trees which receive significant trimming (i.e. >30%) should be monitored and mitigated if mortality is directly attributed to trimming.	E0002-97
D.2.5	85	1	This discussion assumes out-of-kind mitigation will be the only method available to mitigate for project related impacts. Out-of-kind mitigation may be necessary in some instances depending on requirements by the regulatory agencies, however, where out-of-kind mitigation is required it would likely be in the favor of higher tier habitat (i.e. impacts to unvegetated channel and preservation of mule fat scrub etc.). Begin identification of potential mitigation lands as soon as possible based on proposed impacts.	E0002-98
D.2.5	85-87	Table D.2-7	Assumption that scrub oak chaparral is dominated by <i>Quercus dumosa</i> within the ROW therefore should be mitigated at a 2:1 ratio because of the sensitivity status of the species. <i>Q. dumosa</i> is not found east of proposed structure C46 in the Coastal Link and scrub oak chaparral is found further east in the ROW. Mitigate <i>Q. dumosa</i> dominated scrub oak chaparral in the Coastal Link at 2:1 ratio and all other scrub oak chaparral impacted within the ROW at 1:1 ratio.	E0002-99
D.2.5	88	1	The DEIS/EIR suggests that restoration shall be maintained and monitored for five years. But the typical requirement is that sites can be signed off before the five year period is complete if the meet established success criteria. The final EIR/EIS should state that monitoring can end before five years if the restoration sites meet the established success criteria.	E0002-100
D.2.5	92	4, 5, 6, and 7	The EIR/EIS states that there are proposed impacts to vernal pools within the ROW. There are only two features that meet the very liberal City of San Diego definition of vernal pool within the ROW. Clarify that the majority of proposed impacts are to road ruts which act as fairy shrimp habitat and may support limited vernal pool plant species.	E0002-101
D.2.1.2.6	50	Table D.2-4	Footnote 2 (superscript) should also define the criteria for high, moderate, low, etc.	E0002-102

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Chapter #	Page #	Paragraph #	Comment	
D.2.1.2.6	47	Table D.2-4	Prairie falcon - ARCADIS biologists observed a prairie falcon about 1/4 mile away from the ROW at MP53 on the IMP link during the desert tortoise survey in 2007. Change table to read Present - CEN and IMP links and Moderate - ANZ link.	E0002-103
D.2.1.2.6	47	Table D.2-4	Southwestern willow flycatcher - ARCADIS survey results suggest the potential for occurrence to be low in the ANZ link along the proposed route; however, the table states that it is high. Change table to read Low - IMP, ANZ, CEN, INV, and CST Links.	E0002-104
D.2.1.2.6	47	Table D.2-4	White-tailed kite - ARCADIS biologists observed a pair of white-tailed kites about 1/2 mile east of MP18 in the IMP link during the mountain plover survey in 2007. Change table to read Present - IMP and CEN Links and Reconductor Sycamore Canyon to Elliot 69 kV Line.	E0002-105
D.2.2.1	51	3	"The Imperial Valley Link of the Proposed Project is an approximately 83-mile route that extends from the Imperial Valley Substation near El Centro, Imperial County north and west to the eastern boundary of Anza-Borrego Desert State Park." 83 miles seems to be the length of the original Imperial link. Now that the link has been split into the IMP/ANZ link, the correct length for the IMP link should be approximately 61-miles.	E0002-106
D.2.2.1	51	5	"Special Status Plant and Wildlife Species and Documented Sensitive Biological Resources. The following special status plant and wildlife species were observed or have been documented in the Imperial Valley Link Proposed Project PSA: desert pupfish, flat-tailed horned lizard, burrowing owl, and Swainson's hawk. A total of 22 other special status plant species and 36 other special status wildlife species have potential to occur along this route (see Tables D.2-3 and D.2-4)." ARCADIS biologists observed prairie falcon and white-tailed kite along the IMP link as well - add these two species in after Swainson's hawk. Also, change 36 other special status, to 34 other special status.	E0002-107
D.2.2.1	51	6	"travels across approximately 20 miles of bighorn sheep critical habitat." - The proposed project does not cross any DCH for bighorn sheep in the IMP link (confirmed on Figure D.2-1). The project would cross LESS THAN 20 miles of bighorn sheep DCH in the ANZ (confirmed on Figure D.2-2); therefore this statement should be moved to section D.2.2.2.	E0002-108

