

Comment Set A0001, cont.
California Department of Parks and Recreation

EXHIBIT 3

**Anza-Borrego Desert State Park land ownership
map, May 30, 2007**

Responses to Comment Set A0001 California Department of Parks and Recreation

A0001-1 Comments noted. State Parks concurs that there is a substantial inconsistency between the Proposed Project and applicable State Park plans, and that such plans would need to be amended to overcome such inconsistencies. The comment that amendments would be required if one of the ABDSP Link alternatives is selected is also acknowledged and is noted under the Feasibility discussion for each alternative write-up in Appendix 1, Alternatives Screening Report, Section 4.3 (Anza-Borrego Link Route Segment Alternatives) of the Draft EIR/EIS.

A0001-2 By their nature, General Plans adopt goals and objectives that are left to Park managers to achieve and implement. Not all circumstances that may arise can be identified in advance, nor can issues be identified and resolved in the abstract. In the ABDSP General Plan, the policy regarding geology is succinct: “Goal 1: Protect and preserve the unique geological resources and features of ABDSP.” Guidelines for achieving this goal are equally succinct and include “Guideline 1c: Management plans and decisions with respect to facilities development and visitor access and recreation must recognize and accordingly mitigate negative impacts to these fragile geological features” and “Guideline 1f: Identify and monitor significant geological features. Take protective measures where necessary.”

The APMs and Mitigation Measure for geologic impacts, cited in Draft EIR/EIS Section D.16, work toward achieving the Park’s Geology goal and guidelines. The proposed measures provide for minimizing disturbance, for protecting significant features, and for mitigating impacts. While they achieve what was determined to be a less than significant level of impact on the environment, for a Park such as ABDSP this level of adverse effect can still be inconsistent with its General Plan. It is recognized that desert pavement is a sensitive geologic resource, the functions of which are not readily restored after disturbance. In that regard, it is reasonable to conclude that the Proposed Project’s proposed disturbance of this resource would be inconsistent with the plan as written. Therefore, the table on page D.16-37 in Volume 3 of the Draft EIR/EIS is revised as follows:

Geology Element, pages 3-20 to 3-21		
Goal 1: Protect and preserve the unique geological resources and features of ABDSP.	Desert pavement is a unique geological/soil feature that protects underlying silty and sandy soils from erosion. Damage to the desert pavement can lead to excessive erosion. APMs GEO-APM-1, -2, -5 and -6 would induce the amount of potential erosion. In addition, Mitigation Measure G-42a (Protect Desert Pavement) would reduce impacts. <u>However, the plan’s goal is to “preserve and protect” these resources. Development is inconsistent with preservation, therefore the Proposed Project and alternatives would be inconsistent with this goal</u>	YES <u>NO</u>

A0001-3 CPUC and BLM concur with this comment. The Proposed Project would not be consistent with the goal of protecting the native biota of ABDSP if it is not consistent with guidelines for achieving the goal. The Proposed Project would not be consistent with

one or more of the guidelines. Therefore, it would not be consistent with the Goal. The table on page D.16-39 of Volume 3 of the Draft EIR/EIS is modified as shown below.

Significant and Sensitive Biota Element, page 3-24 to 3-26		
Goal 1: Protect the native biota of ABDSP.	The Proposed Project and alternatives include APMs and mitigation measures to minimize impacts to native vegetation, wetland habitats, and sensitive rare plants. Applicable APMs and mitigation measures include measures specific to personnel training regarding appropriate work practices in sensitive areas, access roads, surveying, applicable laws/regulations, brush clearing, and exotic species introduction (i.e., pets). (See APMs BIO-APM-8, -13, -16, -19, -20, -22, -23, and -25, and Mitigation Measures B-1a, -2a, and -5a. <u>However, there would be impacts to bighorn sheep critical habitat that could not be reduced to a less than significant level. Therefore, the Proposed Project and alternatives would not be consistent with this goal.</u>	YES <u>NO</u>

A0001-4 Significant and Sensitive Biota Element Guideline 1e, cited on Draft EIR/EIS page D.16-41 in Volume 3 enumerates resources recognized as sensitive habitats to be “managed for their biological significance and protected as critical resources...” “All sensitive habitats in ABDSP are to be assessed for individual significance and site-specific threats. The sub-unit classification of Natural Preserve may be considered for those sensitive habitats of outstanding importance for regional biodiversity and sensitive species conservation.”

The Proposed Project and alternatives would not traverse a designated Natural Preserve as such. However, as noted in the comment, the construction and presence of the Proposed Project or an alternative “would preclude or at least make exceedingly difficult any future designation of Natural Preserves.” Nevertheless, in the absence of the designation of a Preserve, it is not clear that development of the Proposed Project or an alternative would be inconsistent with this guideline as written. Therefore, it was concluded that the consistency determination for this guideline should be MAYBE, reflecting this uncertainty. Not change is made in the table.

