Sunrise Powerlink Transmission Project

California SCH #2006091071
BLM Serial #CACA-47658
BLM Project #CA-670-2006-31

September 22, 2010

Mr. Alan Colton
San Diego Gas and Electric Company
8830 Century Park Court – CP32D
San Diego, CA 92123

Re: SDG&E Sunrise Powerlink Transmission Project –Sunrise Project Modifications

Dear Mr. Colton:

The Sunrise Powerlink Project was approved by the California Public Utilities Commission (CPUC), as Lead Agency under California Environmental Quality Act (CEQA), in December of 2008 and the Bureau of Land Management (BLM), as Lead Agency under the National Environmental Policy Act (NEPA) in January of 2009. After project approval, SDG&E began the process of completing final project design and engineering. As is generally the case on major transmission line projects, some project components require modification as mitigation measures are implemented and final engineering is completed. SDG&E submitted its proposed project modifications in April and May 2010.

After careful review of the project modifications, as documented in the Determination Memorandum and BLM Determination of NEPA Adequacy (attached), and in accordance with the CEQA and NEPA guidelines, the CPUC and BLM have determined that the changes are within the scope of the Certificate of Public Convenience and Necessity and Record of Decision issued by the CPUC and BLM respectively. The modifications to the Sunrise Powerlink Project described in the Final PMR have been made in response to mitigation measures required for the approved project and they reduce the impacts of the approved project. The modifications are hereby incorporated into the approved project.

The determination memorandum will be posted on the project website. Please feel free to call us with any questions.

Sincerely,

Billie Blanchard

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Enclosures (2):
Project Memorandum
Determination of NEPA Adequacy

cc: Daniel Steward, BLM El Centro Field Office
Tom Zale, BLM El Centro Field Office
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Robert Hawkins, U.S. Forest Service
Eric Porter, USFWS
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Paul Schlitt, CDFG
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Kelly Fisher, CDFG
Erin Wilson, CDFG
Cliff Harvey, State Water Resources Control Board
Susan Lee and Vida Strong, Aspen Environmental Group

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PROJECT MEMORANDUM

Date: September 2010

To: Interested Parties

From: California Public Utilities Commission and Bureau of Land Management

Subject: Sunrise Powerlink Project Modifications Report

On May 14, 2010, San Diego Gas and Electric Company (SDG&E) submitted a Project Modification Report[1] (PMR) for the Sunrise Powerlink Project. The California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM) have reviewed the PMR. This memorandum presents the agency findings to interested parties, beginning with the introduction that summarizes the approval history of the Sunrise Powerlink Project, SDG&E's proposed modifications, and the legal requirements for evaluating the modifications. The memorandum is divided into three parts and has one attachment:

- Introduction and summary of the CPUC and BLM findings;
- Section 1, which provides a discussion of the general issues and comments on the PMR;
- Section 2, which provides a discussion of issues related to each individual modification subunit; and
- Attachment 1, the BLM Determination of NEPA Adequacy.

Introduction

Project Approvals. The Sunrise Powerlink Project was approved by the California Public Utilities Commission (CPUC), as Lead Agency under California Environmental Quality Act (CEQA), in December of 2008 and the Bureau of Land Management (BLM), as Lead Agency under the National Environmental Policy Act (NEPA) in January of 2009. The CPUC approved a combination of alternative routes called the Final Environmentally Superior Southern Route (FESSR) and the BLM approved the same alternative. Since the approvals from the CPUC and BLM, SDG&E has been implementing the required mitigation measures, conducting required pre-construction surveys, and preparing the final project design. This new information was provided to the CPUC, BLM, and other agencies in the PMR. After considering the PMR, the United States Forest Service issued a Record of Decision in July, 2010 authorizing the construction, operation, and maintenance of the Sunrise Powerlink Project as described in the Final PMR. Construction of the Sunrise Powerlink Project would commence August 2010 with the establishment of some construction yards and existing substation upgrades. Notices to Proceed (NTPs) will be issued by the CPUC for each of these activities.

Project Modifications Proposed by SDG&E. After the FESSR was approved by CPUC in December 2008 and BLM in January of 2009, SDG&E began the process of completing final project design and engineering. As is common, some project components were modified as engineering was completed. Modifications result from engineering design requirements, and also from compliance with mitigation measures requiring resource avoidance to minimize or avoid environmental impacts. In addition, some

[1] The SDG&E Project Modification Report can be found at:
http://www.cpuc.ca.gov/environment/info/aspen/sunrise/toc-pmr.htm

project components are proposed to be relocated to accommodate landowner location preferences where possible in compliance with mitigation requirements (i.e., Mitigation Measure L-2b "Revise project elements to minimize land use conflicts"). As a part of this process, SDG&E has been working with landowners regarding project components and transmission line routes within their properties.

The May 24, 2010 PMR submitted by SDG&E defines the major components of the proposed modifications in PMR Table S-1, Project Components (below), as compared to the components identified in the Final Environmentally Superior Southern Route (FESSR) defined in the agency approvals.

PMR Table S-1. Project Components

Variable	FESSR	Modified Project	Change Resulting from Modification	
			Number	%
Length (miles)	119	117	(2)	1.6% decrease
Structures (number)	481	443	(38)	7.9% decrease
Wire Stringing Sites (number)	129	78	(51)	39.5% decrease
New Access Roads (miles)	125	51	(74)	59.2% decrease
Tower Staging Access Pads (number)	108	162	58	53.8% increase
Construction Yards (number)	43	19	(24)	55.8% decrease
Suncrest Substation (acres)	128.18	75.66	(52.52)	41.0% decrease
Reconductoring Replacement Poles (69kV)	11	17	6	54.4% increase

Most of the project components shown in Table S-1 would decrease with the modified project. The tower staging access pads would increase due to the increased number of transmission towers that would be built by helicopter, resulting in fewer new access roads and less ground disturbance. The reconductoring replacement poles would also increase due to further engineering of the Coastal Link System Upgrades. These upgrades were approved as part of the FESSR because they would eliminate a new segment of the transmission line that SDG&E had originally proposed, but additional system upgrades are needed to improve overall reliability of the system because the two Sunrise 230kV transmission lines as proposed in both the FESSR and PMR terminate at the Sycamore Canyon Substation.

In addition to the modifications shown in Table S-1, SDG&E has proposed an increased in the number of transmission towers that would be built by helicopters instead of by conventional construction to 230. For safety purposes and at the request of the Department of the Navy and the US Border Patrol, as required by Mitigation Measure T-11b: Consult with and inform U.S. Customs and Border Protection, SDG&E has proposed infrared lighting to be used on some of the project towers, and has proposed over 1,300 marker balls would be required on 134 project spans (see PMR Table 2-2) based on the location of each span (near airports, at road crossings, and at crossings of canyons) as determined by FAA regulations. SDG&E also refined the construction yards and their locations and included provisions for additional microwave telecommunications equipment at seven locations.

CEQA Requirements Related to Project Modifications. Additional CEQA review, in the form of a Supplemental EIR, would only be triggered if changes to the Sunrise Powerlink Project created new significant impacts or impacts that are more severe than those disclosed in the Final EIR/EIS used to approve the Final Environmentally Superior Southern Route (FESSR). According to CEQA Guidelines section 15162(a)(3):

> *(a)When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:*

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

NEPA Requirements Related to Project Modifications. The Council on Environmental Quality (CEQ) NEPA regulations require a supplement to a draft or final EIS if:

(i) an agency has made a substantial change in the proposed action that is relevant to environmental concerns,

(ii) there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts (40 CFR 1502.9(c)1).

If there remains major federal action to occur and if new information indicates a significant impact not already considered in an existing NEPA document then supplementation may be required. If a project change or new information is consistent with or validates the NEPA document, then supplementation is not likely required.

In order to determine whether a supplemental NEPA document is required, the BLM uses a worksheet entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy." During preparation of the worksheet, if one or more of the criteria are not met, completion of an appropriate NEPA compliance document (e.g., Environmental Assessment, EIS, Supplemental EIS, or Categorical Exclusion if applicable) is required before proceeding with the proposed action. The NEPA adequacy worksheet requires consideration of the following criteria:

- Is the new proposed action a feature of or essentially similar to an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences can you explain why they are not substantial?
- Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values and circumstances?
- Is the existing analysis valid in light of any new information or circumstances? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

- Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document(s)?
- Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Public and Agency Comments on the PMR. The SDG&E PMR was posted to public websites by the CPUC/BLM and the U.S. Forest Service (USFS). Comments were accepted by the CPUC and BLM, and shared with the USFS, between May 14 and June 7, 2010. These comments have been carefully reviewed to ensure that concerns raised therein have been addressed by SDG&E's PMR and in this agency review. However, acceptance of comments on the PMR was not part of a CEQA or NEPA process. Comments were accepted so the lead agencies could be fully informed as to public concerns regarding the Sunrise Powerlink final project changes, and whether those changes would trigger additional CEQA and NEPA documentation.

Summary of Conclusions Regarding the Proposed Modifications

Detailed Analysis Presented in Sections 1 and 2

To reach the conclusions presented in this memorandum, the CPUC and BLM performed an in depth review of the PMR and modified project. The conclusions of this review are summarized below by section, and presented in detail in this memorandum as follows:

- **Section 1, General Components and Comments**: This section reviews the revised project components in general, including the components that apply to multiple locations such as the proposed use of infrared lighting, marker balls, the revised construction yards, the telecommunication equipment, and the increased use of helicopter construction. This section evaluates impacts to biological resources, water supply, and includes a revised fire risk analysis and revised analyses of air emissions, cultural resources, and noise. A brief discussion regarding cumulative impacts and notification requirements is also included.
- **Section 2, Review of Proposed Modifications**: This section presents detailed consideration of each modification subunit on an individual basis. This section includes a table defining cultural resources in areas of direct impact. Attached at the end of Section 2 is a list of cultural resources sites in areas of direct impact, which was completed by SDG&E and reviewed by the CPUC and BLM. This table details which cultural resources within the modified project right-of-way would be avoided. Where a cultural resource could not be avoided entirely, SDG&E explains the reasons why the resource could not be entirely avoided.
- **Determination of NEPA Adequacy:** This determination is required by BLM, and was prepared to determine whether a supplemental NEPA document is required.

General Components and Comments (Summarized from Section 1)

Section 1 of this memorandum defines the proposed modifications to project components that apply either to the entire project or to numerous locations. This section also addresses specific technical issues and explains how they were analyzed.

Revised Project Components. The CPUC and BLM reviewed the project components required during construction and operation of the modified project including the following:

- **Infrared Lighting**. SDG&E proposes to add infrared lights at specific towers in response to aircraft safety requests from the Department of Defense and Homeland Security (Border Patrol) in compliance with Mitigation Measure T-11b: Consult with and inform U.S. Customs and Border Protection. Because the lights would be located on the transmission towers and would not be visible to humans, the context of potential environmental impacts is limited to indirect impacts to birds and bats that may be attracted to insects clustered around the infrared lights, and their potential to collide with the towers. The potential for bird collision with transmission towers was fully evaluated in the Final EIR/EIS. Therefore, lights would not create a new significant impact or to substantially increase the severity of effect to birds. However, to be conservative, the CPUC and BLM will require full implementation of Mitigation Measure B-10a at conductor spans adjacent to infrared lights, rather than only in high bird use areas. This measure requires SDG&E to install bird flight diverters, fund a study to determine the effectiveness of these devices, and to implement an avian reporting system for documenting bird mortality. With this existing mitigation implemented, this project change would not create a new impact or substantially increase the severity of a previously identified significant impact. The addition of infrared lighting on transmission towers is not expected to result in any new significant impacts to bat species (as a result of collision) because of their flight behaviors, natural history, and echolocation abilities.
- **Marker Balls**. After SDG&E completed final project design and defined specific tower and span heights, the Department of Defense and Homeland Security (Border Patrol) identified the specific location of marker spheres would be required on static lines (at the top of the towers, above the conductors) that would ensure aircraft safety in compliance with Mitigation Measure T-11b: Consult with and inform U.S. Customs and Border Protection. The potential for marker balls was identified in Section B.3.2.4 of the Final EIR/EIS, and their presence was assumed in impact analysis. The PMR states that over 1,300 marker balls would be required on 134 project spans based on the location of each span (near airports, at road crossings, and at crossings of canyons) as determined by FAA regulations. The importance of collision avoidance devices for air safety, such as marker spheres and infrared lights is clear from the history of aircraft collision with transmission lines. The visual impact analysis in the Final EIR/EIS concluded that the FESSR would have significant and unmitigable adverse visual impacts, and the analysis assumed the presence of marker balls in some locations (see Final EIR/EIS Figure E.1.3-10B). While the current SDG&E proposal would result in installation of a larger number of marker spheres than anticipated, the Final EIR/EIS concluded that the FESSR, when installed in an area without substantial industrial development, would result in significant and unmitigable visual impacts due to the presence of the new transmission line in an undisturbed setting (see Section E.1.3, E.2.3, and E.4.3), and the definition of marker sphere locations does not substantially increase the severity of this impact.
- **Construction Yards**. Eleven of the nineteen construction yards identified for the modified project have changed in size and location from those identified in the FESSR. Overall, the temporary disturbance associated with use of construction yard has been reduced by approximately 46 percent. This has been accomplished by elimination of several yards, and by reducing the size of other yards. These changes do not constitute new or more severe environmental impacts. The mitigation measures defined in the Final EIR/EIS apply to the revised yard locations and will ensure that impacts are not significant at each location.
- **Telecommunication Equipment**. SDG&E proposes installation of microwave communications equipment within the lattice structure of six transmission towers along the modified project route in addition to changes to the Tierra del sol Communication Facility, analyzed in Section 2 of the Recirculated Draft EIR/Supplemental Draft EIS, as modified in the Final EIR/EIS. This equipment would

establish a reliable communications system during project operation and would increase worker safety. The equipment would be located inside the lattice structure of the transmission towers so would not increase the ground disturbance of the project. No new significant impacts would be created, and the temporary and minor visual effects would not result in a substantial increase over that evaluated in the Final EIR/EIS. Visual impacts were considered to be significant for the FESSR and the conclusions of the Final EIR/EIS remain valid with the addition of the communications equipment.

Biological Resources. The CPUC and BLM reviewed the PMR and the PMR map book. The agencies verified SDG&E's calculations of impacts to sensitive vegetation types and special status species habitat or individuals for the FESSR and the May 2010 Modified Project using a database presented in the PMR and the database presented in the Final EIR/EIS. Regardless of which data set is used, the modified project would reduce impacts to most sensitive vegetation communities, most special status plant species, and all special status wildlife species, resulting in a benefit to biological resources. Permanent impacts of the modified project to herbaceous wetlands, freshwater, and streams and Riparian Conservation Areas would increase compared with the FESSR using the EIR/EIS database, but would decrease compared to the FESSR using the PMR database. The mitigation required for the FESSR would also be required for the modified project.

Overall, the modified project would increase impacts to number of individuals for three special status plant species and decrease impacts to the number of individuals for nine special status plant species. Impacts to special status plant species were assessed in the Final EIR/EIS under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants without giving a specific number of individual loss. The severity of the impact to special status plant species in the FESSR project area was determined to be significant in the Final EIR/EIS. The mitigation required for the FESSR included conducting rare plant surveys and implementation of appropriate avoidance/minimization/mitigation strategies as well as providing restoration/ compensation for affected vegetation communities. This mitigation would also be required for the modified project and ensures that the increase in impacts to the sensitive plant individuals does not substantially increase the severity of Impact B-5, and that the modified project is consistent with the Final EIR/EIS. Overall, impacts to biological resources would decrease with the modified project; see Tables 3-3, 3-6, and 3-7 in the PMR.

PMR Summary Tables S-1 and 3-7 identify 9 golden eagle nests potentially affected by modified project, whereas the Final EIR/EIS identified 4 nests. This apparent increase is a result of a 2010 survey conducted by SDG&E in accordance with the interim USFWS protocols and their minimum distance of four miles, which resulted in the identification of five more golden eagle nest sites reported in the Final PMR than reported in the Final EIR/EIS. However, no new nest sites were identified within 4,000 feet of project activities that would be potentially affected by project construction/maintenance. The disclosure of nest sites between 4,000 feet and four miles from the project route, as a result of the 2010 golden eagle survey results, is not a new significant impact that would require additional CEQA/NEPA analysis, and is not a substantial increase in the severity of impacts. The number of eagle nests around the FESSR transmission line has not changed since publication of the Final EIR/EIS. Eagle nests are not expected to be disturbed by construction activities occurring more than 4,000 feet away. Therefore, there would be no change in the impacts to golden eagles from the time the Final EIR/EIS was published.

Water Supply. SDG&E has defined the sources of water for the project construction. The surface water sources identified are consistent with the types of supplies assumed in the Final EIR/EIS. The Final EIR/EIS in its analysis of the FESSR assumed that no groundwater would be used for construction activities, consistent the information that SDG&E presented for the proposed project. Based on the

review of the PMR and SDG&E's consultant's water study, the use of reclaimed or surface water is available for the project modifications and would validate the conclusions from the Final EIR/EIS. Use of the reclaimed or surface water would not constitute a substantial increased level of an existing environmental impact or new significant impacts. Groundwater will not be used during the construction of the project. The use of recycled water would require transport of this water to construction sites. This has the potential to increase impacts to air quality, traffic, and noise. The impacts associated with transport of reclaimed and surface water were fully described in the Final EIR/EIS. The information provided by SDG&E is consistent with the Final EIR/EIS and does not constitute as an increased level of environmental impact or new significant impacts. Therefore, impacts related to the use of recycled water do not require supplemental analysis under CEQA or NEPA.

Helicopter Construction. Helicopter construction has been proposed for approximately 230 structures, which represents an increase in helicopter construction than what was assumed in the EIR/EIS for the FESSR. The Final EIR/EIS evaluated use of helicopters (both large and small), and defined significant and unmitigable impacts related to noise and wildlife. Just as the EIR/EIS concluded that noise impacts from construction, including the use of helicopters, would be significant even with mitigation, noise impacts from the helicopter usage proposed in the PMR would be significant and unavoidable. While an increased use of helicopters would result in an increase in noise, based on the significance threshold used in the Final EIR/EIS (i.e., any increase in day-night environmental noise levels of more than 5 dBA), this would not be substantially more severe than the impact analyzed in the Final EIR/EIS. Because use of helicopters for construction was evaluated in the EIR/EIS and mitigation was included to reduce noise impacts to wildlife, this increase in use is consistent with the conclusions of the Final EIR/EIS.

The increase in helicopter construction would also result in an increase in tower staging access pads, but this increase is offset by a larger reduction in access road disturbance. These pads are located adjacent to the transmission towers instead of access roads which would no longer be necessary. Because the tower staging access pads require fewer acres than the access roads, the increased use of helicopters would decrease the level of some of the environmental impacts analyzed in the Final EIR/EIS (particularly as related to ground disturbance). Therefore, impacts related to increased helicopter construction do not require supplemental analysis under CEQA or NEPA.

Wildfire Risk. In accordance with the County's suggestion to update the Fire Behavior Trend Model and the homes at risk calculation, the EIR/EIS Team reprocessed both the Fire Behavior Trend Model and the Wildfire Containment Conflict Model, and tallied the number of homes at risk and the number of significant miles of conflict for the project modifications. The number of homes at risk for the project modifications increased from 1,382 homes, as presented in the Final EIR for the FESSR, to 1,409 homes. This 2 percent increase in the number of homes at risk is within the margin of error of the Fire Behavior Trend Model (**+/-** 2 to 3 percent), and does not result in an actual increase in the absolute number of homes at risk. This increase is consistent with the Final EIR/EIS results.

The Fire Behavior Trend Model used in the EIR/EIS considers a worst-case-scenario of impacts, and the number of homes at risk as modeled for the modified route does not represent an increase in an existing significant impact or a new significant impact of the FESSR, and validates the results from the Final EIR/EIS. In order to err on the side of increased safety for residents in the vicinity of the modified route, the higher number of homes at risk (1,409) will be used to calculate the total annual value of the Defensible Space Grants Fund per Mitigation Measure F-1e. Damage or loss of the 1,409 homes at highest risk in the event of a wildfire resulting from the Sunrise Powerlink project will therefore be partially mitigated by implementation of Mitigation Measure F-1e, the Defensible Space Grants Fund, which will ensure defensible space and fire-safe structural improvements to those homes at highest risk,

although not to less than significant. This results in a Fund value of nearly $3 million per year for the life of the project, which would ensure grants for defensible space and physical structure improvements to even more homes than what was required for the FESSR.

The number of miles of significant wildfire containment conflict decreased from 6.5 miles under the FESSR to 6 miles under the modified project.[2] This is because the modified project would be two miles shorter than the FESSR and the realignment resulted in correspondingly shorter segments of significant conflict. However, the locations of significant wildfire containment conflict have not changed; see Final PMR Route – Overview Wildfire Containment Conflict Model. Because the locations of significant wildfire containment conflict have not changed from those identified by the model for the FESSR and because SDG&E has agreed to the calculation of fund value based on 6.5 miles of significant conflict, the amount of funds required for Mitigation Measure F-3a would not change. No substantial increase in a significant impact of the FESSR has been identified. The information presented in the County's June 7, 2010 letter regarding fire hazards does not show that the FESSR or the modified project will have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of an impact previously examined in the EIR/EIS. In addition, the other fire-related comments on the PMR similarly do not demonstrate any new significant effects or a substantial increase in the severity of an impact. Therefore, impacts related to fire do not require supplemental analysis under CEQA or NEPA.

Air Emissions and Air Quality. Most of the project modifications would result in the reduction of construction-related air emissions, because there are fewer structures to build, fewer areas and acres of ground disturbance, and fewer miles of access roads. The increase in transmission towers built using helicopters would increase the air emissions from helicopters and the increase in water haulage would increase the air emissions from the trucks used to haul water. The CPUC and BLM reviewed the construction-phase air emissions estimated for the FESSR in the Final EIR/EIS and the construction-phase emissions estimated for FESSR in the June 2009 Air Quality Mitigation Program for Construction Air Emissions (AQMPC), presented on the CPUC Mitigation and Monitoring website for the Sunrise Powerlink Project. The PMR did not recalculate the air emissions for the modified project but submitted information regarding the construction activities assumed for the modified project compared with the construction activities assumed for the FESSR in the June 2009 AQMPC. After review of all the construction data, although the vehicle miles travelled and use of construction equipment have been revised, the overall estimated emissions created by vehicle miles travelled remains valid and use of construction equipment of the modified project would not create new significant impacts and would not be substantially more severe than those created by the FESSR as estimated in the AQMPC. The emissions assumed for the modified project would be consistent with those assumed for the FESSR as estimated in the AQMPC. Therefore, impacts related to air emissions do not require supplemental analysis under CEQA or NEPA.

The Final EIR/EIS Section D.11.13, Overall Air Quality Impacts of Proposed Project, noted that BLM would need to either complete a full conformity determination for the FESSR or adopt additional mitigation (Mitigation Measure AQ-1h) to reduce project emissions to below the *de minimis* levels. The ultimate level of additional mitigation was to be based on a refined estimate of construction-phase ozone precursor emissions within each nonattainment area, depending on the ultimate engineering, design, and phasing of the project. Construction-phase activities and emissions under the PMR would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP

[2] Appendix D, Mitigation Measures, of the CPUC Decision 08-12-058 granting a certificate of public convenience and necessity for the Sunrise Powerlink Project Transmission Project, identifies the locations of significant conflict along the FESSR, for a total of 6.5 miles.

(January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity *de minimis* thresholds for the San Diego Air Basin and would no longer reach the threshold that triggered Mitigation Measure AQ-1h. Mitigation Measure AQ-1h, which would be required to achieve emission reductions to levels below the federal thresholds, would no longer be required to reduce impacts and would become unnecessary under the PMR.

Cultural Resources. The modified project would reduce impacts to cultural resources when compared with the FESSR. This is because, as required by mitigation presented in the Final EIR/EIS, SDG&E has completed a 100 percent cultural resources survey of the FESSR and Modified Project and refined the placement of towers, roads, and other facilities to avoid direct impacts to cultural resources. At the request of the Forest Service and BLM, SDG&E has continually changed the specific locations of project features to avoid impacts to specific cultural resources. Additionally, as with the FESSR, mitigation would require that cultural resources sites that are near, but not within a construction area will be fenced and monitored during construction by a professional archaeologist and a Native American consultant**.** All sites within the Forest Service would be avoided by the establishment of an Environmentally Sensitive Area (ESA; exclusion zone), as required by Mitigation Measure C-1b, Avoid and protect potentially significant resources, and Mitigation Measure C-1e, Monitor construction at known ESAs as required by the Forest Service ROD mitigation measures. By incorporating mitigation identified in the Final EIR/EIS to reduce impacts to cultural resources, the modified project validates the conclusions of the Final EIR/EIS. Attachment 3 to this memorandum details the archaeological sites that would be potentially impacted by the modified project, the efforts SDG&E has made to avoid the sites, and the rationale for areas where sites cannot be avoided.

Construction Haulage Noise. In the "Sunrise Powerlink Powered Haulage Estimated Acoustical Impact Potential" study, SDG&E's consultant calculates which portions of the on-road haulage roadway segments have the potential to increase background noise levels to the point of being discernable or creating adverse conditions to sensitive receptor areas. Based on the review of this report, the noise associated with the construction haulage would be consistent with the noise impacts identified in the Final EIR/EIS, would not result in a significant impact not identified in the Final EIR/EIS, and would not result in a substantial increase in severity of the impact.

Cumulative Impact Analysis. There were no modifications suggested by SDG&E that would require an update to the cumulative projects list. However, given the time that has passed since completion of the Final EIR/EIS (published in October 2008), and because of NEPA requirements, this update is considered. There were a number of large acreage projects included in the Final EIR/EIS cumulative analysis, and the Final EIR/EIS included the conservative assumption that all projects in the scenario would be built during the life of the project. In addition, many of the projects included in the impact assessment are no longer going to be constructed, or are much delayed. Therefore, new renewable projects proposed in the counties would not change the cumulative scenario conclusions and the conclusions of the Final EIR/EIS regarding cumulative impacts remain valid.

Public Notification. A number of comments on the PMR stated that additional notification regarding the modified project was required. There is no CEQA or NEPA requirement calling for the CPUC or BLM to issue notice that they are reviewing the PMR. Notice would only be required if the agencies determined that additional environmental review was required under CEQA and/or NEPA.

Review of Proposed Modifications (Summarized from Section 2)

Section 2 of the memorandum evaluates 44 modification subunits and concludes that they would not result in new significant impacts or a substantial increase in the severity of significant impacts identified

in the Final EIR/EIS. While not all modification subunits would result in a decreased in ground disturbance, overall, the modified project would result in a decrease in permanent and temporary ground disturbance. Permanent ground disturbance would decrease from 555.20 acres with the FESSR to 298.41 acres with the modified project. Temporary ground disturbance would decrease from 1,261.59 acres with the FESSR to 685.12 acres with the modified project. Mitigation measures required for the FESSR would also be required for the modification subunits and would ensure that the minor route alignments would not substantially increase the severity of the impacts identified for the FESSR.

