

Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Comment Set H0033, cont.
Gregory Courson & Jeffrey Holt



Responses to Comment Set H0033

Gregory Courson & Jeffrey Holt

H0033-1 The names listed by the commenter are the current names of the routes; however, the Preferred Route is generally called the Proposed Project throughout the EIR/EIS. Moretti's Junction is by the intersection of SR76 and SR79, which is near MP 100 of the Proposed Project (called the Preferred Route by the commenter). The Santa Ysabel All Underground Alternative, which has been found to be environmentally superior in this segment, diverges from the Proposed Project and begins at approximately this point as well (see Figures Ap.1-11 and Ap.1-12 in Appendix 1 of the Draft EIR/EIS). The Santa Ysabel All Underground Alternative runs to just west and just south of where SR79 meets SR78 (approximately MP 109.4).

The Santa Ysabel Partial Underground Alternative and the SDG&E Santa Ysabel Partial Underground Alternative Revision both begin farther south of Moretti's Junction along Mesa Grande Road at approximately MP 105.5 of the Proposed Project. The original alternative route would enter SR79 from Mesa Grande Road approximately 5.2 miles south of Moretti's Junction and from this point south it would be the same as the Santa Ysabel All Underground Alternative. The SDG&E revision would travel south across ranching lands and would enter SR79 south of the Santa Ysabel Mission. The original Santa Ysabel Partial Underground Alternative, the SDG&E Santa Ysabel Partial Underground Alternative Revision, and the Santa Ysabel All Underground Alternative would end just west and just south of where SR79 meets SR78 (approximately MP 109.4), as described by the commenter.

H0033-2 Effective implementation of Mitigation Measures V-42a and V-42b presented in Section 3.2.2.3 of the RDEIR/SEIS would reduce the visibility of the northern and southern transition structures from public viewing areas including roads, trails, and overlooks. Since the structures would be located on private land, it is also reasonable to conclude that private views of the structure locations would also be limited and the visual impact on those other private views would also be reduced.

H0033-3 The commenter notes that the SDG&E Santa Ysabel Partial Underground Alternative Revision was suggested in part as a means of reducing potential impacts to cultural resources, including human remains. Cultural resource impacts of the SDG&E Santa Ysabel Partial Underground Alternative are analyzed in Section 3.2.2.5 of the RDEIR/SDEIS. Section D.7.11 of the Draft EIR/EIS analyzes the cultural resource impacts of the Central Link of the Proposed Project, including the Santa Ysabel Valley, and Section D.7.20 analyzes the impact to cultural resources from the Central Link Alternatives.

H0033-4 The commenter states that hundreds or thousands of oak trees and other trees would be removed by the SDG&E Santa Ysabel Partial Underground Alternative Revision. As described in Section D.2.1.1 of the Draft EIR/EIS, SDG&E estimated the number of trees that would need to be removed and trimmed for the Proposed Project and all of the alternatives as part of the vegetation management for the project. However, for the Draft EIR/EIS, SDG&E made no estimates as to how many trees or shrubs would be removed or trimmed as part of vegetation management for the original Santa Ysabel Partial Underground Alternative because it would be located primarily underground in roads (see page D.2-371 of the Draft EIR/EIS). Similarly, there is not an estimate for

the number of trees or shrubs that would be removed by the SDG&E Santa Ysabel Partial Underground Alternative Revision in the RDEIR/SDEIS, because the majority of the alternative would be constructed underground (trees would not need to be removed for vegetation management for portions of the project that are constructed underground). However, it is acknowledged that the start and end of the SDG&E Santa Ysabel Partial Underground Alternative Revision would not be constructed underground and those areas would likely have trees removed as part of vegetation management. However, the number of trees removed in these two areas would not approach the hundreds or thousands, as suggested by the commenter. It is important to note that any oak woodland habitat, and all other native vegetation communities, that would be impacted along the underground portion of this alternative would be mitigated in accordance with the requirements in Mitigation Measure B-1a.

