

Comment Set A0018, cont.
County of San Diego – Department of Planning and Land Use

A0018-39

A0018-40

A0018-41

Comment Set A0018, cont.
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24. **E.1.5-14** *“Once outside the CNF, the route would traverse primarily open unincorporated communities. It would follow the Loveland Reservoir site of the reservoir is not used for recreational purposes.”*

A0018-42

This statement is incorrect and should be revised. The California Riding and Hiking Trail is located to the west and north of Loveland Reservoir as indicated in Figure E.1.5-1, which also indicates the Loveland Substation on the trail. Please indicate mitigation measures for this Substation.

E.2 BCD Alternative

25. **E.2.5-3 Operational Impacts**
One of the access roads required for construction and continued maintenance of the overhead transmission line along the BCD route near MP BCD-16.5 would be collocated with the PCT for approximately 1.6 miles. Along this segment, the PCT would be graded and widened for use as a 20-foot-wide access road.

A0018-43

The PCT is a non-motorized trail for hiking and horseback riding only. A mitigation measure that includes security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles.

26. **E.2.5-4** *The BCD Alternative would cross the PCT at MP BCD-16.5. If transmission support structures were sited on the trail, recreationists would be precluded from these locations.*

A0018-44

Mitigation should include reroute and construction of any sections decommissioned. Mitigation Measure WR-1c: Coordinate with local agencies to identify alternative recreation areas and WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities (i.e. trails) should be incorporated into the mitigation

E.3 Route D Alternative

27. **E.3.5-3** *The Route D Alternative would cross the California Riding and Hiking Trail near MP D-1.2 and the Trans-County Trail three times near MP D-9.4. If transmission support structures were sited on the trails, recreationists would be permanently precluded from these locations.*

A0018-45

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction if any sections of trail decommissioned.

E.4 Modified Route D Alternative

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28. **E.4.5-4** *The Modified Route D Alternative would intersect the PCT three times between MP MD-12 and -13 in new ROW. If transmission support structures were sited on the PCT, recreationists would be precluded from these locations.*

A0018-46

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction of any sections decommissioned.

E.5 New In-Area Renewable Generation

A0018-47

29. **E.5-129** Options 1 and 2 may impact the following four regional trails:
- California Riding and Hiking Trail which crosses SR78 and runs North/South through San Felipe Valley on the north-east side of San Felipe Rd. (S2)
 - Coast to Crest Trail proposed West/East alignment crossing San Felipe Valley at San Felipe Rd. (S2).
 - Trans County Trail which crosses SR78 at Plum Canyon and continues up Grapevine Canyon
 - PCT which crosses SR78 just east of the S2 intersection

CIRCULATION & ROADS

The Proposed Project may potentially have significant impacts to County roads and intersections. These current comments are intended to augment and in some cases reiterate the County's general comments submitted previously for the project Notice of Preparation (NOP):

1. The DEIR/EIS indicates that the Proposed Project will result in temporary construction impacts to several County maintained roads. The temporary impacts include road and lane closures, disruption to pedestrian and bike circulation, elimination of parking spaces, road damage, added traffic to LOS E/F roads, and access restrictions to properties and businesses. It should be noted that road and lane closures along County Circulation Element roads should be avoided.
2. The DEIR/EIS indicates that the Proposed Project could result in temporary road and closures during construction. The DEIR/EIS should more clearly identify which County Circulation Element roads may be subject to a potential road and lane closure. For example, Table D.9.18 identifies several County Circulation Element roads such as Del Dios Highway and Wildcat Canyon Road that would be impacted by the future transmission system expansion and page 9.53 identifies impacts caused by temporary road and lane closures. It is not clear if road and lane closures could occur along to all County roads listed in Table D9-18. The DEIR/EIS should more clearly identify which County Circulation Element