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D.2.4.2	76	Table D.2-5	BIO-APM-21 Structures shall be constructed to conform to "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981) to minimize impacts to raptors. – The guidelines that are recommended and accepted by agencies such as the U.S. Fish and Wildlife Service are the Avian Power Line Interaction Committee (APLIC) guidelines. This APM should reference APLIC 1994 for collision protection and APLIC 1996 and 2006 for electrocution protection.
D.2.11	108	5	ARCADIS biologists observed a prairie falcon about 1/4 mile away from the ROW at MP53 on the IMP link during the desert tortoise survey in 2007.
D.2.11	108	7	ARCADIS biologists observed a pair of white-tailed kites about 1/2mile east of MP18 in the IMP link during the mountain plover survey in 2007.
D.2.11	109	2	ARCADIS biologists observed yellow warblers in the Coastal and Central links - per the WFL survey report at Site 2 (roughly MP145 146 Coastal Link) and 7 (roughly MP107 Central Link) during the southwestern willow flycatcher surveys in 2007.
D.2.11	125	3	Impact B-7g Desert tortoise this impact is classified as Class II; however, desert tortoise surveys were conducted in 2007 and no tortoises nor burrows were located. The fact that no burrows were found is strong evidence that tortoises have not occupied this "habitat" for years; paired with data from the ABDSP that indicates the only tortoise in this area were introduced (pets), these are not significant impacts to the tortoise. It should be classified as a Class III impact.

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D.2.11	127	3	<p>Impact B-7h The EIR/EIS states "One of these nest areas occurs less than 4,000 feet from the Proposed Project route in the Anza-Borrego Link, and there is direct line-of-sight between this nest area and the project. Impacts to this eagle pair would be significant and not mitigable to less than significant levels (Class I) because of the distance between the nest area and the project (less than 4,000 feet) and the direct line-of-sight that would occur. Implementation of Mitigation Measure B-7h, which states that no construction or maintenance activities shall occur during the eagle breeding season, is still required to minimize the impact, however." This impact should be categorized as Class II. There are several issues with classifying this impact as Class I. 1) 4,000 foot buffer is arbitrary and does not seem to have any citations to back it up. Typically, raptor nests (including eagle nests) have a buffer of 1/4 to 1/2 mile around them only when active.</p>
D.2.12	142	2	<p>Pandion, SDG&E's raptor expert, has done studies on the effects of noise on birds and has provided comments on that study. The 60 dB noise threshold that FWS uses is based on the Frank Aubrey noise study that was conducted on least bell's vireo in the 1980's. FWS has expanded that threshold to include all species and is now a standard requirement for construction projects. Newman has found that birds are not disturbed by the noise level but rather the noise frequency and the 60 dB noise threshold seems to be without basis. Please see his comments and recommendations. Additionally, impacts to migratory birds from noise are not a violation of the Migratory Bird Treaty Act; therefore, remove the requirement to have a qualified acoustician conduct surveys with a biologist. Nest surveys should still be completed to ensure that active nests, birds, or eggs are not physically destroyed from construction activities, but this requirement to conduct breeding bird surveys should be limited to the ROW only.</p>

