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San Diego County Department of Planning and Land Use



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County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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May 14, 2008

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F0010-37

Comments on Scoping, Proposed Planning Criteria, and Planning Issues Reports for the Bureau of Land Management (BLM) South Coast Resource Management Plan Revision (SCRMPR)

Dear Mr. Kalish,

The County of San Diego has received and reviewed the above-referenced reports on the pending South Coast Resource Management Plan Revision (SCRMPR) and appreciates the opportunity to provide comments. Lands within the South Coast BLM boundaries that have been acquired for conservation contribute to the development and viability of the County's Multiple Species Conservation Program (MSCP). As such, the County supports development of the SCRMPR and recognizes its value in preserving biological diversity in the region.

In 1994 and 2007, this mutual support and cooperation in habitat conservation planning and management was formally recognized in Memorandums of Understanding (MOUs) between the County, Wildlife Agencies, BLM, and others. The MOUs outline the BLM's commitment to manage lands to the standards necessary to meet the goals and objectives of the MSCP, including conserving the area's rich and unique biological diversity. The County appreciates the BLM's formal commitment toward resource conservation planning efforts, particularly in developing the East County MSCP, which is still in the habitat and species modeling phase, with the preserve design still pending. The BLM plays a vital role in preserving land, protecting species, and enhancing habitat, making it a necessary component to success of the County's MSCP.

As the BLM has jurisdiction over land that constitutes core habitat areas critical to the maintenance and success of the MSCP, consideration of potential impacts to these

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preserves and programs is essential in preparing the SCRMPR. In addition, the County's Department of Parks and Recreation (DPR) also values the opportunity to be involved in the SCRMPR development process and comments provided by DPR have been incorporated into this letter. Since BLM's Resource Management Plan (RMP) was completed in 1994, there have been multiple species planning efforts, new listings of species, and new information available. As a result, coordination among resource agencies, consideration of new circumstances and data, and assessment of impacts from BLM management on species and habitats are needed in developing the SCRMPR.

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According to the preliminary reports and documents for the SCRMPR, some of the major issues that will be addressed by the revision include habitat conservation planning, restoration, energy, recreation, and off highway vehicle (OHV), wildfire and fuels, international border, and minerals management. After reviewing the preliminary SCRMPR reports and documents, County staff provides the following comments and issues for consideration in reviewing alternatives and developing the SCRMPR:

1. The County values protection of sensitive species, habitats, and visual resources while recognizing the need for public agencies to provide multiple use opportunities. The Planning Issues document prepared for the SCRMPR reflects many topics that could impact resources, such as wildfire management, conflicts between conservation and recreation (e.g., OHVs, target shooting, hunting, etc.), minerals and energy production, and grazing. It is anticipated that these issues will be fully considered by the SCRMPR.
2. The SCRMPR Scoping Report states that there will be an assessment of BLM management impacts on threatened and endangered species that were listed since 1993, including formal consultation with the USFWS and analysis of changed circumstances. The SCRMPR should incorporate this new information and allow for adaptive management. The County's MSCP plans (including species covered or potentially covered by those plans) and preserves should be considered in analysis for the SCRMPR based on shared resources and issues, such as habitat fragmentation, wildlife migration corridors, and core habitats in the region.
3. Although the South County MSCP was completed in 1997, the North County MSCP is undergoing review and East County MSCP is currently being prepared, including the preserve design. As these MSCP plans are pending and were not available for consideration under the original Resource Management Plan, the SCRMPR provides an opportunity for coordination to meet the goals and objectives of the County's MSCP plans and implementation of the MOUs signed in 1994 and 2007.

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4. Property adjacent to BLM lands may meet mitigation requirements for development projects proposed in the County. In these situations, if the BLM were to obtain fee title, these lands could be protected and managed by the BLM to conform to applicable MSCP standards (as per the MOU signed in 1994), and any other County standards to meet mitigation requirements.
5. The Planning Issues report states that BLM is working to partner with CAL FIRE on wildfire and fuels management, an issue to be reviewed by the SCRMPR. The County encourages joint participation in such efforts by the BLM, CAL FIRE, and other agencies. As BLM lands encompass a significant area of land prone to wildfires, and in close proximity to unincorporated areas of the County and MSCP preserves, the County would also be interested in coordinating wildfire and fuels management. Furthermore, Otay Mountain supports the largest stand of fire sensitive Tecate cypress in the world. Special consideration needs to be given to this area, particularly as parts of it have burned twice in the past five years. Coordination between US and Mexican agencies should be considered by the SCRMPR for this region, since BLM land is situated just across the international border.
6. OHV area designations are of particular concern under the SCRMPR, due to potential impacts on sensitive species and habitats. OHV usage may result in the take of species, resource damage, erosion, invasive species, litter, increased fire hazard, and excessive noise. The Proposed Planning Criteria report states that a travel management plan, including route designations, may be included in the SCRMPR. Adverse impacts to biological resources, management, enforcement of use restrictions, and ability to revise designations through an adaptive management program in response to resource impacts or changed circumstances should be fully considered by the BLM.
7. An opportunity to examine new proposals for and extensions of rights of way and use of BLM land for grazing, energy, mining, etc. is provided by the SCRMPR. Where appropriate, for protection of key sensitive species, the BLM should reevaluate subsurface mineral extraction and consider abandonment to allow for open space and habitat protection on surface land. Many BLM lands contain important biological resources that may be limited elsewhere, which are important to protection of species and the MSCP. The County recommends that mineral extraction not be permitted in Areas of Critical Environmental Concern (ACEC), as mineral extraction conflicts with ACEC management goals. Sand and gravel mining should be carefully reviewed for impacts to water quality, habitat, soil erosion, and sensitive species.