A0001-5 The comment notes that the Proposed Project would not enhance or perpetuate natural processes, as called for in Biological Processes Guideline 1a. We concur; therefore, the consistency determination is changed to No for ABDSP Final Plan, Biological Processes, page 3-27. In addition, the following has been added to the Consistency Determination column in Section D.16 in Volume 3 of the Draft EIR/EIS:

However, there would be impacts to bighorn sheep critical habitat that could not be reduced to a less than significant level. Therefore, the Proposed Project and alternatives would not be consistent with this goal.

A0001-6 ABDSP Cultural Resources Goal 4 is to “Identify, document, protect, and interpret, if appropriate, archaeological and historic-period resources within culturally sensitive areas, and establish means to minimize impacts from visitor use.” As provided in Guideline 4b, cite at page D.16-44 in Volume 3 of the Draft EIR/EIS, the Park has at its disposal various methods of prohibiting or discouraging use of areas where cultural

resources are found. The proposed mitigation measures and APMs applicable to cultural resources require surveys be conducted to identify and analyze cultural resources in areas potentially disturbed by the Proposed Project and alternatives. Once resources are identified, measures can be undertaken to recover data and protect these resources using the methods available to the Park. Absent specific resource data in areas not already accessible by Park users, it is not possible to determine whether that the Proposed Project and alternatives are consistent with this guideline. Therefore, the table is revised at page D.16-44, Volume 3, as shown below.

<p>Guideline 4b: Actions in future management plans will include the redirection of current visitor activities, such as hiking, camping, etc., which are damaging known archaeological sites or other cultural properties or have the potential to impact resources within culturally sensitive locations. Camping will be excluded if damage to cultural remains is documented. Other management actions to protect these areas may include rerouting trails, or roads; road closures; relocation of parking, trailheads, or other visitor facilities; and posting signs.</p>	<p>The Proposed Project and alternatives have the potential to increase impacts (both direct and indirect) to cultural resources located along existing roads and trails. Implementation of Mitigation Measures C-1a (Inventory and evaluate cultural resources in the Final APE), C-1b (Avoid and protect potentially significant resources), C-1c (Develop and implement Historic Properties Treatment Plan), C-1d (Conduct data recovery to reduce adverse effects), and C-2a (Consult with agencies and Native Americans) will reduce project-related effects to cultural resources to a level that is less than adverse (Class II). <u>However, impacts in portions of the Anza-Borrego Link would be significant and unmitigable (Class I) due to the sensitivity and local importance of its Native American resources. In particular, impacts in the traditional landscape and use area would be significant and partially unmitigable (Class I). The sensitive landscape would be bisected by several miles of transmission lines and towers which cannot be relocated or screened from view.</u></p>	<p>YES<u>NO</u></p>
---	--	--------------------------------

A0001-7

As noted in this comment from State Parks, the construction and presence of the Proposed Project or an alternative “would preclude or at least make exceedingly difficult higher levels of protection, including any future designation of Cultural Preserves.” However, in the absence of the designation of a Preserve and in the absence of additional information, it is not clear that development of an alternative would be inconsistent with Cultural Resources Element Guideline 4c (Draft EIR/EIS Volume 3, page D.16-44). Therefore, it is concluded that the consistency determination for this guideline should be MAYBE, reflecting this uncertainty. The text in the table is revised as shown below.

<p>Guideline 4c: Future management plans will identify areas of the Park with highly significant cultural remains that warrant higher levels of protection. Recommended protective actions may include Superintendent-ordered closures and designation of certain areas as Cultural Preserves.</p>	<p>Technical studies for the Proposed Project have identified cultural resources within ABDSP that may be highly significant. This information can be useful in establishing Cultural Preserves (CPs). <u>The Proposed Project would have no impact on the existing We-Nelsch Cultural Preserve, although alternatives to the Proposed Project could create indirect visual impacts to the CP. The impacts that the Proposed Project or alternatives would have on CPs identified in the future would depend on the location of the CP, types of cultural resources in the CP, and whether direct or indirect impacts would adversely affect the qualities that make those resources significant.</u> Guideline 4c will be aided by implementation of Mitigation Measures C-1a (Inventory and evaluate cultural resources in the Final APE) and C-2a (Consult with agencies and Native Americans). <u>Nonetheless, some impacts of the Proposed Project could be adverse, even after mitigation.</u></p>	<p>YES MAYBE</p>
---	--	---------------------------------

A0001-8 CPUC and BLM concur with this comment. Therefore, it is reasonable to defer to the knowledgeable Park personnel with regard to both the Park plan and the resources to be protected under that plan. Therefore, the consistency determination with regard to Infrastructure and Operations Goal 3 discussed on page D.16-46, Volume 3 of the Draft EIR/EIS is changed as shown below.