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D.2.16, D.2.16	150-151	last , 11	"Maintenance activities (i.e., all but Nos. 2 and 3 above), would impact the coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, and burrowing owl if the noise threshold (i.e., 60 dB[A] Leq hourly) is met or exceeded at the edge of their nesting territories during their breeding seasons." Noise impacts on burrowing owl, because it is not listed under the FESA or CESA, is not a violation of the MBTA so this species should be removed from this requirement. The MBTA prohibits the following, "Unless and except as permitted by regulation, it shall be unlawful to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export, any migratory bird, or any part, nest, or egg
			of any such bird (16 USC 703)... " Take under the MBTA, as defined in 50 CFR 10.12 is: "Pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt any of these acts". There is no provision prohibiting "harassment" like there is in the ESA. Therefore, indirect disturbance resulting from noise (construction or maintenance) to birds covered under the MBTA (such as the burrowing owl) is not a "take" and therefore is not a violation of the MBTA.
D.2.21.1, D.2.21.2, D.2.21.3	274, 285, 296	9, 4, 4	Impact B-1: Construction activities would result in temporary and permanent losses of native vegetation (Class I for sensitive vegetation and type conversion; Class II for vegetation management; Class III for non-sensitive vegetation) -- If there are no special status species, Class I should not be assigned for sensitive vegetation.
D.2.21.1, D.2.21.2, D.2.21.3	276, 287, 298	last, last, last	The discussion on Type Conversion seems to be a moot point. There are references to vegetation being fire-adapted in San Diego County but this alternative is in the desert in Imperial County, which has a lower likelihood of catastrophic fire. Suggest removing as an impact in the Final EIR/EIS.
D.2.21.1, D.2.21.2, D.2.21.3	277, 288, 299	3, 3, 3	Mitigation Measures for Impact B-1: Construction activities would result in temporary and permanent losses of native vegetation. Requires restoration/compensation for impacted sensitive vegetation communities. There should not be any mitigation because there are no sensitive vegetation communities.

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D.2.21.1, D.2.21.2, D.2.21.3	278, 289, 300	4, 3, 3	Impact B-5 Construction activities would result in direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants (Class I). Text states no listed or sensitive plants. Remove impact from Final EIR/EIS.	E0002-120
D.2.21.1, D.2.21.2, D.2.21.3	279, 290, 300	2, 2, last	Remove Mitigation Measures B-1a, B-1c, B-2a, and B-5a because no listed or sensitive plants occur so no mitigation is appropriate.	E0002-121
D.2.22.1	320	3	The Partial Underground 230 kV ABDSP SR78 to S2 Alternative would permanently impact 0.26 acres of occupied vireo habitat and would temporarily disturb 0.29 acres of occupied vireo habitat. This should say flycatcher instead of vireo. This paragraph was taken from the Impact B-7e "Direct or indirect loss of southwestern willow flycatcher or direct loss of habitat (Class II)"; therefore this is a typo and vireo should be replaced with southwestern willow flycatcher.	E0002-122
D.2.22.2	344	last	"No desert tortoise, or sign of desert tortoise, was observed during the survey. Still, the desert tortoise is a mobile species and could move into the alternative area prior to construction. Any direct or indirect impact to the desert tortoise or its occupied habitat (e.g., vehicle crushing a tortoise, occupied habitat removal) would be significant according to Significance Criterion 1.a. (substantial adverse effect on one or more individuals of a species that is federal or State listed). These impacts would be significant but mitigable to less than significant levels (Class II) with implementation of Mitigation Measures B-1a, B-1c, B-2a, and B-7g." -- Impact B-7G: Direct or indirect loss of desert tortoise or direct loss of habitat (Class II) - Based on the historic data and field survey data this impact should be changed to Class III. The likelihood of tortoise occurring here is low and the habitat is not occupied, therefore this is not a significant impact.	E0002-123