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8. The SCRMPR should analyze the benefits and potential impacts of grazing on biological resources, including land health standards (e.g., water quality, soil erosion, invasive species, sensitive species, habitats, riparian areas, watersheds) and cultural resources. Impacts of grazing on biological resources should be addressed. While some species may respond positively to some level of grazing, in other cases, impacts from grazing on sensitive species or critical habitat may render removal of grazing allotments appropriate for resource protection.
9. Proposals to locate cell towers on mountain peaks and/or create new roads to access towers and/or equipment on mountain peaks or other areas on BLM lands, should be carefully reviewed by the SCRMPR. Cell towers, associated equipment, and new roads may have potential adverse impacts to biological, cultural, and visual resources (i.e. adverse impacts to the natural/ undisturbed viewshed). The SCRMPR should consider impacts, such as soil erosion, invasive species, and increased opportunity for trespass from this type of development on BLM lands.
10. Any new public facilities or infrastructure, such as wind energy sites, should be fully considered by the SCRMPR due to potential adverse impacts to species and habitats, as well. The Planning Issues report states that potential wind energy sites within the Planning Area have been identified by interested developers. In considering wind energy, wind turbines should be carefully reviewed for potential impacts and harm to raptors, bats, and other avian species. A map that identifies the location of potential development of wind energy sites, as referenced in the Planning Issues report, should also be provided.
11. Any new energy transmission corridors, including associated infrastructure and roads, should be considered by the SCRMPR due to potential adverse impacts on biological, cultural, and visual resources. The Planning Issues report states that existing utility corridors are nearing capacity, with new transmission routes and corridors being proposed by state and local utilities and planning agencies. Any such proposals should be specifically considered by the SCRMPR, including analysis of proposed locations, capacity determination, and demonstrated need, and increased fire risk. The Planning Issues report states that public lands are seen as preferred routes for utility transmission corridors/routes rather than existing or planned residentially developed areas.

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12. The SCRMPR should evaluate public facilities and infrastructure, including but not limited to, energy transmission corridors, power lines, wind energy sites, communication/wireless facilities, and maintenance roads, for potential impacts on visual resources, scenic natural resources, rural community character of surrounding areas, and panoramic views of ridgelines, skylines, and natural landscapes.
13. The County encourages continued management and protection of biological resources in all BLM lands located within San Diego County, including but not limited to, the Otay Mountain Wilderness Area, Hauser Mountain, Beauty Mountain, Hellhole Canyon, and Agua Tibia. In drafting the SCRMPR, there should be a review of whether these or other BLM lands may be designated as wilderness areas in this region. The County also would appreciate coordination on any change in the resource management status of BLM lands in this region.
14. As the East County MSCP is in the habitat and species modeling phase, with the preserve design not yet developed, close coordination between the BLM and the County is essential for resource planning and management. On May 2007, the County and BLM formally entered into a MOU to coordinate conservation planning efforts to develop the preserve design for the East County MSCP Plan. The County encourages BLM to coordinate with the MSCP Division on plans for BLM lands located within the East County MSCP Study Area. The County looks forward to a strong working relationship and appreciates the BLM's coordination on protection of habitat and species, particularly as the County is seeking coverage for 153 species under the East County MSCP online at http://www.sdcounty.ca.gov/dplu/mscp/ec_species.html.
15. BLM lands in the South Coast planning area are valuable for habitat and provide wildlife linkages throughout San Diego County. As a result, the County appreciates BLM efforts to coordinate with the Department of Planning & Land Use (DPLU) and DPR early in the planning process. Joint collaboration to protect the region's native plant and animal species, key habitat areas, and wildlife corridors is encouraged.
16. Prior to disposal of isolated parcels or consolidation of BLM lands, the County and other agencies should be consulted to ensure those parcels could not be used in assembling a regional preserve system. The preserve planning for the North County and East County MSCP plans are currently underway and changes to the management status is a key consideration for these regional planning efforts. The BLM should retain lands currently managed for ecological

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preservation, particularly if sensitive biological resources are present or it provides wildlife core habitat, corridors, or linkages. A regional interconnected habitat conservation system is needed in the region, reflected in the MOU signed in 1994, in which the BLM agreed to work on identifying BLM land to be included in the region's habitat conservation system. If any land tenure adjustments or public land exchanges are proposed, lands with high biological value for species protection and/or that may play a role in regional preserves and open space should be retained in public ownership. Acquisition of additional land with high public value by the BLM, especially for species protection and open space preservation, is also beneficial to the regional preserve system.

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17. The County encourages on-going coordination regarding any change in the resource management status of BLM lands. The Proposed Planning Criteria report states that the BLM will consider designating new ACECs or modifying existing ACECs. It is unclear to what extent there may be new ACECs or modifications, but areas with sensitive species and habitats, particularly those listed as threatened or endangered, should be given priority for designation. If any existing ACECs are modified, there should be no decreased protection for sensitive species and rationale provided for any modifications. From the documents submitted, it does not appear that ACEC designations will be removed, but this clarification would be appreciated.
18. The SCRMPR should provide consideration of issues related to the international US-Mexico border region, including coordination with US Customs and Border Protection. Impacts from border protection and management activities could include new roads, increased use of existing roads, OHVs, trespass, littering, and wildfire. With an understanding of national security issues, wildlife corridors and linkages in this border region should also be considered by the SCRMPR and be protected to the maximum extent possible.
19. During the SCRMPR process, if there is the potential for the BLM to transfer managed public lands to the Bureau of Indian Affairs to be held in trust for a tribe or assumption of responsibility for land management on any lands currently managed by the BLM by a tribe, the County would appreciate notification and consultation. Any such transfer or change in management responsibility could impact the County's existing MSCP and proposed preserve systems, requiring coordination.
20. The SCRMPR should consider how lands currently owned by the BLM, or lands acquired in the future, could be managed consistent with the MSCP, as set forth under the MOU signed in 1994.