A0018-48

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- roads could be subject to road and lane closures. Tables D.9-2, D9-3, D9-14, D9-15, D9-16, D9-18, and D9-19 all identify County Circulation Element roads that would be impacted by the Proposed Project
- A0018-49 cont.
3. SDG&E should coordinate very closely with the County’s DPW Traffic staff in the development of the following types of plans: 1) Construction Transportation Plans; 2) Transportation Management Plans; and 3) Traffic Control Plans. On a project-by project basis, the plans should attempt to ensure that all feasible measures are implemented to minimize the project’s significant traffic impacts to the extent possible.
- A0018-50
4. The construction impact plan should identify the length of the potential road and lane closures and feasible alternate routes.
5. For any overhead crossings, SDG&E must obtain the proper traffic control permits and encroachment permits for work conducted along County maintained roads.
6. For any underground running of transmission lines within the public right of way, SDG&E will have to provide detailed traffic control plans tied to encroachment permits that detail how the roads will stay in operation simultaneously with the installation of undergrounding work.
7. The DEIR/EIS mentions the construction of several miles of access roads. The DEIR/EIS should identify where the proposed access roads would traverse and/or connect to County maintained public roads.
- A0018-51
8. The DEIR/EIS should clearly identify where Proposed Project’s access roads would require a new driveway along County maintained public roads.
9. The DEIR/EIS should provide an operational assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.
10. For the Proposed Project and all future system expansions, SDG&E should consider impact thresholds for roads operating at LOS F. For example Wildcat Canyon Road and San Vicente Road (Pg.D9-39/52) currently operate at LOS E/F. The Proposed Project should avoid measures during construction that would potentially worsen traffic operations by adding traffic and/or restricting traffic flow along roads that currently experience substantial daily traffic congestion.
- A0018-52
11. The DEIR/EIS should clearly identify where transmission lines would traverse existing and planned County roads. The construction of transmission lines should not preclude the planned future construction of the County Circulation Element roads.
- A0018-53

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12. SDG&E should follow all regional standards regarding construction within the County right of way and that the DPW road cut policy would be observed.
13. SDG&E should reference the County's Guidelines for Determining Significance adopted September 26, 2006 and revised December 5, 2007.

A0018-54

Responses to Comment Set A0018

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A0018-1 The commenter states that the Draft EIR/EIS does not establish the need for the Proposed Project. Purpose and Need for the Proposed Project is discussed in Section A.2 in Volume 1 of the Draft EIR/EIS. The need for the project and the timing of potential need is being considered in the CPUC's General Proceeding. This proceeding has developed an extensive record of testimony, and the CPUC's Administrative Law Judge will assemble it into a Proposed Decision with a recommendation as to whether and when the project is needed. Please see General Response GR-12 (CEQA, NEPA and the Decision-Making Process).

A0018-2 The Draft EIR/EIS evaluates the Proposed Project as it is defined in the Applications to the CPUC and BLM. To clarify, neither the CPUC nor BLM selected the Proposed Project for analysis; rather, this was the project as proposed by SDG&E. In accordance with NEPA and CEQA, alternatives were developed based on their potential to reduce or avoid impacts of the Proposed Project, meet most project objectives, and be feasible. As a result of an extensive alternatives screening process (documented in Draft EIR/EIS Appendix 1, Alternatives Screening Report), 27 alternatives were selected for analysis.

The commenter states that the Draft EIR/EIS does not establish the need for the Proposed Project or for the other transmission alternatives (ranked in the Executive Summary of the Draft EIR/EIS as numbers 3, 4, 5, and 7 in terms of their environmental impacts). Please see Response to Comment A0018-1 regarding determination of need.

The commenter's support for the three alternatives determined to have the least environmental impacts is acknowledged. The commenter accurately describes the Stirling Energy solar facility and the La Rumorosa wind project as having significant impacts on biological resources.

A0018-3 The commenter's agreement with the Draft EIR/EIS's statements that the project would facilitate growth indirectly is acknowledged.

A0018-4 The commenter states a concern that the Draft EIR/EIS's statement about expected regional growth does not correctly reflect the County's General Plan which limits growth in rural areas. Transmission lines serve big-picture regional growth and the San Diego County regional plan specifies low-growth in rural areas. The transmission line may pass through those rural areas to serve load all of the county, but it would not directly result in growth in areas where growth is limited by the General Plan.

A0018-5 The commenter is concerned about impacts to visual resources. This concern is reflected in the Draft EIR/EIS and its numerous conclusions regarding significant visual impacts; see Section D.3 for analysis of the Proposed Project and alternatives along the northern transmission line route.

This comment also requests that all transmission alternatives in San Diego County be installed underground where visual impacts would occur, and that underground routes be located only along existing transmission line or road rights-of-way. The alternatives to the Proposed Project do include a number of underground segments, including an all

underground alternative in the Santa Ysabel Valley (included in the Northern Environmentally Superior Alternative). Undergrounding 230 kV circuits for extended distances through unincorporated San Diego County would increase the construction costs of these segments by six to ten times that of overhead construction. This in turn would substantially increase the cost of the Proposed Project thereby reducing the benefits of its ability to import low-cost power into the San Diego area, which is one of the project objectives.