Determination of NEPA Adequacy (Summarized from Attachment 1)

This attachment presents the BLM Determination of NEPA Adequacy (DNA). The DNA evaluates whether the project modifications were essentially similar to the proposed action analyzed in the existing NEPA documents, whether the range of alternatives analyzed in the NEPA documents was appropriate, whether the existing analysis is valid in light of new information or circumstances, and whether the direct, indirect, and cumulative effects that would result from implementation of the modified action are similar to those analyzed. The DNA concludes that no supplemental NEPA document is required. It also concludes that the public involvement and interagency review for the existing NEPA document was adequate for the modifications.

Conclusion/Recommendation

As described briefly above, and in detail in Sections 1 and 2, and Attachment 1, all project-related activities and modifications defined in the PMR have been thoroughly analyzed. The modifications include project changes such as revised segments of the transmission line alignment; changes in placement of towers and poles; size and location of temporary work areas; number and size of temporary construction yards; number and length of new access roads; and construction methods (conventional or helicopter). Overall, the modified project has fewer structures, fewer new access roads, fewer wire stringing areas, and fewer construction yards; a smaller Suncrest Substation; and more structures designated for helicopter construction than the FESSR. The impacts associated with the proposed modifications were fully described in the Final EIR/EIS, which remains valid, and the information provided by SDG&E is consistent with the Final EIR/EIS and would not result in a substantial increase in the severity of a significant environmental impact or a new significant impact.

Mitigation measures defined in the CPUC and BLM Decisions are still applicable, except as stated in Section 1 and 2. After careful review of the project modifications, in accordance with the CEQA and NEPA guidelines described above, the CPUC and BLM have determined that no additional CEQA or NEPA documentation is required. The modifications to the Sunrise Powerlink Project described in the Final PMR are hereby incorporated into the approved project for mitigation monitoring during construction.

Section 1 – General Components and Comments

After the Sunrise Powerlink Project was approved by the CPUC in December 2008 and the BLM in January of 2009, SDG&E began the process of completing final project design and engineering. On May 14, 2010, SDG&E submitted its Final Project Modification Report (PMR) to the CPUC and BLM. The PMR defines changes made to the project as a result of mitigation requirements or federal and State regulations along the Sunrise Powerlink Transmission Project route after publication of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

All changes were reviewed by the lead agencies, CPUC and BLM, along with the cooperating, responsible and resource agencies, and were published on the CPUC website and made available for public review. Each proposed modification was reviewed to determine whether the changes have resulted in increased levels of environmental impact or new significant impacts and whether the proposed modifications are consistent with and/or validate the environmental analysis such that any additional CEQA or NEPA documentation is or is not required.

Project modifications developed by SD&GE are addressed in two separate sections. Section 2 presents discussion of each individual modification. This section, Section 1, addresses the project changes that are general in nature and applicable to a number of individual route modifications, and reviews whether they are consistent and/or validate the environmental analysis. Section 1 includes a discussion of the following issues:

- **Section 1.1, Revised Project Components**. SDG&E defines different types and quantities of project components that would be required during construction and operation. The components and their impacts include the following:
    - Infrared lighting for nighttime aircraft safety;
    - Marker balls on conductors for aircraft safety;
    - Modified construction yard locations and sizes; and
    - Modified structures for communication facilities.
- **Section 1.2, Biological Resources**. The specific changes in effects resulting from each modification subunit are explained in Section 2.The section addresses the majority of the modified subunits, as well as the following two issues:
    - Comparison of acreage affected for various special status species; and
    - Project effects on golden and bald eagles.
- **Section 1.3, Water Supply**. An attachment to the PMR, entitled “Water Resources Availability Study, Non-Groundwater Sources, Sunrise Powerlink Environmentally Superior Southern Route,” defines sources of surface water to be used during construction. Section 1.3 defines impacts associated with water transportation for the PMR and compares them to those defined in the Final EIR/EIS.
- **Section 1.4, Helicopter Construction.** SDG&E proposes increased used of helicopters in order to reduce ground disturbance from access roads. This topic, and impacts associated with helicopters, is addressed in Section 1.4.
- **Section 1.5, Fire Risk.** Section 1.5 presents an updated analysis of fire risk based on the revised transmission line route, and compares impacts to those defined in the Final EIR/EIS.

- **Section 1.6, Air Emissions.** Section 1.6 evaluates the air emissions associated with the modified project and compares them to approved project (FESSR). It also considers the adopted mitigation measures and whether they are still necessary.
- **Section 1.7, Cultural Resources.** The specific changes in effects resulting from each modification subunit are explained in Section 2. Section 1.7 addresses the cultural resources data and analysis used to compare the modified project with the FESSR.
- **Section 1.8, Construction Noise**. Attachment C to the PMR, entitled "Powered Haulage Estimated Acoustical Impact Report," defines the increase in noise along the traffic haul routes. Section 1.8 defines impacts associated with transportation noise for the PMR and compares them to those defined in the Final EIR/EIS.
- **Section 1.9, Cumulative Projects**. An updated assessment of cumulative impacts is presented in Section 1.9.
- **Section 1.10, Public Notification.** Public concerns were raised about notification required under CEQA and NEPA; these are addressed in this section.

1.1 Revised Project Components

The discussion below presents an evaluation of general project modifications included in Final PMR document, Section 2 (Structure, Yard, and Telecom Update). These project modifications have been reviewed to consider whether they would result in significant effects not discussed in the EIR/EIS and whether the Final EIR/EIS is still valid and consistent.

A number of public comments were received regarding the revised project components addressed in PMR Section 2. All comments were considered and where comments were specific to the PMR document, they have been incorporated into the discussion below.

1.1.1 Infrared Lighting

SDG&E Modification. The PMR presents information on infrared lighting to be used on some of the project towers (see PMR Table 2-1). Infrared lighting was not proposed in the Final EIR/EIS, and was not evaluated as a component of the FESSR. However, Mitigation Measure T-11b (Consult with and inform U.S. Customs and Border Protection), required SDG&E to consult with U.S. Customs and Border Projection. During final design agency meetings, SDG&E was informed by the Department of the Navy and the US Border Patrol that infrared lighting would be required for helicopter safety in the vicinity of the Sunrise towers. These two agencies have operational facilities in the project area, and are concerned about nighttime flight safety.

SDG&E is working with the Federal Aviation Administration (FAA), Marine Corps Air Station (MCAS) Miramar, California Highway Patrol, and others to determine aircraft safety lighting for the transmission towers. FAA determines whether a structure poses a hazard to navigable airspace, and in those determinations FAA includes advisory guidance on what markers or lighting should be used to ensure no hazard. These lighting and marking recommendations are based on FAA guidance, *Obstruction Marking and Lighting Advisory Circular, No. AC/70/7460-1K*. FAA's recommendations on marking and lighting may vary based on terrain features, weather patterns, and geographic location, and, depending on the hazard potential, may result in a recommendation for higher standards for increased visibility of towers to ensure safety to air navigation. SDG&E has also been working closely with the Department of the Navy and Border Patrol regarding the project, given that both those agencies use navigable airspace in the vicinity of certain project structures and have requested that the lighting and marking for the project

be consistent with those agencies' operational needs. The Department of the Navy and the Border Patrol have requested the use of infrared lighting to ensure safety of aircraft during nighttime flights.

The proposed infrared safety lighting would be solar-powered, would operate from dusk to dawn, and would not be visible to humans. It would be visible to certain insects, but not to birds or bats.

Final EIR/EIS Evaluation. The Final EIR/EIS did not analyze the potential environmental effects of infrared tower lighting because tower lighting was not included as a project design feature when the Final EIR/EIS was prepared. However, the only potential environmental impacts that could result from infrared tower lighting would be indirect impacts to birds and bats that may be attracted to common, nighttime flying insects clustered around the infrared lights. The potential for such impacts was addressed in the Final EIR/EIS and is discussed below.

Public Comments. Commenters suggested that the addition of a new type of lighting on the transmission towers requires preparation of a Supplemental EIR/EIS.

Evaluation. Because the proposed infrared safety would not be visible to humans, it would not have any visual impacts. Therefore, CPUC and BLM evaluated the proposed modification in the context of potential direct impacts due to collision with the transmission towers on birds and bats that may be attracted to insects clustered around the lights.

The potential effects of infrared structure lighting on birds and bats are discussed below.

Impacts to Birds. Most birds migrate at night, but migration corridors have never been systematically studied. Impacts to birds as a result of collisions with project features were analyzed in the Final EIR/EIS as Impact B-10 (Presence of transmission lines may result in electrocution of, and/or collisions by, listed or sensitive bird species). Analysis in the Final EIR/EIS assumed that night-migrating birds would collide with transmission line features and that the resulting bird mortality would be a significant and unmitigable (Class I) impact to listed and sensitive bird species. Impacts to non-sensitive bird species and bird species that migrate during the day were determined to be Class II (significant but mitigable) in the Final EIR/EIS with implementation of Mitigation Measure B-10a (Utilize collision-reducing techniques in installation of transmission lines).

Mitigation Measure B-10a is presented below, with underlined notes that relate to this discussion.

B-10a: Utilize collision-reducing techniques in installation of transmission lines. The applicant shall install the transmission lines utilizing Avian Power Line Interaction Committee standards for collision-reducing techniques as outlined in "Mitigating Bird Collisions with Power Lines: The State of the Art in 1994" (APLIC, 1994) as follows.

- Placement of towers and lines shall not be located above existing towers and lines, topographic features, or tree lines to the maximum extent practicable. Power lines should be clustered in the vertical and horizontal planes aligned with existing geographic features or tree lines, and located parallel (rather than perpendicular) to prevailing wind patterns to the maximum degree feasible. [NOTE: This provision is required along the entire approved route.]
- Overhead lines that are located in highly utilized avian flight paths shall be marked utilizing fixed mount Firefly Flapper/ Diverters, swan flight diverter coils, or other diversion devices, if proven more effective, as to be visible to birds and to reduce avian collision with power lines. [NOTE: the Final EIR/EIS did not identify any portions of the FESSR as "highly utilized avian flight paths" so based on flight paths alone, no diversion devices would be installed along the approved route. This bullet and the bullets below would not apply to this route based on flight path use. See further discussion below.]
- Where such markers are installed, the applicant shall fund a study to determine the effectiveness of the markers as a collision prevention measure since there are few, if any, studies that show if such markers work, especially on transmission lines (CEC, 2007). The applicant shall develop a draft study protocol and submit it to the Wildlife Agencies and State Parks, as well as to CPUC and BLM, for review. The applicant shall continue to work with these agencies until approval of a final study protocol is obtained. If the study shows the markers to be ineffective, the applicant shall coordinate with the Wildlife Agencies and State Parks (for markers in ABDSP) to develop alternate collision protection measures.
- The applicant shall implement an avian reporting system for documenting bird mortalities to help identify problem areas. The reporting system shall follow the format in Appendix C of "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC, 2006) or a similar format. The applicant shall submit a draft reporting protocol and reporting

system to the Wildlife Agencies and State Parks, as well as to CPUC and BLM, for review and approval. The applicant shall continue to work with these agencies until approval of a final reporting protocol and reporting system is obtained. The applicant shall develop and implement methods to reduce mortalities in identified problem areas. The methods shall be approved by the Wildlife Agencies, State Parks (for problem areas in ABDSP), CPUC, and BLM prior to implementation. Bird mortality shall continue to be documented in the problem areas per the avian reporting system to determine the effectiveness of the mortality reduction methods and to determine if new methods need to be developed.

As stated in the Mitigation Monitoring, Compliance and Reporting Plan, this mitigation measure would be required along the length of the FESSR except for underground locations. Mitigation Measure B-10a requires the utilization of collision-reducing techniques in highly utilized bird flight paths. The Final EIR/EIS did not identify any portions along the FESSR as "highly utilized avian flight paths." Likewise, there are no "highly utilized avian flight paths" along the modified project. Therefore implementation of Mitigation Measure B-10a would not require installation of bird flight diverter devices or a funded study of bird mortality.

However, the modified project now has identified infrared lighting in a number of locations. Night-flying insects may be attracted to these locations, and in turn, the presence of insects may attract birds. Therefore, to be conservative and to reduce the likelihood that birds would collide with conductors in areas near infrared lights, the CPUC and BLM will implement Mitigation Measure B-10a in its entirety for conductor spans adjacent to infrared lights and will thus require installation of bird flight diverter devices and defined study to determine the effectiveness of such devices. This will ensure that these impacts remain the same and that the inclusion of the infrared lights is consistent with the conclusions in the Final EIR/EIS and that the Final EIR/EIS remains valid. Mitigation Measure B-10a further requires SDG&E to implement additional protective measures to reduce mortality in identified problem areas. For example, bird flight diversion devices could be concentrated near areas of infrared lights to help avoid collisions by birds that may be attracted to the insects that may be attracted to the infrared lights. Implementation of this mitigation measure in full (including installation of diversion devices near infrared lights) would ensure that impacts to birds from infrared lighting on towers are not significant or substantially more severe than that analyzed in the EIR/EIS and that the impact to birds is consistent with the analysis in the Final EIR/EIS.

Impacts to Bats. The potential for bats to collide with transmission towers was not addressed in the Final EIR/EIS. The risk of bat collision with towers is not a well-documented or understood phenomenon. Bats (like humans) do not see infrared lights. However, like birds, bats may be attracted insects that are attracted to the infrared lights, which could potentially result in collision. Much of what is known about bat collision with any type of towers results from anecdotal data and not from formal studies; collision studies completed to date have focused on birds.

Bat collisions with a variety of man-made structures including television towers, communication/cell towers, large windows, buildings, and barbed-wire fences have been documented and reported in both bat collision studies and bird/tower collisions studies. The number of bats killed as a result of collision with communication or transmission tower structures appears to be small. One of the earliest documented collision events occurred in Kansas, where five bat mortalities were recorded at a large television tower (Van Gelder 1956). In Florida, a 25-year monitoring study of a television tower recorded 54 bat collisions across seven species (Crawford and Baker 1981). Similarly, an 18-year study collected 12 bats underneath another television tower in Florida (Zinn and Baker 1979). Other small numbers of bats have been recorded on communications towers in North Dakota, Tennessee, and Canada (Avery and Clement 1972; Ganier 1962; and Gollop 1965, respectively).

Often, the risks associated with birds are similarly applied to bats. However, a flaw in this approach is that there are significant differences in the flight behaviors and the natural histories of birds versus bats, and bats, unlike birds, have the ability to echolocate. Furthermore, many of the current studies have

focused on the impact that wind turbines have on bat mortality, with the assumption that similar mortalities occur with transmission line infrastructure despite the operational differences between wind turbines and other types of transmission line infrastructure.

In modern studies using thermal imaging cameras, bats have been observed flying through extremely complex habitat including areas with transmission lines. While no collisions were reported, observers noticed the acrobatic nature of bat flight, and their ability to avoid obstacles and complex structures. Habitat complexity also plays a role in how bats partition the landscape, with some species avoiding cluttered areas (Sleep and Brigham 2003).

Conclusion. The addition of infrared lighting is not expected to result in a significant impact or to substantially increase the severity of effect to bird or bat species. The analysis regarding collision impacts to birds in the Final EIR/EIS is consistent with the addition of infrared lighting and the modification does not reduce the validity of the Final EIR/EIS. The addition of an element or project component not analyzed as part of the adopted project, but included within the range of impacts studied, does not require the preparation of a supplemental EIS. *(In re: Operation of the Missouri River System Litigation v. US Army Corps of Engineers,* 516 f.3d 688 (2007).) However, to be conservative, the CPUC and BLM will require full implementation of Mitigation Measure B-10a at conductor spans adjacent to infrared lights. The addition of infrared lighting on transmission towers is not expected to result in any new significant impacts to bat species (as a result of collision) because of their flight behaviors, natural history, and echolocation abilities. Impacts to bat species with the inclusion of infrared lighting would be consistent with the analysis in the Final EIR/EIS and would not reduce the validity of the Final EIR/EIS. Therefore, this project change would not create a new impact or substantially increase the severity of a previously identified significant impact.

1.1.2 Marker Balls

SDG&E Modification. After SDG&E completed final project design and defined specific tower and span heights, the Department of Defense and Homeland Security (Border Patrol) identified the specific location of marker spheres would be required on static lines (at the top of the towers, above the conductors) that would ensure aircraft safety in compliance with Mitigation Measure T-11b: Consult with and inform U.S. Customs and Border Protection. The PMR states that over 1,300 marker balls would be required on 134 project spans (see PMR Table 2-2) based on the location of each span (near airports, at road crossings, and at crossings of canyons) as determined by FAA regulations.

The importance of collision avoidance devices for air safety, such as marker spheres and infrared lights (see Section 1.1.1), is clear from the history of aircraft collision with transmission lines. There have been accidents resulting from collision of aircraft with SDG&E transmission line, and these have resulted in loss of life. One accident occurred on Camp Pendleton, where Marine helicopter hit a transmission tower at night. Another accident occurred along the existing 500 kV transmission line between the Imperial Valley Substation and the San Diego area (the Southwest Powerlink or SWPL) soon after it was constructed and prior to installation of marker balls. Installation of marker spheres also decreases the likelihood of wildfires in the project areas, since aircraft accidents are one cause of wildfires. The FAA's *Marking and Lighting Advisory Circular, no. AC/70/7460-1K*, governs recommendations for markers. Chapter 2, section 20, of the Advisory Circular states that for aviation safety any structure, including appurtenances, that exceeds 200 feet in height above ground level should normally be marked and/or lighted. While none of the transmission towers exceed 200 feet in height, there will be marker balls on Sunrise wire spans that exceed 200 feet above ground level. The marker balls are installed for the safety of flight crews whose aircraft may cross the Sunrise transmission lines at low levels. In addition to wire spans that exceed the 200 foot elevation, agencies such as the Customs and Border Patrol (CBP) have

requested that marker balls be installed on a number of spans at road crossings, which is consistent with SDG&E practice. SDG&E has been working closely with the FAA, Department of the Navy, and the Border Patrol to identify the appropriate use of markers on the static lines for air safety. These marker balls also comply with Mitigation Measure B-10a, required by the CPUC and BLM to reduce the risk of avian collision.

SDG&E is now proposing the use of marker balls on 134 conductor spans, covering a majority of the project route. Of those 134 spans:

- Five (4%) would be freeway (I-8) spans,
- One (<1%) would be a state highway (SR67) span,
- Nine (7%) would be local road spans,
- One (<1%) would be across Sugarloaf Mountain,
- One (<1%) would be across a rail line, and
- 117 (87%) would be non-travel corridor spans of mostly undeveloped terrain.

In total, these 134 spans would utilize 1,345 marker balls. Altering a project to increase the use of certain components analyzed in the EIS does not necessarily require the preparation of supplemental environmental analysis. *Arkansas Wildlife Federation v. US Army Corps of Engineers,* 431 F.3d 1096 (2005), no supplementation of an EIS is necessary if the environmental impact of the alteration of a project is insignificant and would have a positive rather than negative environmental impact.

Final EIR/EIS Evaluation. The Project Description in the Final EIR/EIS (Section B.3.2.4) states the following:

> Hardware that is not associated with the transmission of electricity would not be installed as part of the Proposed Project. However, aerial marker spheres or aircraft warning lighting may be required for the conductors or structures per Federal Aviation Administration, U.S. Customs and Border Protection, or U.S. Department of Defense regulations. Structure proximity to airports and structure height are the determinants of whether FAA regulations would apply.

The visual impact analysis presented in the Final EIR/EIS was based on the project defined in the EIR/EIS project description, as defined above. Marker spheres are standard requirements for transmission lines and are installed to reduce safety risk. No specific locations for aerial marker spheres were identified by SDG&E. However, the visual impact analysis in the Final EIR/EIS assumed that built facilities included marker spheres at major roadway and canyon crossings. For example, the visual simulation presented in EIR/EIS Figure E.1.3-10B included marker balls on the Interstate 8 Alternative freeway crossing.

Public Comments. Commenters suggested that the visual impact of marker balls was not evaluated in the Final EIR/EIS and that these locations could result in a new or more severe visual impact.

Evaluation: **Visual Impacts.** As stated in Section D.3.4.1, the factors considered in determining impacts on visual resources included: (1) scenic quality of the project site and vicinity; (2) available visual access and visibility, frequency and duration that the landscape is viewed; (3) viewing distance and degree to which project components would dominate the view of the observer; (4) resulting contrast of the proposed facilities or activities with existing landscape characteristics; (5) the extent to which project features or activities would block views of higher value landscape features; and (6) the level of public interest in the existing landscape characteristics and concern over potential changes. Impacts on visual resources within the study area could result from various activities including: structure and line construction, substation construction, establishment of construction staging areas and access roads, and project operation or presence of the built facilities. Because the need

for marker balls was identified in the Project Description of the EIR/EIS, the visual impact analysis in the Final EIR/EIS assumed that the built facilities included marker spheres at major roadway and canyon crossings, see Figure E.1.3-10B for a visual simulation of the Interstate 8 Alternative freeway crossing that includes the use of marker balls. However, the specific locations of marker spheres were not known. The visual impact analysis for the FESSR is presented in Final EIR/EIS Sections E.1.3, E.2.3, and E.4.3. This analysis concludes that the installation of the project in the FESSR would create numerous significant and unmitigable impacts (Class I) along the route due to the introduction of a new industrial facility with characteristics that are inconsistent with the environmental setting of this area. The significant impacts identified are as follows:

- Impact V-58: Inconsistency with BLM VRM Class III Management objective due to introduction of structure contrast, industrial character, view blockage and skylining when viewed from Key Viewpoint 46 at the Plaster City West OHV Staging Area
- Impact V-60: Inconsistency with BLM VRM Class II Management objective due to introduction of structure contrast, industrial character, view blockage and skylining when viewed from Key Viewpoint 48 south of Table Mountain ACEC on Old Highway 80 (Airport Mesa)
- Impact V-62: Increased structure contrast, industrial character, and view blockage when viewed from Key Viewpoint 50 on westbound I-8
- Impact V-66: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 53 on westbound Alpine Road
- Impact V-68: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 55 on Moreno Boulevard
- Impact V-73: Increased structure contrast, industrial character, structure prominence and view blockage associated with the Chocolate Canyon Option
- Impact V-74: Inconsistency with BLM VRM Class II Management objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 60 on McCain Valley Road at Sacatone Overlook Road
- Impact V-75: Inconsistency with BLM VRM Class II Management objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 61 on at Carrizo Overlook
- Impact V-76: Inconsistency with BLM VRM Class II Management objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 62 on McCain Valley Road South of Cottonwood Campground
- Impact V-77: Inconsistency with USFS Scenic Integrity Objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Viewpoint 63 on the Pacific Crest National Scenic. Triad Just north of Fred Canyon Road.
- Impact V-89: Increased structure contrast, industrial character, structure prominence and view blockage when viewed from Key Viewpoint 79 on La Posta Truck Trail
- Impact V-90: Inconsistency with USFS Scenic Integrity Objective due to introduction of structure contrast, industrial character, view blockage, and skylining along the BCD South Option
- Impact V-82: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 67 on northbound South Buckman Springs Road
- Impact V-83: Inconsistency with USFS Scenic Integrity Objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 68 on Lyons Valley Road

- Impact V-84: Inconsistency with USFS Scenic Integrity Objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 69 on Japatul Road
- Impact V-86: Star Valley Option: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 70 on Star Valley Road
- Impact V-90: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 90 on the PCT and South Boundary Road

The markers are intended to enhance safety by preventing aircraft collision. This is done by making conductor spans more visible in locations where aircraft are likely to fly. When viewed at distance, lattice towers take on a characteristic transparency and conductor spans are generally not visible. Given that many of these markers would be viewed against the sky, the location of the conductor spans would become substantially more apparent. The large number of marker balls defined by SDG&E based on recommendations by FAA and other agencies increases the likelihood that several consecutive spans with strings of marker balls would be visible in a single frame of view. Therefore, more distant route segments would become more noticeable. However, as noted above, the Final EIR/EIS already concludes that the FESSR, when installed in an area without substantial industrial development, would result in significant and unmitigable visual impacts due to the presence of the new transmission line in an undisturbed setting.

Conclusion. The visual impact analysis in the Final EIR/EIS concluded that the project would have significant and unmitigable overall adverse visual impacts. While the current SDG&E proposal would result in installation of a larger number of marker spheres than anticipated, these spheres would not be the only or the most visible component of the project. The Final EIR/EIS conclusion identifies numerous significant visual impacts (see list above), and is based on the installation of new transmission towers, new conductors, new access roads, and other associated facilities (including line markers). Marker spheres are one component of the project, and they were assumed to be present in some locations along the FESSR as shown on Figure E.1.3-10B. The severity of the visual impact in the FESSR project area was determined to be significant in the Final EIR/EIS, and the definition of marker sphere locations does not substantially increase this severity and is consistent with the conclusions of the Final EIR/EIS.

While the proposed use of marker balls as project components would make the line more noticeable, they will also improve aircraft safety in the vicinity of the transmission line, reducing the impact related to flight hazards.

1.1.3 Construction Yards

SDG&E Modification. Several modified construction yards are proposed in the PMR. Construction yards (called staging areas in the Final EIR/EIS) are described in the Final EIR/EIS for the Sunrise Powerlink Project (see EIR/EIS Section B.4.5). The Final EIR/EIS states that construction yards would be required for storing materials, construction equipment, and vehicles. It further acknowledges that the exact locations had not yet been determined, and that the staging areas would likely be sited near the center and endpoints of the proposed route of the SRPL and at several potential locations in between. It was anticipated that the exact locations would be finalized following final engineering and negotiations with landowners. Specifically, the final engineering defined in the PMR includes 19 construction yards (nearly 430 acres of temporary ground disturbance). The Final EIR/EIS included 43 construction yards along the FESSR (approximately 801 acres of temporary ground disturbance).

The PMR includes specific information on the size and location of the construction yards that are now proposed to be used for the Sunrise Powerlink Project. While the location of some construction yards

varies from the sites defined in the Final EIR/EIS, both the number of construction yards and the total acreage of construction yards have been reduced by 46 percent from the FESSR.

Section 2 includes an assessment of each yard, as compared with the facility defined in the Final EIR/EIS and explains the difference in impact for each. This discussion compares the overall acreage and number of construction years along the entire route.

Final EIR/EIS Discussion. The impacts associated with construction yards were analyzed in the Final EIR/EIS as components of the FESSR, within each of the resource areas. The following list presents the major impacts associated with construction yards and describes how they were evaluated in the Final EIR/EIS:

- **Visual impacts**: Impact VR-1 considered the short-term visibility of construction activities, equipment, and night lighting. This impact was found to be less than significant due to its relatively short duration, but mitigation was adopted regardless. Mitigation Measures V-1a (Reduce visibility of construction activities and equipment) and V-1b (Reduce construction night lighting impacts) would ensure that impacts are not significant during the construction period.