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21. The SCRMPR should consider the County Trail Master Plan as a framework for trail planning on BLM lands and coordinate with the DPR to ensure connectivity with existing and proposed trails.

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The success of regional habitat conservation programs, including the MSCP, depends on acquisition of new lands with high wildlife value and strong management and protection of habitat preserve areas by local, state, and federal agencies. Future acquisitions and habitat management for sensitive species by the BLM will contribute to the success of the MSCP. The opportunity to participate in the environmental review process for SCRMPR is appreciated. We look forward to receiving future documents related to this project or providing additional assistance at your request. If you have any questions or comments, please contact Thomas Oberbauer, Chief of the MSCP Division, at (858) 694-3071 or by email at thomas.oberbauer@sdcounty.ca.gov.

Sincerely,



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Department of Planning and Land Use (DPLU)

EG:TO:SO:lh

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Responses to Comment Set F0010

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F0010-1 Please refer to General Response GR-12 regarding project need. The Draft EIR/EIS, RDEIR/SDEIS and Final EIR/EIS consider impacts of the Proposed Project and all alternatives.

The contents of the August 4, 2008 Scoping Memo and Ruling and its resolution do not affect the contents of the RDEIR/SDEIS nor the information on the Southern Environmentally Superior Alternative (Section 5 of the RDEIR/SDEIS), and therefore, it is not necessary to extend the comment period on the RDEIR/SDEIS.

F0010-2 As a component of the ROW Grant permitting procedure, the Proposed Project and several route alternatives would require an amendment to BLM's California Desert Conservation Area Plan (as amended) and/or to the Eastern San Diego Resource Management Plan (RMP), and thus the EIR/EIS addresses that they are related. An overview of these Plans, including their pending revisions, is provided in Section D.17.1.1 of the Draft EIR/EIS, as well as an overview of the South Coast Resource Management Plan since the Modified Route D Alternative would traverse the BLM lands managed by this Plan. A discussion of BLM Plan Amendments resulting from Proposed Project and alternatives is included in Section D.17.2.1 in Volume 3 of the Draft EIR/EIS.

Regarding the BLM Solar Programmatic EIS, please refer to General Response GR-5, which includes a discussion of the many renewable energy projects in the Imperial Valley and explains how they relate to the Sunrise Powerlink Project. This PEIS is not a "connected action" because there is no direct connection between the many renewable projects being evaluated and the Sunrise Powerlink. The specific projects that are connected are evaluated in the EIR/EIS (including the Stirling Solar Two project west of El Centro).

Please refer to General Response GR-7 for a discussion of the connection of Sunrise Powerlink Project and Mexican generation and LNG. The Sempra power plant and LNG facility have no direct connection with the Sunrise Powerlink Project. Please see the definition of "connected actions" and "indirect effects" presented in Section B.6 of the Draft EIR/EIS for further clarification.

F0010-3 The commenter addresses the High Meadows Reroute, stating that the reroute would traverse Louis Stelzer County Park lands. Direct impacts to Stelzer Park were not identified previously in the Draft EIR/EIS, as the former route passed only within a mile. The commenter states that impact to the park should be evaluated and acreage loss of parkland calculated. Equal amounts of acreage would need to be preserved to result in no-net-loss of park land. The calculations should include tower locations and ROW, new and widened access roads, and trail relocations, if necessary.

The original Interstate 8 Alternative passed approximately 400 feet north of the reroute location, and did not directly affect the park. Based on detailed site maps provided by SDG&E for the High Meadows Reroute, the proposed reroute would pass over a corner of the park for a distance of approximately 100 feet. No permanent structures would be

located within the park. Two towers required for this alignment reroute would be near but not on park land. Because there is a change in transmission line direction at this point, a temporary construction site would need to be located partially on park land to allow the pulling of conductors between towers. Following construction and site restoration, no permanent direct impacts to the park would occur. The very small extent of ROW passing across a corner of the park would not preclude use of the land beneath. Therefore, no compensating land acquisition would be required as there would be no net loss of park land.

F0010-4 The commenter states that impacts to areas within existing MSCP plans should be examined, and consistency with the MSCP needs to be demonstrated. Appendix 8O of the Final EIR/EIS, Consistency with Existing and Draft Regional Conservation Plans, provides information regarding the relationship of the Proposed Project, Final Environmentally Superior Northern Route, Final Environmentally Superior Southern Route, and SDG&E's "Enhanced" Northern Route with the boundaries of various regional habitat conservation plan areas, and the designated or proposed preserve areas within each plan, including impacts to the preserves. The commenter also states that impacts to covered species must be adequately analyzed and mitigated in conformance with the MSCP. The mitigation is based primarily on the requirements established in regional habitat conservation programs (i.e., the MSCP and its various subarea plans) and also on mitigation required for other projects. See General Response GR-14, Biological Resources Impact Calculations/Mitigation Ratios.

F0010-5 The commenter notes that the Pacific Crest Trail Reroute would eliminate two crossing of the trail by the transmission line, but also notes the need for one additional tower, one additional pull site, and a greater total length of access roads. Please see Responses to Comments F0003-6 and F0003-7 regarding modifications to this reroute after publication of the RDEIR/SDEIS.