- A0018-5A The commenter is correct that the Proposed Project and alternatives would have a number of significant impacts to biological resources. Please see Responses A0018-11 through A0018-15 regarding specific comments on biological resources.
- A0018-6 The connected actions or indirect effects (for actions outside the United States) are not directly related to the reliability objective of the Proposed Project. The Proposed Project would improve reliability by adding another high voltage transmission line into San Diego, allowing the import of renewable or fossil-fuel generation. Analysis of the connected actions is included in the Draft EIR/EIS because, as described in Section B.7, these projects are likely to be constructed if the Sunrise Powerlink (or a transmission alternative) is constructed, so the public and decision-makers need to be aware of the impacts that they would create. Please see Response to Comment A0018-7 regarding fire risk and reliability.
- A0018-7 The commenter is concerned about the location of the Proposed Project in high fire risk areas. The project's potential to increase fire risk is addressed in detail in Draft EIR/EIS Section D.15. Please see also General Response GR-9, Fire Risk and the Comparison of Alternatives, for additional discussion of risk, including the risk of two-line outages due to simultaneous fires.
- A0018-8 The County's concern about greenhouse gas emissions is acknowledged. Please see General Response GR-8, Greenhouse Gas (GHG) Impacts of Sunrise Powerlink Project and Non-Wires Alternatives for additional discussion of this issue.
- A0018-9 The County's concern about impacts to agriculture is acknowledged. Agricultural impacts are defined in Section D.6, and include a number of significant and unmitigable impacts to grazing land and other active agricultural operations in San Diego County. The EIR/EIS presents 10 mitigation measures to reduce or avoid agricultural impacts as much as possible; however, residual impacts would still be significant in some cases, as discussed in the EIR/EIS. No additional mitigation has been suggested by the County.
- A0018-10 Please see the responses below for discussion of specific County concerns. With regard to the selection of the preferred alternative by BLM and the CPUC, this process is described in General Response GR-12 (CEQA, NEPA and the Decision-Making Process). Pursuant to CEQ guidance, BLM is not required to identify its preferred alternative prior to publication of the Final EIS. (CEQ Forty Questions, No. 4b.)
- A0018-11 The commenters concern regarding disruption of MSCP plans is noted. See General Response GR-17, Consistency with Existing and Draft Regional Conservation Plans.
- A0018-12 The commenter requests examination of impacts to areas designated as high biological value areas or Pre-Approved Mitigation Area and to proposed sensitive and covered species

within existing and proposed MSCP plans. See General Response GR-17, Consistency with Existing and Draft Regional Conservation Plans.

A0018-13 The commenter requests further definition of compensation as a mitigation measure, including identification of the specific species and general locations where such compensation may satisfactorily occur and specific measures that may be taken to minimize impacts. Identification of specific species that are not listed or highly sensitive (e.g., burrowing owl) is not typically done via focused surveys for those species. Instead, they are identified during focused surveys for listed or highly sensitive species or during other field survey work (e.g., during vegetation mapping). This was the case for the Proposed Project and its alternatives where such focused surveys were conducted. Where surveys were not conducted (e.g., for the Connected Actions), the potential for certain non-listed, sensitive species were identified based on CNDDDB records and/or the presence of potential habitat. For compensation locations, see General Response GR-6, Identification of Mitigation Lands. Specific measures to minimize impacts to non-listed, sensitive species are provided in Mitigation Measures for Impact B-7 (Construction activities would result in direct or indirect loss of listed or sensitive wildlife or a direct loss of habitat for listed or sensitive wildlife). Since this comment refers to a Connected Action, see the Mitigation Measures for Impact B-7 on page D.2-205 of Volume 1 of the Draft EIR/EIS for the Stirling Energy Systems Solar Two LLC Project as an example.

The commenter states that the edge effects of the introduction of roads and tower platforms in preserves, which are multiples greater than simply the acreage of surface disturbance, need to be compensated. See General Response GR-14, Impact Calculations/Mitigation Ratios.

A0018-14 The commenter's statement that all transmission alternatives would have significant, unmitigable biological impacts, and that the impacts' negative effects would be similar to those of the Proposed Project with regard to the County of San Diego adopted and proposed MSCP plans is acknowledged. See General Response GR-17, Consistency with Existing and Draft Regional Conservation Plans.