<p>Goal 3: Provide trails and roads that offer the opportunity for diverse visitor experiences while not compromising the integrity of park resources.</p>	<p>The Proposed Project and alternatives would use existing ROW and access roads to the extent possible, which would help to minimize impacts to surrounding biological resources.</p> <p>The construction of access roads and spur roads associated with the Proposed Project and alternatives would compromise the integrity of park resources by creating unnatural or more prominent lines of demarcation in vegetative patterns. Also, land scarring from construction activities would persist for an extended period of time due to the slow recovery and recruitment rates in arid landscapes. Mitigation Measures V-2a through V-2c would reduce land scarring and road construction impacts, but impacts to the integrity of park resources would remain.</p> <p>The degree to which the Proposed Project and alternatives would be consistent with the goal is unclear. It depends on the interpretation of what constitutes a compromised resource.</p>	<p>MAYBE NO</p>
---	--	--------------------------------

A0001-9 The Park notes that the Proposed Project would not be entirely within the existing easements. It is further noted that the available documentation on portions of the ROW does appear to specify a width. In some circumstances there appears to be no recorded easement. Guideline 4a is specific to expanding facilities “within existing easements.” The history and status of the existing transmission line easement is discussed in Section B.2.2 of the Draft EIR/EIS. Therefore, this guideline included at page D.16-48, Volume 3 of the Draft EIR/EIS would not be applicable. It is deleted in its entirety, as indicated below.

<p>Guideline 4a: Should Caltrans or utility companies propose to improve or expand existing facilities (within existing easements); the department will work in collaboration with them to minimize adverse impacts to Park resources and the visitor experience. By evaluating proposed designs, DPR will be able to foster implementation of park friendly project elements (such as: reducing intrusion of footings, built elements that can be camouflaged to blend with or match natural surroundings, spacing between facilities to be less obtrusive to vistas, etc.)</p>	<p>The Park has been involved in the review of the Proposed Project and alternatives and has engaged in discussions on how to minimize impacts. Therefore, the project is consistent with this goal</p>	<p>YES</p>
---	---	------------

A0001-10 The Park is correct in noting that development of the Proposed Project or alternatives would not result in a net improvement to the environment and are not consistent with the General Plan Management Zones through which it they would pass. Therefore, the project would not be consistent with this Infrastructure and Operations Guideline 4b, included at page D.16-49, Volume 3 of the Draft EIR/EIS. The text is amended as indicated below.

<p>Guideline 4b: If Caltrans or utility companies propose new facilities, in areas not presently developed for such use, the department will work with the appropriate parties to evaluate alternatives that result in a net improvement to the environment. As well, such evaluation will strive to ensure projects which are consistent with the Management Zones delineated in this General Plan.</p>	<p>The Park has been involved in the review of the Proposed Project and alternatives and has engaged in discussions on how to minimize impacts. Therefore, the project is consistent with this goal. However, the Proposed Project and alternatives would not result in a "net improvement to the environment."</p>	<p>YES NO</p>
---	--	-------------------

A0001-11 The text in Section D.17 Plan Amendments, subsection D.17.2.2 (Draft EIR/EIS page D.17-7, Volume 3) is amended to indicate that an amendment to the ABDSP General Plan will be required. The word may is changed to will in the first sentence of the section, as shown:

... are three reasons that the proposed SRPL ~~may~~would require an amendment

State Parks has provided additional information on the requirement for an amendment to the General Plan. This is added to the last paragraph of subsection D.17.2.2, as shown:

... would violate applicable sections of the Public Resources Code. Providing any permit or approval within ABDSP is a subordinate act that must be consistent with the ABDSP General Plan (Pub. Res. Code § 5002.2)

A0001-12 The commenter's agreement with the CPUC and BLM's three basic project objectives is acknowledged.

A0001-13 Please refer to Responses to Comments A0001-1 through A0001-11 for responses to comments on Sections D.16 and D.17. The commenter's description of the ABDSP General Plan process and the guidance regarding undergrounding of utilities is acknowledged. Section H.3.2 of the Draft EIR/EIS found that the Partial Underground 230 kV ABDSP SR78 to S2 Alternative with the All Underground Option would be environmentally superior in the Anza-Borrego Link. With this alternative, the 230 kV line would be entirely underground within ABDSP.