The County has concerns with the placement of towers and access roads relative to the trail. The placement of a transmission tower on a trail that precludes its use is considered unacceptable. The PCT is a non-motorized trail for hiking and horseback riding only. Security gates with sufficient access for equestrians would be necessary to protect the trail from unauthorized vehicles.

Biological resources Mitigation Measure B-1a (Provide restoration/compensation for affected sensitive vegetation communities) includes a provision to prevent unauthorized motorized access to trails; reference to this measure has been added to the discussion of the PCT crossing in Section E.4.5:

Where the route would intersect a trail, there is the potential for unauthorized motorized access to be gained to the trail, damaging the trail and disrupting its use by others (Class II). Biological Resources Mitigation Measure B-1a (Provide restoration/compensation for affected sensitive vegetation communities) includes a provision requiring that after construction entrances to access roads shall be gated and signs prohibiting unauthorized use of the access roads shall be posted on the gates at the discretion of the land management agency.

B-1a Provide restoration/compensation for affected sensitive vegetation communities.

F0010-6 The commenter enumerates a number of requirements that would need to be met by SDG&E for crossing and working in County-maintained roads. These include the need for traffic control and encroachment permits, traffic control plans that allow roadway use during construction, following County road cut policies, replacement of culverts as necessary, replacement of striping, signs, and traffic control devices as necessary, and coordination with the County's DPW Utility Coordinator.

Appendix 12 of the Draft EIR/EIS provides the full text of all mitigation measures, including those dealing with traffic impacts. These include specific requirements regarding lane closures, detour plans, road damage repair, obtaining permits, coordinating with emergency service providers, obtaining ROW permits, preparing a transportation management plan, consulting with bus and transit services, ensuring pedestrian and bicycle circulation and safety, ensuring access to businesses and properties. Taken together with Applicant Proposed Measures and the County permit requirements to avoid or reduce impacts, the County's concerns are fully addressed.

F0010-7 The commenter notes that no impacts to County airports were noted, and if there were adverse effects to agricultural or sport aircraft flying areas, these operators would need to comment separately. Potential impacts to airports air transportation were considered and discussed in Section D.9, Transportation and Traffic (and parallel sections for alternatives). Section D.9.2.8 (Air Transportation) outlines the airports, landing strips, and private airstrips within the project area. The discussion identifies aircraft for pleasure or crop dusting as one of the potential uses within the study area. Section D.6 (Agriculture) also includes additional information on potential impacts to crop dusting. Although impacts to agricultural and sport aircraft was discussed and evaluated in the EIR/EIS, no comments from aircraft operators were received.

F0010-8 The commenter notes that route alternatives will result in temporary construction impacts to some County-maintained roads and that road and land closures along County Circulation Element roads should be avoided. The numerous mitigation measures listed in Response to Comment F0010-6 address these concerns.

F0010-9 The commenter notes that construction of the transmission line could result in temporary road and lane closures. The commenter also requests that the Draft EIR/EIS more clearly identify which County Circulation Element roads may be subject to these impacts. Table D.9-18 is cited as an example where roads that would be affected are listed. Other tables listing roads that would be affected are also cited.

The commenter requests that SDG&E coordinate closely with the County's DPW traffic staff in developing various plans (Construction Transportation Plans, Transportation management Plans, and Traffic Control plans). These plans should attempt to ensure that all feasible measures are implemented to minimize traffic impacts. It is also requested that the plans identify the length of the potential road and lane closures and feasible alternative routes.

Maps provided in the Draft EIR/EIS Appendix 11 clearly show where alignments would cross County and other roads. Specific measures to address temporary impacts on

traffic at road crossing along an approved transmission line route would be done in consultation with the County, as required by mitigation measures and the Draft EIR/EIS. As noted in Response to Comment F0010-6, the mitigation measure spelled out in full in Appendix 12 of the EIR/EIS address all of the concerns regarding traffic management. With regard to providing more detail on which roads would be directly affected, during consultations with the DPW traffic staff, subsequent to the final alignment selection, the final list of roads crossed can be specified and the specific management practices to undertake at each location identified. Which roads will be subject to land and road closures will depend on the final route and the construction techniques employed.

F0010-10 The commenter states that for any overhead road crossings, SDG&E must obtain proper traffic control permits and encroachment permits. For underground transmission lines within the public ROW, SDG&E would have to provide detailed traffic control plans, including details on how the roads would stay in operation during installation of underground work. These specific requirements are addressed by the mitigation measures cited in Response to Comment F0010-6.

F0010-11 The commenter, noting the need for access roads to reach tower locations, asks that the location where access roads would traverse or connect to County-maintained public roads be identified, along with the locations where new driveways would be required. A sight-line assessment is requested for new driveways and access points created by the project along County-maintained roads.

While preliminary access points can be inferred from preliminary engineering, the final location of access roads and their points of connection to public roads would not be determined until final engineering. Because of the extensive coordination required between the County and SDG&E with regard to traffic and roadways, this subject can be addressed on a case-by-case basis after approval of a specific route and the development of final engineering plans. Access points to County-maintained roads would require County concurrence.

F0010-12 The commenter expresses concern about the impact of the project or future expansion on roads operating at level of service (LOS) F, citing Wildcat Canyon Road and San Vicente Road as examples. It is recommended that measures that would worsen traffic operations during construction be avoided.