A0018-15 The commenter's statement that the Top of the World Substation alternative site is included in the Study Area for the East County MSCP, and that impacts to species proposed for coverage under the East County MSCP should not be permitted to occur, is acknowledged. The commenter's statement that these impacts should be mitigated to a level that does not preclude completion of the East County MSCP plan based on the proposed covered species list is also acknowledged. See General Response GR-17, Consistency with Existing and Draft Regional Conservation Plans.

A0018-16 Sections D.7 and E.7 acknowledge that construction of the Proposed Project and many of the alternative routes would have significant impacts on cultural resources, many of these within areas of unincorporated San Diego County. An agency may approve a project under CEQA in spite of one or more significant effects if it finds that the alternatives and mitigation measures that might lessen these impacts are infeasible, and the specific overriding economic, legal, social, technological or other benefits of the project outweigh the significant effects on the environment. (Pub. Res. Code § 21081.)

A0018-17 The commenter states that Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area) is not sufficient to mitigate for the permanent preclusion of recreational activities. This mitigation measure is intended to prevent permanent preclusion of areas through SDG&E's advance coordination with the authorized officer for the affected recreation area. Overhead transmission line design is flexible to accommodate shifts in siting locations. Therefore, in most cases, impacts to recreation areas (e.g., parks/preserves) can be mitigated by modifications to transmission structure locations and access roads.

The commenter also stated that compensation for the acreage of park/preserve that is traversed by the proposed or alternative ROW, access roads, and tower locations should be acquired at a 1:1 ratio to achieve a no-net-loss of park/preserve lands. Overhead transmission lines are compatible with various recreational activities. As such, access roads that are dually used as trails and transmission line ROW would not result in the loss of park/preserve land. Mitigation Measure WR-3a has been revised to require compensation in the event that it is not feasible to site structures outside of a park/preserve and to require payment by SDG&E for relocation of trails.

WR-3a Coordinate tower and road locations with the authorized officer for the recreation area. Where the Proposed Project crosses the recreation areas listed below, SDG&E shall coordinate with the authorized officer for the recreation area to determine specific tower site and spur road locations in order to minimize impacts to recreational resources. If it is not feasible to site structures outside of a park/preserve, compensation shall be required for permanent impacts (i.e., structure footings, access roads not dually used as trails) to park/preserve land at a 1:1 ratio. However, this mitigation measure is superseded by the appropriate park/preserve biological resource mitigation measure in the instance that the park/preserve has been established as mitigation for other purposes (e.g., habitat compensation).

In consultation with the authorized officer of the trail or recreation area, access roads shall not be located on trails (~~i.e.~~, e.g., PCT, Trans-County Trail) unless the authorized officer determines that the construction of new access roads would result in greater impacts than modifying the trail for use as an access road. If it is not feasible to site transmission structures off of a trail, SDG&E shall provide full funding for relocation of trail segments, including planning and trail construction, at location(s) identified by the authorized officer of the trail or recreation area. Trail segment relocation shall maintain the connectivity of regional and community trails.

This coordination shall occur no less than 60 days prior to the start of construction. SDG&E shall document its coordination and/or payment with the authorized officer and shall submit this documentation to the CPUC, BLM, and ABDSP, at least 30 days prior to project construction.

- Juan Bautista de Anza National Historic Trail
- Anza-Borrego Desert State Park
- Cleveland National Forest
- Trans-County Trail
- Pacific Crest National Scenic Trail

- California Riding and Hiking Trail
- San Dieguito River Park
- Mt. Gower Open Space Preserve
- Santa Ysabel Open Space Preserve
- Barnett Ranch Open Space Preserve
- Boulder Oaks Open Space Preserve
- San Vicente Highlands Open Space Preserve
- Los Peñasquitos Canyon Preserve