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D.2.22.2, D.2.23.1	345, 361	2, last	"Impact B-7H: Direct or indirect loss of golden eagle or direct loss of habitat (Class I for nests within 4,000 feet; Class II in existing transmission corridor)." – Impacts to active nests can be mitigated to less than significant levels by limiting construction activities within 4000 feet of a nest during the nesting season. This should be a Class II impact. Page D.2-377 assigns a Class II impact to the golden eagle "because the project would be underground within 4,000 feet of the nest area". It was previously stated the golden eagle's have acute eyesight and collisions are not an issue. Assuming this is Class I because of potential collision (this is inferred not stated in the document), this is mitigable to less than significant levels. There are several issues with classifying this impact as Class I: 1) 4,000 foot buffer is arbitrary and does not have any citations to back it up. Typically, raptor nests (including eagle nests) have a buffer of 1/4 to 1/2 mile around them only when active.
			Therefore, if SDG&E conducts nesting surveys during the appropriate season and finds an active nest, they could avoid construction within 1/4 mile during nesting season and not disturb the eagles. If it is inactive, there should be no restrictions on construction even during nesting season. 2) SDG&E would avoid construction within the buffer zone at active eagle nests. This is a Class II impact that is mitigable to less than significant levels.
D.2.22.2	350	2	For Mitigation Measure B-7g "Implement appropriate avoidance/minimization strategies for desert tortoise," The Final EIR/EIS should add "when appropriate" to the end of the sentence. Do this for proposed action and all alternatives along the proposed action.
D.2	D.2-1	4	A pre-construction protocol survey measuring special status species within 500 feet of construction activities is excessive. (500 ft. is too great, recommend 300 ft. as standard practice. There is no appreciable benefit with the additional 200 ft.)
D.2	D.2-1	4	The protocol surveys (same as comment #2) regarding avoidance/minimization measures for special status species are not needed if already done for EIR/EIS. Recommend modified protocol surveys with reduced frequency for those areas with existing ROW; full protocol surveys would be done for new ROW areas.
D.2	throughout		"quino" should read: "Quino"

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D.2	D.2-2	2	San Diego County has prepared a draft subarea plan for MSCP North and is drafting MSCP East. Both plans provide a landscape level context for SRPL. While only a draft, a significant amount of specialized information could be integrated into the SRPL EIR/EIS. For example, the Sunrise project is treated as if it is to be constructed independently of the landscape-level habitat conservation plan context through which it traverses. SDG&E transmission corridors have been used since 1996 as the "skeleton" for the assemblage of the San Diego regional preserve system. The EIR/EIS treats the Sunrise project as biologically negative, rather than recognizing the positive role major parts of the existing SDG&E transmission grid fills today in the MSCP and MHCP plans. For example, the only good habitat connection remaining between Oceanside and Carlsbad is along the SDG&E right of way. Resource surveys for the Sunrise project confirmed the effectiveness of SDG&E's operational practices in avoiding impacts to biological resources, insofar those studies found a diversity and richness of habitat
			coexisting with the long standing utility use of the land.
D.2	D.2-2	4	line 7 sentence should read: "However, subsequent engineering done for the Proposed Project showed that there would be impacts to fairy shrimp habitat, and by the time the impacts were determined, it was too dry to conduct the surveys."
D.2	D.2-9	2, bullet-point 4	Survey areas not always including all of the proposed impact areas is not a significant problem, as long as construction changes can be made to avoid impacts in the field.
D.2	D.2-9	3	last line: "species would be assumed to be present (where appropriate), and mitigation would be developed based on that assumption" overstates probable impacts to the point of misrepresenting the scope of likely actual impacts. Recommend a more explicit disclaimer that points out that pre-construction surveys will provide accurate information and that these analyses indicate a very low level of impacts.