Construction in or near a road has the potential to lower the level of service on the road. This is temporary, but unavoidable during the construction period. However, mitigation measures have been included for the project that will minimize this impact to the degree feasible. Principal among those affecting LOS are the following:

- T-1a Restrict lane closures.
- T-1b Prepare detour plans.
- T-9a Prepare Construction Transportation Management Plan.
- T-9b Prepare Traffic Impact Study.

These measures include identifying peak traffic periods when lane closures would not be allowed. Because of the extensive coordination required between the County and

SDG&E with regard to traffic and roadways, this subject would be addressed on a case-by-case basis. As noted in Response to Comment F0010-6, extensive coordination would be required between the County and SDG&E regarding these issues in order to craft the best solution for these construction-period impacts.

F0010-13 The commenter asks that the location of transmission lines that would traverse existing and planned County roads be identified and that they not preclude the planned future construction of County Circulation Element roads. Also, SDG&E should follow regional standards regarding construction in the ROW. SDG&E is referred to the County's Guidelines for Determining Significance.

Maps in the Draft EIR/EIS for the Proposed Project and alternatives show the relationship between the transmission line and existing roadways. The transmission line would be strung between towers, allowing vertical clearance of the conductors from roads under the conductors. None of the potential towers has been knowingly sited in a planned Circulation Element roadway. However, if there is a conflict, the road alignment or the tower location could readily be modified in final engineering to accommodate both the transmission line and the road.

F0010-14 The commenter's statement that the construction of substations near Jacumba would introduce industrial uses into a rural area is acknowledged. Section 2 of the RDEIR/SDEIS describes the baseline environmental setting and includes an impact discussion for every issue area related to the new substation construction. The visual analysis (see Section 2.3 in the RDEIR/SDEIS) includes the discussion of seven significant and unmitigable (Class I) operational impacts related to Sempra Presidential Permit and related facilities. As connected actions to the Sunrise Powerlink Project, the Sempra Presidential Permit and related facilities are considered as part of the Proposed Project and its growth inducing effects are analyzed in Section F.2 of the Draft EIR/EIS. Please also see Response to Comment A0018-4 regarding growth inducement.

F0010-15 As described in Section 2 of the RDEIR/SDEIS, the approximately two-mile portion of the transmission line route in Mexico would be owned by Sempra Generation and under jurisdiction of the Mexican government, and specific details about the transmission line, including the engineering of roads, is not known. Sempra Generation has other existing transmission lines within Mexico, including lines that cross the U.S.-Mexico border. Sempra's maintenance procedures are not known, but the transmission towers north and south of the border could be accessed from either the U.S. or Mexico depending on the location of required maintenance and a new cross-border roadway would not necessarily be required.

F0010-16 The commenter states that the Final EIR/EIS should acknowledge that a planning process is underway to draft an MSCP plan for the unincorporated eastern portion of San Diego County, and that the project could potentially impact conservation planning for this area. The commenter states that impacts to areas within existing and proposed MSCP plans should be examined, and consistency with the MSCP needs to be demonstrated. Mitigation must be identified that is sufficient to maintain and not preclude the county's take authorization for covered species under the South County Subarea Plan and proposed covered species under the North or East County Subarea Plans. Please see Response to Comment F0010-4.

- F0010-17 The commenter states that the potential for the California condor to utilize the area should also be addressed and impacts evaluated. Please see Response to Comment G0018-13.
- F0010-18 The commenter states that page 2-27 of the RDEIR/SDEIS states that an estimated 85 acres of permanent disturbance would remain after restoration efforts and that page 2-208 states that up to 2,125 acres would be permanently disturbed. The commenter states that the amount of temporary and permanent disturbance should be clarified and used consistently throughout the document. Page 2-27 refers to the Jacumba Substation and SWPL Loop-In and states that, “Construction of the Jacumba Substation and SWPL Loop-In would cause permanent displacement of an estimated 85 acres of sensitive Peninsular juniper woodland, ...” There is no mention in the document of “after restoration efforts.” Page 2-208 refers to the Sempra RWEP (i.e., 2,125 acres of permanent disturbance from the wind generation in Mexico) not the Jacumba Substation and SWPL Loop-In. There is no inconsistency between the acreage numbers.
- F0010-19 The commenter states that permanent impacts to wildlife movement appear to be substantially understated in Impact B-9 relative to the impact of up to 7,500 acres (from vegetation removal, ground vibration, noise, and constant overhead movement of the turbines) for the RWEP wind development site in Mexico. The commenter states that to its knowledge, studies have not been conducted on wildlife movement within wind generation facilities with this concentration of turbines. Therefore, the commenter states that the impacts should be disclosed and mitigation measures proposed to offset the impact. The surveys performed for biological resources are described in the Response to Comment F0003-2.

General wildlife movement (with the exception of the Peninsular bighorn sheep) is not funneled through this area by surrounding barriers, and wildlife would not be precluded from moving through the site by fencing (see next paragraph). The potential impact to Peninsular bighorn sheep movement from the RWEP wind farm site (since Peninsular bighorn sheep are known from the Sierra Juarez Mountains) was considered significant and not mitigable to less than significant levels (Class I) in the RDEIR/SDEIS. Additionally, the turbines would likely be located on ridge tops (see Wind Facility Design on page 2-15 of the RDEIR/SDEIS), and while it is acknowledged that wildlife does move on ridge tops, canyons and valleys are more likely to be used as movement corridors.