- **Biological Resources impacts**: Final EIR/EIS Section D.2.10 addresses "Construction Activities: Disturbance to Wildlife." Numerous individual impact analyses address the loss of habitat or construction disturbance, and a large number of mitigation measures require implementation of protective and compensatory measures during construction.

- **Noise impacts:** Final EIR/EIS Section D.8 addresses noise impacts of the project, and is primarily focused on construction noise, since operational noise impacts are comparatively small.

- **Air Emissions**: Final EIR/EIS Section D.10 includes detailed analysis of Impact AQ-1 (Construction would generate dust and exhaust emissions of criteria pollutants and toxic air contaminants), concluding that these impacts would be significant and unmitigable (Class I), even with implementation of Mitigation Measures AQ-1a and 1b.

Public Comments. Commenters indicate concern about greater areas of disturbance for specific construction yards.

Evaluation. Approximately 9 of the 19 construction yards remaining in the modified project described in the PMR were proposed at the same locations as those assumed in the FESSR. Although the size and location of certain construction yards have changed from the FESSR, the impact analysis provided in the Final EIR/EIS adequately considers these impacts, and the mitigation measures developed for the FESSR are equally effective for the revised areas. Mitigation for this ground disturbance is required for the modified project. The Final EIR/EIS acknowledges that construction yards (or staging areas) were not finalized and were subject to change based on final engineering and negotiations with landowners. The modified locations validate the Final EIR/EIS and are consistent with the discussion therein. As required by EIR/EIS mitigation measures SDG&E has completed pre-construction protocol surveys for all listed or highly sensitive biological resources. See Mitigation Measures B-3a, Prepare and implement a Weed Control Plan; B-5a, Conduct rare plant surveys, and implement appropriate avoidance/ minimization/compensation strategies; B-7i, Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies for examples of mitigation measures that require pre-construction surveys. Consideration of each specific construction yard is presented in *Section 2*. The specific yards are analyzed geographically under the PMR modification subunit listed in PMR Table 2-3 of the Final PMR.

Overall, the temporary disturbance associated with use of construction yard has been reduced by approximately 46 percent. This has been accomplished by elimination of several yards, and by reducing the size of other yards.

Conclusion. Although the construction yards have changed in size and location from those identified in the FESSR, this change on its own is consistent with the Final EIR/EIS and does not constitute as an increased level of environmental impact or a substantial new significant impact. The mitigation measures defined in the Final EIR/EIS apply to the revised yard locations and will ensure that impacts are not significant at each location (see *Section 2* for detail as to the differences between effects of each yard). In addition, the acreage of temporary disturbance has been reduced by approximately 46 percent.

1.1.4 Telecommunication Equipment

SDG&E Modification. Installation of microwave transmission equipment inside the lattice structure of six transmission towers along the route in addition to changes to the Tierra del sol Communication Facility, analyzed in Section 2 of the RDEIR/SDEIS as modified in the Final EIR/EIS, is discussed in Section 2.3 of the Final PMR. This equipment would establish a reliable communications system during project operation and would increase worker safety. The equipment would be used during construction and operations, as follows:

- **Construction**: The mobile telecommunications equipment at the Alpine Headquarters and Yard would be temporarily placed on flat beds (truck trailers) at the existing work areas during project construction, because communication is required for worker safety and construction communication.
- **Operation**: After towers are constructed, certain towers (Structures EP146, EP34-1, EP87-1, CP60, CP108, CP82-1) would have the communications equipment permanently installed within the tower lattice structures themselves. There would be no additional ground disturbance to install these facilities. The incremental visual impact of the telecommunications equipment (inside the lattice tower structure) would be very small because the exterior shelter of the poles would remain the same and only the interior would be modified to house the communications equipment.

These facilities are addressed in the PMR because SDG&E requires additional communication facilities to be installed along the transmission line route, and these facilities were not defined at the time of the Final EIR/EIS.[1] A project design modification does not necessarily require the preparation of supplemental environmental analysis. For example, a change in project design with no discernable differences in the level of environmental impact does not trigger NEPA supplementation requirements (*Price Road Neighborhood Association v. US Dept. of Transportation,* 113 F.3d 1505 (1997)).

Final EIR/EIS Discussion. Telecommunication facility upgrades to Tierra del Sol/White Star facility were described in Section 2 of the October 2008 Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) (see pages 2-13 to 2-14 under "SDG&E Communication Facility" for its initial description) and analyzed under each issue area in the RDEIR/SDEIS as well. This upgrade is described on pages 2-7 and 2-8 of the RDEIR/SDEIS) and is illustrated in Figure 2 of this document.

Public Comments. Commenters suggest that the additional communication facilities would have more severe visual impacts.

[1] As noted by several commenters, the Tierra del Sol Communication Facility is located in Boulevard, not in Jacumba as mentioned in PMR Section 2.3.

Evaluation. The Tierra del Sol and White Start facility upgrades are addressed in the RDEIR/SDEIS. The remainder of the modified communications equipment included in the PMR would be enclosed within the already approved transmission towers. No new towers would be constructed to house this equipment so the context of the impact would be restricted to visual impacts at the transmission towers. The additional structural complexity added to each tower by the equipment attached to the towers would be minimally visible, and would not change the visibility of each tower. As such, the visual impact analysis of the transmission towers would remain consistent with Sections E.1.3, E.2.3, and E.4.3 of the Final EIR/EIS.

Conclusion. No new significant impacts would be created, and the temporary and minor visual effects would not result in a substantial increase over that evaluated in the Final EIR/EIS, nor would it impact the validity of the Final EIR/EIS. The additional structural complexity of the equipment would be consistent with the visual analysis of the Final EIR/EIS. The benefits of the system are that it would establish a reliable communications system and would increase worker safety during both operational and construction timeframes.

1.2 Biological Resources

The Final EIR/EIS evaluated the biological resources impacts of the proposed project and alternatives, including the approved FESSR. Impacts to biological resources resulting from the project modifications have been reviewed to consider whether they would result in significant effects not addressed in the EIR/EIS or whether significant effects previously examined would be substantially more severe than in the EIR/EIS, as required by CEQA Guidelines section 15162(a)(3). Similarly, the modifications have been reviewed to ensure they are substantially the same action as previously analyzed and that the analysis of the approved project is consistent with the proposed modifications, that the analysis is valid in light of any new information or circumstances, and that the methodology and analytical approach used in the existing EIR/EIS continues to be appropriate as required by NEPA guidance.

The biological resources impacts of each separate modification are considered in Section 2. This section addresses broader issues that apply to the entire modified project.

1.2.1 CPUC and BLM Review of Biological Data and Analysis

In order to determine whether the project modifications would result in new, significant effects to biological resources that were not disclosed in the EIR/EIS, whether significant biological effects previously examined in the EIR/EIS would be substantially more severe, and whether the proposed modifications are consistent with and/or validate the existing environmental analysis such that additional CEQA or NEPA documentation is or is not required. The CPUC and BLM reviewed the PMR and the PMR map book and verified SDG&E's calculations of impacts to sensitive vegetation types and special status species habitat or individuals for the Final Environmentally Superior Route (FESSR) and the May 2010 Modified Project using the PMR Database. The data presented in the PMR Section 3, includes the impacts of the FESSR using the data set from the FESSR, the impacts of the FESSR using the PMR data set, and the impacts of the modified project using the PMR data set. Regardless of whether the FESSR data set is used, or the PMR data set is used, the modified project would reduce impacts to sensitive vegetation communities, most special status plant species, and all special status wildlife species. Overall, the modified project would increase impacts to three special status plant species and decrease impacts to nine special status plant species. Impacts to special status plant species were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants. Impacts to special status plant species in the FESSR project area were determined to be significant in the Final EIR/EIS; however, the increase in impacts to some, but not all

sensitive plant individuals does not substantially increase the severity of this impact. Overall, the number of special status plant species and individuals impacted would decrease with the modified project; see Table 3-6 in the PMR. The Final EIR/EIS requires mitigation for significant impacts to special status plants: the applicant is required to conduct rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies as well as provide restoration/compensation for affected vegetation communities. A detailed discussion regarding the data sets is provided below.

The CPUC and BLM additionally examined SDG&E's calculations of the different types of impacts listed for a number of the individual modifications, including special status plant species, Waters of the U.S., State waters, and Riparian Conservation Areas (RCAs). The CPUC and BLM verified SDG&E's acreage calculations by using GIS shapefile impacts and comparing their results with the impacts in SDG&E's PMR Database. Prior to conducting the examination of the calculations, the CPUC and BLM reviewed the PMR Database to ensure inclusion of all biology survey data to date and randomly inspected the impact polygons in the GIS shapefiles to ensure correct coding (i.e., permanent versus temporary impacts).

As stated in the Final EIR/EIS, Section 2 (General Responses to Major Comments: Adequacy of Biology Surveys), 100 percent survey data for the alternatives was not available at the time the Final EIR/EIS was published. Where survey data was collected remotely from public access points or interpreted from aerial photographs and were not verified in the field, the presence of a threatened or endangered species was assumed based on the presence of potential habitat. Section 2 further states that where species are assumed to be present and impacted, pre-construction surveys that meet USFWS protocol would be required to determine the presence or absence of species, and the mitigation required may be reduced or eliminated based on the results of these surveys. As such, the revised acreage of loss of special status plant and wildlife species as presented in the PMR, is consistent with the conclusions of the Final EIR/EIS and validates these conclusions.

Public Comments. Commenters expressed concerns that effects on a variety of biological resources would be increased or changed as a result of the modifications.

Evaluation. The Final PMR largely presents impacts for the FESSR using updates to the Final EIR/EIS Database rather than the database used to calculate the impacts presented in the Final EIR/EIS. As discussed above, information from pre-construction surveys, collected in compliance with various mitigation measures, is included in the updated database and is consistent with the requirements of the Final EIR/EIS. The updated database (referred to as the "PMR Database" in this PMR) includes the information in the Final EIR/EIS Database as well as additional survey information or data collected by SDG&E since issuance of the Final EIR/EIS. The updated information/data includes data for the arroyo toad, barefoot banded gecko, bats, coastal California gnatcatcher, golden eagle, Peninsular bighorn sheep, Quino checkerspot butterfly (QCB), Stephens' kangaroo rat, special status plant species, riparian birds, and invasive, non-native, or noxious plant species. It also includes new data gathered during a delineation of jurisdictional waters[2] and an analysis of Riparian Conservation Areas (RCAs).

PMR Table 3-3 (repeated below and on page 3-8 of the PMR), for example, shows the impacts to acres of sensitive vegetation communities:

- The first column of PMR Table 3-3 summarizes the impacts to vegetation communities for the FESSR using the data known at the time the Final EIR/EIS was published (referred to as "Final EIR/EIS Database").

[2] Available on CPUC website at
http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/otherdocs/Revised-Updated%20Prelim%20JD%20Report_072309.pdf

- The second column of PMR Table 3-3 summarizes the impacts to vegetation communities for the FESSR using the data from the Final EIR/EIS and the additional survey information and data collected by SDG&E since the Final EIR/EIS was published (referred to as the "PMR Database").

- The third column of PMR Table 3-3 summarizes the impacts to vegetation communities for the May 2010 Modified Project using the PMR Database.

PMR Table 3-4, on the other hand, only displays impacts from the FESSR using the PMR Database (noted in the title to PMR Table 3-4). Additionally, each PMR unit discussion in Section 4 of the PMR only addresses the FESSR with impacts analyzed using the PMR Database.

The CPUC and BLM reviewed all comments regarding biological resources submitted on the PMR. Comments addressed the impacts to occupied habitat for a number of species including QCB, arroyo toad, coastal California gnatcatcher, least Bell's vireo, and Stephens' kangaroo rat. As stated above, in some instances where surveys results were not available, the Final EIR/EIS assumed presence based on potential habitat; however, now that surveys of the FESSR have been completed in compliance with mitigation measures, additional data is now available to determine whether potential habitat is also suitable or occupied habitat. Other examples of CPUC/BLM data review include the following:

- The Final EIR/EIS assumed permanent impacts to 19.20 acres of 2002 critical habitat for the Quino checkerspot butterfly (QCB) and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB and required appropriate mitigation. Since the completion of the Final EIR/EIS, additional surveys have been performed in compliance with mitigation, and 2009 critical habitat for QCB has been designated. Analysis now shows that the modified project would result in permanent impacts to a total of 19.61 acres of QCB habitat (4.45 acres of 2009 critical habitat and 15.16 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.08 acres (1.59 acres of 2009 critical habitat and 17.49 acres of occupied habitat, which is former 2002 critical habitat). Mitigation adopted from the Final EIS/EIR required SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species; reduction in impacts to QCB habitat (occupied habitat, as well as 2002 and 2009 designated critical habitat) is consistent with the Final EIR/EIS.

  Similarly, the Final EIR/EIS assumed presence (in the absence of surveys) for other sensitive species. For example, the Final EIR/EIS assumed presence of the barefoot banded gecko from approximately MP I8-23 through MP 39 and from approximately MP BCD-0 through MP BCD-8 for the FESSR where appropriate habitat occurs and required appropriate mitigation. The modified project now includes references to "occupied" habitat for the species. "Occupied" habitat was determined by: 1) assuming all suitable habitat as identified in the Final EIR/EIS (i.e., from MP 23 through 39) is occupied by the gecko and 2) with additional data from area where the gecko was found within portions of the Final EIR/EIS suitable habitat. This data supports a determination of presence within a portion of the suitable habitat using data not available during the Final EIR/EIS. However, it does not establish absence throughout the rest of the suitable habitat. SDG&E is conducting surveys for the gecko (May to July 2010; page 3-21 of the PMR), which could potentially support a determination of absence in other areas if the California Department of Fish and Game (CDFG) accepts the survey methods and results. SDG&E's survey data indicates that no new significant effects would occur and that the modifications would not result in substantially more severe effects previously examined as discussed below and that the modified project would be consistent with the conclusions of the Final EIR/EIS.

- In PMR Table 3-7 (below, and on page 3-15 of the PMR), the CPUC and BLM noticed that acreages for FESSR impacts to FTHL Management Areas and FTHL Habitat Outside of Management Areas are different when analyzed using the Final EIR/EIS Database and the PMR Database. The CPUC and BLM contacted SDG&E on May 28, 2010 to discuss the difference. Based on that discussion and the review of the PMR Database, it is evident that SDG&E used a more generalized shapefile that included a larger area of this habitat to calculate the impacts than was used by the CPUC and BLM (the CPUC and BLM used a more refined shapefile of this habitat that was provided by the Bureau of Land Management [BLM]). Using either the Final EIR/EIS Database or the PMR Database to calculate impacts, the May 2010 Modified Project would reduce impacts to the habitat as compared to the FESSR.
- CPUC and BLM review also noticed that acreages for FESSR impacts to Peninsular bighorn sheep critical habitat are different when analyzed using the Final EIR/EIS Database and the PMR database (see PMR Table 3-7). The CPUC and BLM contacted SDG&E on May 28, 2010 to discuss the difference. Based on that discussion and the review of the PMR Database, it is evident that SDG&E used the critical habitat that was considered in the Biological Opinion (i.e., a 2006 critical habitat shapefile from U.S. Fish and Wildlife Service [USFWS] that contained updates to the 2001 designated critical habitat.) The Final EIR/EIS Database used the slightly larger 2001 critical habitat shapefile, which was obtained from the USFWS. Whether using the Final EIR/EIS Database or the PMR Database to calculate the impacts, the May 2010 Modified Project would reduce impacts to Peninsular bighorn sheep critical habitat as compared to the FESSR.

The CPUC and BLM verified the impact assessments of vegetation, plant and animal species, Waters of the U.S., State waters, and RCAs for the modifications to the FESSR in the PMR (PMR Table 2) and verified the impact numbers presented therein. The CPUC and BLM also reviewed SDG&E's explanations regarding decreases or increases in impacts for each modification and conclusions made for the May 2010 Modified Project in the PMR. The modification would result in impacts to sensitive plant species and wildlife consistent with the Final EIR/EIS and validates the conclusions of the Final EIR/EIS. Discussions of specific subunit modifications (e.g., where there are increases in impacts, or where the CPUC and BLM have additional comments) are included under the affected subunit modification in *Section 2*.

1.2.2 Impacts to Biological Resources

After reviewing and verifying the biological resources data provided in the PMR, the CPUC and BLM assessed the impacts of the PMR as a whole and compared these to the FESSR. SDG&E's calculations of permanent and temporary impacts to sensitive vegetation types (PMR Table 3-3, repeated below) and special status species habitat or individuals (PMR Table 3-7, repeated below) for the Final Environmentally Superior Route (FESSR) and the May 2010 Modified Project using the PMR Database are summarized below.

PMR Table 3-3. FESSR and Modified Project Impacts to Sensitive Vegetation Communities based on EIR/EIS and PMR Databases

Alignment	December 2008 FESSR	December 2008 FESSR	May 2010 Modified Project
Information Source	EIR/EIS Database	PMR Database	PMR Database
SENSITIVE VEGETATION COMMUNITIES	Acres	Acres	Acres
Permanent Impacts			

Alignment	December 2008 FESSR	December 2008 FESSR	May 2010 Modified Project
Information Source	**EIR/EIS Database**	**PMR Database**	**PMR Database**
Desert Scrub and Dune Habitats	93.08	91.88	36.37
Coastal and Montane Scrub Habitats	54.52	53.56	27.47
Grasslands and Meadows	14.37	13.74	4.15
Chaparrals	320.17	294.36	181.19
Woodlands and Forests	6.54	17.89	4.24
Herbaceous Wetlands, Freshwater, and Streams (Non-vegetated Channel)	0.13	3.17	1.10
Riparian Scrubs	0.57	0.38	0.00
Riparian Forests and Woodlands	0.58	0.88	0.25
Total Permanent Impacts to Sensitive Communities	489.96	475.86	254.77
Temporary Impacts			
Desert Scrub and Dune Habitats	269.47	282.13	142.27
Coastal and Montane Scrub Habitats	118.39	114.56	66.94
Grasslands and Meadows	172.89	161.49	48.40
Chaparrals	271.20	321.44	223.96
Woodlands and Forests	12.78	30.57	3.93
Herbaceous Wetlands, Freshwater, and Streams (Non-vegetated Channel)	3.03	10.73	2.37
Riparian Scrubs	1.08	0.69	0.00
Riparian Forests and Woodlands	<0.01	2.96	0.10
Total Temporary Impacts to Sensitive Communities	848.85	924.57	487.97
TOTAL IMPACTS TO SENSITIVE VEGETATION COMMUNITIES	**1338.81**	**1400.43**	**742.74**

As shown in PMR Table 3-3 impacts to nearly all sensitive vegetation communities would decrease with the SGD&E modifications and would be consistent with the Final EIR/EIS conclusions. Permanent impacts of the May 2010 Modified Project to herbaceous wetlands, freshwater, and streams would increase by 0.97 acres compared with the FESSR using the EIR/EIS database, but would decrease by 2.07 acres compared with the PMR database. Specific acreages of impacts to jurisdictional waters were not calculated for the FESSR in the Final EIR/EIS because a jurisdictional delineation had not yet been conducted. Analysis of impacts to jurisdictional waters used vegetation communities that generally occur in jurisdictional waters as a proxy for jurisdictional areas. As explained in the Final EIR/EIS, impacts to jurisdictional areas cannot be clearly defined until a final route, including project-specific features and final engineering, is selected. Consistent with the process described in the Final EIR/EIS, a formal jurisdictional delineation has since been conducted to determine those impacts so that SDG&E can apply for permits from the U.S. Army Corps of Engineers ("ACOE"), Regional Water Quality Control Board (RWQCB), and CDFG. Information from the completed jurisdictional delineation shows that both permanent and temporary impacts to jurisdictional waters would decrease with the modified project compared with the FESSR and validates the conclusions of the Final EIR/EIS. Temporary impacts to riparian forests and woodlands would increase by less than 0.09 acres compared with the FESSR using the EIR/EIS database, but would decrease by 2.86 acres compared with the PMR database. Area of impacts of the May 2010 Modified Project to all other sensitive vegetation communities would decrease compared with the FESSR, regardless of which database is used for comparison. Overall, permanent and

temporary impacts to sensitive vegetation communities would decrease by approximately 48 percent (45 percent with the PMR database) and 44 percent (47 percent with the PMR database), respectively.

PMR Table 3-7. Estimated Impacts of the FESSR and Modified Project to Special Status Species Based on the EIR/EIS and PMR databases

Alignment	December 2008 FESSR	December 2008 FESSR	May 2010 Modified Project
Data Source	EIR/EIS Database	PMR Database	PMR Database
SPECIAL STATUS SPECIES[1]	(acres or number)	(acres or number)	(acres or number)
QUINO CHECKERSPOT BUTTERFLY			
USFWS Critical Habitat (2002 or 2009)[2]			
Permanent Impacts	19.20	11.46	4.45
Temporary Impacts	55.72	16.93	1.59
USFWS Occupied Habitat (USFWS Data)[3]			
Permanent Impacts	--	36.16	15.16
Temporary Impacts	--	84.76	17.49
ARROYO TOAD			
USFWS Proposed Critical Habitat[4]			
Permanent Impacts	--	7.13	2.46
Temporary Impacts	--	100.67	44.23
USFS Suitable Habitat [USFS Habitat Model]			
Permanent Impacts	32.45	33.09	11.92
Temporary Impacts	150.69	154.97	63.00
USFS Suitable Habitat in CNF [USFS Habitat Model]			
Permanent Impacts	--	3.83	3.49
Temporary Impacts	--	20.53	0.01
BAREFOOT BANDED GECKO (SUITABLE HABITAT)			
Permanent Impacts	--	20.63	10.84
Temporary Impacts	--	17.16	4.53
FLAT-TAILED HORNED LIZARD			
Permanent Impacts			
Management Areas	22.62	22.26	9.54
Habitat Outside of Management Areas	52.95	71.16	26.35
Total Permanent Impacts	**75.57**	**93.42**	**35.89**
Temporary Impacts			
Management Areas	91.31	103.25	36.87
Habitat Outside of Management Areas	141.53	170.67	94.88
Total Temporary Impacts	**232.84**	**273.92**	**131.75**
COASTAL CALIFORNIA GNATCATCHER			
Number of Pairs Affected	--	--	2
Number of Unpaired Individuals Affected	--	--	1
USFWS Critical Habitat			
Permanent Impacts	2.22	10.06	3.88
Temporary Impacts	32.97	17.84	21.58
USFWS Occupied Habitat (USFWS Data)			
Permanent Impacts	0[5]	1.46	0.16
Temporary Impacts	0[5]	1.83	8.11
USFS Suitable Habitat [USFS Habitat Model]			

Alignment	December 2008 FESSR	December 2008 FESSR	May 2010 Modified Project
Data Source	EIR/EIS Database	PMR Database	PMR Database
SPECIAL STATUS SPECIES[1]	(acres or number)	(acres or number)	(acres or number)
Permanent Impacts	25.52	25.03	11.97
Temporary Impacts	52.69	48.50	15.67
USFS Suitable Habitat in CNF [USFS Habitat Model]			
Permanent Impacts	--	2.65	1.12
Temporary Impacts	--	7.07	0.60
GOLDEN EAGLE[6]			
Nest Sites Potentially Affected	4	--	9[5]
LEAST BELL'S VIREO[7]			
USFWS Occupied Habitat [USFWS Data]			
Permanent Impacts	0.94	0.89	0.00
Temporary Impacts	0.00	0.32	0.00
USFS Suitable Habitat in CNF [USFS Habitat Model][7]			
Permanent Impacts	--	1.32	0.19
Temporary Impacts	--	0.00	0.00
SOUTHWESTERN WILLOW FLYCATCHER[7]			
USFS Suitable Habitat in CNF (USFS Modeled Habitat]			
Permanent Impacts	--	5,14	3,98
Temporary Impacts	--	14.39	0.74
PENINSULAR BIGHORN SHEEP			
2001 Designated Critical Habitat/Occupied Habitat[8]			
Permanent Impacts	60.42	30.41	10.36
Temporary Impacts	111.81	34.64	20.24
2009 Designated Critical Habitat			
Permanent Impacts	N/A	16.04	5.41
Temporary Impacts	N/A	17.16	1.41
STEPHENS' KANGAROO RAT[7]			
USFS Suitable Habitat in CNF [USFS Habitat Model][7]			
Permanent Impacts	0	0.71	0.18
Temporary Impacts	0	0.03	0.00

Notes: See SDG&E PMR Table 3-7 for detailed notes.

Conclusion. None of the modifications to the FESSR in the Final PMR would create new significant impacts to biological resources. Most project modifications would reduce or would not change impacts to biological resources and remain consistent with the conclusions of the Final EIR/EIS. The details of each modification and the changes in effect to each type of habitat are detailed in Section 2 of the CPUC and BLM Memorandum. Where the project modifications would increase impacts to biological resources (e.g., to sensitive vegetation, special status plant species, Waters of the U.S., state waters, and/or RCAs), the increases in impacts would be comparatively small and would not be substantial increases in the severity of impacts previously discussed in the Final EIR/EIS.

While some of the modifications result in small increases in impacts to biological resources, they often result in larger reductions in impacts to other resource areas. As such, the modifications would not present new significant impacts, a substantial increase in the severity of existing impacts, and are found consistent with the existing environmental analysis such that no additional CEQA/NEPA analysis is required. Each PMR modification (including the addition of infrared tower lighting) would not change

the significance of the impacts listed in the Final EIR/EIS (i.e., Class I impacts would remain as Class I impacts, Class II impacts would remain as Class II impacts, etc.), and no new mitigation measures would be required.

1.2.3 Impacts to Golden and Bald Eagles

SDG&E Modification. PMR Summary Tables S-1 and 3-7 identify 9 golden eagle nests potentially affected by modified project, as opposed to the Final EIR/EIS which identified 4 nests. A number of commenters highlighted this apparent increase and requested further information and analysis regarding the significance of this impact. The greater number of eagle nests identified during the surveys is based on the survey methodology used by the eagle biologist; *Interim Golden Eagle Inventory and Monitoring Protocols, and Other Recommendations* recently published by the USFWS. For these surveys, a four mile radius was used to be consistent with the new survey methodology. The purpose of the protocols is to provide information on the baseline circumstances for evaluation of permit applications and foundation for permit conditions, they do not provide a specific distance at which human activities would significantly affect a golden eagle nesting site. Therefore, as explained in detail below, although the 2010 inventory shows that there are nine nest sites within four miles of project activities, only four nest sites would be significantly affected because they are within 4,000 feet of the project and project activities including project construction/maintenance. Thus, the number of nest sites significantly affected is unchanged from the EIR/EIS.