The commenter also states that the project would need to clear-cut a part of the slope to create a very wide corridor. As described on page B-57 of the Draft EIR/EIS, two 7-foot-wide trenches, separated by 20 feet, would be required for the underground construction of the double-circuit 230 kV line. Clear-cutting of trees and shrubs in this area would not be required along the underground portion of this alternative because vegetation management is not needed when the transmission components are located underground. Therefore, no changes were made to the RDEIR/SDEIS based on these comments.

H0033-5 It is acknowledged that cultural value is often ascribed to natural landscapes such as the oak and manzanita studded portions of the SDG&E Santa Ysabel Partial Underground Alternative Revision. Existing cultural resources laws and regulations provide for management consideration of cultural landscapes, but these are typically altered landscapes (such as plantings, agricultural fields, fences, etc.) associated with specific historic structures. Likewise, some natural landscapes can qualify for inclusion on the National Register of Historic Places — such landscapes are Traditional Cultural Properties (TCPs). However, For NRHP-eligibility, it must be demonstrated that a property, itself, is important for maintaining the cultural traditions of a particular group.

An inventory for historic landscapes has not been completed in the Santa Ysabel Valley, in part because access to many of the privately owned parcels was denied. As part of Mitigation Measure C-6a (*Reduce adverse visual intrusions to historic built environment properties*) a complete analysis will be conducted for any project or alternative that is selected to ensure that impacts to historic landscapes are minimized through relocating towers, screening visual intrusions, or altering towers. As well, landscapes, such as that described in the comment are considered in the land use and visual analyses, with appropriate mitigation measures to reduce impacts to the cultural qualities described.

H0033-6 Please see General Response GR-12 regarding purpose and need for the Proposed Project.

H0033-7 The commenter questions whether the mitigation required for impacts to oak woodland that has already been designated as mitigation for prior development projects is adequate. Permanent impacts to oak woodland habitat would be mitigated offsite by acquiring and preserving oak woodland habitat, in accordance with Mitigation Measure B-1a of the Draft EIR/EIS. The acquired and preserved mitigation lands must be approved by the Wildlife Agencies and cannot use lands previously designated as mitigation. Tree

removals as part of vegetation management would be mitigated at a ratio ranging from 3:1 to 20:1, depending on the size of the tree (see Mitigation Measure B-1a). Tree removal mitigation ratios were developed in coordination with the Wildlife Agencies.

The commenter states that the mitigation for impacts to oak trees and oak woodland is a poor solution because oak trees take hundreds of years to reach full maturity. Please see General Response GR-14.

- H0033-8 To the extent that a visitor to the Santa Ysabel Resort & Casino notices the transmission line in the valley below, it could be perceived as an adverse visual impact. However, the attention of casino visitors is typically drawn to activities within the casino, not the view outside of the casino. Therefore, casino visitors would not be considered a highly sensitive viewing population. Furthermore, the visible landform and vegetation modifications that would be noticeable as a result of the transmission line would appear substantially subordinated to the landform and vegetation changes that have occurred as a result of the casino development.
- H0033-9 The commenter expressed concern about the risk of increased erosion as a result of a future fire de-vegetating the area of the SDG&E Santa Ysabel Partial Underground Alternative Revision. Water quality impacts of the Proposed Project and alternatives presented in the Draft EIR/EIS and the RDEIR/SDEIS were evaluated from environmental baseline conditions (the existing environmental setting) per CEQA Guidelines Section 15125 and BLM NEPA Handbook Section 6.7.1, and did not attempt to speculate about future environmental conditions. Water quality impacts of the SDG&E Santa Ysabel Partial Underground Alternative Revision would be identical to water quality impacts evaluated for the Santa Ysabel Partial Underground Alternative. SDG&E's APM WQ-APM-14 would be implemented, and would reduce potential impacts of erosion and sedimentation to a less than significant level. As stated in Section D.12.3 of the Draft EIR/EIS, the NPDES Program requires implementation of a SWPPP, which describes construction and post-construction Best Management Practices (BMPs) the discharger will use to prevent stormwater runoff. No changes to the text of the RDEIR/SDEIS or the Draft EIR/EIS have been made.
- H0033-10 The commenter is correct in noting that the Proposed Project is a large project and would have significant impacts. The extent of the damage of the project has been analyzed and disclosed in a multi-volume EIR/EIS.
- H0033-11 The commenter's photographs are acknowledged. Solid waste removal within the Central Link is discussed in Section D.14.7 in the Draft EIR/EIS, Impact S-3 (Project construction and operation would increase the need for public services and facilities) and concludes this would be a less than significant impact. Impacts to visual resources within the Central Link are analyzed in Section D.3.7 of the Draft EIR/EIS and in Section 3.2.2.3 of the RDEIR/SDEIS.
- H0033-12 Impacts that would result from the Proposed Project, which has the objective of accommodating the delivery of renewable energy from the Imperial Valley Region to San Diego, are disclosed in the D Sections and E.1 through E.4 of the EIR/EIS and in Section 3 and 4 of the RDEIR/SDEIS.

