Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.1.2.3, E.2.2.2	35, 16	1st paragraph (page 35, section E1.2.3), 4th paragraph (page 16, section E.2.2.2)	The EIS/EIR states that there is a Class I impact on bare foot banded gecko, although "No surveys were conducted for this species. If surveys were conducted, and the species was not found, the survey result would have to be considered false negative because of the species' highly elusive nature. The barefoot banded gecko is, therefore, assumed to be present along the I-8 Alternative from approximately MP I8-23 through MP 39. Any impact to the barefoot banded gecko or its habitat would be significant according to Significance Criterion 1.a. (substantial adverse effect, either directly or indirectly, on one or more individuals of a federal or State listed species through habitat modification) and not mitigable to less than significant levels (Class I) since the extent of the impacts that would occur is unknown. Implementation of Mitigation Measures B-1a (that requires all construction to remain within delineated construction limits) and B-1c (Conduct biological monitoring) would provide some protection for this species but is not adequate to mitigate impacts to less than significant levels." Existing occurrence data should be incorporated for this species. Suitable habitats could be avoided, where feasible, to reduce impacts. Please change the classification to a Class II impact.	E0003-110
E.1.2.3, E.1.2.5	36, 45	7th and 8th (page 36, section E.1.2.3), 1st paragraph (page 45, section E.1.2.5)	The EIS/EIR states that there is no known concentrated migration (and that it is unlikely because of existing topography) in the vicinity of this alternative, then it states "Even so, since most birds migrate at night, and migration corridors have never been studied systematically (their use by birds has had to be pieced together from anecdotes), there is no way to know how many birds and what species of birds could actually be impacted by collision with the project transmission lines, towers, poles, or static wires. There is no way to know because much of the migration occurs at night when it cannot be seen, and birds that collide with transmission line features and fall to the ground are often taken away by predators/scavengers before morning. Therefore, as with the Proposed Project, it is assumed that some migrating species could be federal or State listed or of other special status, and their mortality would be a significant impact that is not mitigable to less than significant levels (Class I) according to the following Significance Criteria: 1.a. (substantial adverse effect through any impact to one or more individuals of a federal or State listed species), 1.f. (directly or indirectly cause the mortality of candidate, sensitive, or special status wildlife species), and 1.g. (result in the killing of migratory birds)." It cannot be assumed or stated without a citation that 1) more birds will collide with the line at night; 2) that these are "often" carried away by scavengers before morning; and 3) these would be federal or state-listed or other special status species. Additionally, much of this alternative parallels the SWPL line. If impacts relating to collisions have not been shown to be an issue on that line, one cannot assume it will be a Class I impact for this alternative.	E0003-111

Comment Set E0003, cont.
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CH#	Pg#	Par#	Comment
E.1.2; E.2.2; E.3.2; E.4.2; E.5.2	E.1.2-37 , E.2.2-17, E.3.2-18, E.4.2-19, E.5.2-61	1,5,7,5,2	Impact B-10 is defined in the EIR/EIS as follows: "Presence of transmission lines may result in electrocution of, and/or collisions by, listed or sensitive bird species (No impact for electrocution; Class I for collision for listed species; Class II for collision for non-sensitive species or daytime migration)." The literature does not support the frequently stated impact discussions on Raptors at Risk from Collisions (Impact B-10) and the resulting proposed mitigation is questionable. In fact the EIS/EIR refers to Bittner 2007, a local expert, who said that "eagles do not tend to be collision victims." The impact analysis on Golden Eagle collision risk is contradictory to this statement and the literature, including:• Avian Power Line Interaction Committee (APLIC). 1994. Mitigating bird collisions with power lines: the state of the art in 1994. Edison Electric Institute/Raptor Research Foundation. Washington, D.C.• Bevanger, K. 1994. Bird interactions with utility structures: collision and electrocution, causes and mitigating measures. Ibis 136:412-425• Faanes, C.A. 1987. Bird Behavior and Mortality in Relation to Power Lines in Prairie Habitats. U.S. Fish and Wildlife Service Technical Report No. 7. 24pp• Hunting, K. 2002. Roadmap for PIER Research on Avian Collisions with Power Lines in California. California Energy Commission, Commission Staff Report. P500-02-071F. Change the proposed mitigation. Conduct an avian risk assessment for the line as a part of the APP and consider mitigation, e.g., marking the line, only in higher risk areas.