Final EIR/EIS Discussion. The biology section of the Final EIR/EIS analyzed the project's compliance with the Bald and Golden Eagle Protection Act (referred to as the Bald Eagle Protection Act in Sections D and E of the Final EIR/EIS). The Bald and Golden Eagle Protection Act (September 2009) rule published by USFWS was not in place at the time the Final EIR/EIS was published and was not analyzed as part of the Final EIR/EIS. The regulation set forth in 50 CFR 22.26 (published in the September 2009 rule) provides for issuance of permits to take bald eagles and golden eagles where the taking is associated with, but not the purpose of, the activity and cannot practicably be avoided. Most take authorized under this section will be in the form of disturbance, and not direct take of nests. The regulation includes a provision for a programmatic permit that allows for potential take resulting from ongoing activities associated with operation and enduring site features (e.g., collision impacts). Prior to this rule, there was no provision in the Act for projects like utilities and airports to take eagles.

Potential project impacts to golden eagles were analyzed in Impact B-7H (direct or indirect loss of golden eagles or direct loss of habitat) of the Final EIR/EIS. Impacts to golden eagles (Impact B-7H) were considered significant according to Significance Criteria 1.e. (substantial adverse effect on the breeding success of the golden eagle), 1.f. (project would directly or indirectly cause the mortality of a special status species), 1.g (project would result in the abandonment of migratory bird nests and/or eggs), and 1.h (project would take golden eagles, eagle eggs, or any part of an eagle). (Subsection D.2.4.1, Significance Criteria.) Impacts to golden eagles were considered significant and unmitigable (Class I) because construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Four golden eagle nest sites occur within 4,000 feet of the FESSR and the EIR/EIS concluded that each of the 4 nest sites would be adversely affected by the project.

Potential project impacts to bald eagles were analyzed in Impact B-7I (direct or indirect loss of bald eagles or direct loss of habitat) of the FEIR/FEIS. The Final EIR/EIS acknowledged the following in relation to bald eagles: the single breeding pair in San Diego County (at Lake Henshaw); the occasional winter sightings near the FESSR (Morena Reservoir, Corte Madera Lake, and Barrett Reservoir); and the USFS's modeled habitat for the species. The Final EIR/EIS stated No Impact to bald eagles as a result of the

project (except for collision risk). The statement of No Impact was based on the Lake Henshaw nest site being more than 4,000 feet from the FESSR and based on a low potential for bald eagles to forage in the areas identified by USFS as modeled habitat for the species.

Impacts to listed and sensitive bird species, including golden eagles and bald eagles, as a result of collision with project features were considered significant and unmitigable (Class I). Impacts were considered significant according to Significance Criteria 1.a (project would impact one or more individuals of a species that is federal or State listed as endangered or threatened), 1.f (project would directly or indirectly cause the mortality of a special status species), and 1.g (project would result in the abandonment of migratory bird nests and/or eggs).

Evaluation. The project's Biological Opinion, dated January 2009, did not address impacts to golden eagles or bald eagles because they are not federally listed. The Final EIR/EIS analyzed the project's potential impacts on golden eagles and bald eagles (Impacts B-7H, B-7I, B-10, and B-12). The new 2009 rule does not change the conclusions in the Final EIR/EIS, but rather provides a permit process that the project may need to follow if disturbance impacts to eagles cannot be avoided. However, impacts of the proposed modifications remain consistent with the analysis and conclusions presented in the Final EIR/EIS.

In February 2010 the U.S. Fish and Wildlife Service published the *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* which recommends assessing a 4 to 10 miles area slated for development or authorizations for increased human activity. The protocols further state that Golden Eagles, visibly display behavior that signifies disturbance when they are stressed by anthropogenic activities; whether it is a lone hiker walking 1000 meters or more from a nest, or extended construction or recreation activities 2000 – 5000 meters from a territory (pg. 9). However, the protocols do not set a distance at which anthropogenic activities would no longer impact golden eagle nest sites.

SDG&E is currently conducting a golden eagle nest area study following the interim protocols, and preliminary results of Phase 1 of the surveys indicate that there are 9 nests (active territories) within a 4-mile radius of the modified project's activity areas in compliance with the interim protocols. The purpose of the Phase I survey is to record and report occupancy of resident golden eagle activities, nests, and territories. This survey protocol is intended to standardize procedures to inventory and monitor Golden Eagles within the direct and indirect impact areas of planned or ongoing projects where disturbance or lethal take from otherwise permitted human activities is possible.

SDG&E has, on its own, initiated this 2010 eagle survey with Mr. Bittner[3]. According to SDG&E, Mr. Bittner indicated to SDG&E that he would conduct the survey but only in accordance with the interim USFWS protocols and their minimum distance of four miles, which has resulted in the identification of five more golden eagle nest sites reported in the Final PMR than reported in the Final EIR/EIS (i.e., a total of nine nest sites reported in the Final PMR compared with four in the Final EIR/EIS). The significance criteria defined in the Final EIR/EIS, however, considered human activity (including construction and maintenance) within 4,000 feet (or approximately 0.75 mile) of nest sites to have the potential to significantly affect nesting eagles (nest abandonment, subsequent reproductive failure and continuing decline of the species). Four-thousand feet was, at the time the EIR/EIS was published, the

[3] J. David Bittner is the executive director of the Wildlife Research Institute, Inc; he is the project leader of the longest running Golden Eagle research project in the Western Hemisphere (1982 to the present) and his research projects include population study of golden eagles in southern California, study of golden eagles fall and winter migratory patterns, determining golden eagle territory size and use in San Diego County, and population study of nesting golden eagles in Anza Borrego Desert..

accepted disturbance avoidance buffer for golden eagle nests and established in consultation with Mr. Bittner. The USFWS conducted more than one review of the EIR/EIS, and did not comment on the 4,000-foot avoidance buffer. Four thousand feet is also used to evaluate impacts to the golden eagle nest sites for coverage under the Multiple Species Conservation Program (MSCP) for most of San Diego County, see map at http://www.dfg.ca.gov/habcon/nccp/status/SanDiegoMSCP/,) including as recently as 2008 in the Draft Conservation Analysis for the North County MSCP. The North County MSCP area, specifically, encompasses 294,849 acres in and around the unincorporated communities of Bonsall, De Luz, Fallbrook, Harmony Grove, Rancho Santa Fe, Lilac, Pala, Pauma Valley, Rainbow, Ramona, Rincon Springs, Twin Oaks Valley, and Valley Center. Therefore, 4,000 feet is still considered an adequate distance for evaluating the impacts to golden eagle nesting for the FESSR and the modified project. The additional survey data will benefit the USFWS as the protocol was designed to standardize data collection for potential local and regional analysis of long-term occupancy, productivity and eagle use trends. Impacts to golden eagle nesting resulting from the modified project are consistent with the analysis presented in the Final EIR/EIS.

The golden eagle discussion on Pages 3-23 and 3-24 of the Final PMR explains that project activities will be subject to mitigation measures that are consistent with and more conservative than existing USFWS recommendations for avoiding take of golden eagles, which are found in the Utah Field Office Guidelines for Raptor Protection from Human and Land Disturbance (2002). While not technically applicable to Sunrise, the CPUC and BLM are aware that the Utah Guidelines are being considered for use by the USFWS for another project within the Sunrise project area, so it is reasonable to expect that the USFWS would use these guidelines when considering impacts to golden eagles for Sunrise, as well, if it was required. The CPUC and BLM have independently reviewed the golden eagle data and analysis in the PMR. The 2002 Field Office Guidelines identify a spatial buffer of 0.5 mile (2,640 feet) during the breeding season and allow for a smaller spatial buffer (i.e., 0.25 mile or 1,320 feet) for power line and road construction/maintenance under the following conditions:

- For less than 1 hour of activity in a 24-hour period during the post-brooding nestling period or
- For periods of no more than 1 hour of activity, spaced at least 2 hours apart, and only during daylight hours during the post fledging dependency period.

SDG&E's inclusion in its PMR report of the results of the eagle surveys outside of the 4,000-foot avoidance buffer in the Final PMR has resulted in confusion for some commenters as to whether there are new, or increased impacts to eagle nests and what is required mitigation for the modified project. While the 2010 inventory discloses that there are nine nest sites within four miles of project activities, no new nest sites were identified within 4,000 feet of project activities that would be potentially affected by project construction/maintenance. Analysis in the Final EIR/EIS determined that impacts to golden eagle nests would be Class I for nests within 4,000 feet of project activities and Class II for golden eagle nests within the existing transmission corridor. None of the nests identified for the modified project in SDG&E's 2010 surveys were within an existing transmission corridor. As discussed above, the CPUC and BLM have determined that the 4,000 foot buffer distance on which this determination is based continues to be appropriate. (Mitigation Measure B-7h in the Final EIR/EIS places restrictions on construction/maintenance activities within 4,000 feet of eagle nests during the breeding season.) Thus, the CPUC and BLM have determined that number of nest sites that would be affected by the modified project described in this PMR is four (4) and not "9"[4] as reported in PMR Table 3-7, consistent with the Final EIR/EIS. new (i.e., additional) 2010 data does not change the conclusion of the Final EIR/EIS (i.e., impacts to four golden eagle nest sites), and there are still only four eagle nest sites within 4,000 feet of the modified project that would be affected.

[4] Note: footnote 5 by the number 9 regarding nest sites potentially affected is an error and should be footnote 6.

Conclusion. The number of eagle nests around the FESSR transmission line has not changed since publication of the Final EIR/EIS. Eagle nests are not expected to be disturbed by construction activities occurring more than 4,000 feet away. Therefore, there would be no change in the impacts to golden eagles from the time the Final EIR/EIS was published and the modified project would be consistent with the conclusions of the Final EIR/EIS. For the reasons discussed above, the disclosure of nest sites between 4,000 feet and four miles from the project route, as a result of the 2010 golden eagle survey results, is not a new significant impact that would require additional CEQA/NEPA analysis, and is not a substantial increase in the severity of impacts but may be used by the USFWS for data collection for potential local and regional analysis of long-term occupancy, productivity and eagle use trends.

1.3 Water Supply

SDG&E Proposal. In the Geosyntec "Water Resources Availability Study of Non-Groundwater Sources for the project modifications" (Water Study, available on the CPUC website)[5], SDG&E defines the sources of water to be used for project construction. The surface water sources identified are consistent with the types of supplies assumed in the Final EIR/EIS.

Public Comments. Commenters on the PMR expressed concerns regarding the water providers identified in the PMR and the amount of reclaimed water required for the project, and requested confirmation that no groundwater would be used for construction of the project modifications.

Final EIR/EIS Discussion. The Final EIR/EIS addressed potential water suppliers for each of the alternatives, and Mitigation Measure S-3b requires SDG&E to obtain reclaimed water where feasible. The Final EIR/EIS in its analysis of the FESSR assumed that no groundwater would be used for construction activities, consistent the information that SDG&E presented for the proposed project. As defined in Final EIR/EIS Section E.1.14.2, "water would be obtained from IID in Imperial County and SDCWA in San Diego County … the route would pass by Padre Dam Reservoir [MP I8-79], El Capitan Reservoir and associated dam facilities [MP I8-82], and San Vicente Reservoir and water could also be obtained from these reservoirs."

The Final EIR/EIS listed potential water suppliers for each of the alternatives in Sections E.1.14 (I-8 Alternative, Socioeconomics), E.2.14 (BCD Alternative, Socioeconomics), and E.4.14 (Modified Route D Alternative, Socioeconomics). The water suppliers identified were preliminary and comparable with the providers identified in the Water Study.

Based on the review of the PMR and the Geosyntec Water Study, the use of reclaimed or surface water is available for the project modifications, and use of the reclaimed or surface water would not constitute a substantial increased level of an existing environmental impact or new significant impacts as described below. Groundwater will not be used during the construction of the project.

Evaluation. The average daily demand for water during the construction period of approximately 18 to 24 months is 300,000 gallons per day. The CPUC and BLM have reviewed SDG&E's Water Study and concur that five water providers could each provide more than this amount per day. No single source would be utilized for the entire project, reducing individual source-specific water demands. SDG&E has stated that it has initiated the application process for obtaining reclaimed water from the City of San Diego and the Padre Municipal Water District for use in San Diego County. SDG&E's current plan for water use in Imperial County is Imperial Irrigation District canal water. Groundwater will not be used during the construction of the project.

[5] See Water Resources Availability Study, available on the CPUC's website at http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/toc-pmr.htm.

The use of recycled water would require transport of this water to construction sites. This has the potential to increase impacts to air quality, traffic, and noise. Impacts to air quality from construction emissions, including from the transport of water, were reviewed as a whole, in Section 1.6, Air Emissions and Air Quality Assessment below. This section concludes that PMR emissions would be reduced substantially when compared to the results analyzed in the Final EIR/EIS. Construction-phase activities and emissions under the PMR would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010).

The KOA Corporation prepared a Traffic Impact Study dated April 23, 2010 that was provided to Caltrans for approval as required under Mitigation Measure T-9a. This study considered the construction worker commuter trips, equipment deliveries, material hauling, and reclaimed water deliveries from the "worst case scenario" source location (see Appendix B to Traffic Impact Study). The vehicular trips predicted by the project traffic engineer incorporate the "worst case scenario" for reclaimed water deliveries, and take into account all the project modifications defined in the PMR.

The Traffic Study identifies six locations with potential to create traffic impacts and recommends mitigation to ensure that impacts are not significant. Mitigation includes additional traffic control plans for approval by local agencies prior to commencing construction activities, employee shuttling, and the restriction of peak-time deliveries. The Final EIR/EIS identified a series of impacts to traffic and circulation. All impacts to traffic and circulation were found to be either potentially significant and mitigable (Class II) or adverse, but less than significant (Class III); four mitigation measures are required for construction impacts. The CPUC and BLM reviewed Traffic Impact Study, including the recommended mitigation and agree with the conclusions that impacts remain less than significant. The impacts identified in the Final EIR/EIS remain accurate. The project modifications would not result in increased levels of environmental impact or any new significant impact.

Conclusion. Based on the review of the PMR and the Water Resources Availability Study of Non-Groundwater Sources, the use of reclaimed or surface water is available for the project modifications. The impacts associated with transport of reclaimed and surface water were fully described in the Final EIR/EIS which remain valid and the information provided by SDG&E is consistent with the Final EIR/EIS and does not constitute as an increased level of environmental impact or new significant impacts.

1.4 Helicopter Construction

SDG&E Modification. Helicopter construction has been proposed for approximately 230 structures, which represents an increase in helicopter construction than what was assumed in the EIR/EIS for the FESSR. The use of helicopters for construction was evaluated in the Final EIR/EIS as it was recommended as a mitigation measure to reduce long-term visibility of land scars. The use of helicopters for construction was assumed for the FESSR in the Final EIR/EIS, although no details were provided regarding the numbers of helicopters or the precise locations where helicopter construction would be used, as the engineering of the route had not been finalized. A project design modification does not necessarily require the preparation of a supplemental EIS. (*Price Road Neighborhood Association v. US Dept. of Transportation,* 113 F.3d 1505 (1997))

Final EIR/EIS Discussion. Final EIR/EIS Section B.4.4.2 describes how and why helicopters would be used for the construction of the proposed project. The alternatives analysis assumes construction methods similar to those described for the proposed project in the environmental analysis. Furthermore, Mitigation Measure V-2d (Construction by helicopter) was recommended for portions of the FESSR specifically to reduce impacts associated with grading and vegetation clearing (resulting in long term land-scarring).

The Project Description included in the Final EIR/EIS, identified numerous situations in which helicopters would be used for construction. Helicopters would be used in areas with steep terrain, or where access road construction would not be feasible. As a result, impact analysis throughout the EIR/EIS considered the use of helicopters as one of the construction vehicles.

Helicopter construction is associated with certain types of environmental impacts not present with conventional construction, as identified in the Final EIR/EIS and detailed below. It also provides benefits not present with conventional construction. The Final EIR/EIS includes consideration of helicopter construction in the following analyses:

- **Wildlife species** could be affected by helicopter noise. Helicopter construction was analyzed in Final EIR/EIS Section E.1.2, Biological Resources, which identified significant impacts (Class I, significant and unmitigable) to Peninsular Bighorn Sheep, partly because of the use of helicopters during construction. Impact B-7 (Construction activities would result in direct or indirect loss of listed or sensitive wildlife or a direct loss of habitat for listed or sensitive wildlife) is found to be significant (Class I) for bighorn sheep. For this reason, Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep, see below) is required. This measure applies to the FESSR; it provides compensation for loss of critical habitat and incorporates restrictions regarding the use of helicopters for construction to minimize impacts to Peninsular Bighorn Sheep along the FESSR. These restrictions apply only within PBS critical habitat.

  > **Mitigation Measure B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat.** With regard to timing of activities, construction and maintenance activities (including the use of helicopters) in bighorn sheep critical habitat shall be limited to outside the lambing season and the period of greatest water need, or a minimum ceiling of 1,500 feet for helicopter flights shall be maintained. The lambing season is February January 1 through August June 30. The period of greatest water need is May through September. Construction and maintenance activities in PBS critical habitat may occur during the lambing season and/or period of greatest water need if prior approval is obtained from the Wildlife Agencies.

- **Noise impacts** associated with helicopters were described in Final EIR/EIS Section D.8 under the overview of construction impacts, and incorporated by reference for the alternatives. Section E.1.8 describes noise impacts for the Interstate 8 Alternative (a large segment of the FESSR). The bulk of the noise analysis is in Section D.8, which discusses helicopters on page D.8-16, stating that "Helicopters would also be needed to transport construction materials and to string the conductors for the overhead line." Similarly, on page D.8-17, there is additional discussion: "Helicopters would be used in areas where access is limited (e.g., no suitable access road, limited pad area to facilitate onsite structure assembly area) or there are environmental constraints to accessing the project area with standard construction vehicles and equipment. Heavy-duty and light-duty helicopters would be needed … Helicopters would generate noise levels of 89 dBA to 99 dBA at 50 feet." Mitigation Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant because the substantial noise increase from construction, including the use of helicopters, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

- **Air emissions** from helicopters were evaluated in the Final EIR/EIS, as shown in Appendix 10. In the Appendix 10 emissions calculations, nearly every page accounts for emissions from both small and heavy lift helicopters. The revisions to air emissions due to changes in construction

methods are addressed in Section 1.6 of this Section 1. While helicopter use has increased, other changes in construction methods have resulted in a substantial reduction in air emissions.

Public Comments. Commenters stated concerns that noise and air emissions from increased use of helicopters would exceed levels analyzed in the Final EIR/EIS, and that bighorn sheep may be disturbed more than previously considered.

Evaluation. The Final EIR/EIS evaluated use of helicopters (both large and small), and defined significant and unmitigable impacts related to noise and wildlife. As discussed above, Mitigation Measure B-7c restricts the use of helicopters to minimize impacts to peninsular bighorn sheep. Just as the EIR/EIS concluded that noise impacts from construction, including the use of helicopters, would be significant even with implementation of mitigation, noise impacts from the helicopter usage proposed in the PMR would be significant and unavoidable. The significance threshold for noise was an increase in day-night environmental noise levels of more than 5 dBA, see Section D.8.4.1 (Significance Criteria) of the Final EIR/EIS. The Final EIR/EIS did not differentiate between the noise levels above a 5 dBA increase, because any increase of more than 5 dBA was considered a substantial increase and a significant impact. While an increased use of helicopters would result in an increase in noise, based on the significance threshold this would not be substantially more severe than the impact analyzed in the Final EIR/EIS. As stated in EIR/EIS Section D.8.4.3, maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. Helicopters, estimated at 95 dBA (in flight at 200 feet) would be within this range of construction noise and would not exceed the loudest construction noise, estimated at 98 dBA from jack hammers and rock drills. The noise would be similar in nature to that analyzed in the EIR/EIS; however, it would be shorter in duration because of the use of helicopters to aid in construction. The revisions to air emissions due to changes in construction methods are addressed in Section 1.6 of this Section 1. While helicopter use has increased, other changes in construction methods have resulted in a substantial reduction in air emissions.

Several significant benefits would result from the increased use of helicopter construction:

- Helicopter construction is one of the main contributors to the decrease in temporary ground disturbance impacts that would occur under the modified project described in the PMR. This is because the helicopter construction would use tower staging access pads rather than access roads during construction. Because the tower staging access pads require fewer acres than the access roads they reduce the amount of ground disturbance required for construction. Ground disturbance would be reduced from over 800 acres identified for the FESSR to less than 500 acres for the modified project. Permanent ground disturbance impacts would be reduced from just under 500 acres (as defined for the FESSR) to about 250 acres for the modified project, respectively. Additionally, while use of helicopters in construction increases the maximum intermittent noise levels, as addressed in the Final EIR/EIS, it also shortens the construction period.

- Reduced need for new access roads also reduces the requirement for water to control dust during construction.

Conclusion. The use of helicopter construction was assumed and analyzed in the Final EIR/EIS which remains valid. Increased helicopter use would not result in a substantial increase of an identified environmental impact or the creation of new significant impacts and is consistent with Mitigation Measure V-2d (Construction by helicopter) recommended for portions of the FESSR. The increased use of helicopters would decrease the level of some of the environmental impacts analyzed in the Final EIR/EIS (particularly as related to ground disturbance).

1.5 Fire Risk

SDG&E Modification. The project changes relevant to fire and fuels management include transmission line re-routes outside of the approved ROW. As described below, the Fire and Fuels Management analysis in the EIR/EIS relied on wildfire behavior modeling, which used the transmission ROW as the point of ignition of potential wildfires. Therefore, changes to the alignment of the approved ROW have the potential to change the wildfire modeling results, as discussed below.

Final EIR/EIS Discussion.

The approach and conclusions of the Final EIR/EIS related to fire and fuels management are described here.

Project Firesheds in the EIR/EIS. The project study area, or area of potential effect, for the Fire and Fuels Management analysis was defined as the project "firesheds." Firesheds are regional landscapes that are delineated based on fire history, vegetation, topography, and potential wildfire behavior. Firesheds were defined in the EIR/EIS first and foremost by the location of the overhead portions of the proposed and alternative transmission alignments. Underground transmission lines do not have the capacity to result in long-term operational wildfire ignitions, and project fireshed boundaries did not attempt to encompass underground portions of the project.

The fireshed boundaries were delimited by the location of the overhead portions of the proposed and alternative transmission alignments, plus the following factors: landscape topography, vegetation cover, weather patterns, historic ignitions, and historic fire perimeters. All of these are factors that influence landscape-level wildfire behavior. The ways in which these factors limit the spread of wildfire are described here. Topographic features, such as mountain ridges, can serve as physical barriers to fire spread. In addition, physical barriers to wildfire spread can include water features, rocky un-vegetated terrain, urban landscapes, paved roads and highways, and manmade fuelbreaks. Large wildfires in San Diego County are primarily influenced by Santa Ana winds, which are southwesterly trending winds; areas substantially upwind of the overhead portions of the transmission line would not be affected by a Santa Ana wind-driven wildfire with its origin in the transmission ROW. Areas of lower annual precipitation result in reduced fuel loading and a correspondingly reduced susceptibility to fire. Finally and most importantly, historic fire perimeters, or the areas where fires were historically contained or where they naturally burned their course, are strong indicators of the limits of future wildfires. A visual depiction of how the El Capitan Fireshed was established is shown in the figure entitled "Final PMR Fireshed Topology Map" (presented at the end of Section 1). The yellow line depicts the El Capitan Fireshed, and the red line depicts the adjoining Poway Fireshed. As is demonstrated, the El Capitan Fireshed and the Poway Fireshed encompass a majority of the historic fire perimeters and fire ignition points on the landscape within the Santa Ana wind influence area relative to the transmission alignment. It can also be seen that the community of Harbison Canyon, located in the southern portion of the figure, was reasonably excluded from the El Capitan Fireshed boundary due to its location, which is directly downwind of the underground portion of the transmission line.

These fire-limiting factors were used to delimit the boundaries of the project firesheds. These firesheds represent the study area for the discipline of Fire and Fuels Management for the EIR/EIS. This study area remains valid and was delimited based on a reasonable set of fire-limiting factors, resulting in a reasonable and correct area of potential effect for the Fire and Fuels Management analysis presented in the EIR/EIS.

Fire Behavior Modeling in the EIR/EIS. The Fire Behavior Trend model analysis produced areas of potential impact of a wildfire originating at the transmission line. The model used actual vegetation

cover and simulated burn behavior from random ignitions within the transmission ROW, at a rate of one ignition every 500 feet, under both normal and extreme weather conditions and normal and extreme fuel moisture levels. The Fire Behavior Trend model therefore predicted how ignitions related to project construction, operation, and maintenance would affect the extent of fire damage by simulating wildfire behavior in the vicinity of the transmission line. The model generated an estimate of the number of acres that would burn and WUI Homes at highest risk if *multiple simultaneous ignitions* were to occur along the length of the transmission corridor.

Because large fires are often sparked by just one or two ignition sources, the outcome of the Burn Probability Model is necessarily "unrealistic", as the transmission line would never be the cause of hundreds of simultaneous ignitions along the entire length of the corridor. Nonetheless, use of the model in the EIR/EIS was a reasonable and correct approach to the evaluation of the relative risk of multiple alternative transmission alignments.

In addition to delimiting the study area to project firesheds as describe above, the Fire Behavior Trend Model was delimited by wildfire burn duration. A 48-hour burn duration (identified as "4 burn periods" in the EIR/EIS) was used to simulate biophysical wildfire behavior during Santa Ana winds; the model was limited to this period because beyond this burn duration fire behavior would be influenced by firefighter suppression response, developed features on the landscape, and localized weather patterns that were determined to render the output of the biophysical model unreliable.

Major wildfires can, of course, burn longer than 48 hours, and therefore, during extreme fire weather, the extent of a wildfire could be greater and the shape of the fire perimeter could be different than simulated. The extent of a wildfire could also be smaller than modeled, due to the potential for future differences in fuel moisture content, fuel loads, wind speeds, development, and landscape features that were present at the time the EIR/EIS fuel inventory and wildfire modeling were completed. Despite this inherent uncertainty involved in simulating the behavior of natural phenomena, use of the model in the EIR/EIS was a reasonable and correct approach. Simulating uniform multiple random ignitions along the line was the only means of identifying the varying risk of individual segments of the line, and it provided a useful comparison of the relative risk of various routing alternatives evaluated in the EIR/EIS

Background on the Defensible Space Grants Fund and Assets at Risk. The intent of Mitigation Measure F-1e, the "Defensible Space Grants Fund," was to identify homes at highest risk of a wildfire that might be ignited by the Sunrise Powerlink transmission project and reduce residential structure damage from such a fire. Homes at risk were identified through simulations of wildfire behavior in the project study area. A maximum of 1,382 homes was identified in the Final EIR/EIS and in the CPUC Decision as being those at highest risk of damage and those requiring mitigation for the significant, unavoidable wildfire impact that the transmission project presents in San Diego County, as identified in the Final EIR/EIS.