- A0018-18 The difference between Impacts WR-2GT and WR-2LR in Table 5-2, Section D.5.4.3 of Volume 2 of the Draft EIR/EIS was unclear to the commenter. These impacts refer to connected actions; LR refers to the SCE La Rumorosa Wind Project (Section D.5.12.5 of the Draft EIR/EIS), and GT refers to the Esmeralda–San Felipe Geothermal Project. The numbering was changed from the standard Impact WR-2 because the impact language is slightly different due to the fact that these connected actions do not have a transmission line or substation. Instead, “transmission line or substation” was replaced with “project” for the SCE La Rumorosa Wind Project and Esmeralda–San Felipe Geothermal Project impact discussions. The SCE La Rumorosa analysis was modified and expanded in the Recirculated Draft EIR/Supplemental Draft EIS, superseding the analysis presented in the Draft EIR/EIS. Therefore, the original analysis from the Draft EIR/EIS has been deleted and is shown as ~~struck out~~ in the Final EIR/EIS.
- A0018-19 Mitigation Measure WR-3a has been revised to require compensation in the event that it is not feasible to site structures outside of a park/preserve and therefore, the impact would remain potentially significant but mitigated to a less than significant (Class II); please refer to Response to Comment A0018-17.
- A0018-20 The commenter states that noise levels at the edge of the FTSE ROW would result in “permanent recreational preclusion” and that Mitigation Measure N-3a is not adequate mitigation. Noise does not preclude recreational use; rather, it may change the character of a recreation area thereby diminishing its recreational value. Mitigation Measure N-3a is intended to mitigate Impact WR-2 (Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value) to less than significant levels and is not applicable to Impact WR-3 (Presence of a transmission line would permanently preclude recreational activities).
- A0018-21 Mitigation Measure WR-3a has been revised to require payment by SDG&E for relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Regarding amendments to the San Diego County General Plan resulting from trail decommissioning or major trail reroutes, no local discretionary permits (Variance, Conditional Use Permit or Specific Plan approval) or local plan consistency evaluation is required for the Proposed Project or Project Alternatives. 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, the project is consistent, to the extent possible, with the County of San Diego goals, objectives, and policies.
- A0018-22 The introduction to Section D.5 in Volume 2 of the Draft EIR/EIS has been modified as follows:

...including but not limited to a national, State, county, or city park or trail; refuge or preserve...

The text in Section D.5.5, within the text of Mitigation Measure WR-1a in Volume 2 and throughout the Draft EIR/EIS has been modified as follows:

- Juan Bautista de Anza National Historic Trail (County of San Diego Regional Trail)
- Trans-County Trail (County of San Diego Regional Trail)
- Pacific Crest National Scenic Trail (County of San Diego Regional Trail)
- California Riding and Hiking Trail (County of San Diego Regional Trail)
- San Dieguito River Park (County of San Diego Regional Trail)

A0018-23 The text in Section D.5.3 describing the San Diego County General Plan in Volume 2 of the Draft EIR/EIS has been modified as follows:

The ~~Recreation Element of the~~ general plan was amended in January 2005 to relocate the County Trails Program and the Community Trails Master Plan from the Recreation Element to the Public Facilities Element and is directive of County officials and provides for the creation of a system of public parks and riding and hiking trails.

A0018-24 Mitigation Measure WR-3a has been revised to require payment by SDG&E for relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17.

A0018-25 The list of potentially affected recreation facilities for Mitigation Measure WR-1a in Section D.5.5 (page D.5-28) in Volume 2 and throughout the Draft EIR/EIS has been modified as follows:

- Pacific Crest National Scenic Trail
- California Riding and Hiking Trail
- Santa Ysabel Open Space Preserve

A0018-26 The list of potentially affected recreation facilities for Mitigation Measure WR-1b in Section D.5.5 (page D.5-28) in Volume 2 and throughout the Draft EIR/EIS has been modified as follows:

- Pacific Crest National Scenic Trail
- California Riding and Hiking Trail
- San Dieguito River Park Trails

A0018-27 The list of potentially affected recreation facilities for Mitigation Measure WR-1c in Section D.5.5 (page D.5-28) in Volume 2 and throughout the Draft EIR/EIS has been modified as follows:

- Pacific Crest National Scenic Trail
- California Riding and Hiking Trail
- Santa Ysabel Open Space Preserve

Mitigation Measure WR-1c, as presented in Section D.5.5 (page D.5-28) in Volume 2 of the Draft EIR/EIS requires coordination with the County of San Diego Department of Parks and Recreation. Per Mitigation Measure WR-1c SDG&E is also required to submit

documentation of its coordination efforts to the County of San Diego Department of Parks and Recreation for any affected recreational facilities under its jurisdiction.