Furthermore, the distance from the ground to the bottom of the rotor blades would be at least 80 feet (see Wind Facility Design on page 2-15 of the RDEIR/SDEIS), or the approximate height of an 8-story building; therefore, the movement of the blades would be high enough that significant effects to most wildlife movement are not anticipated. Additionally, ground vibration (turbines do not cause ground vibration) and noise from construction equipment is not likely to have an adverse affect on general wildlife movement since most of the wildlife movement occurs from dusk until dawn; all, or at least most, construction would occur during the day. Noise from the turbines would be minimized through the use of current industry standard turbine technology that minimizes the low frequency noise by eliminating the wind shadow “thumping” and vibration caused by blades passing behind the tower, which was common on many older turbines (see Impact N-3 on page 2-157 of the RDEIR/SDEIS). The noise levels (see Impact

N-3 on page 2-157 of the RDEIR/SDEIS) where wildlife movement is expected to be concentrated (i.e., in canyons and valleys; the turbines would likely be located on ridge tops) are not expected to be high enough to significantly affect general wildlife movement. Please also See Response to Comment F0006-2.

The commenter further states that the assumption that no fencing would occur around the site has not been substantiated or restricted by mitigation measures. The commenter asserts that if fencing along all or portions of the site was to occur, the conclusions of the RDEIR/SDEIS relative to this impact would be invalid. Based on the sheer size of the site (up to 7,500 acres disturbed [2,125 acres of permanent disturbance]) and its remote location, the assumption that the site would not be fenced is valid; therefore, no change has been made in the Final EIR/EIS based on this comment.

F0010-20 Night lighting is identified as a contributor to the potential visual impacts from Jacumba Substation in Impact V-87 in Section 2.3.2 and from Boulevard Substation in Impact V-90 on page 2-89 of the RDEIR/SEIS. Mitigation Measure V-21a (Reduce night lighting impacts) is presented in the same section. The mitigation measure is intended to reduce the potential impact of night lighting on nighttime views, including those associated with activities dependent on dark night skies such as astronomical observations. Night lighting at RWEP would be associated with the red aircraft warning lights on top of the wind turbines. While these lights would be visible from the ground and air, they would not cause sufficient glare or light scatter (light pollution) to substantially affect Astronomical Dark Sky or those activities dependent on dark night skies.

F0010-21 At the time the simulation of the wind development area and substation (Figure 2.3-7b) was prepared, minimal information was available about the development area, access roads, pad clearance, or substation design. However, the simulation does present a reasonable illustration of the potential visual impact that would be experienced in the vicinity of the project area (in this case, the view from Table Mountain). Furthermore, the resulting visual impact (as depicted in the simulation) was determined to be significant and unmitigable (Class I). Even with the incorporation of additional project design features (such as the water tank or access roads), the impact characterization and significance determination would not change. This is because, in the context of the visually dominant wind farm that backdrops the substation site and the prominence of the substation facilities and associated industrial character, the addition of several geometric forms or additional land scars, would not substantially affect either the casual observer's impression of the change or the visual change determination presented in the analysis. Therefore, the simulation is adequate for the purposes of this analysis.

F0010-22 As stated in the RDEIR/SEIS Section 2.3 Visual Resources on page 2-63, the RWEP would have broad visibility in the vicinity of the project area in both the U.S. and Mexico. A number of viewing locations were identified in the U.S. and included the community of Jacumba, Interstate 8, Old Highway 80, Table Mountain ACEC, Anza-Borrego Desert State Park, Jacumba Wilderness, and BLM-administered lands in the Yuha Desert to the east. However, these are *representative* viewing areas. The wind development area would be visible from greater distances given the elevation of portions of the development area. Though further away (approximately 10 miles), other viewing areas would include Ocotillo and the higher elevations in the vicinity of the community of Boulevard. Clearly, from these more distant locations, the visual impact

would be substantially less, though potentially noticeable. However, incorporating additional viewpoints in these more distant communities would not change either the impact characterization or the significance determination. Therefore, the decision to base the visual analysis on representative viewing areas closer to the project area is reasonable and appropriate. Also, the selection of Table Mountain for a key viewpoint was based on a field reconnaissance with staff from Anza-Borrego Desert State Park (ABDSP). State Park staff agreed that the Table Mountain view would adequately represent views not only from Table Mountain ACEC, but also from the southern portions of ABDSP as well.

F0010-23 The EIR/EIS includes an impact evaluation for Pending and Future Development, and potential projects are addressed in Section G, Cumulative Analysis. The Pending and Future Development discussion recognizes that new development is occurring rapidly in the project area and has incorporated a mitigation measure that works to minimize land use conflicts. Mitigation Measure L-2b in Section E.1.4 Land Use (Interstate 8 Alternative) requires SDG&E to notify property owners of the location of the ROW, individual towers, staging areas, access road, or other facilities to minimize land use conflicts. This land use measure, as well as other notification measures, apply to the Jacumba area of San Diego County.

The commenter also notes that the Sempra Project and associated substation/transmission components may be inconsistent with the County of San Diego General Plan Update Draft Maps. No local discretionary permits or local plan consistency evaluation is required for the Proposed Project or alternatives as the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of public utilities. However, SDG&E would be required to obtain all ministerial building and encroachment permits from the County of San Diego. As demonstrated in Section D.16, Policy Consistency, and Appendix 2, Policy Screening Report of the Draft EIR/EIS, the project is consistent, to the extent possible, with the County of San Diego's goals, objectives, and policies. However, these connected actions are not being considered for approval by the CPUC and BLM at this time.

F0010-24 The RDEIR/SDEIS (Section 2.1) describes a transmission connection from the wind turbines to the SDG&E territory; CPUC and BLM are not aware of any other connection to the transmission system in Mexico or conventional (fossil fueled) power plants in Mexico. Please refer to General Response GR-7 for a discussion of the Sunrise Powerlink Project and its connection to Mexican Generation.