As presented in the Final EIR/EIS and the CPUC Decision, the number of "assets at risk" during extreme weather as a result of ignitions from the FESSR included (1) the number of *acres* that would be potentially burned during a severe fire originating from the transmission line, and (2) the number of *homes* that would be potentially burned during a severe fire originating from the transmission line.

The number of homes at risk presented in the EIR/EIS and the CPUC approved decision was estimated using San Diego County parcel data to identify the number of structures that met the following criteria:

- Parcel was zoned for residential use;
- Parcel was ¼ acre or greater in size;
- Parcel included a minimum of a single improved structure worth $10,000 or more;

- Parcel laid within the project study area, or within one of the project "firesheds;"
- Parcel laid within the Fire Behavior Trend Model fireshed burn area; and,
- Parcel was within a community meeting the definition of an "Intermix" Wildland-Urban Interface (WUI) community or an "Interface" WUI community as published in the Federal Register on Thursday, January 4, 2001 (Vol. 66, No. 3). An Intermix WUI community is defined as having a population density between 28 and 250 people per square mile, where structures are interspersed throughout wildland areas on parcels less than 40 acres. An Interface WUI is defined as having a population density of 250 to 1,000 people per square mile, where there is a clear delineation between developed areas and wildlands.

It was assumed for the purposes of analysis in the EIR/EIS that structures meeting these criteria represented the homes at highest risk of structural damage or destruction in a large wildfire originating from the transmission line. Homes that were located beyond the EIR/EIS study area, i.e., beyond the boundaries of the project firesheds as defined in Section D.15, were not assessed. Homes were screened out of the highest-risk group that did not fall within a community meeting the federal definition of Intermix WUI or Interface WUI. Homes were screened out that did not meet a minimum parcel size of ¼ acre, as parcels smaller than ¼ acre do not allow for the creation of defensible space around a home. Urbanized areas were not included in the EIR/EIS fire behavior models, as these models are not designed to simulate fire behavior in landscapes where buildings, asphalt, sidewalks, and maintained ornamental plants have displaced wildland vegetation. The assessment was limited to any improved structure worth $10,000 or more, rather than being inclusive of all structures with any economic value. It was assumed that structures that met the criteria were probably homes, and homes were the structures of highest concern in the affected communities.

Due to the assumptions of the Fire Behavior Trend Model described above, including the simulation of multiple simultaneous ignitions and the limitation of the burn period to 48 hours, it is unlikely that the WUI homes at highest risk identified in the Defensible Space Grants Fund would be the exact homes that would be damaged or lost in an actual fire originating from a single point along the transmission line. However, simulating uniform multiple random ignitions along the line was the only means of identifying the varying risk of individual segments of the line, and it provided a useful comparison of the relative risk of various routing alternatives evaluated in the EIR/EIS. The 1,382 WUI homes identified in the Defensible Space Grants Fund were determined to be those at highest risk. In summary, the EIR/EIS determined that damage or loss of the 1,382 WUI homes at highest risk in the event of a wildfire resulting from the Sunrise Powerlink project would be partially mitigated by implementation of Mitigation Measure F-1e, the Defensible Space Grants Fund. The number of homes at risk presented in the EIR/EIS was based on a reasonable set of assumptions, professional expertise, and a defensible modeling approach.

Public Comments

Commenters on SDG&E's PMR presented concerns about the fire risk of the Sunrise Powerlink project or about the impact analysis for the modified route. Those comments include the following concerns:

- EIR/EIS and PMR should use County of San Diego Planning Department's fire behavior modeling and assets at risk data. EIR/EIS underestimates number of homes threatened (addressed below)
- Verify the fuel modification zone around the perimeter of the Suncrest Substation. The draft Construction Fire Prevention Plan did not include a fire buffer (addressed in Section 2, PMR 29)

- PMRs need to address helipads, fuel modification along roadway, fuel modification around helipads, potential clearing in easements, and fire breaks around facilities (addressed in Section 1.2.3 and Table 1-4)
- PMR 17, EP 121A-1, will prohibit firefighting and aerial fire support in this area and will endanger residents of Sandy Creek Lane. Line was moved adjacent to the Berglund property and crosses the La Posta Truck Trail. The line so close and crossing the La Posta Truck Trail will eliminate any possibility of fire protection for their properties and their neighbors. This is an extreme fire danger area. Over a year ago the community met with SDG&E/Sempra and proposed a realignment that would enable firefighting around properties and along La Posta Truck Trail. (addressed in Section 2, PMR 17.)
- Modification created new fire risk at FS land 60112002 and 60118001 (addressed in Section 2, PMR 25)
- PMR says the modifications would not result in new significant public safety or fire hazard impacts; however, the FEIR conclusions related to fire were flawed because the fire analysis was performed with the Historical CalFire Maps of 1950 to 2007, which exclude fires on BLM and private land for the years between 1950 and 2003; 56 of the 60 years of fire history. (addressed below)
- The statement that the landscape is not defensible is factually wrong. Fire risk in this area, including El Monte Valley is severe, but it is defensible via air (and only air), as evidenced by our long history of successful fire suppression via air in this valley. In addition, the premise that this area is indefensible is not consistent with the claims by the local fire jurisdiction. (addressed below)
- MS-47: Shows the lake on the Wuest Ranch (upper left corner) that is used for a water source to fight fires in this remote area. How will the Sunrise Powerlink's proximity interfere with this important current use of a scarce surface water source. CAL-Fire reps have informed us that they will operate or fly within 1,000 feet of energized or de-energized powerlines. (addressed in Section 2, PMR 12)
- MS-67: Shows the proximity to the private ranch (APN 52817001). In the lower right corner of the photo is another scarce surface water source / lake that is accessed by fire fighters and helicopter. Due its proximity to the Sunrise Powlerink, will this source no longer be available? These private properties may no longer be deemed as defensible space due to the proximity of Sunrise to their homes and La Posta Truck Trail (addressed in Section 2, PMR 17)
- MS-118 & 119 Show the Powerlink's proximity to the El Capitan Reservoir and the narrow El Monte Valley residential/agricultural area. This raises fire fighting issues related to access to reservoir water to fight fires, and the Powerlink's proximity to homes impeding fire fighting abilities. This area has already been devastated in the recent firestorms. El Monte Road is a narrow two-lane dead end road. (addressed in PMR 34)

Project Firesheds and Fire Behavior Modeling in the EIR/EIS. The County of San Diego Department of Planning and Land Use commented on the approach taken in the EIR/EIS to model wildfire behavior, suggesting that the EIR/EIS underestimates the extent of a major wildfire event in San Diego County. Although wind-driven wildfires in San Diego County have the tendency to be larger than the potential burn areas shown in the Fire Behavior Trend Modeling analysis, the EIR/EIS analysis was confined to the project study area, defined as the project firesheds in the EIR/EIS. This approach is addressed in General Response GR-9, Fire Risk and the Comparison of Alternatives: Fire and Fuels Modeling in the Final EIR/EIS. As stated in General Response GR-9, the fire models presented in the EIR/EIS are based on defensible assumptions and a uniform protocol, and any modifications to the modeling inputs would introduce bias into the results. The protocol and assumptions are explained in detail above, and it is demonstrated that, although actual wind-driven wildfires in San Diego County may be smaller, larger, or

otherwise different than simulated, the approach taken in the EIR/EIS is reasonable and correct and does not underestimate the extent of a potential major wildfire caused by the Sunrise Powerlink Project in San Diego County as suggested by the County. The approach taken in the EIR/EIS was the best available means of comparing alternative transmission alignments.

Calculation of Assets at Risk in the EIR/EIS. The County also stated that it had performed an independent analysis of the number of structures at risk of wildfire from the approved route of the Sunrise Powerlink project. The County's letter states that according to its modeling, "2,650 homes" would be at risk for a 4-burn period within the anticipated fire perimeters modeled in the Sunrise EIR/EIS for the FESSR. By comparison, the Final EIR/EIS identified 1,382 homes[6] at risk. The difference between the County's estimate and the EIR/EIS is a result of two factors:

1) the County's estimate included urban homes that would not be at highest risk of damage or loss in a wildfire because they lack adjacent wildland fuels. Specifically, the County's estimate of structures at risk was not screened for the Wildland-Urban Interface (WUI) risk factor. Therefore, it over-estimates the number of homes at risk because it includes urban homes that would not be at highest risk of damage or loss in a wildfire because they lack adjacent wildland fuels. The County's estimate includes closely-spaced urban homes on parcels less than ¼ acre in size that would not be subject to the defensible space requirement under Public Resources Code 4291. Any fire risk to these homes would not be mitigated by the creation of defensible space due to a lack of adjacent wildland fuels; and

2) the County's estimate included *all* structures potentially at risk (including garages, sheds, and barns) whereas the estimate in the EIR/EIS was limited to structures meeting the criteria of homes at risk, as defined above.

The County presented a useful "peer review" of the results of the Final EIR/EIS for the Sunrise Powerlink Project. However, the number of homes at risk presented in the Final EIR/EIS for the FESSR and in the CPUC Decision is based on reasonable assumptions and calculations and remains valid, and the results of the County's analysis does not result in a substantial increase in an existing significant impact or a new significant impact of the FESSR.

In addition to providing an estimate of the number of homes at risk, the County commented on the approach taken in the EIR/EIS to model wildfire behavior, suggesting that the EIR/EIS underestimates the extent of a major wildfire event in San Diego County. As noted above, areas located beyond the EIR/EIS study area, i.e., beyond the boundaries of the project firesheds as defined in Section D.15, were not included in the Fire Behavior Trend Model.

Wildfire History Data on BLM Lands.

Historic fire perimeters and ignitions data were used to characterize the environmental setting for the Fire and Fuels Management sections of the EIR/EIS and in the Wildfire Containment Conflict Model to characterize the degree of "defensibility" of the landscapes through which the Proposed Project and alternatives would pass and to determine whether transmission lines would adversely affect firefighting operations in defensible landscapes.

[6] The Final EIR/EIS presented two values for the number of homes at risk that would be covered by Mitigation Measure F-1e, the Defensible Space Grants Fund. Appendix 3E (Figure Ap. 3E-12) reported a total of 1,382 homes at risk during extreme fire weather simulated for four burn periods; the Executive Summary (Table ES-3) and General Response GR-9 (Table GR.9-3) in Section 2 reported a total of 1,300 homes at risk during extreme fire weather simulated for four burn periods. The correct number for the FESSR is 1,382 homes at risk. The value of the Defensible Space Grants Fund would be based on this number of homes at risk for the FESSR.

Although the fire history and ignitions data set is incomplete, it helps to provide the best picture of whether fires can be successfully fought by firefighters or not. In the case of the approved route, the majority of BLM land along the route occurs for what was identified as the "BCD Alternative" in the EIR/EIS. Section E.2.15 of the EIR/EIS evaluated the potential for the transmission line to interfere with firefighting operations (Impact F-3) along this portion of the approved route using the Wildfire Containment Conflict Model as a basis for the analysis. The model results indicated that this landscape is not defensible due to the fuel load and rugged terrain. Any fire history data deficiency on BLM lands would not influence the model results because the effects of fuel and topography dominate the model results, masking any effect of fire and ignition history. The EIR/EIS concluded that any effect of the transmission on firefighting efforts would be less than significant for the BCD Alternative because the transmission line would occur in an already indefensible landscape.

Additional BLM lands occur along portions of what was referred to as the "Modified Route D Alternative" in the EIR/EIS. Effects of the transmission line on firefighting operations along this alternative were determined in Section E.4.15 of the EIR/EIS to be significant and unavoidable. Mitigation measures related to this impact will be required for the long-term operation of the approved route. Similar to the conclusion reached for the BCD Alternative on BLM lands, any data deficiency for the Wildfire Containment Conflict Model for BLM land along the Modified Route D Alternative would have no bearing on the significance conclusion made in the EIR/EIS because the maximum level of significance was determined for this impact (Impact F-3). The Wildfire Containment Conflict Model is described in detail in Section D.15.4.3 of the EIR/EIS.

Wildfire Containment Conflict Model and Landscape "Defensibility". The Wildfire Containment Conflict Model was used in the EIR/EIS to determine areas of significant aerial and ground-based firefighting conflicts created by the presence of the overhead transmission line. The model inputs were a suite of factors that restrict or conflict with firefighting efforts. Topography influences firefighting tactical approach: steep slopes and canyons are areas where firefighters will not attempt to suppress a wildfire because fires tend to burn at high intensities and rates of spread on steep slopes. The model assumes that a transmission line at the base of a steep slope would not present a firefighting conflict due to the indefensible nature of this topography. A transmission line at the crest of a hill would present a conflict.

"Indefensible landscapes" as defined in the EIR/EIS were therefore locations with dense fuels along steep slopes and canyon bottoms that are both strategically poor for firefighting and physically hazardous for firefighting personnel. The defensibility of a landscape was important to establish as the baseline environmental conditions in order to describe the effect of the transmission line on firefighting.

Evaluation

Updating the Fire Models in Accordance with the Project Modifications. In accordance with the County's suggestion to update the Fire Behavior Trend Model and the homes at risk calculation, the EIR/EIS Team reprocessed both the Fire Behavior Trend Model and the Wildfire Containment Conflict Model, and tallied the number of homes at risk and the number of significant miles of conflict for the project modifications. The results are presented here and in the figures entitled "Final PMR Route Overhead Portion Fire Behavior Trend Model, 4 Burn Periods – Extreme Weather" and "Final PMR Route – Overview Wildfire Containment Conflict Model" (figures are presented at the end of Section 1).

The number of homes at risk for the project modifications increased from 1,382 homes, as presented in the Final EIR for the FESSR, to 1,409 homes. This 2 percent increase in the number of homes at risk is

within the margin of error of the Fire Behavior Trend Model (**+/-** 2 to 3 percent[7]), and does not result in an actual increase in the absolute number of homes at risk. The Fire Behavior Trend Model represents a worst-case-scenario of impacts, and the number of homes at risk as modeled for the modified route does not represent an increase in an existing significant impact or a new significant impact of the FESSR. In order to err on the side of increased safety for residents in the vicinity of the modified route, the higher number of homes at risk (1,409) will be used to calculate the total annual value of the Defensible Space Grants Fund per Mitigation Measure F-1e. Damage or loss of the 1,409 WUI homes at highest risk in the event of a wildfire resulting from the Sunrise Powerlink project will therefore be partially mitigated by implementation of Mitigation Measure F-1e, the Defensible Space Grants Fund, which will ensure defensible space and fire-safe structural improvements to those homes at highest risk, although not to less than significant. This results in a Fund value of nearly $3 million per year for the life of the project, which would ensure grants for defensible space and physical structure improvements to even more homes than what was required for the FESSR.

The number of miles of significant wildfire containment conflict decreased from 6.5 miles under the FESSR to 6 miles under the modified project.[8] This is because the modified project would be two miles shorter than the FESSR and the realignment resulted in correspondingly shorter segments of significant conflict. However, the locations of significant wildfire containment conflict have not changed; see Final PMR Route – Overview Wildfire Containment Conflict Model. Because the locations of significant wildfire containment conflict have not changed from those identified by the model for the FESSR and because SDG&E has agreed to the calculation of fund value based on 6.5 miles of significant conflict, the amount of funds required for Mitigation Measure F-3a would not change. No substantial increase in a significant impact of the FESSR has been identified.

Conclusion. As discussed above, the project modifications would not significantly increase the project's fire-related impacts. The information presented in the County's June 7, 2010 letter regarding fire hazards does not show that the FESSR or the modified project will have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity of an impact previously examined in the EIR/EIS. The data used to model the project's fire-related impacts remains valid and the results of the modified project modeling are consistent with the conclusions of the Final EIR/EIS. In addition, the other fire-related comments on the PMR similarly do not demonstrate any new significant effects or a substantial increase in the severity of an impact. Therefore, impacts related to fire do not require supplemental analysis under CEQA or NEPA.

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[7] The margin of error of the Fire Behavior Trend Model polygon is approximately +/- 2 to 3 percent. This margin of error is a result of two factors. The first factor, resulting in a maximum of approximately 2.4 percent error, is a result of the quanta of raster (spatial) data used in the model. The raster quantum used in the Fire Behavior Trend Model is 60 square feet. Because random ignitions were simulated along the transmission alignment in the Fire Behavior Trend Model, iterations of the model can result in variable simulated points of ignition for identical alignments. This slight variation of ignition points can result in a slight variation in the burn polygon, which is made up of 60 square foot rasters. This can result in a variation in burn polygon area of up to 60 feet on all sides, or up to 2.4 percent. This error is a result of the nature of random simulation combined with the quantum nature of spatial data. The second source of error in the Fire Behavior Trend Model lies in the variation amongst the dozen sources of GIS meta-data used in the Fire Behavior Trend Model. This error has not been quantified, as it would require extensive field-verification and was beyond the scope of the EIR/EIS, but is expected to be less than 1 percent.

[8] Appendix D, Mitigation Measures, of the CPUC Decision 08-12-058 granting a certificate of public convenience and necessity for the Sunrise Powerlink Project Transmission Project, identifies the locations of significant conflict along the FESSR, for a total of 6.5 miles.

1.6 Air Emissions and Air Quality Analysis

SDG&E Modification. The changes to the FESSR that SDG&E has proposed in the PMR are defined generally in the introduction to Section 1 above, and in more detail in SDG&E's PMR itself. Most of these changes have resulted in the reduction of construction-related air emissions, because there are fewer structures to build, fewer areas and acres of ground disturbance, and fewer miles of access roads. The increase in transmission towers built using helicopters would increase the air emissions from helicopters and the increase in water haulage would increase the air emissions from the trucks used to haul water. Additionally, while temporary ground disturbance associated with use of construction yards would decrease by 46 percent, the amount of ground disturbance at some individual subunits would increase and result in minor increases in air emissions for those individual subunits. However, air emissions from construction of the modified project as a whole would be much lower than those of the FESSR.

Final EIR/EIS Discussion. The estimated air emissions of the FESSR are presented in Final EIR/EIS Sections E.1.11 (Interstate 8 Alternative), E.2.11 (BCD Alternative), and E.4.11 (Modified Route D Alternative). The emissions shown in the Final EIR/EIS for the Environmentally Superior Southern Route are summarized in Table 1.1.

Table 1.1. Emissions from Construction of Environmentally Superior Southern Route, from Final EIR/EIS

Construction Activity	NOx (ton/yr)	VOC (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	CO (ton/yr)	SOx (ton/yr)	CO_2 (ton/yr)
Imperial County Total	100.8	13.1	175.1	24.3	55.5	1.6	10,775.5
Imperial County, General Conformity *de minimis* Threshold	**100**	**100**	**70**	**70**	**---**	**---**	**---**
San Diego County Total	342.9	44.4	595.5	82.8	188.8	5.5	36,644.1
San Diego County, General Conformity *de minimis* Threshold	**100**	**100**	**---**	**---**	**---**	**---**	**---**
Significance Criteria	**40**	**14**	**15**	**10**	**100**	**40**	**0**
Exceed Significance Threshold?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**No**	*

Source: EIR/EIS Appendix 10.
* For discussion of impact significance of CO2 emissions and greenhouse gases, see Final EIR/EIS Section D.11.13.3.

Table 1.1 shows that construction-phase emissions would cause significant and unavoidable air quality impacts (Impact AQ-1, Class I). Three mitigation measures are defined in Section D.11.20 for Impact AQ-1; MM AQ-1a, Suppress dust at all work or staging areas and on public roads, MM AQ-1b, Use low-emission construction equipment, and MM AQ-1h, Obtain NOx and particulate matter emission offsets. These measures were adopted by the CPUC and BLM and apply to the FESSR.

Public Comments. Commenters indicated concern that the truck transport of water during construction would result in air emissions not previously evaluated. In addition, other changes were highlighted as concerns related to potentially increased air emissions, including the use of a particularly large helicopter, changes to reconductoring plans, and changes in ground disturbance in specific areas.

The San Diego County Air Pollution Control District (SDAPCD) separately filed comments to the USFS regarding the PMR on June 23, 2010. The SDAPCD indicated concerns of a large underestimate of particulate matter emissions due to activity on unpaved surfaces, a significant underestimate of emissions from helicopter operations, a lack of quantification of emissions from blasting, and missing or disputed emissions estimates for unpaved road emissions, wind erosion, material delivery activity, and earthmoving activity.

Evaluation. In June 2009, SDG&E provided updated air emissions estimates reflecting the level of activity expected to occur with the FESSR. The emission estimates and SDG&E's general mitigation strategy were made available for CPUC and public review in 2009 (Air Quality Mitigation Program for Construction Air Emissions, including attachments [AQMPC], dated June 9, 2009), and SDG&E later filed details on how activity could be capped as part of a Construction Emissions Monitoring Plan (CEMP, January 21, 2010).[9, 10] The PMR did not recalculate the air emissions for the modified project. However, in response to questions from the CPUC, SDG&E submitted additional emissions information on the activities assumed for the modified project as compared with the construction activities assumed for the FESSR in the June 2009 AQMPC.[11] The CPUC and BLM reviewed this data and found that the air emissions for the modified project would be similar to the air emissions for the FESSR as shown in the AQMPC, as further discussed below. As such, both the emission estimates and general mitigation strategy from June 2009 and the CEMP from January 2010 are still applicable and valid for the modified project and SDG&E will be required to comply with these measures.

In response to the SDAPCD comments, SDG&E provided additional information in a letter to CPUC and BLM dated July 13, 2010. In that letter, SDG&E claims that particulate matter emissions are not subject to the federal General Conformity Rule, as is noted in the Final EIR/EIS (Section D.11.4.1 and elsewhere).

Helicopter use was considered as part of the Final EIR/EIS, the AQMPC (June 9, 2009, see page 40-44) and the CEMP (January 21, 2010, see page 4). The PMR assumes approximately 230 structures would be built using helicopters, which is a greater number than was assumed in the Final EIR/EIS. However, the expected helicopter activity in both the Final EIR/EIS and the AQMPC included a greater number of helicopter hours than required for the PMR construction of 230 transmission structures. This is in part because SDG&E plans to use helicopters to ferry tower sections to final assembly areas, to install transmission lines, and to shuttle workers to more remote tower locations (see page 6 of the AQMPC). The AQMPC estimates 2 hours of heavy lift helicopter flight, 4 hours of medium lift helicopter flight, and 10 hours of light lift helicopter flight per structure, and assumes one structure per day of construction (see page 40 of the AQMPC), for a total of approximately 450 helicopter days or 450 structures built using helicopters. This level of activity appears sufficient for SDG&E to build the 230 structures, and the emission calculation presented in the AQMPC accounts for the additional helicopter use proposed for the modified project.

The air emissions for the FESSR were derived from the estimated construction equipment proposed for the original project which assumed many thousands of hours of small and heavy lift helicopter use (see Appendix 10, page 4-6). It did not specify the number of transmission structures to be built using helicopters. The modified project reflects the level of helicopter use that was predicted in the July 2009 AQMPC, which was lower than the emissions assumptions for the FESSR. CPUC would monitor and limit the total fuel used by helicopters relative to a cap of 497,514 gallons for the overall project total, as part of implementing the AQMPC and CEMP. SDG&E has committed to tracking helicopter use by project link

[9] For the Air Quality Mitigation Program for Construction Air Emissions see http://www.cpuc.ca.gov/environment/info/aspen/sunrise/otherdocs/AQ%20Mitigation%20Program%20060909.pdf. For the Construction Emissions Monitoring Plan see http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/otherdocs/Construction%20Emission%20Monitoring%20Plan.pdf

[10] The CEMP specifies tracking construction activity relative to the following caps: off-road equipment operation of 74,706,064 brake horsepower-hours (bhp-hr); helicopter fuel use of 497,514 gallons; and on-road heavy-duty diesel truck deliveries of 1,900,000 vehicle miles traveled (VMT).

[11] Correspondence dated June 25, 2010 and July 6, 2010 from Alan Colton, SDG&E, to Susan Lee, Aspen Environmental re SDG&E responses to questions received from CPUC related to the PMR.

and providing this information to the CPUC on a quarterly basis. The monitoring would allow CPUC to verify that actual emissions do not exceed those forecasted. If targets are not met, SDG&E has committed to taking corrective actions as necessary and provide further written documentation to ensure the targets are met, see CEMP Section 4.

Table 1.2 shows the FESSR Construction-Phase Emissions with emission reduction strategies and activity limited in a manner consistent with the AQMPC and CEMP. SDG&E has committed to complying with the *Construction Emissions Monitoring Plan*, to track and verify the effectiveness of the mitigation measures and project internal emission reductions detailed in the Mitigation Program.

Table 1.2. Emissions from Construction of FESSR, with AQMPC and CEMP Implemented

Construction Activity	NOx (ton/yr)	VOC (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	CO (ton/yr)	SOx (ton/yr)	CO_2 (ton/yr)
Imperial County Total	29.9	5.5	51.9	Not inc.	24.8	0.6	6,054.0
Imperial County, General Conformity *de minimis* Threshold	**100**	**100**	**70**	**70**	**---**	**---**	**---**
San Diego County Total	89.8	16.4	155.8	Not inc.	74.5	1.8	18,162.1
San Diego County, General Conformity *de minimis* Threshold	**100**	**100**	**---**	**---**	**---**	**---**	**---**
Significance Criteria	**40**	**14**	**15**	**10**	**100**	**40**	**0**
Exceed Significance Threshold?	**Yes**	**Yes**	**Yes**	**Yes**	**No**	**No**	*

Source: SDG&E Air Quality Mitigation Program for Construction Air Emissions, including attachments [AQMPC], dated June 9, 2009.
* For discussion of impact significance of CO2 emissions and greenhouse gases, see Final EIR/EIS Section D.11.13.3.

Table 1.2 shows that emissions included in the AQMPC would be reduced substantially when compared to the results analyzed in the Final EIR/EIS. The Final EIR/EIS based air emissions for heavy duty trucks, including water trucks, on a gross estimate of 5.2 million vehicle miles traveled (VMT). After further review, the July 2009 AQMPC estimated the total Sunrise Project heavy-heavy duty on road truck traffic to be under 1.9 million VMT. Of the 1.9 million VMT total, approximately 330,000 VMT was projected for water transportation. In addition, 1.2 million VMT was estimated for local material deliveries, 158,000 VMT for port marshalling of materials, 179,000 VMT for fuel transportation, and 29,000 VMT for equipment deliveries.[12]

Since the publication of the AQMPC, SDG&E has made a number of revisions to the FESSR based on compliance with mitigation measures and final engineering. The revisions have been presented as the modified project evaluated in this memorandum. The modified project includes a higher number of estimated VMT than what was predicted in the July 2009 AQMPC. Specifically, SDG&E now estimates 1.2 million VMT for water transportation over 12 months of construction for the delivery of recycled water to construction sites per Mitigation Measure S-3b which requires SDG&E to obtain reclaimed water where feasible (see PMR, Attachment D).