A0018-28 Overhead transmission line design is flexible to accommodate shifts in siting locations. The Proposed Project and the Interstate 8 Alternative would cross almost perpendicular to the Juan Bautista de Anza National Historic Trail. Therefore, it is likely feasible that the trail can be spanned. Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area) would require SDG&E to coordinate with County of San Diego Department of Parks and Recreation or other authorized officer of the Juan Bautista de Anza National Historic Trail to prevent impacts and avoid relocation of the trail.

A0018-29 The list of potentially affected recreation facilities for Mitigation Measure WR-3a in Section D.5.5 (page D.5-30) in Volume 2 and throughout the Draft EIR/EIS has been modified as follows:

- Pacific Crest National Scenic Trail
- California Riding and Hiking Trail
- San Dieguito River Park Trails

Mitigation Measure WR-3a has been revised to require that the connectivity of regional trails (e.g., the California Riding and Hiking Trail) be maintained in the event that trail segment reroutes are needed; please refer to Response to Comment A0018-17.

The commenter states that 60 days would not be adequate to achieve coordination between multiple agencies prior to the start of construction and stated that the timing of coordination should be extended, potentially up to six months. It is understood that coordination with multiple agencies may require more than 60 days; the mitigation measure states that the “coordination shall occur *no less than* [emphasis added] 60 days prior to the start of construction.” SDG&E would have to initiate coordination earlier than 60 days prior to construction in order to be able to meet the deadline of submitting coordination documentation to the applicable agencies 30 days prior to the start of construction, and adhere to its construction schedule.

Additionally, the commenter requests that the San Diego County of Parks and Recreation be included in coordination; please refer to Response to Comment A0018-27.

A0018-30 Mitigation Measure WR-3a has been revised to require that the connectivity of regional trails (e.g., the California Riding and Hiking Trail) be maintained in the event that trail segment reroutes are needed; please refer to Response to Comment A0018-17.

Regarding amendments to the San Diego County General Plan resulting from trail decommissioning or major trail reroutes; please refer to Response to Comment A0018-21.

A0018-31 Mitigation Measure WR-3a has been revised to require that the connectivity of regional trails (e.g., the California Riding and Hiking Trail) be maintained in the event that trail segment reroutes are needed; please refer to Response to Comment A0018-17.

A0018-32 The commenter states that impacts to the California Riding and Hiking Trail through Grapevine Canyon should be addressed. Within Grapevine Canyon, the California Riding and

Hiking Trail is also the Trans-County Trail. Impact WR-4 is specific to direct impacts to wilderness and wilderness study areas. Indirect and direct impacts to the Trans-County Trail in ABDSP are respectively discussed under Impact WR-2 (Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value) and Impact WR-3 (Presence of a transmission line would permanently preclude recreational activities), of Section 5.6 in Volume 2 of the Draft EIR/EIS.

- A0018-33 The commenter states that decommissioning regional trails is not acceptable, identification of suitable reroutes should be included as mitigation, and cumulative effects could result from impacts to trail systems. Overhead transmission line design is flexible to accommodate shifts in siting locations. Therefore, in most cases, impacts to trails can be mitigated by modifications to transmission structure locations and access roads. Relocating trails is considered a last resort. Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response A0018-17.
- A0018-34 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Implementation of this mitigation measure would avoid permanent trail closure. Mitigation Measure WR-1a (Coordinate construction schedule and activities with the authorized officer for the recreation area) and WR-1c (Coordinate with local agencies to identify alternative recreation areas) apply during construction. They would be implemented in the area of the Juan Bautista de Anza National Historical Trail area during constructions, as is discussed under Impact WR-1 (Construction activities would temporarily reduce access and visitation to recreation or wilderness areas) in the Draft EIR/EIS.
- A0018-35 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Implementation of this mitigation measure would avoid permanent trail closure.
- A0018-36 Regarding the addition of the California Riding and Hiking Trail to lists of affected trails, please refer to Responses to Comments A0018-25, -26, -27, and -29.
- The commenter requested that the California Riding and Hiking Trail be added to the list of affected areas in Mitigation Measure WR-3b (Provide funding for planning and physically establishing replacement campsites and facilities). However, provision of funds for relocation of trails, including planning and trail construction, is included in Mitigation Measure WR-3a. The California Riding and Hiking Trail was added to the list of affected areas for this mitigation measure; refer to Response to Comment A0018-29.
- A0018-37 The commenter states that the Juan Bautista de Anza National Historic Trail, PCT, California Riding and Hiking Trail, and Trans-County Trail should be identified as San Diego Regional Trails. Please refer to Response to Comment A0018-22.