F0010-25 The County requests that the Water Resources section of the RDEIR/SDEIS discuss the irrigation requirements associated with restoring 7,500 acres of potentially disturbed habitat associated with the RWEP. It is not anticipated that the entire 7,500 acres would require restoration; however, as discussed in Section 2.1 of the RDEIR/SDEIS, it is anticipated that temporarily disturbed areas, including crane pads, the outside shoulders of all construction access roads, and interconnect and power line rights-of-way would be re-seeded and reclaimed to native vegetation once the construction period is completed. As discussed under Impact S-3 in Section 2.14.2 (Socioeconomics, Services, and Utilities), the Tecate Municipality is under water strain, and the use of water for construction and operation would be a significant impact, and Mitigation Measure S-3b (Use reclaimed water) would reduce the impact to a less than significant level. To

clarify that Impact S-3 and Mitigation Measure S-3b are applicable to the water requirements resulting from any potential revegetation and restoration efforts, the text of Section 2.14.2 under Impact S-3 has been modified as follows:

Water. Water would be required during construction of the RWEP wind project for dust abatement, ~~and~~ cleaning construction equipment, and possibly for irrigating revegetated areas post-construction. The amount of water required depends on the length of access roads used, weather conditions, road surface conditions, and other site-specific conditions. Dust suppression efforts would occur on each day that grading activities take place and on unpaved access roads. Water consumption for this purpose would also vary depending on the implementation of the air quality Mitigation Measure AQ-1a (Implement Fugitive Dust Control Plan) that specifies the use of soil binders on unpaved roads, staging areas, and parking areas, which would substantially minimize water use. Non-potable water would be used for dust control when available. Water would also be needed to make the concrete used during project construction. Comparatively small amounts of potable water would be needed for sanitary and drinking purposes.

Once constructed, the RWEP would require small amounts of water for maintenance activities. Water use during RWEP construction and for post-construction revegetation, should it be required, would be a small fraction of the total water supply for the entire Tecate jurisdiction. However, the Tecate Municipality is already under water strain. Because Tecate is already under water strain, the use of water for construction and operation would be a significant impact. Implementation of Mitigation Measure S-3b (Use reclaimed water.) would ensure the impact is less than significant (Class II). The Applicant would need to coordinate the use of reclaimed water with the proper Mexican authorities. Additionally, the Applicant would be subject to any rules and regulations concerning water usage within the Tecate region.

- F0010-26 Water use for construction includes the water required for concrete mixing and would likely be trucked to each turbine site. As discussed under Impact S-3 in Section 2.14.2 (Socioeconomics, Services, and Utilities) in the RDEIR/SDEIS, the Tecate Municipality is under water strain, and the use of water for construction and operation would be a significant impact, and Mitigation Measure S-3b (Use reclaimed water) would reduce the impact to a less than significant level. As is discussed in Response to Comment F0010-25 for restoration efforts, Impact S-3 and Mitigation Measure S-3b are applicable to the water requirements for concrete mixing as well.
- F0010-27 Please see Response to Comment F0010-21 regarding the availability of information, including information on the 300,000 gallon water tank, at the time the visual simulation was produced. Even with the incorporation of additional project design features (such as the water tank), the impact characterization and significance determination would not change. Therefore, the simulation is adequate for the purposes of this analysis.
- F0010-28 The County notes that because of the large area of permanent disturbance associated with the RWEP, erosion control measures will have to be implemented on a massive scale and be well monitored for Impact H-1 to be less than significant. The County suggests that erosion and sedimentation may remain significant despite best mitigation efforts due to the steep terrain at the RWEP location. As discussed in Section 2.12.2 of the RDEIR/SDEIS Mitigation Measures H-1a (Prepare Substation Grading and Drain-

age Plan; construct during the dry season), H-1f (Develop and implement construction Best Management Practices), and H-1h (Compliance with NPDES regulations) recommend preparation of a Stormwater Pollution Prevention Plan (SWPPP) for the 7,500 acre facility. If implemented by the Mexican authorities as recommended in this EIR/EIS, the SWPPP would include construction and post-construction best management practices (BMP) for erosion and sedimentation control. Post-construction BMPs would be in place through the life of the project. In addition, as discussed in Section 2.13.2 of the RDEIR/SDEIS Mitigation Measure G-1d (Restore surfaces for erosion control and revegetation) would ensure recontouring of graded areas to minimize erosion. Even with the steep terrain at the RWEP site, erosion control BMPs would ensure that erosion and sedimentation are minimized to a level that is less than significant.

F0010-29 The commenter states that it has the same comment on water use for biological restoration efforts as that made in Comment F0019-25. See Response to Comment F0010-25.