- A0001-14 The following text under Section B.2.2 (Anza-Borrego Link) in Volume 1 of the Draft EIR/EIS (page B-6) has been revised as requested to clarify the easement issue within ABDSP:
- However, a minimum of an additional 50-foot ROW width would need to be acquired,...
- A0001-15 Construction of the line is technically feasible within ABDSP regardless of the ROW concerns. Due to the disagreement between parties regarding the status of the easement, a legal decision will be required to resolve the issue. Thus, determination of the status of the easement is outside of the scope of CEQA, NEPA, and this EIR/EIS. The validity of the legal arguments associated with the easement issue was raised in Phase 2 of the General Proceeding for the Sunrise Powerlink Project, and the matter will be addressed by the CPUC through that portion of the proceeding.
- A0001-16 Please refer to Responses to Comments E0002-17 and E0002-19. SDG&E has stated that the source of the following statement is uncertain and that the 2006 GPS survey accurately positions the location of the facilities. Therefore, the following sentence has been deleted from Section B.2.2:
- ~~SDG&E asserts that maps of the facilities to date, including results of the 2006 GPS survey, are inaccurate.~~
- A0001-17 The history of the transmission line ROW is acknowledged and Section B.2.2 states that the prescriptive and equitable easements have not yet been decided on by the parties. Please refer to Response to Comment A0001-15.
- A0001-18 The commenter's statement that a SPRC action and a General Plan amendment would be required with the Overhead 500 kV ABDSP Alternative and that a 500 kV line would potentially increase the burden on the underlying estate is acknowledged. Please refer to Response to Comment E0004-138, which discusses a reroute proposed by SDG&E for the Overhead 500 kV ABDSP Alternative in which the towers, pull sites, and access roads would all be within the 100-foot ROW.
- A0001-19 The commenter's position regarding the solar thermal transmission line component of the New In-Area Renewable Generation Alternative is acknowledged. Option 2 of the transmission line upgrades would place the 138 kV line underground and within existing paved roadways through ABDSP. The projects considered in the Draft EIR/EIS, including the solar thermal component, are representative of reasonable renewable generation scenarios. Should the New In-Area Renewable Generation Alternative be approved, the party selected by SDG&E to construct and operate the generation would initiate permitting and CEQA and/or NEPA compliance for each project and would develop a detailed project description at that point.
- A0001-20 The commenter states that some of the proposed biological mitigation will not be sufficient to uphold ABDSP General Plan Biological Process Goal 1/Guideline 1a to protect natural processes, support native biodiversity, and allow adequate space and time for organisms to adapt to the human element and environmental variables. The representatives of the CPUC and BLM met with State Parks staff on several occasions in preparing the Draft EIR/EIS and asked for input regarding the mitigation ratios for impacts in ABDSP. Specific ratios were never provided by State Parks, only statements, such as in

this comment, that the ratios were not high enough. In the absence of specific input from State Parks, the USFWS (Chris Otahal) was asked to review the mitigation ratios that were based primarily on the requirements established in regional habitat conservation plans and also on mitigation required for other projects. The mitigation ratios were conservatively calculated based on an assumption that all impacts will occur in preserve, such as ABDSP. The ratios, as they appear in the Draft EIR/EIS, are as they were agreed to by the USFWS. See General Response GR-14 Impact Calculations/Mitigation Ratios.

The commenter further states that all suitable habitats for sensitive species, regardless of visible signs of occupation, should be mitigated at the same ratios as those that are currently occupied. For the most part, this is the case. For example, permanent impacts to occupied least Bell's vireo habitat are required to be mitigated at a 3:1 ratio. As shown in Table D.2-7 (page D.2-87) of Volume 1 of the Draft EIR/EIS, the majority of the riparian scrubs and woodlands where the vireo could occur, also require mitigation for permanent impacts at a 3:1 ratio. A distinction is made for occupied habitat impacts. Impacts to occupied habitat must be mitigated with occupied habitat; however, the mitigation ratios, as noted above, are similar whether or not the habitat is occupied at the time of survey. Therefore, no change has been made to the Draft EIR/EIS based on this portion of the comment.

A0001-21 The commenter is concerned that mitigation ratios do not distinguish between impacts and mitigation for preserved and managed park lands and unpreserved, unprotected lands outside ABDSP. The commenter believes that all mitigation ratios for impacts within ABDSP must be increased by at least an additional 1:1, and this comment is acknowledged. However, the mitigation ratios were conservatively calculated based on an assumption that all impacts will occur in preserve areas and that all mitigation will occur in preserve areas; these preserve areas include ABDSP. Additionally, much of the mitigation for impacts within ABDSP require a ratio of 5:1 because the impacts are to Peninsular bighorn sheep designated critical habitat. Therefore, no change to the Draft EIR/EIS has been made based on this comment. See General Response GR-14 Impact Calculations/Mitigation Ratios.

Finally, the comment that a total mitigation package that retains overall regional ecosystem functions, not just maintenance of specific species populations, will be required is acknowledged.

A0001-22 The commenter states that some of the biological resources APMs are included in Appendix 12, while others are not, and that the language in those that are included appears to be the same as the original APMs, including NCCP language that is not applicable to this project. The commenter states that it must be clarified which APMs will be applied to the project and which will not. All of the biological resources APMs are specific to SDG&E and apply to projects for which SDG&E is the Applicant, including the Proposed Project. The APMs are based on SDG&E's NCCP, which itself is not applicable to this project (see discussion in Section D.2.3.3 of Volume 1 of the Draft EIR/EIS). SDG&E was not willing to modify the APMs based on early requests from the Wildlife Agencies and the Draft EIR/EIS preparers. So, in some cases, the APMs were deemed inappropriate or inadequate to provide mitigation for the Proposed Project. In such cases, mitigation measures were proposed in addition to the APMs. For projects

where SDG&E may not be the applicant (e.g., New In-Area Renewable Generation Alternative — solar thermal), applicable SDG&E APMs were converted into mitigation measures for those projects (e.g., B-1d Perform Protocol Surveys, which is the same as Biological Resources APM-1). In Appendix 12, some of the biological resources APMs that were converted to mitigation measures (e.g., B-1d) still identify SDG&E as the entity that would implement the mitigation measure; it should state “the Applicant” instead of SDG&E. Appendix 12 and applicable sections of text within the main body of the Draft EIR/EIS have been changed to clarify this. Also see General Response GR-13, Applicant Proposed Measures.