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D.2	D.2-11	2	Because the climate in the PSA is extremely variable, and because of the great distance SRPL travels, a regional-scale mitigation package is most appropriate for the project. Species-by-species, habitat-by-habitat mitigation will not allow regional planning to take full advantage of the synergies attendant to comprehensive resource management when SDG&E coordinates its offsite mitigation package with state, federal and local regional planning. Recommend especially close coordination with the County of San Diego.	E0002-132
D.2	D.2-11	3	USFWS has found traversing habitat areas acceptable in all Section 7 consultations carried out for SDG&E. As long as operational protocols are followed, impacts have been found acceptable.	E0002-133
D.2	D.2-11	3	Change "Multiple Species Habitat Conservation Plan" to "Multiple Species Habitat Conservation Program"	E0002-134
D.2	D.2-15	2	last sentence: "eight more species currently meet the criteria to be listed but have yet to receive the designation" needs further explanation here as to why this has not happened	E0002-135
D.2	D.2-17	1	Change "void" to "devoid", "The MSCP designates regional preserves intended to be mostly devoid of development activities, while allowing development of other areas subject to the requirements of the program.	E0002-136
D.2	D.2-17	2	The section on Multiple Species Habitat Conservation planning needs to be expanded to properly address the role played by linear utilities, especially water, gas, and electric providers, who have all been reducing operational impacts in numerous ways (e.g., helicopter construction and maintenance to reduce roads and travel disruption) since the mid-1990's in response to an increased level of endangered species listings. The reduction in impacts has been also accompanied by improvements in onsite restoration. Further, the somewhat unique ability of utilities to fulfill key mitigation needs at a regional level while still minimizing the ground level impacts of their activities has facilitated the completion of regional habitat preserves ahead of schedule. For example, SDG&E and the San Diego County Water Authority have provided the funds to acquire the first pieces of land in the San Diego National Wildlife Refuge, key California gnatcatcher linkage areas in East San Diego County and the City of San Diego's largest block of gnatcatcher core habitat.	E0002-137

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			Due to the regional habitat planning context that has been the approach of regional and local government since 1991, planning for linear utilities has always been part of the MSCP process since its inception. In many cases, utility rights of way were the initial (and sometimes sole start points) elements of MSCP and MHCP preserve planning. This crucial interrelationship needs to be expanded in the Final EIR/EIS.	E0002-137 cont.
D.2	D.2-17	5	Change "County of San Diego MSCP Subarea Plan" to "County of San Diego MSCP Subarea Plan South"	E0002-138
D.2	D.2-18	2	In regards to the North San Diego County MSCP Subarea Plan, the plan is notable for its lack of both large blocks of habitat and the interconnections between the blocks of habitat. Therefore, utility rights of way would be useful in connecting areas within the plan.	E0002-139
D.2	D.2-19	4	Change first sentence of "Sycamore Canyon/Goodan Ranch Open Space Preserve" to read: "The Sycamore Canyon/Goodan Ranch Open Space Preserve (a joint City of Santee, Poway, and County of San Diego preserve) covers approximately 1,820 acres in southeast Poway."	E0002-140
D.2	D.2-20	2	change "Pomo" to "Pamo"-- the Focused Planning Area (FPA) for the park extends along a 55-mile corridor that encompasses the San Dieguito River Valley and its major tributary canyons, as well as Lake Hodges, San Pasqual Valley, Boden Canyon and Pamo Valley, Lake Sutherland...."	E0002-141
D.2	D.2-20	3	add "large areas of" --- "The INRMP describes the biological resources on MCAS Miramar and designates five levels of management areas (MAs): MA1 contains the largest extant areas of vernal pools in San Diego County;...."	E0002-142
D.2	D.2-21	3	Regarding USFWS designation of the Quino Checkerspot Butterfly, it is being redesignated in spring 2008 by Court order. This should be included in the Final EIS/EIR.	E0002-143
D.2	D.2-23	3	Under the section "The PSA includes upland and wetland vegetation community types. All Chaparral Community should not be deemed sensitive. Regional habitat planning generally considers only southern maritime chaparral sensitive. Other types such as chamise and mixed chaparral are assigned the least sensitive category for native habitat types. Recommend moving to the less sensitive list.	E0002-144