Although this is a higher VMT estimate for water transportation than predicted in the July AQMPC, the expected number of truck trips for other project activities has decreased. For example, the estimate for local material deliveries is now 500,000 VMT; the estimate for port marshalling of materials is 110,000 VMT; the estimate for fuel transportation is 54,000 VMT; and the estimate for equipment deliveries is 23,000 VMT. [13] The CPUC and BLM have reviewed the data provided in the PMR and the additional data

[12] Correspondence dated June 25, 2010 and July 6, 2010 from Alan Colton, SDG&E, to Susan Lee, Aspen Environmental re SDG&E responses to questions received from CPUC related to the PMR.

[13] Ibid.

provided by SDG&E regarding the overall vehicle miles travelled for the modified project and have determined that the overall emissions created by vehicle miles travelled and use of construction equipment of the modified project are consistent with the emissions estimated in the AQMPC and would not create new significant impacts or substantially increase the severity of the impacts created by the FESSR as estimated in either the AQMPC or the Final EIR/EIS.

As stated in the Final EIR/EIS, Section D.11.13, Overall Air Quality Impacts of Proposed Project, implementation of Mitigation Measures AQ-1a and AQ-1b would minimize ozone precursor and particulate matter pollutant emissions but not to levels below the General Conformity *de minimis* thresholds in Imperial County or San Diego County. The Final EIR/EIS noted that BLM would need to either complete a full conformity determination for the FESSR or adopt additional mitigation (Mitigation Measure AQ-1h) to reduce project emissions to below the *de minimis* levels. The ultimate level of additional mitigation was to be based on a refined estimate of construction-phase ozone precursor emissions within each nonattainment area, depending on the ultimate engineering, design, and phasing of the project. As shown in Table 1-2, construction-phase activities and emissions under the PMR would now be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity *de minimis* thresholds for the San Diego Air Basin and would no longer reach the threshold that triggered Mitigation Measure AQ-1h. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would no longer be required to reduce impacts and would become unnecessary under the PMR.

As with the other air emissions, Table 1.2 shows a decrease in greenhouse gas emissions when compared with Table 1.1 for the FESSR. The CPUC and BLM have reviewed the changes SDG&E proposed in the PMR, and the additional data provided by SDG&E regarding the construction for the modified project and have determined that the overall greenhouse gas emissions of the modified project would not create new significant impacts or substantially increase the severity of impacts created by the FESSR as estimated in the AQMPC or the Final EIR/EIS. Further, Mitigation Measure AQ-4a requires SDG&E to mitigate GHG emissions from construction at the EIR/EIS's original estimates. (See Final EIR/EIS at Ap.12-102-103.) SDG&E subsequently executed a purchase contract for GHG reduction credits created by The Conservation Fund through conservation-based forest management in Mendocino County at the Big River/Salmon Creek Forest Project (SDG&E letter to CPUC dated October 20, 2009). Thus, SDG&E will use Carbon Reduction Tonnes (CRTs) to offset the 110,000 tons of GHG emissions estimated in the EIR/EIS, even though construction of the project will actually result in fewer GHG emissions.

Air quality impacts related to project operation are not expected to result in a substantially more severe impact because the route alignment for the modified project would be two miles shorter than the FESSR and would require essentially the same operations and maintenance as the FESSR. While more structures would be maintained by helicopter, there would be overall fewer transmission towers and fewer miles of alignment to maintain (443 structures for the modified project compared with 481 structures for the FESSR).

Conclusion. Construction-phase activities and emissions under the PMR would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity *de minimis* thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would no longer be required to reduce impacts and would become unnecessary under the PMR. However, all other feasible mitigation would remain applicable and valid, and construction-phase emissions would remain significant and unavoidable consistent with the conclusions of the Final EIR/EIS (Impact AQ-1, Class I).

1.7 General Issues Related to Cultural Resources

In analyzing impacts to cultural resources, the EIR/EIS relied on the best available data for each potential alternative route. At that time, the best available data for analysis on such a large scale was limited to the number of cultural sites within the survey corridor and proposed ROW. The exact locations of impacts for towers, lay downs, yards, and roads were not known or well-defined. In order to provide a fair comparison between the FESSR and the modified project identified in the PMR, the evaluation of incremental difference in impacts to cultural resources between the FESSR and the modified project has been generalized to replicate the analyses originally conducted for the EIR/EIS. Therefore, the comparison between the FESSR and the various subunit modifications detailed in Section 2 to this document identifies all sites within the archaeological survey corridor (i.e., ROW, pull sites, access roads, etc.), which was defined under Section 106 of the National Historic Preservation Act as the Area of Potential Effect/Direct Impact Areas. This includes all sites in the ROW, whether or not any construction activity is proposed there. The PMR includes all sites that could be impacted. It does not account for all of the adjustments in road alignments or tower placements that were subsequently made specifically to avoid cultural resources.

The lists of cultural sites in SDG&E's PMR reflect site definitions that have since been refined during subsequent fieldwork. For example, in several cases, sites identified as single sites in the PMR have now been combined to form a larger site as a result of discovery of additional archaeological materials between formerly separate sites, thereby linking the smaller sites into a single larger site. Such discoveries occurred during field inspections to refine the placement of towers, roads, and other facilities to avoid direct impacts to cultural resources. This leads to some minor discrepancy in the number of sites that are mentioned in the PMR and the number of sites that will be impacted, as shown in the attachment to Section 2.

In developing final project design, SDG&E has continually changed the specific locations of project features to avoid impacts to specific cultural resources as required by mitigation recommended in the Final EIR/EIS. Therefore, while the original analysis in the PMR identified all sites within the ROW that could be impacted, most sites will not be directly affected by construction. There are many ways that this has been accomplished. For example, the project design of the PMR may show that a yard or a tower overlaps a portion of an archaeological site. In many cases, the working limits of the yard or the tower can be reduced enough to completely protect the site from impacts. Sites that are near, but not within a construction area will be fenced and monitored during construction by a professional archaeologist and a Native American consultant, as required by Mitigation Measure C-1b, Avoid and protect potentially significant resources, and Mitigation Measure C-1e, Monitor construction at known ESAs. Likewise, all sites within the Forest Service would be avoided by the establishment of an Environmentally Sensitive Area (exclusion zone), as required by Mitigation Measure C-1b, Avoid and protect potentially significant resources, and Mitigation Measure C-1e, Monitor construction at known ESAs as required by the Forest Service ROD mitigation measures. By incorporating mitigation identified in the Final EIR/EIS to reduce impacts to cultural resources, the modified project is consistent with the conclusions of the Final EIR/EIS. Although sites may appear to be within an area of direct impact, there is enough flexibility to protect these sites during construction, avoiding all direct impact. Additionally, the maps provided by SDG&E to the cultural specialists depicting the modified project and the cultural resources boundaries show that many access roads will transect archaeological sites, but they do not show that most of these access roads will cause no adverse impact because they will use existing roads without modification. Any site damage that has already occurred along the roads will not be caused by or exacerbated by the Project. Please see the cultural resources attachment to Section 2 regarding the archaeological sites that would be potentially impacted, the efforts SDG&E has made to avoid the sites, and the rationale for areas where sites cannot be avoided.

1.8 Construction Haulage Noise

SDG&E Proposal. In the "Sunrise Powerlink Powered Haulage Estimated Acoustical Impact Potential" study prepared by Investigative Science and Engineering, Inc. (ISE) to address Mitigation Measure N-1a (Attachment C of the PMR), ISE calculates which portions of the on-road haulage roadway segments have the potential to increase background noise levels (denoted in California as the Community Noise Equivalent Level or CNEL) to the point of being discernable or creating adverse conditions to sensitive receptor areas. The ISE study states that a significant impact would occur if two conditions are met: 1) Project-related traffic produces a net increase to the ambient CNEL level of 3.0 dBA or greater, and, 2) The increase exposes sensitive receptor areas to a sound level of 60 dBA CNEL or greater where it was not exposed to this level before the addition of the proposed project action. The ISE report concludes that the short-term powered haulage due to the proposed Sunrise Powerlink Project would not result in a significant acoustical impact. Based on the ISE study, SDG&E states that mitigation of increased noise will not be necessary for the transportation of reclaimed water during the construction of the Sunrise Powerlink, and no significant environmental impacts were identified.

Public Comments. Commenters on the PMR expressed concerns regarding the noise created by construction traffic.

Final EIR/EIS Discussion. The Final EIR/EIS addresses construction noise in Sections E.1.8 (I-8 Alternative, Noise), E.2.8 (BCD Alternative, Noise), and E.4.8 (Modified Route D Alternative, Noise). The significance criteria presented for construction noise evaluated whether the project would result in a substantial (more than five dBA) temporary or periodic increase in ambient noise levels above levels existing without the project at sensitive receptor locations, see EIR/EIS Section D.8.4.1, Noise Significance Criteria.

The Final EIR/EIS concluded that construction of the FESSR would result in increased ambient noise levels along all transport access routes and would result in a significant (Class I) impact by causing substantial noise increases at rural residences and other noise-sensitive uses. Mitigation Measure N-1a, Implement Best Management Practices for construction noise, was required. However, the exact locations of the increased ambient noise levels were unknown at the time of the publication of the Final EIR/EIS as the haul routes had not yet been identified.

Evaluation. Attachment C to the PMR, Sunrise Powerlink Powered Haulage Estimated Acoustical Impact[14], is a study of the estimated vehicular trip noise levels, associated impact contour distances, and potential for impact to sensitive land use areas. The vehicular trips were predicted by the project traffic engineer and incorporate the "worst case scenario" for reclaimed water deliveries. The noise study was reviewed by the CPUC and BLM. The routes shown on the figures provided in the ISE study depict areas exposed to a sound level of 60 dBA CNEL or greater where not exposed to this level before the addition of the proposed project action (i.e., either the FESSR or the modified project). Most of the routes avoid sensitive receptors, in accordance with Mitigation Measure N-1a, Prepare Construction Notification Plan which requires SDG&E to route construction traffic away from residences and schools, where feasible. One location near Potrero Valley Road, in the area south of Round Potrero Drive, indicates a sound level of 60 dBA CNEL or greater in areas adjacent to the route which would not have been exposed to this level without either the FESSR or the modified project, a significant impact per the ISE study criteria. However, this does not represent a new significant impact above and beyond what was analyzed in the EIR/EIS because the haul routes were not defined for the FESSR in the Final EIR/EIS, and the impact was

[14] See Attachment C of the PMR, The Sunrise Powerlink Powered Haulage Estimate Acoustical Impact Potential ISE Project #10-00 at http://www.cpuc.ca.gov/environment/info/aspen/sunrise/pmr/sdge_final_pmr_051410.pdf

analyzed as a significant and unmitigable impact along the entire FESSR construction routes and this information is consistent with the conclusions in the Final EIR/EIS. The definition of the haul route locations does not result in new significant impacts or substantially increase the severity of the significant impacts identified in the Final EIR/EIS.

However, SDG&E's Attachment C used a different significance criterion than the Final EIR/EIS. As stated above, the Final EIR/EIS considered whether the project would result in a substantial temporary or periodic increase in ambient noise levels above levels existing without the project at sensitive receptor locations, regardless of whether this would result in a sound level of 60 dBA CNEL or greater. As such, SDG&E will need to model the net increase in noise level (SPL), shown on Table 2, Traffic Segment Noise Impact Comparison at sensitive receptors locations pursuant to Mitigation Measure N-1a prior to construction to comply with this mitigation. Compliance with this mitigation measure will be monitored under the Mitigation Monitoring Compliance Reports and will be addressed in each Notice to Proceed. If either the FESSR or modified project haul routes result in an increase of 5 dBA or greater at sensitive receptor locations, this would result in a significant impact consistent with the analysis for the FESSR in the Final EIR/EIS and Mitigation Measure N-1a, Implement Best Management Practices for construction noise, would be required.

Conclusion. Based on the review of the PMR and Attachment C, the noise associated with the construction haulage would not result in a significant impact not identified in the Final EIR/EIS nor would it result in a substantial increase in severity of the impact. An increase in noise along construction haul routes was identified in the Final EIR/EIS and the information provided defining the haul routes does not impact the validity of the conclusions of the Final EIR/EIS. However, SDG&E will need to model the haulage route using the Final EIR/EIS criteria in order to comply with Mitigation Measure N-1a.

1.9 Cumulative Impacts Analysis

SDG&E Modification. There were no modifications suggested by SDG&E that would require an update to the cumulative projects list. However, given the time that has passed since completion of the Final EIR/EIS (published in October 2008), and because of NEPA requirements, this update is considered. The NEPA adequacy worksheet requires BLM to consider whether the cumulative impacts that would result from implementation of the proposed action (in this case the project modifications) are similar (both quantitatively and qualitatively) to the cumulative impacts analyzed in the existing NEPA documents.

Final EIR/EIS Discussion. The Final EIR/EIS addressed cumulative impacts of the FESSR in Section G.4.2 Table G-3 (starting on page G-78) included a list of reasonably foreseeable projects for the alternative transmission line routes where other project impacts that could combine with the impacts of the FESSR to create cumulatively significant effects, and includes the following projects among many others:

- La Rumorosa Wind Area (potential development of over 1,000 MW of wind generation in Mexico south of the Jacumba area with transmission into the U.S.)
- Stirling Energy (a solar generating facility in Imperial County of thousands of acres)
- Numerous residential subdivisions in San Diego and Imperial County, including the areas of El Centro, McCain Valley, Boulevard, Alpine, Japatul Valley, and Lakeside
- Geothermal leasing of federal lands (over 40,000 acres)
- Crestwood Wind Project (up to 791 MW on 17,000 acres in the McCain Valley)

This list was updated prior to the publication of the Final EIR/EIS in October of 2008. In addition to renewable projects, numerous other large-scale projects were included in the cumulative scenario.

In the time since publication of the Final EIR/EIS, new projects have been identified, including several solar projects on private land, a racetrack project in Ocotillo, and the Pattern Energy Ocotillo Express wind project. In addition, many housing projects identified in Table G-3 are not being developed due to the more challenging economic climate.

Evaluation. Since the time of publication of the Final EIR/EIS, a number of wind and solar projects have been proposed in San Diego and Imperial Counties, while other projects included in the cumulative scenario have since been cancelled. As detailed above, the cumulative scenario already incorporated a number of renewable, large-scale projects covering tens of thousands of acres in San Diego and Imperial Counties in addition to other large-scale projects such as housing developments covering thousands of acres. To be conservative, the cumulative analysis in the EIR/EIS also assumed that all projects in the cumulative scenario would be built and operating during the operating lifetime of the Proposed Project, which is not likely to be the case.

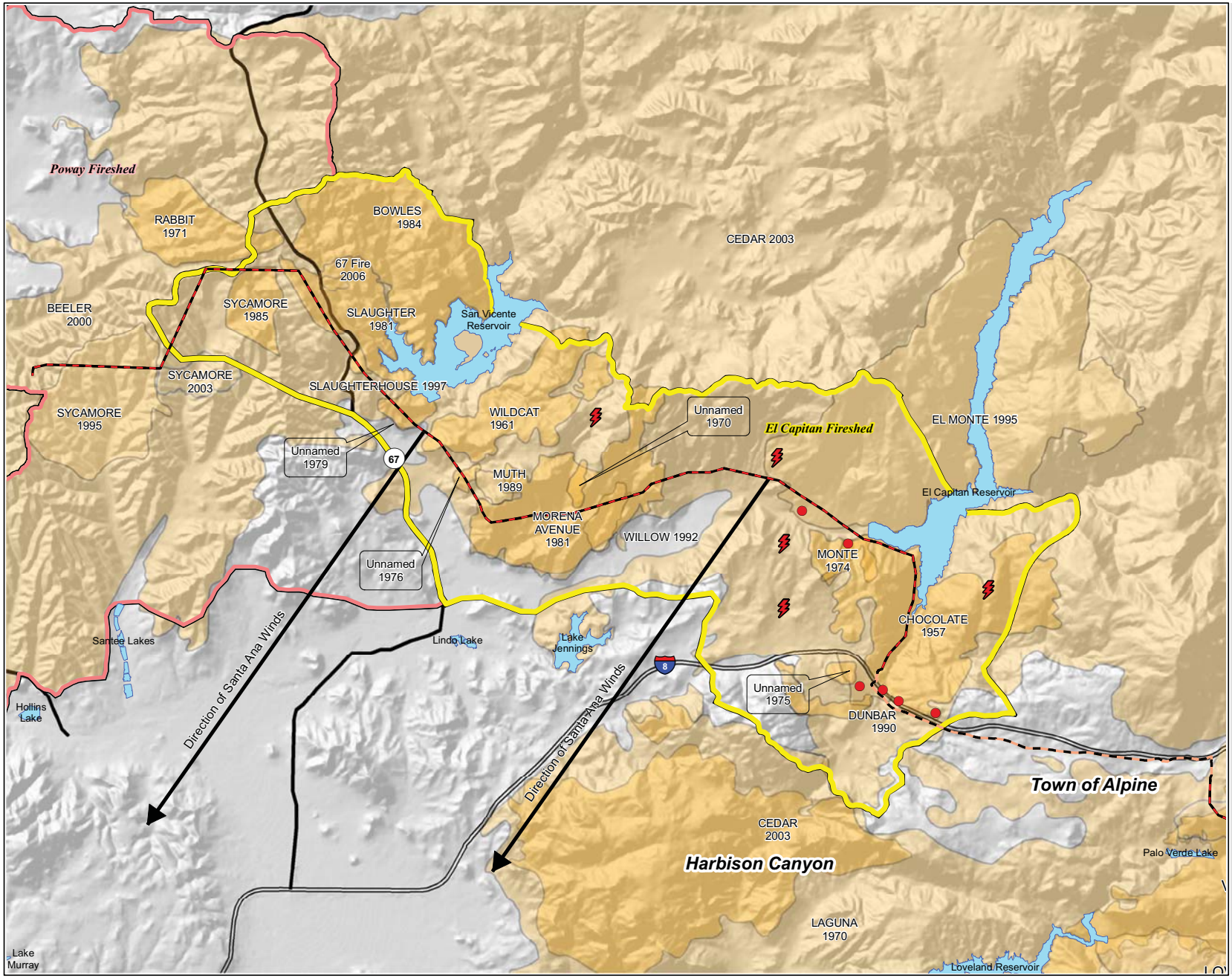
While the cumulative scenario has changed since the publication of the proposed project, the incremental contribution of the modified project would not change substantially from that analyzed for the FESSR and the analysis of cumulative impacts in the Final EIR/EIS remains valid. This is because, as stated above, the modified project would result in fewer acres of disturbance resulting in a decrease in impacts to biological resources; and would not result in new significant impacts or in a substantial increase in severity of impacts identified for the FESSR, as shown in Section 2. While the cumulative scenario has changed, "an agency need not supplement an EIS every time new information comes to light after the EIS is finalized." (*Marsh v. Oregon Natural Resources Council,* 490 US 360, 374 (1989)) This is true under both NEPA and CEQA. (See, e.g., *River Valley Preservation Project v. Metropolitan Transit Development Board* (1995) 37 Cal.App.4th 154.)

Conclusion. There were a number of large acreage projects included in the Final EIR/EIS cumulative analysis, and the Final EIR/EIS included the conservative assumption that all projects in the scenario would be built during the life of the project. In addition, many of the projects included in the impact assessment are no longer going to be constructed, or are much delayed. Therefore, new renewable projects proposed in the counties would not change the cumulative scenario conclusions and the conclusions remain valid. Additionally, the modified project would not result in a substantial increase in severity of impacts identified for the FESSR as seen in Section 2 of the CPUC and BLM Memorandum. As such, the project modifications would not change the cumulative impact analysis, would not result in increased levels of environmental impact or new significant impacts, and would remain consistent with the Final EIR/EIS. Therefore additional CEQA/NEPA review is not required.

1.10 Notification

A number of comments on the PMR stated that additional notification regarding the modified project was required. There is nothing in CEQA or NEPA requiring the CPUC or BLM to issue notice that they are reviewing the PMR. Notice would only be required if the agencies determined that additional environmental review was required under CEQA and/or NEPA.

Additionally, notification required per mitigation measures in the Final EIR/EIS is still required; see for example Mitigation Measure L-1a, Prepare Construction Notification Plan.



Final PMR Fireshed Topology Map

- Sunrise Final PMR Route Overhead Portion
- Sunrise Final PMR Route Underground Portion
- Human Caused Ignitions
- Lightning Ignitions
- El Capitan Fireshed - 34,150 acres
- Poway Fireshed - 44,896 acres
- 50 year Fire History - El Capitan Fireshed
- San Diego County Road
- Urban Freeway or Expressway
- Urban Interstate
- Major Waterbodies

1 inch = 1.42 miles

0 1.5 3 Miles

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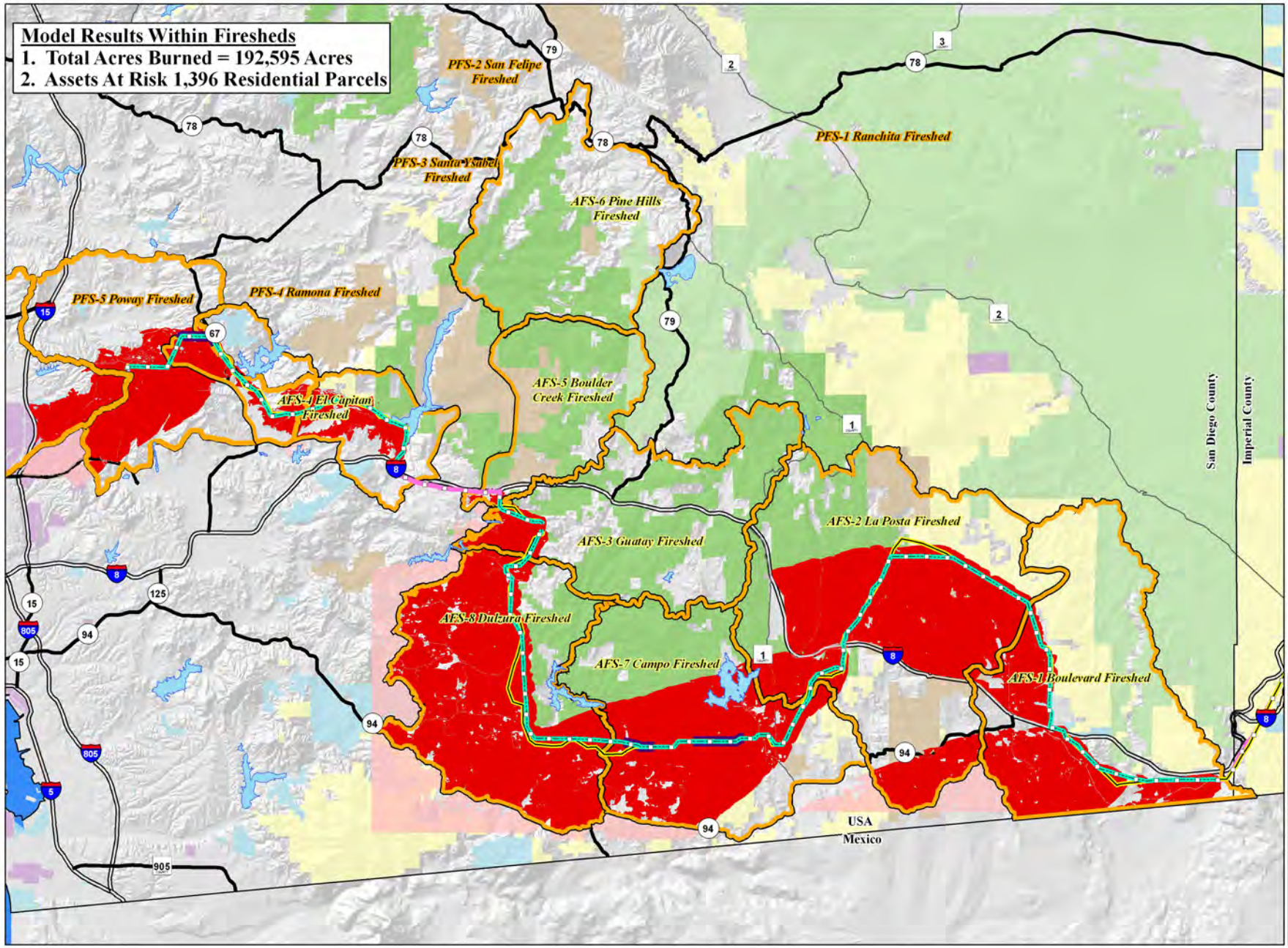
N W E S

July 2010



Proposed Project and Alternative Routes

- Final PMR Route Above Ground Portion
- Final PMR Route Underground Portion
- Environmentally Superior Southern Route
- Milepost
- Road
- Interstate
- Major Water Bodies
- Proposed Project Firesheds
- Wildfire Containment Conflict Model - Minimum 1.5 mile Segments
- Extreme Fire Weather - Fire Behavior Trend Modeled within Firesheds
- Extreme Fire Weather - Estimated Fire Perimeter - (Limited Fuel Model Data)

Jurisdictional Land Owership

- U.S. Forest Service Land
- Bureau of Land Management Land
- Department of Defense Land
- State Land
- State Park
- Tribal Land

N

0 15,000 30,000 Feet

0 4 8 Miles

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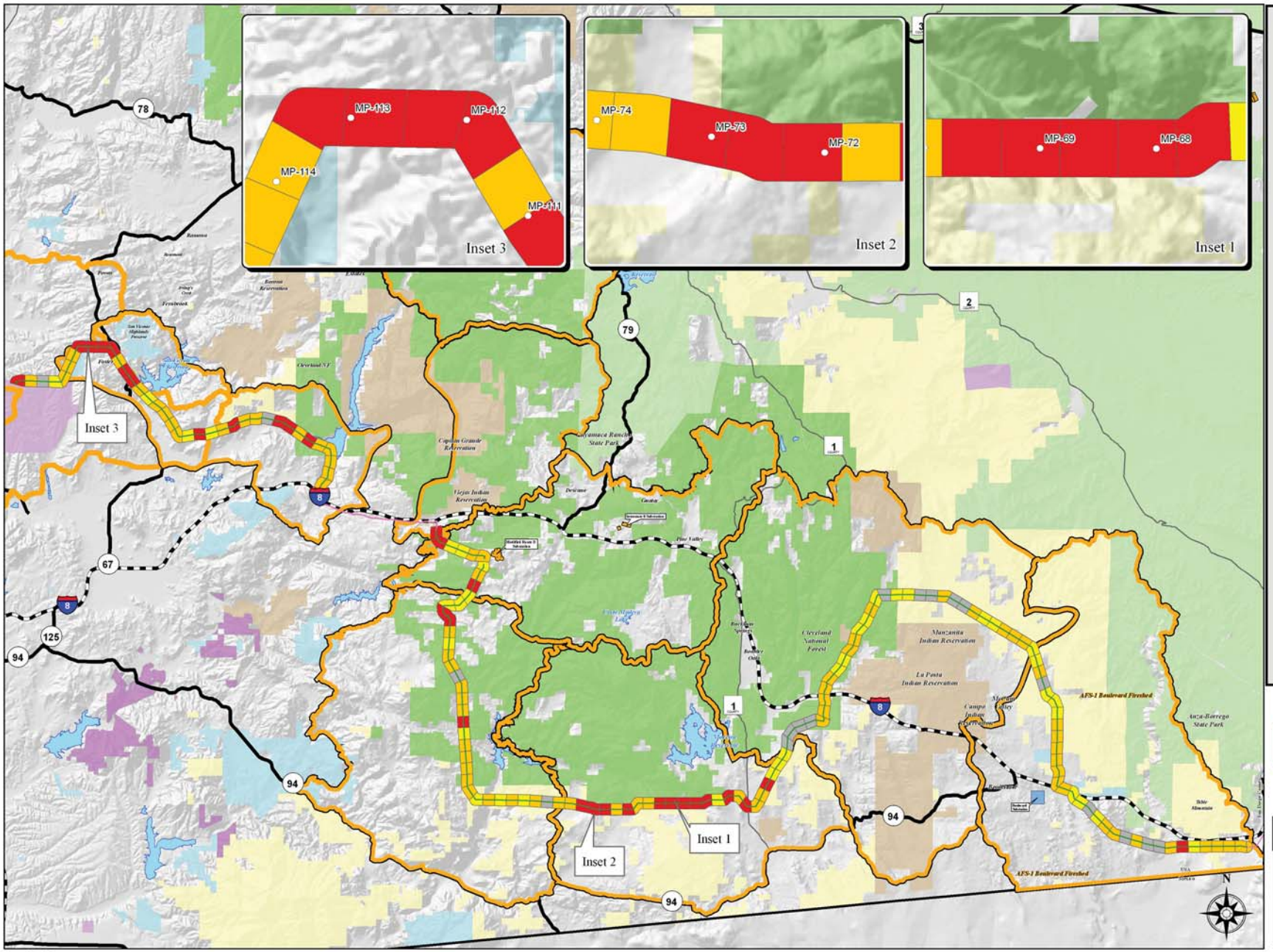
Sunrise Powerlink Project

Final PMR Route
Overhead Portion
Fire Behavior Trend Model
4 Burn Periods - Extreme Weather



Final PMR Route Underground Portion

Final PMR Route Above Ground Portion

Final PMR Route Milepost

Existing Substation (69/12kV)

Water Bodies

Wildfire Containment Conflict Model

- Low
- Moderate
- High
- Very High

Jurisdictional Land Ownership

- Fireshed Boundaries
- Bureau of Land Management
- Department of Defense
- National Parks Service
- State Land
- State Park
- U.S. Fish & Wildlife
- U.S. Forest Service

- Rural Interstate
- San Diego County Road
- Urban Freeway or Expressway
- Urban Interstate

0 3.5 7 Miles

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Sunrise Powerlink Project

Final PMR Route - Overview Wildfire Containment Conflict Model

June 2010

Section 2 – Review of Proposed Modifications

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MODIFICATION SUBUNIT 1: IMPERIAL VALLEY SUBSTATION (PMR1)

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

Public Comments. Commenters raised the following concerns:

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification includes three components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR2

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

(from PMR Section 4, page 4-10)

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

Overall Conclusion for PMR2

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

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

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

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

Brief Description and Purpose

The modification includes two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR3

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

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

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total

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

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

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

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

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

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

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

Overall Conclusion

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

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

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

Brief Description and Purpose

The modification has two components:

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

Environmental Impact Discussion

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

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

TABLE PMR4

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

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

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR5

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

Cultural Resources.