A0001-23 The commenter requests that a requirement for maintenance and monitoring of all restoration, reseeding, relocation, etc., in the park be maintained and monitored for a minimum of five years.

Mitigation Measure B-2a (page D.2-95) of Volume 1 of the Draft EIR/EIS has been revised as follows:

The mitigation of habitat shall be maintained and monitored for five years after installation, or until established success criteria...are met.... Maintenance and monitoring in ABDSP shall be for a minimum of five years, even if established success criteria are met before the end of five years.

Mitigation Measure B-5a (page D.2-104) of Volume 1 of the Draft EIR/EIS has been revised as follows:

The reseeding or relocation of plants in ABDSP shall be maintained and monitored for a minimum of five years, even if established success criteria are met before the end of five years.

A0001-24 The commenter states that State Parks must have review and approval authority, including which weed species would be addressed, over the weed control plan within SDG&E ROW within and adjacent to the boundaries of ABDSP.

Mitigation Measure B-3a (page D.2-97) of Volume 1 of the Draft EIR/EIS has been revised as follows:

Prior to implementation, the Applicant shall work with the landowners to obtain authorization of the weed control treatment that is required. State Parks shall have review and approval authority over the Weed Control Plan for ROW within or adjacent to the boundaries of ABDSP.

...(1) are considered by the San Diego County Agriculture Commissioner or State Parks (for ROW within or adjacent to ABDSP) as being a priority for control and (2) aid and promote...

...High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006) or are weed species of concern to State Parks (for ROW within or adjacent to ABDSP). These plant species shall be treated prior to construction according to control methods and practices for invasive weed populations designed in consultation with Cal-IPC and State Parks (for treatment in ROW within ABDSP).

Mitigation Measure B-3a (page D.2-98) of Volume 1 of the Draft EIR/EIS has been revised as follows:

...species in consultation with the PCA, the San Diego County Agriculture Commissioner, State Parks (for treatment in ABDSP) and Cal-IPC with the goal of controlling...

The commenter requests clarification of the meaning of “lifespan of the project.” Mitigation Measure B-3a (page D.2-98) of Volume 1 of the Draft EIR/EIS has been revised as follows:

For the lifespan of the project (i.e., as long as the project is physically present), long-term...

A0001-25 The commenter’s statement that all impacted sensitive plants within ABDSP, listed or not, should be mitigated with occupied habitat if at all possible is acknowledged; however, no change has been made to the Draft EIR/EIS based on this comment, because Mitigation Measure B-5a provides adequate mitigation for non-listed (but still sensitive) plant species defined as “special status” in Section D.2.1.1 of Volume 1 of the Draft EIR/EIS. As stated in Mitigation Measure B-5a (pages D.2-103 and D.2-104 in Section D.2.9 of Volume 1 of the Draft EIR/EIS), impacts to sensitive plant species shall first be avoided where feasible, and, where not feasible, impacts shall be compensated as follows (see below). Also see Responses to Comments A0001-23 and A0001-26.

A0001-26 The commenter requests that text in Mitigation Measure B-5a be revised to include “in consultation with, and approval of, State Parks.” Mitigation Measure B-5a (page D.2-103) of Volume 1 of the Draft EIR/EIS has been revised as follows:

...temporarily disturbed areas (reseeding and relocation of plants in ABDSP shall be determined ~~by~~ in consultation with, and approval of, State Parks).

A0001-27 The commenter requests clarification in Mitigation Measure B-7c that the tunnel would be for SR78 and not sheep. The requested change has been made to Mitigation Measure B-7c of Volume 1 of the Draft EIR/EIS as follows:

...fund the design and construction of an overpass (for sheep) or tunnel (for vehicles) to facilitate PBS movement across a SR78 highway at a location determined by the USFWS (in coordination with State Parks and CDFG). Tunnel or overpass design must be approved by the Wildlife Agencies. ...

The commenter’s statement that it may be more effective to utilize existing topography for the sheep and put SR78 in a tunnel through the hillside is acknowledged.

A0001-28 The commenter states that Mitigation Measure B-7d should include a requirement that pipes, etc., that are stored onsite be inspected for burrowing owls. Text has been added to Mitigation Measure B-7d (page D.2-118) of Volume 1 of the Draft EIR/EIS as follows:

During construction, any pipe or similar construction material that is stored onsite for one or more nights shall be inspected for burrowing owls by a qualified biologist before the material is moved, buried, or capped.

A0001-29 The commenter requests the addition of specific text to ensure that the potential for night lighting is taken into consideration for mitigation of impacts to bat nursery colonies.

Mitigation Measure B-9a (page D.2-144) of Volume 1 of the Draft EIR/EIS has been revised with the specific text as follows:

...vibration impacts, or any other construction-related impact (including lighting used for night work) to a nursery colony as determined....