- H0033-13 The commenter is concerned that the SDG&E Santa Ysabel Partial Underground Alternative Revision would pose a significant threat to firefighting abilities. A Wildfire Containment Conflict model was used in analyzing the Proposed Project and alternatives to evaluate the potentially significant impacts on the ability of firefighters to suppress fires. This model evaluated a variety of characteristics of the project and the project site, including fuel load and topography as the commenter suggests creating an index of features that combine to conflict with fire suppression efforts. Areas determined to present significant conflicts to firefighting efforts are those with a minimum of 1.5 consecutive miles with a criteria ranking of Very High (see Table D.15-23 of the Draft EIR/EIS). This minimum conflict length is based on professional judgment in consultation with the CAL FIRE San Diego Unit, USDA Forest Service Wildfire Incident Commanders, and the BLM Fire Mitigation Education Specialist. The SDG&E Santa Ysabel Partial Underground Alternative Revision would be overhead for only 2,300 feet, which would not meet the minimum criteria of a significant wildfire containment conflict. No changes to the text of the RDEIR/SDEIS or the Draft EIR/EIS have been made.
- H0033-14 The decision on the project's merits will be made by the Lead Agencies' decisionmakers, who will consider all comments. No further response is required because the comment does not address significant environmental issues.
- H0033-15 Please see Response to Comment H0033-2.
- H0033-16 Please see Response to Comment H0033-5.
- H0033-17 Please see Response to Comment H0033-5.
- H0033-18 Please see Response to Comment H0033-8.
- H0033-19 Please see Response to Comment H0033-9.
- H0033-20 The extent of the damage of the project has been analyzed and disclosed in the multi-volume EIR/EIS.
- H0033-21 Impacts that would result from the Proposed Project that has the objective of accommodating the delivery of renewable energy from the Imperial Valley Region to San Diego are disclosed in the D Sections and E.1 through E.4 of the EIR/EIS and in Section 3 and 4 of the RDEIR/SDEIS.
- H0033-22 Please see Response to Comment H0033-13.
- H0033-23 Please see Response to Comment H0033-8.
- H0033-24 The commenter's concern regarding the economic costs and benefits of the La Rumorosa Wind Energy Projects is beyond the scope of the EIR/EIS. As stated in Section 2 of the RDEIR/SDEIS, these projects are evaluated in the EIR/EIS for the benefit of decisionmakers and the public as part of the whole of the action. However, approval of the Proposed Project (or a northern or southern route alternative) would not result in automatic approval of either the Sempra or the SDG&E projects identified below. The SDG&E project would require a separate application to the CPUC, followed by preparation of project-level environment documents and a separate approval from the CPUC

prior to permitting and construction. The Sempra project is subject to approval from the U.S. Department of Energy (DOE) of its Application for a Presidential Permit and completion of all necessary environmental review. The Sempra project would also need to comply with Mexican laws and regulations for those components located in Mexico.

H0033-25 The commenter's maps and photographs are acknowledged. Commenter's concern about the economic impacts of the La Rumarosa Wind Energy project in Mexico is acknowledged. No further response is required because the comment does not address significant environmental issues.