F0010-30 The County suggests that a Fire Prevention and Response Plan (FPRP) be included in the Mitigation Measures listed for Impact S-3, as it is discussed recommended in the final paragraph of Impact S-3 in Section 2.14.2 of the RDEIR/SDEIS which was derived from SDG&E's Applicant Proposed Measure (APM) HS-APM-11. SDG&E no longer refers to its fire plan as a "Fire Prevention and Response Plan," but rather to the Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007), and the EIR/EIS language has been updated accordingly. The Fire and Fuels Management Section of the RDEIR/SDEIS contains mitigation to reduce fire risk and ensure that service interruptions of emergency fire protection are minimized, the recommendation to include an "FPRP" (old terminology) was made in the Impact S 3 discussion in error and has been updated to include the more general "Fire Plan," which more accurately reflects the Sempra Utilities Wildland Fire Prevention and Fire Safety Guide represented in HS-APM-11 and modified in Mitigation Measures F-1a and F-1b. The final paragraph under Impact S-3 has been changed as follows:

However, as described in Section 2.15 (Fire and Fuels Management), temporary construction activities would result in an increase in potential fire hazards and could increase temporary demands for fire protection services. Although not discussed here, available mitigation includes coordinating construction schedules, lane closures, and other activities with installation of the project with fire-protection emergency and police services to ensure that disruption to response times and access areas minimized. Preparation of a project specific Fire Prevention and Response Plan (FPRP) Fire Plan for construction and operation (as proposed in HS-APM-11 and modified in Mitigation Measures F-1a and F-1b), which would be reviewed by pertinent regulatory authorities, and coordination for emergency fire suppression (Mitigation Measure F-1c) isare also recommended for Impact F-1 discussed in Section 2.15.

F0010-31 A discussion of impacts to property values within the United States has been added to the analysis for Sempra RWEP under Impact S-5 (Presence of the project would decrease property values) in Section 2.14 in the RDEIR/SDEIS as follows:

Sempra RWEP (Mexico)–(No Available Data; U.S.: Class III). The data that would be required to conduct a detailed analysis of the RWEP impacts to property values in Mexico are unavailable as they would be based on future property values

and on current property values in the region which are unknown. The conclusions of the studies discussed in Section D.14.5 state that overhead transmission lines can, in some instances, reduce the value of nearby properties. However, as discussed in Section D.14.5, incremental effects on property values that may result from overhead transmission lines would be very small, would diminish over time, and would be very difficult to quantify. Based on the studies discussed under Impact S-5 in Section D.14.5, it is likely that the RWEP would not significantly impact property values. Impacts resulting from the presence of wind towers/turbines would be expected to be similar.

Although much of the land north of RWEP is BLM land, RWEP would be visible from private land around the community of Jacumba within the United States and would result in significant and unmitigable visual impacts, even though the project would be several miles to its south. As discussed in Section D.14.5, impacts on property values may result from visual impacts. These issues and potential visual impacts are analyzed extensively in Section 2.3 (Visual Resources) above. Implementation of mitigation measures in the Visual Resources section, such as Mitigation Measures V-3a (Reduce visual contrast of towers and conductors) and other visual resources mitigation specific to Key Viewpoints within the United States, would reduce the visual impacts of the project.

Even in areas where there would be potentially significant impacts (e.g., visual resources), the numerous studies discussed in Section D.14.5 of the EIR/EIS conclude that these effects are usually smaller than anticipated and essentially impossible to generally quantify due to the individuality of properties/neighborhoods, differences in personal preferences of individual buyers/sellers, and the weight of other factors that contribute to a person's decision to purchase a property. Other factors (e.g., neighborhood factors, square footage, size of lot, irrigation potential) are much more likely than overhead transmission lines to be major determinants of the sales price of property (Kroll and Priestley, 1992). In addition, across the board, studies have generally concluded that over time, any adverse property value impacts diminish and within five years the change is negligible most likely due to increased screening as trees and shrubbery grow and/or diminished sensitivity to the line proximity in the absence of adverse publicity. As a result, any changes in property values would not be a substantial decrease and this impact is considered to be less than significant to properties within the United States (Class III).

- F0010-32 The County suggests that the discussion under Impact F-1 in Section 2.15.2 of the RDEIR/SDEIS fails to address the fundamental issue of fire hazard from downed power lines or turbine failures. Impact F-1 (Construction and/or maintenance activities would significantly increase the probability of a wildfire) includes fire hazards associated with construction and maintenance, and fire hazards associated with the long-term presence of overhead transmission lines and wind turbines is discussed under Impact F-2 (Presence of the overhead transmission line would increase the probability of a wildfire). The risk of ignitions and the risk of damage from a project-related ignition can be reduced, though not to a level that is less than significant, through implementation of mitigation for long-term ignitions from both overhead transmission lines (Mitigation Measures F-2a and F-1e) and wind turbines (Mitigation Measure F-2d). These mitigation measures are recommended.

- F0010-33 The County suggests that no mitigation is offered in Section 2.15.2 of the RDEIR/SDEIS to address the fire risk of wind turbines. Mitigation Measures F-2d (Install wind turbine protection system) and F-1e(LR) (Contribute to Defensible Space Grants Fund) would reduce the risk of wind turbine fires and reduce the potential damage to life and property that could result from a wind turbine-ignited fire, respectively and therefore, fire mitigation regarding wind turbines has been addressed in the RDEIR/SDEIS.
- F0010-34 The County's support for the non-wires alternatives and the No Project Alternative, as discussed in the April 9, 2008 comment letter, is acknowledged. The commenter's concerns regarding the BCD Alternative Revision and BCD South Option Revision are acknowledged. The impacts of both alternatives and their revisions are analyzed in Section E.2 of the Draft EIR/EIS and in Section 3.3.2 of the RDEIR/SDEIS.
- F0010-35 The commenter's inclusion of scoping comments made on the BLM Solar Energy Development PEIS is acknowledged. Please also refer to Response to Comment F0010-2.
- F0010-36 The commenter's inclusion of comments made on the BLM Eastern San Diego County Resource Management Plan Revision is acknowledged. Please also refer to Response to Comment F0010-2.
- F0010-37 The commenter's inclusion of scoping comments made on the BLM South Coast Resource Management Plan Revision is acknowledged. Please also refer to Response to Comment F0010-2.