A0001-30 The commenter requests modification of Mitigation Measure B-10a to include State Parks for alternative measures in ABDSP. Mitigation Measure B-10a (page D.2-147) of Volume 1 of the Draft EIR/EIS has been revised as follows:

...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.

A0001-31 It is acknowledged that entryways to the Park are important visual resources and can set the tone for the visitor's experience. The Draft EIR/EIS states in Section D.3.13 (page D.3-204), and shows in Figure D.3-28, that the Proposed Project (or SDG&E's "Enhanced" Northern Route Alternative) would cause significant Class I visual impacts throughout the entire length of the route in Anza-Borrego Desert State Park (ABDSP). While numerous other possible viewpoints could have been selected to demonstrate the project's significant visual impact on the Park, it was determined that the eight (8) Key Viewpoints selected for ABDSP and presented in the Draft EIR/EIS were representative of the various landscapes and viewing experiences along the project route, and adequately capture the most apparent visual impacts that would be experienced in the Park. With respect to the eastern and western entryways to the Park, KVPs 5, 6, and 11 provide a variety of impact characterizations along and in the immediate vicinity of SR78. Montezuma Grade was not selected for a viewpoint analysis because, at a viewing distance of approximately 10 miles (to east of Yaqui Ridge), the Proposed Project would not be a prominent feature in the landscape and would be minimally noticeable except where structures skyline (extend above the horizon) further to the east along Old Kane Springs Road or SR78. At these extended viewing distances, the visual impact would not be significant. The visual impact that would occur in the vicinity of the Split Mountain Road entryway would be similar to that captured for the viewpoint (KVP 5) on Old Kane Springs Road approximately 8.5 miles to the west. Also, KVP 30 on Split Mountain Road, just south of the existing San Felipe Substation captures the impact that would be associated with the construction of a 500 kV/230 kV substation under the Partial Underground 230 kV ABDSP SR78 to S2 Alternative component. In each of these examples, the resulting visual impact is classified as significant and unmitigable (Class I), which is the highest impact classification.

Kenyon Overlook was selected as an elevated vista Key Viewpoint because it was sufficiently close (approximately 0.5 miles from the route) that the project would be a noticeable and prominent feature in the landscape as illustrated in Figure D.3-9B. As shown in Figure D.3-9B, the access road and structure pads would contribute as much to the visual impact as the towers and conductors, if not more. At distances greater than two miles, transmission structures, particularly lattice-design structures, can become extremely difficult to see. Except for Pinyon Ridge, which is approximately 2.5 miles from the route, other vista viewpoints are substantially further away and include Blow Sand Hill (approximately 3 miles away), the Pinyon Mountains (approximately 4 miles away), Borrego Mountains (approximately 4 miles away; see Figure A1-31), Font's Point (approx-

imately 8 miles to the closest visible point west of the Borrego Mountains and approximately 15 miles to the closest visible point east of the Borrego Mountains; see Figure B30-1), and Montezuma Grade (approximately 10 miles away). These vista viewpoints were not selected as viewpoints because of their substantially greater distance from the route.

With regard to the visual impact to the Sky Trail, the resulting visual impact would be significant and unmitigable (Class I).

A0001-32 The visual analysis presented in the Draft EIR/EIS presents the methodology and rationale for each visual change determination. While the visual change determinations for KVPs 5 through 12 within ABDSP range from moderate to moderate-to-high, the resulting impact conclusions for these eight key viewpoints were all significant and unmitigable (Class I), which is the highest (most severe) impact conclusion. Of the eight selected viewpoints, only two (KVPs 6 and 11) are on a paved road (SR78). Three (KVPs 5, 7, and 12) are on back-country 4WD roads (also used by hikers, equestrians, and mountain bikers), one (KVP 8) is from a vista overlook accessible only by hiking trail), one (KVP 9) is from a hiking/nature trail, and one (KVP 10) is from a primitive camping area. It is believed that the diverse viewing opportunities represented in these eight key viewpoints adequately capture the nature of the visual impacts that would be experienced within the Park, even from backcountry areas not in the immediate vicinity of the eight key viewpoints.

A0001-33 As noted above in the Response to Comment A0001-31, the visual analysis presented in the Draft EIR/EIS states in Section D.3.13 (page D.3-204) and illustrates in Figure D.3-28, that the Proposed Project (or SDG&E's "Enhanced" Northern Route Alternative) would cause significant Class I visual impacts throughout the entire length of the route in Anza-Borrego Desert State Park (ABDSP). While numerous other possible viewpoints could have been selected to demonstrate the project's significant visual impact on the Park, it was determined that the eight (8) Key Viewpoints selected for ABDSP and presented in the Draft EIR/EIS were representative of the various landscapes and viewing experiences along the project route and adequately capture the most apparent visual impacts that would be experienced in the Park. Blow Sand Hill or Ocotillo Wells SVRA were not selected as a Key Viewpoints or mentioned in the narrative of Key Viewpoint 5 because of their greater distance (approximately three miles) from the project route. Although the potential exists for significant visual impacts to occur at these more distant locations, the impact would be somewhat reduced. At viewing distances greater than approximately two miles, when there is mottled terrain in the background, lattice structures can substantially blend with the background, becoming considerably less distinct.