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Chapter #	Page #	Paragraph #	Comment
D.2	D.2-23	4	Under heading "All vegetation communities in the PSA are considered sensitive with the exception of those that occur in the following areas" Eucalyptus woodland can be very sensitive if certain raptors nest in it. Recommend revising to provide more accurate characterization of the blurring between native and non-native habitat value. A significant example is for many years now, non-native grassland has filled the role that native grassland used to fill, and while its species constituents are problematic in some ways (fire risk), it is more appropriate to see natural land (native or non-native) as all having a role to play in regional planning. Recommend revising the text to reflect this reality.
General Comment for Proposed Project			Many of the impacts to biological resources cited throughout the DEIR/EIS are overstated. Impacts are not concentrated in one area, as a large residential or commercial development, but are "diffuse" over a large area. Three of the linkages (Desert, Central and Inland Valley) traverse large areas of extensive native habitats where the impacts would even be more "diffuse". For a majority of two of the links (Coastal, Inland Valley), the project is sited in an existing ROW. For a large portion of the Desert East Linkage, the proposed project parallels an existing utility corridor. In these areas the Proposed Project follows corridors originally designed and approved for this specific use. There are approximately 450 acres of permanent impacts to native habitats from the Proposed Project. These impacts extend over a 150-mile corridor, many of which are adjacent to existing transmission lines that, as the results of the 2007 surveys indicate, support a high diversity of species, both common and rare despite the presence of existing transmission lines.
			There are approximately 1,000 acres of temporary impacts, most of which would be restored. In the western portion of the San Diego County, existing SDG&E rights of way, and mitigation lands play a critical role in the overall preserve network within the MSCP and MHCP Plan areas yet this project is assessed as having a relatively high number of Class I impacts to biological resources.

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Chapter #	Page #	Paragraph #	Comment
General Comment for Proposed Project and Alternatives			All of the alternatives were assessed as having Class I impacts for sensitive vegetation, listed or sensitive plant species and non-listed wildlife species. The analysis was not based on quantification, i.e., no threshold level in terms of amount of habitat lost, or number of individuals lost, for the impact to be considered Class I. Any direct loss, and in some instances, assumed potential loss, was considered a Class I despite differences in the amount and level of impacts to these resources from all the different alternatives. Since all were assessed equally for these resources despite different levels of impacts, impacts to these resources had no "weight" in the analysis and hence no effect on the selection of the environmentally superior alternative (since each alternative was assessed the same for these resources, each of these canceled themselves out).
General Comment for Proposed Project and Alternatives			The Proposed Project and all of the alternatives were assessed as having Class II impacts for jurisdictional waters and wetlands. Since the primary criteria for ranking the environmentally superior alternative was the number of Class I impacts, impacts to jurisdictional waters were not considered for the selection of the environmentally superior alternative despite likely (since delineations were not conducted on all alternatives) significant differences between the alternatives.
D.2	71-72	entire pages	The Significance Criteria (Section D.2.4.1) do not seem to provide any criteria for what constitutes a Class I impact. Many of the Class I impacts are not based on any scientific data or justifications (see specifics below). In fact several of the Class I impacts are based on speculative conclusions without any data to support the statements e.g., inconclusive surveys, uncertainty over available mitigation lands, etc.

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Chapter #	Page #	Paragraph #	Comment
D.2	85 & Table D.2-7 pp. 85-87;	1st on p.85	<p>The DEIR/EIS states that "Based on the data in Table D.2-7 and Mitigation Measure B-1a, nearly 1,360 acres of mitigation land will be required to fully mitigate this impact. It is anticipated that adequate acreage of mitigation land will be available for this project based on the availability of potential mitigation land in ABDSP, FTHL MAs, unincorporated areas of San Diego, and other jurisdictions. The final mitigation package for this project must be acceptable to the CPUC, BLM, USFS, CDFG, State Parks (for impacts to ABDSP), and USDA Forest Service (for impacts to forest lands). However, due to the large number of vegetation types; the large acreage of mitigation; and the vast area, different jurisdictions, and biomes that a long linear project like this one traverses, it is not likely that all the sensitive vegetation communities can be mitigated "in-kind" or that all the mitigation will occur within close proximity to the impacts. Therefore, the impacts to sensitive vegetation communities would be significant and are not mitigable to less than significant levels (Class I)."</p>
			<p>The statement that there is enough acreage in San Diego to mitigate but not likely enough in close proximity to the impacts seems contradictory. As a linear project the impacts and hence mitigation (1,360 acres) are spread out over a large area and certainly over a 150 mile stretch there is very likely to be high quality available properties in close enough proximity to the site to capture "in-kind" communities. There is no data to support the assumption that there are not. The current status of declining property values in the County, due to the recent fires and financial lending crisis, only increases the probability of more potential mitigation lands becoming available.</p>

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