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification includes two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR6

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

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

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

TABLE PMR7

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification includes two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

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

TABLE PMR8

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

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

TABLE PMR9

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

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

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

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

TABLE PMR10

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

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

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modified project has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR11

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

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

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

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

TABLE PMR12

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

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

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

TABLE PMR12

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification has two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

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

TABLE PMR13

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

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

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Affected Issue Areas.

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

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

Overall Conclusion

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

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

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

Brief Description and Purpose

The modification would have two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR14

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

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

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

		Permanent	Temporary	Total
FESSR	Chaparrals	21.61	37.48	59.09

TABLE PMR14

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Affected Issue Areas.

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR15

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

	Permanent	Temporary	Total

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR16

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

		Permanent	Temporary	Total
FESSR	Sticky geraea	0	26	26

TABLE PMR16

Modified Project	None	0	0	0

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

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

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

Other Affected Issue Areas.

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification would have two components:

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

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

TABLE PMR17

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR18

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

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

TABLE PMR18

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

Overall Conclusion

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

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

MODIFICATION SUBUNIT 19: EP105-2 (REES PMR19)

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

TABLE PMR19

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR20

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

TABLE PMR21

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

		Permanent	Temporary	Total
FESSR	None			
Modified Project	Sticky geraea	3		3

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

TABLE PMR22

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

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

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

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

Impacts to Special Status Species (acres)

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

TABLE PMR22

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modified project has two components:

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

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

Environmental Impact Discussion.

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

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

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

TABLE PMR23

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

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modified project has two components:

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

The primary purpose for this modification is improved engineering.

Environmental Impact Discussion

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

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

TABLE PMR24

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

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

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

		Permanent	Temporary	Total
FESSR	Chaparrals	6.98	10.30	17.28

TABLE PMR24				
Modified Project	Chaparrals	4.61	2.42	7.04

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

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

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

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

Other Affected Issue Areas.

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification would have two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR25

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

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

TABLE PMR25

Modified Project	Rush-like bristleweed	7	5	12

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

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

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

Other Affected Issue Areas. .

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

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

TABLE PMR26

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

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

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

The primary purpose for the modification was to improve engineering.

Environmental Impact Discussion

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

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

TABLE PMR27

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

TABLE PMR28

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR29

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

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

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

TABLE PMR29

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

TABLE PMR30

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

		Permanent	Temporary	Total

TABLE PMR30

FESSR	Rush-like bristleweed	3	6	9
Modified Project	None			

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

TABLE PMR31

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

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

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

TABLE PMR32

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has three components:

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

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR33

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

		Permanent	Temporary	Total

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

The modification has two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR34

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

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

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

		Permanent	Temporary	Total

TABLE PMR34

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

Impacts to Special Status Species (acres)

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

Impacts to RCAs in CNF (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Ground Disturbance/Other Affected Issue Areas.

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR35

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

		Permanent	Temporary	Total
FESSR	Delicate clarkia	400		400
Modified Project	None			

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification has two components:

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

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

Environmental Impact Discussion

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

Public Comments. Commenters raised the following concerns:

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

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

TABLE PMR36

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

		Permanent	Temporary	Total
FESSR	Lakeside ceanothus	6		6

TABLE PMR36

	San Diego sunflower	2	2
Modified Project	Lakeside ceanothus	5	5

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

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

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

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

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

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

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

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

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

Other Affected Issue Areas.

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

Overall Conclusion

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

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

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

Brief Description and Purpose

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

Environmental Impact Discussion

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

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

TABLE PMR37

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

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

Impacts to Special Status Species (acres)

TABLE PMR37

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

This modification has two components:

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

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

Environmental Impact Discussion

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

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

TABLE PMR38

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

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

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

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

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

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

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

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

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

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

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

Overall Conclusion

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

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

Brief Description and Purpose

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

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

Environmental Impact Discussion

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

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

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

TABLE PMR39

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

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

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

Impacts to Special Status Species (acres)

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

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

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

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

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

Cultural Resources. PMR39 will slightly reduce impacts to cultural resources. The FESSR has three resources within the Project Impact Area. The modified project has two of these resources within the

Project Impact Area and will avoid remnants of a historical structure. Therefore, for cultural resources, PMR39 is preferred.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR39 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR39 would have environmental impacts similar in context to those of the FESSR. Although, it would increase temporary ground disturbance, the modification would be preferred to the FESSR because it would reduce permanent ground disturbance, associated permanent biological impacts and would reduce impacts to cultural resources.

MODIFICATION SUBUNIT 40: CP12-1 TO CP3 (STONEBRIDGE PMR40)

Brief Description and Purpose

This modification has two components:

- It would shift structures slightly within the FESSR ROW, resulting in the elimination of two structures as well as minor reductions of permanent and temporary ground disturbance and a change from lattice to steel-pole structures along the route segment. The primary purposes for this modification are to accommodate landowner request and avoid the San Diego County Water Authority parcel.
- It would create a new 20.87-acre construction yard south of Kirkham Road between CP6-1 through CP9-1. See Section 1 for a detailed discussion regarding construction yards.

The primary purpose for this modification is to accommodate landowner requests in compliance with Mitigation Measure L-2b, Revise project elements to minimize land use conflicts and support assembly of structures between Highway SR 67 and the existing Pomerado Substation.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR40 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR40

Impacts to Rare Plants (number of individuals detected in impact areas)

		Permanent	Temporary	Total

TABLE PMR40

FESSR	Nuttall's scrub oak	10	10
Modified Project	Nuttall's scrub oak	17	17
	San Diego sunflower	1	1

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Coastal and Montane Scrub Habitats	3.07	0.93	4.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.24		0.24
	FESSR Total	**3.31**	**0.93**	**4.24**
Modified Project	Coastal and Montane Scrub Habitats	2.23	0.01	2.24
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.46	20.87	21.32
	Mod Proj Total	**2.69**	**20.87**	**23.56**

Impacts to Special Status Species (acres)

			Permanent	Temporary	Total
FESSR	Quino Checkerspot Butterfly	USFWS Occupied Habitat	0.71		0.71
Modified Project	Coastal California Gnatcatcher	USFWS Occupied Habitat		8.11	8.11
	Quino Checkerspot Butterfly	USFWS Occupied Habitat	1.00		1.00

This modification would impact approximately 70 percent more individuals of Nuttall's scrub oak (CNPS List 1B) than the FESSR (17 versus 10). The Final EIR/EIS states that Nuttall's scrub oak is a perennial shrub that was observed along portions of the alignment. Overall, the modified project would increase impacts to Nuttall's scrub oak from 10 individuals to 17 individuals. Impacts to special status plant species, including Nuttall's scrub oak, were assessed under Impact B-5 for direct or indirect loss of listed or sensitive plants or a direct loss of habitat for listed or sensitive plants without giving a specific number of individual loss. Impacts to special status plant species in the FESSR project area were determined to be significant but mitigable to less than significant for special status perennial shrubs such as the Nuttall's scrub oak in the Final EIR/EIS and implementation of Mitigation Measure B-5a and B-1a would be adequate to ensure that this increase is not substantial. Mitigation Mitigation Measure B-5a, Conduct rare plant surveys and implement appropriate avoidance/minimization/mitigation strategies, would also provide habitat-based restoration and compensation mitigation for these impacts. Overall, the number of special status plant species and individuals would decrease with the modified project; see Table 3-6 in the PMR. For these reasons, the increase in impacts to Nuttall's scrub oak individuals does not represent a substantial increase in the severity of this previously identified significant impact.

This modification would permanently impact approximately 0.29 acres more Quino checkerspot butterfly occupied habitat than the FESSR. Impacts to Quino checkerspot butterfly ("QCB") in the FESSR project area were determined to be significant (Class I) in the Final EIR/EIS, and this increase in impacts does not substantially increase the severity of this significant impact. Mitigation Measure B-7i, Conduct QCB surveys and implement appropriate avoidance/minimization/compensation strategies, would also provide habitat-based mitigation for these impacts. Overall, the modified project would reduce permanent impacts to QCB occupied habitat from 36.16 acres to 15.16 acres. For these reasons, this increase in impacts to QCB does not represent a substantial increase in the severity of this previously identified significant impact

This modification would also result in an increase in temporary impacts to 8.11 acres of USFWS occupied coastal California gnatcatcher habitat due to the proposed Stowe/Kirkham construction yard which was

not proposed in the FESSR. In 2009, SDG&E concluded the area now proposed for this construction yard did not meet criteria for suitable gnatcatcher habitat and did not conduct USFWS protocol surveys (Chambers Group, Inc. 2009). However, the January 22, 2010 Draft SRPL/FESSR Modification Document stated that the area (i.e., the western portion of the proposed construction yard according to the PMR Database) was previously identified as USFWS occupied gnatcatcher habitat, and SDG&E has incorporated this assumption in the Final PMR report. The January 22, 2010 Draft SRPL/FESSR Modification Document, also stated that this construction yard (and the USFWS occupied habitat) occurs on graded pads, which the CPUC and BLM have independently reviewed via aerial photography in preparing comments on the draft PMR document. Impacts to the gnatcatcher were determined to be Class II in the Final EIR/EIS, so this modification would not result in a new significant impact to the species. The Final EIR/EIS identified Mitigation Measure B-7l, Conduct coastal California gnatcatcher surveys and implement appropriate avoidance/minimization/compensation strategies, as well as B-1a, Provide restoration/compensation for affected sensitive vegetation communities, which would reduce impacts to gnatcatcher to less than significant. These mitigation measures would also be required for the PMR. Overall, impacts to gnatcatcher would decrease for both temporary and permanent impacts. For these reasons, the modified project would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS

Impacts to non-native vegetation, developed areas, and disturbed habitat were considered an adverse but less than significant impact in the Final EIR/EIS because the communities are not sensitive, and no mitigation would be required unless they occur within designated critical habitat for a federal listed species; an increase in impacts would not change this determination and the impact would remain Class III consistent with the Final EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed route modification would result in a change from lattice to steel-pole structures along this route segment per a landowner request. This would increase structure prominence when viewed from the Stonebridge residential development. The route modification would also result in a reduction in ground disturbance, which would reduce long-term visible land scarring. Although the modification would result in a slight increase in project visibility along this route segment (an adverse visual change), the overall visual impact would not change substantially and the visual impact would remain significant and unavoidable consistent with the Final EIR/EIS.

The proposed Stowe/Kirkham Construction Yard would result in an increase in the impacts on Visual Resources along this route segment by introducing a temporary construction yard into an area not previously considered. This new location would place the facility in a visibly prominent location relative to the new residential developments along the hilltops immediately south of the site. The Final EIR/EIS concluded that construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at the construction and storage yards. The Final EIR/EIS assumed that construction impacts at these sites could last two years and the resulting visual impacts would be significant but mitigable (Class II). Mitigation Measures V-1a, Reduce visibility of construction activities and equipment and V-1b, Reduce construction night lighting impacts are required to reduce the impacts to levels that would be less than significant. Given the relatively short-term duration of this visual impact (approximately 12 months), the impact is not considered significant. Therefore, overall the modification would not substantially change the impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR40 does not affect or change impacts to cultural resources.

Land Use. The modified project would accommodate a landowner request and would avoid the San Diego County Water Authority parcel. However, there has been new residential and commercial development in the area since the publication of the Final EIR/EIS within the Stonebridge residential development. Property owners adjacent to the Stowe/Kirkham construction yard, north of the alignment, were notified through newspaper circulars and public venue postings throughout the EIR/EIS process, but were not individually noticed.

Transportation and Traffic: The modification would shift structures slightly within the ROW, eliminate two structures, eliminate a new access road, and add a 20.87-acre construction yard south of Kirkham Road. The addition of construction traffic to local roadways in the vicinity to travel to and from the new construction yard was analyzed in the Traffic Impact Report and would not result in substantially increased congestion on these roadways. This is because construction-related traffic would be required to adhere to the requirements of mitigation measures discussed in the Final EIR/EIS, including restricting land closures (mitigation measure T-1a) and preparing a Construction Transportation Management Plan (mitigation measure T-9a). Therefore this modification would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts at this revised location.

Other Affected Issue Areas.

Minor increases in impacts to noise. The modified alignment would not move the project closer to any sensitive receptor. The Stowe/Kirkham Construction Yard would be located adjacent to existing commercial structure and would be new. The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for construction. Page D.8-16 of the EIR/EIS states that "Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA." Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant for either the FESSR or PMR40 because the substantial noise increase above baseline levels from construction, including the undergrounding, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR40 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR40 would have environmental impacts similar in context to those of the FESSR. Although, it would increase temporary ground disturbance, the modification would be preferred to the FESSR because it would reduce permanent ground disturbance, would also avoid land use conflicts with the San Diego County Water Authority parcel, and would accommodate a landowner request.

MODIFICATION SUBUNIT 41: CP3 TO CP1A (SYCAMORE SUBSTATION PMR41)

Brief Description and Purpose

This modification has two components:

- It would add a temporary work area around one structure (CP3) without changing access, add three wire stringing sites along the borders of the Sycamore Canyon Substation, and add three structures within the existing substation.
- It would eliminate a construction yard north of Pomerado Road.

The primary purpose for this modification is to improve engineering design.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- Stonebridge Powerlink Action Reroute Committee would like SDG&E to modify the configuration of the line within the existing right of way (ROW) such that it will more directly mirror existing lines
- Review and research clearances to help eliminate the need for aerial markers
- Review and confirm that fire evacuation routes from Stonebridge are adequate
- Review and confirm that standard fire fighting measures, including the use of aerial tankers, are not negatively impacted
- Stonebridge Powerlink Action Reroute Committee has also requested that SDG&E review the approach route to Sycamore Canyon Substation, and look at an approach that follows existing 230kV lines to the slightly to the south.

Biological Resources. This modification would not result in a substantial increase in significant impacts to biological resources. Table PMR41 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR41

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

		Permanent	Temporary	Total
FESSR	Coastal and Montane Scrub Habitats	0.24		0.24
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.05	10.74	10.79
	FESSR Total	**0.29**	**10.74**	**11.03**
Modified Project	Coastal and Montane Scrub Habitats	0.19	0.01	0.20
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	0.04	0.06	0.10
	Mod Proj Total	**0.23**	**0.07**	**0.30**

This modification would reduce permanent impacts to sensitive vegetation communities (coastal and montane scrub habitats), however, temporary impacts to coastal and montane scrub habitats would increase by approximately 0.01 acres. Impacts to these communities were determined to be significant (Class I) in the FEIR/FEIS. Mitigation identified in the Final EIR/EIS would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to coastal and montane scrub habitats from 53.56 acres to 27.47 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

Neither the modified project nor the FESSR would impact special status species along the alignment.

The CPUC and BLM have independently has reviewed the impact assessment of vegetation and species, as well as dry washes, ephemeral streams, and wetlands, and concurs with the impact acreage provided, documenting a reduction in area of effect. See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment though the reduction in ground disturbance would reduce long-term visible land scarring. Therefore, the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR41 does not affect or change direct impacts to cultural resources.

Other Affected Issue Areas. As noted above, the Stonebridge Powerlink Action Reroute Committee included a number of comments regarding the transmission line. As the commenter notes, this neighborhood was still being developed in 2006 and 2007 and was not in existence during the time of the proceeding. The EIR/EIS anticipated that land development projects such as the Stonebridge neighborhood would be continually entering local development approval processes and for this reason, considered pending and future development as part of the project's impact analysis. (See EIR/EIS, Section D.4 Land Use.) As stated in Section D.4, if a transmission route is approved by CPUC and BLM decisionmakers, ROW acquisition and detailed design would begin soon after approval. Prior to this process, new land development projects may have been proposed or constructed by landowners on land parcels across which the transmission line would pass. Identical mitigation to that applicable to the existing development is required for the pending and future development. For example, mitigation measure L-1a (Prepare Construction Notification Plan) requires SDG&E to notify property owners prior to the commencement of construction in the area, regardless of whether the property was developed prior to or following adoption of the mitigation measure. Mitigation measure L-1b requires SDG&E to coordinate with all landowners to revise the route, where feasible, to minimize land use conflicts between the transmission line and existing/planned development. Regarding fire concerns, as stated above, based on the updated fire modeling performed for the project modifications, there would be no change to fire/fuels analysis or modeling results. Marker balls are addressed in Section 1.

The approved approach route to Sycamore Canyon Substation is within an the existing SDG&E ROW, parallel to an existing 69 kV transmission line and entirely on military lands (MCAS Miramar).

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR41 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR41 would have environmental impacts similar in context to those of the FESSR. The modification would be preferred to the FESSR because it would reduce

permanent and temporary ground disturbance, and would reduce permanent impacts to biological resources.

MODIFICATION SUBUNIT 42: SYCAMORE CANYON TO POMERADO SUBSTATION (TL6915/TL6924) RECONDUCTORING (PMR42)

Brief Description and Purpose

The PMR42 modification would:

- replace an existing conductor with a higher capacity conductor,
- replace insulators, circuit breakers, and related equipment at the Pomerado Substation, all within the existing fence-line of the substation,
- replace 4 existing transmission poles, requiring two new wire pull sites north and south of structure 171667, and removal of existing poles and foundations, and
- replace hardware and insulators on 15 existing poles.

No new access roads or widening of existing roads is required; minor grading of existing roads may be required. The EIR/EIS analyzed reconductoring the existing Sycamore Canyon–Pomerado 69 kV circuit entirely on existing structures.

The primary purpose of the modification is to increase power delivery/export capacity at the Sycamore Canyon Substation.

As stated in the PMR, elimination of the proposed Coastal Link in the Final EIR/EIS necessitated additional system upgrades to improve overall reliability of the system because the two new Sunrise 230kV transmission lines both terminate into the Sycamore Canyon Substation. The power flowing from Sunrise into Sycamore Canyon Substation will be dispersed to adjoining substations via the existing 69kV, 138kV and 230kV transmission lines connecting Sycamore Canyon Substation to other substations in the SDG&E grid. The amount of power flowing on each of these lines is determined by each lines electrical resistance characteristics (or impedance), and not by its voltage or the size of the conductors themselves. A study of the operating conditions after the addition of the Sunrise 230kV lines demonstrated that in addition to TL639 (PMR43 – Elliott), which was already identified as experiencing an overload even with the Coastal Link, three additional 69kV lines at Sycamore Canyon Substation experienced overloads (TL's 6915, 6924 (PMR42 – Pomerado), and 6916 (PMR44 – Scripps)). The power flowing in these lines exceeded the rating of the conductors. Therefore, the lines are being reconductored to relieve these overloaded conditions.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR42 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR42
Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	**None**	Permanent	Temporary	Total
Modified Project	Coastal and Montane Scrub Habitats		0.09	0.09
	Grasslands and Meadows		1.56	1.56
	Non-native Vegetation, Developed Areas, and Disturbed Habitat		1.26	1.26
	Mod Proj Total		**2.91**	**2.91**

There would be a 1.56-acre temporary impact to grasslands and meadows and a 0.09-acre temporary impact to coastal and montane scrub habitats that would not occur at this location with the FESSR. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS for these impacts would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres. For these reasons, this modification would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. Under this project modification, existing steel pole structures Z171687, Z171688, Z171690 and Z171691 would be replaced with steel pole structures approximately 6 feet taller that include marker balls and warning lights to meet Federal Aviation Authority (FAA) requirements. See Section 1 regarding marker balls and warning lights. Although this would increase the adverse visual impacts that would occur along this route segment under the FESSR, this adverse visual effect would not substantially change overall impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions (adverse but less than significant) would not change. This is because the upgrade to existing transmission facilities would not introduce substantially different structures. Operational impacts would be minimally noticeable because the new components (insulators, conductors, and new poles) would appear similar to identical when compared to the components that would be replaced.

Cultural Resources. PMR42 does not affect or change direct impacts to cultural resources.

Land Use. SDG&E states that the activities would not alter and otherwise impact land uses along the ROW. This is because all of the modification impacts would occur within an existing right-of-way and the modification would not result in a modification to any project component such that it is nearer to any sensitive receptors. Impacts of the modification would not result in new significant impacts, and while the increased construction activity in the area would temporarily disrupt existing land uses, applicant proposed measures and Mitigation Measure L-1a would be adequate to ensure that this increase is not substantial. **Transportation and Traffic.** This modification would result in replacement of existing conductors and four existing transmission poles, and upgrades to Pomerado Substation. This

modification would require two new wire pull sites, and removal of existing poles and foundations. Temporary lane closures may occur along Stowe Road, Blaisdell Place, Scripps Poway Parkway, Kirkham Way, Beeler Canyon Road, and Stonebridge Parkway. Lane closures would be limited to off-peak traffic periods. Traffic speeds along arterial/collector roadways such as Stowe Road, Scripps Poway Parkway, Kirkham Way, and Stonebridge Parkway may need to be reduced and some traffic may experience brief delays during the reconductoring process. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways caused by construction vehicles and/or equipment would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4 (Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan) to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts or a substantial increase in the existing impact.

Other Affected Issue Areas. Disposal of the 4 existing poles would slightly increase impacts to waste facilities/landfills, but impacts would remain less than significant consistent with the Final EIR/EIS. As stated in Section D.14, there would be adequate landfill capacity for the systems upgrades because construction of this short alternative would represent a fraction of the overall public service requirements of the FESSR or existing facilities supply.

The CPUC and BLM agree with SDG&E that temporary impacts to adjacent residents would occur from increased construction noise to the sensitive receptors along the reconductored line. Sensitive receptors are located approximately 100 feet from the reconductoring. However, sensitive receptors would be no closer to PMR42 than they would be to the FESSR. Impacts caused by construction noise were evaluated in the Final EIR/EIS depending on the proximity to sensitive receptors and determined to be Class I, so increases in impacts by this modification would not represent new significant impacts. The bulk of the noise analysis is in EIR/EIS Section D.8, which discusses use of heavy equipment required for construction. Page D.8-16 of the EIR/EIS states that “Maximum instantaneous construction noise levels would range from 80 to 90 dBA at 50 feet from any work site. This means that construction noise at 200 feet from work could range up to 78 dBA, and that beyond 1,000 feet levels from multiple pieces of equipment operating simultaneously would not exceed 70 dBA.” Similarly, on page D.8-17, noise levels for typical pieces of construction equipment are specified in Table D.8-12 and range from 76 to 98 dBA at 50 feet. Measure N-1a (Implement Best Management Practices for construction noise) is required, but the impact remains significant for either the FESSR or PMR40 because the substantial noise increase above baseline levels from construction, including the undergrounding, would be significant and could not be reduced to less than significant levels, even with implementation of mitigation.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR42 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR42 would have environmental impacts similar in context to those of the FESSR. Although the PMR42 reroute would slightly increase biological, waste and noise impacts with the replacement of 4 existing poles with taller structures and two new pull sites, the modifications are preferred to the FESSR because they would be necessary for the installation of higher capacity conductor allowing for the elimination of the Coastal Link and would occur entirely within an existing SDG&E ROW.