A0001-34 Key Viewpoint 6 represented in Figures D.3-7A/B was selected in order to demonstrate the visual impact of the Proposed Project in the vicinity of the Narrows, as requested by ABDSP staff. This viewpoint captures the existing Narrows Substation because of its close proximity to the Narrows. The specific view orientation at this viewpoint, while it does capture the existing substation, also encompasses SR78 and three of the large H-frame structures that would converge on the Narrows. The images reflect the landscape and viewing conditions in the vicinity of the Narrows, which also happens to include the Narrows Substation. The Number of Viewers determination (moderate) is also considered reasonable along this portion of SR78 (when one considers busy inter-

state freeways to have high numbers of viewers and backcountry roads and recreation trails with limited accessibility to have low numbers of viewers) and the “foreground” Distance Zone determination accurately identifies the distance zone through which that portion of the Proposed Project shown in the images passes. Therefore, the visual analysis and imagery presented for this viewpoint do not understate the visual impacts in the vicinity of the Narrows. Indeed, the resulting visual impact conclusion for this key viewpoint is significant and unmitigable (Class I), which is the highest (most severe) impact classification.

A0001-35 While the Number of Viewers venturing into the Mine Wash area of the Park may seem to warrant a higher classification than the “low” value assigned in the analysis, on an absolute basis (compared to the number of viewers on a busy freeway for example), the number of viewers is low and should be recorded as such in the analysis. The “moderate” determination for Overall Visual Change accurately reflects the more limited views of the project from within the Mine Wash area (essentially only one structure would be visible due to screening by terrain and/or vegetation). However, the resulting impact conclusion for this key viewpoint is still significant and unmitigable (Class I), which is the highest (most severe) impact classification.

A0001-36 The visual setting parameters (including Number of Viewers) are specific to the actual viewpoint (Kenyon Overlook in this case), which is accurately described as “low,” because it is reachable only by hiking trail. While the Overlook can be accessed by a trail from the Yaqui Pass camping area, the Proposed Project is not directly visible from the camping area. Therefore it was not discussed in the impact narrative. The resulting Overall Visual Sensitivity for this key viewpoint correctly reflects the relatively low number of viewers venturing to the Overlook and was determined to be “moderate-to-high.” The resulting impact conclusion for this key viewpoint is significant and unmitigable (Class I), which is the highest (most severe) impact classification.

A0001-37 The text of the Draft EIR/EIS (page D.3-24) does not assert that the project would not be visible from Tamarisk Grove Campground unless trees were removed for construction purposes. However, the text does state that:

“...views of the Proposed Project from within the campground would be minimally affected because the existing trees that surround the campground almost entirely screen views to the east, south, and west. However, if during construction, any trees were to be removed that would open up views from the campground toward the project, the resulting visual impact could become significant.”

This is an accurate statement in that, while views of the Proposed Project would be available from the southern perimeter of the campground (including the campfire area), views of the project from the actual camping area beneath the tree canopy would be almost entirely screened from view. However, it is also acknowledged that if trees are lost for other reasons (such as drought, disease, fire, or removal for safety reasons), a similar, significant (Class I) visual impact could occur.

The comment states that the discussion omits other park facilities that would be significantly adversely impacted including the Cactus Loop Trail and the Yaqui Well Nature Trail. However, the analysis presented for Key Viewpoint 9 is from Station 6 on the

Cactus Loop Trail and the analysis for Key Viewpoint 10 is from the Yaqui Well Primitive Camping Area, which is in close proximity to the Yaqui Well Nature Trail.