E0003-112

Comment Set E0003, cont.
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CH#	Pg#	Par#	Comment	
E.1.2.3	39	1	The draft EIR/EIS claims that maintenance would result in Class I impacts to bighorn sheep: "Impact B-12: Maintenance activities would result in disturbance to wildlife and could result in wildlife mortality (Class I for Peninsular bighorn sheep … and/or adverse effects to Peninsular bighorn sheep from maintenance activities that cause sheep to avoid affected areas. Even with implementation of the APMs, disturbance to wildlife and potential wildlife mortality would be significant according to Significance Criteria 1.a. (impacts to one or more listed species), 1.c. (disturbance to FTHL MAs), 1.d. (disturbance of critical habitat)" Additionally, the draft EIR/EIS relies on speculation to justify Class I impacts. "Impacts to PBS and its critical habitat (see Impact B-7B) from maintenance activities could cause PBS to avoid affected areas and could interfere with the use of resources such as escape terrain; water; mineral licks; rutting, lambing, or feeding areas; the use of traditional movement routes, and/or could cause physiological stress or increased predation. All of these potential effects could adversely affect survival and recovery of the species and are significant and not mitigable to less than Class 1 impacts." This impact should be changed to a Class III impact in most cases and a Class II impact in others, but it should not be a Class I impact. There is no documented basis that bighorn sheep abandoned lambing habitat during construction activities for the Palo-Verde Devers No.1 project. There are examples from Palo-Verde Devers No. 1 that bighorn sheep ewes were either not affected by transmission line construction or were attracted to it. Smith, E.L., Gaud, W.S., Miller, G.D., and M.H. Cochran (1986) Studies of desert bighorn sheep (Ovis canadensis mexicana) in western Arizona: Impacts of the Palo Verde to Devers 500 kV Transmission Line. Final Report-Volume II. E. Linwood Smith and Associates, Tucson, AZ. Submitted to Southern California Edison Co. and Arizona Public Service Co. 51. The assertion that metapopulation dynamics (e.g. movement of bighorn sheep between populations which contributes to genetic exchange) will be disrupted is unsupported by any empirical evidence. For example, the EIR/EIS asserts: "The other aspect deals with the overall impacts to the population affected by the Proposed Project. One of the goals for recovery of the PBS is to reconnect the entire range of the PBS metapopulation. A metapopulation maintains stability through unobstructed movement between geographically separated subpopulations (such as the southern San Ysidro Mountains ewe group). This interchange allows natural levels of genetic heterogeneity and demographic augmentation that compensates for temporary declines at the subpopulation level and maintains population stability over time across the entire metapopulation.") [continued]	E0003-113
Continued from above			However, experience with Palo Verde Devers No. 1 showed no such effect with limiting crossings (Smith et al. 1986), nor have any been reported from the Old Dad Mountains of California where a transmission line traverses part of bighorn population range. Transmission lines are inanimate objects in the environment that pose no threat to bighorn sheep or impediment to their crossing.	E0003-114

Comment Set E0003, cont.
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CH#	Pg#	Par#	Comment	
E.1.2	112	7th species down in table	The taxonomy and common name for bighorn sheep used in the draft EIR/EIS is in error. The EIR/EIS refers to bighorn sheep in the Peninsular Ranges (Ovis canadensis nelsoni) as: "Peninsular bighorn sheep Ovis canadensis cremnobates" Change to the accepted name desert bighorn sheep in the Peninsular Ranges (Ovis canadensis nelsoni) (listed as a distinct population segment).	E0003-115
E.1.3	E.1.3-1	2	"Passing less than one mile southeast of the southwest corner of ABDSP …" should be passing less than one mile southwest of the southwest corner of ABDSP.	E0003-116
E.1.3	E.1.3-8	V-56	"Increased structure contrast, view blockage, skylining when viewed from Key Viewpoint 44 at Dunaway OHV Staging Area". The term skylining implies the towers are at the top of a ridge; in fact this viewpoint is in the desert flats and is paralleling the existing SWPL.	E0003-117
E.1.3	E.1.3-36	V-66	The author states the re-located cable poles would be less visible on the south side of I-8 than the north side as proposed by SDG&E. In reality if the cable poles are located south of I-8 the would be skylined along Alpine Blvd. and I-8 as they would be above the elevation of both where the conductors cross the interstate. The result of this aerial crossing by the CPUC is an unnecessary interstate crossing that could be detrimental to low flying aircraft. Conversely, SDG&E's proposal would place the cable poles on the north side of I-8 at a point lower that the interstate elevation so worst case is the pole tops may be visible but not the whole structure and contrary to what is implied.	E0003-118
E.1.3	E.1.3-27	V-3a	In Key Viewpoint 51 it depicts graded areas at each tower location, initially this will be likely but low growth vegetation will fill in; this appears to be a subjective view as other Key Viewpoints do not show graded pads at tower locations. This is a temporary visual impact. Also, the comment is made "…on sunny summer days the transmission line would stand out more and the contrast would be more noticeable." This appears to be an assumption and is not necessarily true, the steel will be dull galvanized and the conductor will be non-specular for the purpose of reducing glare.	E0003-119
E.1	E.1.3-36	3	For the I-8 crossing on the west end of Alpine Boulevard, the Draft EIS/EIR argues the overhead crossing of the I-8 is preferred visually as compared to an underground crossing. SDG&E has submitted an underground crossing as part of a data request response that was termed the Peutz Valley crossing. This alternative is not mentioned in the Draft EIS/EIR. SDG&E strongly feels the underground crossing is superior to an overhead crossing just from the visual impacts of the conductor crossing the I-8. There are also other advantages such as one less point of potential risk for wires coming across the highway due to an airplane of helicopter contact. This especially makes sense because there is an opportunity to underground 230 kV unlike the other I-8 crossings which are 500 kV.	E0003-120