MODIFICATION SUBUNIT 43: SYCAMORE CANYON TO ELLIOTT SUBSTATION (TL639) RECONDUCTORING (PMR43)

Brief Description and Purpose

This modification would:

- replace transmission conductors on 84 poles in an 8.2-mile ROW,
- replace 7 wooden poles in addition to the 10 wooden poles identified in the Final EIR/EIS for a total of 17 wooden poles, requiring 8 wire pulls along the ROW, and
- replace an existing underground cable.

No new access roads or widening of existing roads would be required; minor grading of existing access roads would be required. The Final EIR/EIS analyzed replacement of 11 existing poles.

The primary purpose for the modification is to meet all clearance requirements for the upgraded circuit and increase power capacity at the Sycamore Canyon Substation. See Modification Subunit 42 for information regarding the Coastal Link upgrades.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Public Comments. Commenters raised the following concerns:

- The PMR proposes the replacement of 16 poles with 17 poles for reconductoring of 69 kV lines from Sycamore Canyon Substation, including replacing six poles not originally considered for replacement in the EIR/EIS. Replacing six poles would affect visual resources, especially if materials used would contrast rather than blend with the surrounding environment.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR43 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR43

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	**None**	Permanent	Temporary	Total
Modified	Chaparrals		0.10	0.10

TABLE PMR43			
Project	Coastal and Montane Scrub Habitats	0.08	0.08
	Non-native Vegetation, Developed Areas, and Disturbed Habitat	1.52	1.52
	Mod Proj Total	**1.70**	**1.70**

There would be a 0.1-acre increase in temporary impacts to chaparrals and a 0.08-acre increase in temporary impacts to coastal and montane scrub habitats. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS to reduce these impacts would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres and would not represent a substantial increase in the severity of an impact previously examined in the EIR/EIS. For these reasons, this modification would not result in a substantial increase in the severity of a previously identified significant impact to these vegetation communities.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would result in an increase in structure height at eight locations and the reduction in structure height at three locations. The modification would also result in a slight increase in ground disturbance. However, the overall visual impact along this route segment would not substantially change, and the overall impact assessment and significance conclusions (adverse but less than significant) would not change. This is because the increase in existing transmission structure height would not introduce substantially different structures. Operational impacts would be minimally noticeable because the new components (insulators, conductors, and new poles) would appear similar to identical when compared to the components that would be replaced.

Cultural Resources. PMR43 does not affect or change direct impacts to cultural resources.

Transportation and Traffic. This modification would include replacing transmission conductors on 84 poles in an 8.2-mile ROW, replacing 16 wooden poles with 17 wooden poles, adding and using 8 wire pulls along the ROW, and replacing an existing underground cable. Temporary lane closures may occur along Scripps Lake Road, Scripps Ranch Boulevard, Ironwood Road, Pomerado Road, and Rue Biarittz. Lane closures would be limited to off-peak traffic period. Traffic speeds along arterial/collector roadways such as Scripps Ranch Boulevard and Pomerado Road may need to be reduced and some traffic may experience brief delays during the reconductoring process. Due to the temporary nature of the lane closures, operation and access by emergency services would not be affected. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4, Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan, to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts nor a substantial increase in the severity of an existing impact.

Ground Disturbance/Other Affected Issue Areas.

Disposal of the 16 existing poles would slightly increase impacts to waste facilities/landfills compared with the 11 poles removal as analyzed in the Final EIR/EIS, but impacts would remain less than significant consistent with the Final EIR/EIS.

Overall Conclusion.

The analysis in the Final EIR/EIS remains valid. PMR43 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR43 would have environmental impacts similar in context to those of the FESSR. Although there would be an increase in ground disturbance and noise impacts, PMR43 reconductoring would be similar to the FESSR and would meet all clearance requirements of the upgraded circuit and increase power capacity at the Sycamore Canyon Substation.

MODIFICATION SUBUNIT 44: SYCAMORE CANYON TO SCRIPPS SUBSTATION (TL6915) RECONDUCTORING (PMR44)

Brief Description and Purpose

This modification would:

- replace transmission conductors on 48 poles in a 6.4 mile ROW, requiring 8 wire pulls along the ROW,
- require two underground upgrades: a new 900-foot-long double circuit 69 kV duct package and a 7,725 replacement cable within existing underground cable ducts,
- upgrade work within the Scripps Substation to accommodate the increased circuit flows, including replacement of circuit breakers and disconnects and other associated equipment.

No new access roads or widening of existing roads would be required; minor grading of existing access roads would be required.

The primary purpose for the modification is to increase power capacity at the Sycamore Canyon Substation. See Modification Subunit 42 for information regarding the Coastal Link upgrades.

Environmental Impact Discussion

Impacts to air quality, noise, public safety/hazards, traffic, and water resources are not described in detail, below, because this modification would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact in these resource areas. Impacts resulting from the proposed modifications would remain within the same context and similar or reduced intensity as those resulting from the FESSR. The CPUC and BLM have independently reviewed the description and impact assessment provided by SDG&E in the Final PMR report for this subunit for the resource areas discussed below. Impacts in these issue areas would not result in new significant effects not discussed in the EIR/EIS, and they would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS. The paragraphs below present additional detail for issue areas where needed.

Biological Resources. This modification would increase certain impacts in comparison with the FESSR. However, as discussed below, it would not result in a substantial increase in the severity of a significant impact previously examined in the EIR/EIS nor in new significant impacts to biological resources. Table PMR44 below shows the impacts to sensitive vegetation communities and special status species for the FESSR and modified project.

TABLE PMR44

TABLE PMR44

Impacts to Sensitive Vegetation Communities and Total Ground Disturbance (acres)

FESSR	None	Permanent	Temporary	Total
Modified Project	Chaparrals		0.10	0.10
	Coastal and Montane Scrub Habitats		0.16	0.16
	Grasslands and Meadows		0.00	0.00
	Non-native Vegetation, Developed Areas, and Disturbed Habitat		1.33	1.33
	Mod Proj Total		**1.59**	**1.59**

There would be a 0.1-acre increase in temporary impacts to chaparrals and a 0.16-acre increase in temporary impacts to coastal and montane scrub habitats. Impacts to these communities were assessed in the FEIR/FEIS (as Class I). Mitigation identified in the Final EIR/EIS for impacts to sensitive vegetation communities would also be required for the PMR. Mitigation Measure B-1a, Provide restoration/compensation for affected sensitive vegetation communities, would provide habitat-based mitigation for these impacts. Overall the modified project would reduce temporary impacts to grasslands and meadows from 13.74 acres to 4.15 acres and would reduce temporary impacts to coastal and montane scrub habitats from 114.56 acres to 66.94 acres. For these reasons, this modification would not result in a substantial increase in the severity of an impact previously examined in the EIR/EIS.

See Section 1, Section 1.2.1 for a detailed explanation regarding the verification of the PMR calculations to sensitive plant and animal species.

Visual Resources. The proposed modification would not noticeably change overall impacts on Visual Resources along this route segment and the overall impact assessment and significance conclusions would not change.

Cultural Resources. PMR44 would not increase impacts to cultural resources. The FESSR has no resources within the Project Impact Area. The modified project has one resource (prehistoric lithic scatter) within the Project Impact Area. While the modified project has one more resource within the Project Impact Area, SDG&E has made recent design revisions for other project issue areas which avoid all cultural resources. Therefore, PMR44 does not affect or change impacts to cultural resources.

Transportation and Traffic. This modification would include replacing transmission conductors on 48 poles, eight new wire pull sites along the ROW, two underground upgrades, and upgrades at the Scripps Substation. Temporary lane closures may occur along Scripps Lake Road, Scripps Ranch Boulevard, Ironwood Road, Pomerado Road, and Rue Biarittz. Lane closures would be limited to off-peak traffic period. Traffic speeds along arterial/collector roadways such as Scripps Ranch Boulevard and Pomerado Road may need to be reduced and some traffic may experience brief delays during the reconductoring process. Due to the temporary nature of the lane closures, operation and access by emergency services would not be affected. Bike routes and pedestrian access along these local roads would be temporarily disrupted and would need to be detoured to safely keep users away from the construction site. Damage to local roadways would be repaired by the contractor upon completion of the installation. As discussed in the Final EIR/EIS, Section D.9.18.4, Mitigation Measure T-1a, Restrict land closures, and T-9a, Prepare Construction Transportation Management Plan, to reduce impacts would be included within a traffic management plan and coordinated with the appropriate jurisdictions as required by MMCRP measures. The KOA Traffic Impact Study Report included the project upgrades and concluded they would not create significant impacts. Therefore, these modifications would not substantially change overall impacts related to traffic and transportation and would not result in new significant traffic impacts nor in a substantial increase in severity of an existing impact.

Overall Conclusion

The analysis in the Final EIR/EIS remains valid. PMR44 would not have any new significant effects not discussed in the EIR/EIS or a substantial increase in the severity or intensity of a significant impact previously examined in the EIR/EIS. PMR44 would have environmental impacts similar in context to those of the FESSR. Although there would be an increase in ground disturbance and noise impacts, PMR44 reconductoring would be similar to the FESSR, would meet minimum clearance requirements over Highway SR 52, and would increase power capacity at the Sycamore Canyon Substation.

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Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-8793	BLM	Prehistoric Artifact Scatter	Structure was placed to parallel (soldier) SWPL to minimize visual impacts and to minimize new access roads. The potential area of site impact is estimated to be 1169 square meters. The site is recorded as 4 pieces of debitage and one core and three ceramic sherds. Will be able to create an ESA for a portion of the site area, small potion within the work area will be protected to the degree possible and evaluated prior to construction to determine the presence of surface and subsurface artifacts.	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the northwest side of the structure.
10B	IMP-1015/4348/8744	BLM	Prehistoric Artifact Scatter	The structure was placed to parallel (soldier) SWPL to minimize visual impact and to minimize new access roads. A series of dry washes surround this area, limiting the choice of structure location within the approved ROW. The cultural resource sites occupy a large area to the south and east of the structure. Impacts are within the temporary work area and may be able to be avoided through establishing an ESA at the edge of the work areas and on the perimeter of the access road without changing the proposed location. The Sunrise survey resulted in an expansion of the various artifact scatter areas to link these smaller areas into one larger overall site. There are extensive areas of open space between surface artifacts and evaluation efforts will provide the opportunity to define the areas of potential direct impact, if any.	An effort was made to adjust the locations from the proximity of the cultural sites and dry washes. Due to the size and locations of the sites, tower locations could not be relocated to maintain conductor to ground clearances.
10B	IMP-3784/3785/4340/4341/4344	BLM	Prehistoric Artifact Scatter	The structure was placed to parallel (soldier) SWPL to minimize visual impacts and to minimize the creation of new access roads. A number of dry washes surround this location limiting the choice of placement within the approved ROW that will not result in impacts to dry washes. The archaeological sites occupy a large area surrounding the structure. The overall site is sufficiently large to not allow a shift within the approved ROW without significant changes in other structures and additional, significant impacts to biological resources from ground disturbance and possible addition of more structures to span a greater distance between structures.	An effort was made to adjust the locations from the proximity of the cultural sites and dry washes. Due to the size and locations of the sites, structures could not be relocated to maintain conductor to ground clearances.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-4237	BLM	Prehistoric Artifact Scatter	Structure was placed to parallel (soldier) SWPL to minimize visual impacts and to avoid dry washes to the degree possible. This location also minimizes the creation of new access roads. The terrain in this area becomes more undulating and erosion areas are significant limiting the number of areas that are suitable for the placement of a structure. The placement of the structures within the approved ROW is limited by load capacity of the towers not exceeding approximately 1/4 mile between structures without the need to add additional structures or change the overall structure type to withstand greater loads. The recorded archaeological site is large and the two proposed structures are at opposite edges of the recorded limits in an east/west direction. The structure was placed as far outside the site as possible with the access road traversing the site over the shortest possible distance from the existing SWPL access road to minimize ground disturbance and minimize biological impacts.	The Sunrise centerline was relocated to the extent possible to avoid the cultural site and dry washes. Both structures were adjusted along the relocated centerline to avoid and/or minimize impacts to the cultural site and dry washes but still maintain conductor to ground clearances.
10B	IMP-10898	BLM	Prehistoric Lithic Scatter, Changed to an isolated find by ASM Inventory	Not a direct impact as the site was reclassified as an isolated find of one metavolcanic flake	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the southwest side of the structure.
10B	IMP-10372	BLM	Prehistoric Artifact Scatter	Structure was placed to soldier SWPL line to minimize visual impacts and use the existing access to this area to minimize new ground disturbance. Limits to the location of the structure are because of the change in altitude approaching Sugarloaf. A significant dry wash is west of this location and the ROW was approved across the Sugarloaf Peak to be consistent with SWPL. An ESA may be established at the northern portion of the work area to avoid surface artifacts and a careful examination of the ground surface within the site area that corresponds with the work area will be completed prior to construction to ensure that no additional surface artifacts are present. If determined necessary a subsurface exploration can be completed to assess the presence of buried or masked archaeological materials. If the Sugarloaf re-route is selected this resource area will not be impacted.	Cultural site visit notes indicated that there were no resources affected by the foundations. Access road location was modified to the southwest side of the structure.

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
10B	IMP-3708	BLM	Prehistoric Artifact Scatter and trail segment	Structure was placed to soldier SWPL line to minimize visual impacts and use the existing access to this structure. Very short segment of new road will be required, existing access road will not be changed, area of impact is small and the overall site area has been disturbed by existing roads. Limits of existing road will be staked and not altered for project. If the Sugarloaf re-route is selected this resource area will not be impacted.	Pursuant to the recommendation of the site visit report, the Sugarloaf Re-route was designed.
10B	IMP-103/3710	BLM	Prehistoric Habitation, Trial	Structure was placed to soldier SWPL and use the same disturbed areas. Limitations of re-location based on terrain and clearance requirements for I-8 crossing. Visual impacts are reduced to some degree by maintaining consistent pattern with SWPL across this corridor and creating the shortest exposure to the visual intrusion in this corridor. Structure is well back from the I-8 corridor to the north and above the viewshed to the south. Maximum span with minimal number of structures, terrain considerations. Area of the structure placement does not have any evidence of surface artifacts although it is within the site boundary as mapped. This area will be carefully examined prior to construction to determine if any artifacts are present. A subsurface exploration can also be completed. The limits of construction activity will be maintained to the absolute minimum and the previously disturbed areas will be used to the extent possible for construction activity. If the Sugarloaf re-route is selected this resource area will not be impacted.	Pursuant to the recommendation of the site visit report, the Sugarloaf Re-route was designed.
10A	IMP-4228	BLM	Prehistoric Habitation	Both structures are helicopter construction with disturbance at the foundation area including work zone. Mapped site area covers several hundred meters and is made-up of 12 separate site areas that were joined into one large site in 2007. The size is s**u**fficiently large that there is no way to shift structures out of the site area and maintain the approved ROW alignment or span the site. If the Sugarloaf re-route is chosen this resource area would not be impacted. The impact to the site will be specific to the foundation and work areas only and the presence of artifacts is not necessarily specific to these areas of the site. A careful examination of the ground surface at the plotted locations of these structures will be completed prior to construction to determine the presence of cultural resources. A subsurface exploration can be completed if appropriate prior to construction.	Pursuant to the recommendation of the site visit report, the structure was relocated 100-feet north. Due the size of the cultural site and the topography, no other adjustments were possible.
10A	IMP-10897	BLM	Prehistoric Artifact Scatter	Area of direct impact altered to avoid impact with IMP-10897. No impacts anticipated at this site as the TSAP was removed.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
*Highlighted cells indicate where a change was made to eliminate or reduce direct ground disturbance.					
9C	SDI-9188	Private	Prehistoric Bedrock Milling	It may be possible to establish an ESA and avoid impacts to this site which is recorded on the western edge of the proposed work area and not within the actual foundation area for the structure. ESA will be established prior to construction and will limit access to the mapped site area. A careful examination of the ground surface in the mapped site area and the immediate adjacent areas will be completed to assess the presence of surface artifacts. A subsurface exploration can be completed as appropriate and directed by the BLM.	Pursuant to the site visit report, the existing road was utilized to the extent practical with minor improvements for curve widening and construction pads.
9C	SDI-7073/7083/8306	Private	Prehistoric Artifact Scatter	A significant consideration in the area between structures in this area is the exceptional density of recorded sites, many of which occupy an expansive footprint. The ROW passes through this area as part of the partnering with SWPL and the lines diverge just west of Jade Peak, with Sunrise maintaining a more northern rather than southern path. The approved ROW would require a significant reroute across the Jacumba Plateau to avoid sites. The presence of the Interstate, Old Highway 80, natural features and resources, endangered species and visual considerations and maintaining placement on public land to the degree possible are all factors in the consideration of the ROW across this area and the placement of the specific structures. The foundation for one structure is outside the site area as mapped. The impacts could come from the work areas and stringing sites, one of which is completely within the site and one is only partially in the mapped site area. This structure has been re-located three times to minimize impacts and maintain proper engineering in this section of the ROW. The area chosen soldiers an existing SWPL tower to minimize visual impacts and maximizes the use of existing access roads to limit the need to construct new roads. The use of ESAs may be effective in limiting the potential for ground disturbance and may allow for a more limited need for evaluation. This is an angle structure and the location is difficult to adjust within the ROW in order to maintain the proper angle and accommodate the two stringing sites that are necessary outside the ROW at an angle structure to pull and tension conductor.	

Cultural Resources Attachment: Sites in Areas of Direct Impact

Cultural Resources Sites in Areas of Direct Impact

(August 10, 2010)

Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
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9C	SDI-7074/7075/7076/15879	Private	Prehistoric Bedrock Milling	The foundation for this structure is at the site boundary with approximately 1/2 of the work area within the site. There are no artifacts mapped on the surface in this area based on the Inventory report and the work area can be staked to minimize the activity within the site area. There are no surface artifacts mapped in this area of the large site and a careful survey of the proposed structure location will be completed prior to construction to determine the presence of artifacts. Subsurface evaluation can be conducted as directed by the BLM. The structure will be constructed by helicopter which will reduce the overall ground disturbance footprint.	Cultural site visit notes indicated that there were no resources affected by the foundations.
9C	SDI-7060	BLM	Prehistoric Artifact Scatter	This site is mapped over a large area that includes the locations of two structures. The structure is at the eastern edge of the site and a portion of the work area and the foundation for the structure are within the site area. The location of this structure is within the approved ROW and there is a drainage close by and Old Highway 80 is a short distance to the south. The ROW crosses OH 80 between structures and spacing in proximity to the roadway incurs some limitations. There is limited space in this area that does not have a recorded cultural resource in addition to natural resource considerations. One structure is completely within the mapped site area including the access road. There are two drainages that require avoidance and an existing access road contributed to minimizing the amount of new ground disturbance. There is no place along this segment, within the approved ROW, where this structure could be moved and not impact a cultural resource site. The area selected for structure placement appears to have a minimal surface presence of cultural resource items.	Relocations of two structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-6776/7051/7059/19035	BLM	Prehistoric Artifact Scatter	This is a large site created by linking a number of smaller surface artifact concentrations together. The ROW in this area is between I-8 and Old Highway 80 on public land. The large size of the site and the presence of a number of natural features such as drainages, washes, and undulating terrain limit the areas where structures can be placed within the approved ROW and completely avoid cultural resources.	Relocations of two structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-7052	BLM	Prehistoric Lithic Scatter	This access road was eliminated.	

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9C	SDI-19304	BLM	Prehistoric Lithic Scatter	The location of this structure was determined by the maximum distance between three structures which were placed to minimize disturbance to biological resources and to minimize visual impacts. There are a number of drainages and washes in this area with some terrain considerations for construction, access, and required clearance for the conductor.	Relocations of several structures were considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-18063	BLM	Historic Refuse	This access road was eliminated.	
9C	SDI-7043/7044	Private/BLM	Prehistoric Lithic Scatter	There are a number of significant drainage features in this area and terrain considerations. The placement of two structures was based on the maximum span (minimize ground disturbance with additional structure) and maintaining placement within the approved ROW. There are also considerations of visual impacts to I-8 and Old Highway 80 as well as private property concerns in this area of the project.	Relocation of structures was considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-19281	Private	Prehistoric Lithic Scatter	This tower location was optimized for best location to reduce impacts to the property and impacts to the County landing strip to the south of this location. The visual impacts would be reduced by the present location as it matches up with the SWPL structure location.	Relocation of structures was considered impractical or impossible due to the size and locations of the numerous cultural sites in this area. The designers attempted to minimize impacts in response to the site visit reports.
9C	SDI-19303	Private	Prehistoric Bedrock Milling	These will be helicopter structures, there is an existing access road that will not be changed for the project, but will be driven on. There is a stringing area proposed within the mapped site boundary and guard structures to protect the road during stringing. Surface artifact mapping does not show artifacts at the proposed location of the structure or the stringing site. There is a scatter of surface artifacts (debitage, cores) at the plotted location of the structure. The segment was revised once (Quino Re-route) between structures to avoid biological impacts.	Due to the size and location of the cultural site, no structure relocations were practical.
9C	SDI-7030/7951/9153/19268	Private	Prehistoric Bedrock Milling	The size of this site coupled with the size of CA-SDI-19303, immediately adjacent to the east, creates difficulty in relocation of structures to avoid impacts. The segment was revised once (Quino Re-route) between structures to avoid biological impacts.	Due to the size and location of the cultural site, no structure relocations were practical.

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Sect.	Site Designation	Ownership	Description	Justification*	Pre-Construction Survey Team Notes
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9B	SDI-4788	BLM	Prehistoric Bedrock Milling	The temporary work area at this structure can be staked as an ESA to avoid work within the mapped limits of SDI-4788. The work area can be restricted to the permanent work area on the northwest portion of the designated area which will result in no impacts within the mapped boundary of SDI-4788. There are no surface artifacts recorded within the temporary or permanent work areas for this structure. The area will be carefully examined during the evaluation effort. Subsurface testing can be completed as determined necessary by the BLM.	The site visit report did not indicate any impact to cultural resources.
9B	SDI-19301	Private	Prehistoric Bedrock Milling	This structure was placed in proximity to McCain Valley Road to minimize the need for new road construction. The Rough Acres re-route is described in the PMR as motivated by a request from a property owner. This re-route eliminated two structures. The area of impact within the mapped limits of SDI-19301 is in an area of the site with a single surface artifact identified as debitage in the southerly portion of the site. An ESA can be established at the edge of the permanent work area to limit activity to the southern portion of the site area to minimize to potential for impacts.	The site visit report did not indicate any impact to cultural resources.
9B	SDI-19851	BLM	Prehistoric Lithic Scatter	This is an angle structure that was part of the Rough Acres re-route. Relocation of angle structures is complex and in this case would result in impacts to biological resources with an increase in ground disturbance.	The structure site was located to maintain close proximity to the existing road.
9B	SDI-19001/19003	Private/BLM	Prehistoric Habitation	This is an angle structure that was part of the Rough Acres re-route. Relocation of angle structures is complex. The large mapped prehistoric site in this area is primarily to the north of this structure with the southernmost portion overlapping the location of this structure. There are a couple of surface artifacts in the vicinity of the proposed structure and an ESA can be established to limit the activity within the portion of the site with surface artifacts. The area identified for ground disturbance will be carefully examined for evidence of surface artifacts and a subsurface evaluation will be accomplished as directed by the BLM.	
9B	SDI-19293	BLM	Prehistoric Bedrock Milling	The site in this work area is recorded as four ceramic sherds and one piece of debitage. The location of this structure is designed to maximize the use of the landform for clearance of the conductor and also to minimize visual impacts from skylined structures.	
9B	SDI-19853	BLM	Prehistoric Lithic Scatter	This site is recorded as seven pieces of debitage and a metate fragment. The metate fragment is mapped within the temporary work area and can be avoided within an ESA. This structure is on a hillside and critical to the clearance of conductor across the span to the north and south. The use of high points reduces the number of structures that are necessary to achieve the required span above the ground surface.	

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9B	SDI-19364	BLM	Prehistoric Lithic Scatter	The mapped boundary of this site will be impacted by the access road from McCain Valley Road to the proposed structure. There are no surface artifacts noted on the site record for this area which can be delimited during preconstruction staking to maintain a minimal path to the construction area. The corner of the temporary work area can be removed from the construction drawings such that the area will not be part of the work area and an exclusion area can be established to protect this portion of the site during construction. The location and elevation of this structure is necessary to safely span McCain Valley Road with the appropriate clearance.	
9B	SDI-19018	BLM	Prehistoric Habitation	This structure is part of the McCain Valley Reroute. This is an angle structure at the north-central edge of the mapped site boundary of SDI-19018. There is one milling feature mapped near the permanent work area for this structure and it can be protected in an ESA during construction. The concentration of surface artifacts at this site is more than 90 meters to the south of the proposed structure.	
9B	SDI-19874	BLM	Prehistoric Artifact Scatter	The location of this stringing site may be movable as these are temporary work areas and access and use will generally be drive/crush. The area needed for stringing that corresponds to the mapped site boundary can be protected in an ESA and the drive/crush access to the stringing location can be re-routed around the limits of the site area.	
8D/8C	SDI-19279	Private/CNF	Prehistoric Bedrock Milling	This is an angle structure at the edge of the CNF. The portion of the site on Forest property will not be impacted by the project and will be protected in an ESA.	This structure site could not be relocated due to steep terrain and since no surface artifacts were noted, the centerline was not realigned.
8C	SDI-17987	BLM/Private	Prehistoric Bedrock Milling	This is a helicopter construction location. The TSAP was located outside the site area and the foundation for the structure and one-half of the permanent work area are immediately inside the eastern limits of the mapped site. The surface map shows three debitage artifacts in the vicinity of this construction activity. The location of this structure is tied to the presence of a private property and maintaining a safe clearance of the conductor in this area. The tower was placed on the high point of this formation within the ROW to achieve this necessary clearance.	This structure site could not be relocated due to steep terrain.

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8C	SDI-8440	BLM/Private	Prehistoric Bedrock Milling	The location of this structure was determined by selecting a location that keeps a low profile so as not to skyline. It was also selected in order to minimize the angle of the line in order to reduce the number of structures, pull sites, and construction impacts. The location also minimizes the boulders that impact the structure.	This structure site was not relocated due to steep terrain.
Suncrest Sub.	SDI-19779	SDG&E	Historic Refuse	The location of the substation was chosen by the CPUC and there is no way to avoid this resource and retain the location of the Substation as approved.	
Suncrest Sub.	SDI-19036/19037	SDG&E	Prehistoric Bedrock Milling	The location of the substation was chosen by the CPUC and there is no way to avoid this resource and retain the location of the Substation as approved.	
5	SDI-19769	City of SD	Prehistoric Bedrock Milling	The alignment through Chocolate Canyon was designed to keep a low profile in order to reduce the visual impacts. Moving the structure would introduce clearance issues due to the difficult terrain. An ESA can be established to protect the cultural resource during construction.	This structure site was not relocated due to steep terrain.