- A0001-38 The determination of overall visual sensitivity for a given Key Viewpoint is based on the ratings assigned for the contributing factors of visual quality, viewer concern, and overall viewer exposure, and is reflective of the general landscape quality and viewing circumstances. The designation of the area as a primitive campground is accounted for in the analysis and description of viewer concern, which in this case was rated “high.” The overall visual change determination is related to project-induced changes and not the existing landscape characteristics or viewing circumstances. Therefore, a change of the “moderate-to-high” overall visual change classification is not warranted.
- A0001-39 The importance of SR78 as a major gateway to the park and a state-designated Scenic Highway are captured in the Viewer Concern input (which is rated “high”). Furthermore, the “moderate” rating for number of viewers at this viewpoint is an accurate characterization (in absolute terms) of the viewing population along this portion of SR78. The overall visual change determination is related to project-induced changes and not the existing landscape characteristics or viewing circumstances (including SR78’s “gateway” status or designation as a Scenic Highway). Therefore, a change of the “moderate-to-high” overall visual change classification is not warranted.
- A0001-40 The Visual Sensitivity determination is based on assessments of Visual Quality, Viewer Concern, and Viewer Exposure. The presence of springs contributes to variety in vegetation, which directly effects landscape visual quality and is factored into that determination. The use of the area for camping, reflection, and personal experience contributes to the determination of viewer concern. Since the determination of Visual Sensitivity already takes into account these factors, no change to the determination is warranted. Also, Visual Change is a function of Project-induced effects and is not related to existing characteristics or use of a given area. Therefore, no change to the Visual Change determination is warranted.
- A0001-41 The commenter’s agreement with the assessment that construction and operation of the Proposed Project is inconsistent with State Wilderness and wilderness area designation is noted. Additionally, the commenter’s agreement with the conclusion that impacts to wilderness and recreation within ABDSP are significant and unmitigable is noted.
- A0001-42 It is noted that the existing 69 kV wooden monopoles near Tamarisk Grove campground in ABDSP are visually unobtrusive and are not perceived as inconsistent with the Park experience. This is consistent with the analysis in Section D.5.6 of Volume 2 of the Draft EIR/EIS.
- A0001-43 The commenter states that Impact WR-1 should be significant and unmitigable (Class I) only, because it should be conservatively assumed that relocation of structures may not be successful. Overhead transmission line design is flexible to accommodate shifts in siting locations. If environmental, legal, or technical constraints do not allow the location of the transmission structure to shift, the trail can be rerouted to allow for continued use. Without mitigation permanent preclusion of trail use would be significant; however, implementation of Mitigation Measure WR-3a (Coordinate tower and

road locations with the authorized officer for the recreation area) would reduce this impact to less than significant.

The commenter states that the Impact WR-3 analysis does not adequately discuss impacts specific to Yaqui Well Primitive Campground, Yaqui Pass Primitive Campground, Yaqui Well Nature Trail, Narrows Earth Trail, and the Cactus Loop Trail. The Proposed Project would be located approximately 0.2 and 0.7 miles south of Yaqui Well Primitive Campground and Yaqui Pass Primitive Campground. Because the Proposed Project would not preclude use of these recreation areas, they are not considered in the analysis for Impact WR-3. Although not individually identified, all ABDSP trails were considered in the analysis for Impact WR-3 (refer to page D.5-30, Section D.5.5 of Volume 2 of the Draft EIR/EIS).

The commenter states that it may not be possible to identify or develop replacement facilities of comparable quality and capacity to Tamarisk Grove in ABDSP and also that specific facilities associated with Tamarisk Grove should be identified. Mitigation Measure WR-3B (Provide funding for planning and physically establishing replacement campsites and facilities), provides for the replacement of associated recreation facilities, which would encompass the employee residence and maintenance facilities at Tamarisk Grove. Mitigation Measure WR-3b has been revised as follows to consider the scenario in which comparable recreational resources cannot be developed in ABDSP.

WR-3b Provide funding for planning and physically establishing replacement campsites and facilities. If technically feasible and possible without creating impacts to sensitive resources or conflicting with established land uses, project facilities shall be relocated or re-routed to prevent closure of recreation facilities, in coordination with CDPR officials. Should Tamarisk Grove Campground or other established recreation facility in ABDSP be closed by CDPR due to public safety concerns or a significant reduction of recreational value resulting from construction of the Proposed Project or alternative, then SDG&E shall provide full funding for planning and developing replacement campsites and facilities at a location in ABDSP identified by CDPR that are of comparable quality and capacity to the closed campsite and/or facility. Should it be determined infeasible by CDPR to replace closed campsites and facilities with those of comparable quality and capacity, SDG&E shall provide full funding for planning and developing lesser replacement campsites and facilities at a 3:1 ratio as requested by CDPR (replacing each lost campsite with three new sites). SDG&E shall document its payment to and coordination efforts with CDPR officials and provide this documentation to the CPUC, BLM at least 30 days prior to initiating any SRPL construction that would affect the subject park facility.

A0001-44 The commenter states that Impact WR-1 should be Class I only, because it should be conservatively assumed that relocation of structures may not be successful. Overhead transmission line design is flexible to accommodate shifts in siting locations. If environmental or technical constraints do not allow the location of the transmission structure to shift, the trail can be rerouted to allow for continued use. Without mitigation permanent preclusion of trail use would be significant; however, implementation of Mitigation

Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area) would reduce this impact to less than significant.

A0001-45 The comment regarding policy inconsistencies with the Proposed Project has been acknowledged. Please see Responses to Comments A0001-1 through A0001-11 for a specific policy consistency text changes in the EIR/EIS.

A0001-46 Please see Responses to Comments A0001-3 through A0001-5. It was determined that the Proposed Project and alternatives would be inconsistent with a number of goals and guidelines set forth in the ABDSP General Plan. In light of that, the project and alternatives would also be inconsistent with the Biological Processes goal and guideline cited. Therefore, the consistency determinations for this goal and guideline have been amended to include the following:

However, there would be impacts to bighorn sheep critical habitat that could not be reduced to a less than significant level. Therefore, the Proposed Project and alternatives would not be consistent with this goal.

Figure A1-31. Borrego Mountain West Butte
[CLICK HERE TO VIEW](#)

This page intentionally blank.