Comment Set E0003, cont.
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CH#	Pg#	Par#	Comment	
E.1.3	E.1.3-42	V-68	Key Viewpoint 55 assumes steel poles. If structures are relocated lower on the slope to eliminated skyling and lattice towers are used, the visual would be reduced as the lattice would blend into the side slope.	E0003-121
E.1.3	E.1.3-41	3	The visual impact is overstated for the Proposed transmission line as viewed from KVP 55. The new pole structures would be set back at a distance too far from Moreno Blvd. to block any portion of the view, as the structures are small in scale relative to other landscape features; therefore, view blockage is low. There is no significant sky-lining of the poles because hills form a backdrop that is higher in elevation that the poles as seen from the highway. In addition, textural and color variations of the background of rolling hills provide some screening for the lattice structure, which provides numerous openings through which the background is visible, which provides some screening. The scale of the structures is small relative to the surrounding landscape elements, and so would be subordinate rather than co-dominant. The character of the landscape would not be degraded from the introduction of the poles into the landscape, and the overall visual change would be low. Impact V-67 should be changed to Class III, as the impact is less than significant.	E0003-122
E.1.3	46, 54 Figures E.1.3-14B, E.1.3-15B	4,4	KVP 56: Visual Simulation, KVP 57: Visual Simulation. The soil color selected for the new access road is too light, which overemphasizes the color contrast of the new road. The highly visible access road as shown in the simulation would be temporary, as the strong line and color contrasts would be mitigated by revegetation. In the event there is no revegetation, the surrounding grasses would encroach on the cleared roadway, significantly softening contrasts. Typical transmission line access roads (long-term) are visible as a lightly-used two-track road. It should be disclosed that the visual impact of the new access road is temporary, or the simulated access road should be replaced with a two-track road.	E0003-123
E.1.4	E.1.4-1	3	The land use description for Interstate 8 Alternative acknowledges tribal lands along the route as sensitive land uses. However, the text does not explain that where the route may cross these sensitive land uses, tribal approval for such crossing may not be granted.	E0003-124
E.1.4.1; E.1.4.4	E.1.4-1; E.1.4-14	Various	Feasibility of options that cross Campo Reservation is questionable, since Campo Tribe will not permit entry into reservation.	E0003-125
E.1.4	E.1.4-2, E.1.4-2, E.1.4.7	last paragraph, Table E.1.4-1, Table E.1.4-2	The tables identify a number of sensitive land uses without defining why they are sensitive. Definitions of sensitive land use categories should have been provided to support the identification of certain kinds of land uses as sensitive. Some of the categories identified as sensitive include rural residential, multi-family residential and single family residential, with no supporting facts to justify why they would be considered sensitive. An appropriate location to add definitions of sensitive land uses would be the last paragraph on page E.1.4-1.	E0003-126
E.1.4	E.1.4-3	Table E.1.4.1	Data for milepost 35 needs to note the 1000 acres of land recently purchased by the Nature Conservancy as a sensitive land use.	E0003-127
E.1.4	E.1.4-6	6th row down	Under Campo North Option in chart, should be "CN 0-1.4" not "NC", "CN" is denoted on maps	E0003-128