A0018-38 The list of directly affected recreation facilities for Impact WR-1 in Section E.1.5 in Volume 4 of the Draft EIR/EIS has been modified as follows:

Construction activities for the Interstate 8 Alternative would directly affect the following recreation areas: Plaster City ORV Open Area, Juan Bautista de Anza National Historic Trail, PCT, Horse Canyon hang gliding and paragliding site, Secret Canyon Trail, California Riding and Hiking Trail, Trans-County Trail, and Blossom Valley hang gliding and paragliding site.

A0018-39 The commenter states that the California Riding and Hiking Trail should be included in the operational impact assessment for the Interstate 8 Alternative. The underground portion of the Interstate 8 Alternative would intersect the California Riding and Hiking Trail near MP I8-74.2. Because the transmission line would be underground, operation impacts to the trail would not occur. Construction impacts are addressed under Impact WR-1. Mitigation Measure WR-1b (Provide temporary detours for trail users) is provided to avoid trail closures (See page 1.5-6).

The commenter states that gates should be required as mitigation on non-motorized trails and trail segments that are proposed for dual use as access roads to prevent use by unauthorized vehicles. Portions of the Trans-County Trail that would be traversed by the Interstate 8 Alternative (near MP I8-82) and the PCT near MP BCD-16.5 of the BCD Alternative would be widened and graded for use as an access road. Resulting impacts to the recreational value of the Trans-County Trail and PCT are respectively discussed in Sections E.1.5.2 (pages E.1.5-7 through 8) and E.2.5.2 (pages E.2.5-3 through 4) in Volume 4 of the Draft EIR/EIS.

Where the route would intersect a trail, there is the potential for unauthorized motorized access to the trail, thereby 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 posted on the gates at discretion of the land management agency. Please see Responses to Comments A0024-9, A0024-11, and E0004-154.

It is noted that an amendment to the Pacific Crest Trail Association 2007–2009 Strategic Plan and the San Diego County Regional Trails Plan would be required to convert portions of these trails from non-motorized use.

A0018-40 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Mitigation Measure WR-1b (Provide temporary detours for trail users) would avoid trail closures during construction. Implementation of this mitigation measure would avoid permanent trail closure. Coordination and funding direction are included in Mitigation Measure WR-3a.

A0018-41 The commenter states that the San Diego River Regional Trail should be considered in impact analysis. The San Diego River Regional Trail is also known as the Trans-County Trail or Sea-to-Sea Trail. Impacts to the Trans-County Trail would not occur from construction or operation of the Chocolate Canyon Option, because this route option ends

immediately south of the trail. Impacts to the Trans-County Trail are considered in the analysis of the Interstate 8 Alternative (Section E.1.5.2 in Volume 4 of the Draft EIR/EIS).

- A0018-42 The commenter states that the California Riding and Hiking Trail should be considered in the Future Transmission System Expansion – Interstate 8 Alternative with Modified Route D Alignment and West of Forest Alignment scenario. Accordingly, the text in Section E.1.5.5 in Volume 4 of the Draft EIR/EIS has been revised as follows:

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Once outside the CNF, the route would traverse primarily open space, rural residences, and some unincorporated communities. It would follow the Loveland Reservoir for 800 feet, immediately east of the California Riding and Hiking Trail. ~~;~~ ~~however,~~ ~~the~~ The western side of the reservoir is not used for recreational purposes.

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Due to the presence of the future transmission lines, the character of the affected BLM land and this southern portion of CNF as well as the California Riding and Hiking Trail corridor would be permanently changed from an open space with minimal development to one that includes large industrial structures.

Impacts to the California Riding and Hiking Trail were incorporated into the discussion of local recreational resources along the FTSE route under Impacts WR-1 and WR-3 of Section E.1.5.5 in Volume 4 of the Draft EIR/EIS.

The Loveland Substation is an existing substation, unrelated to the Sunrise Powerlink Transmission Project, and therefore, does not warrant analysis. Although the relatively large scale of Figure E.1.5-1 depicts the substation on the trail, the substation is approximately 225 feet southeast of the trail.

- A0018-43 The commenter states that gates should be required as mitigation on non-motorized trails and trail segments that are proposed for dual use as access roads to prevent use by unauthorized vehicles. Please refer to Response to Comment A0018-39.

- A0018-44 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Implementation of this mitigation measure would avoid permanent trail closure. Coordination and funding direction are included in Mitigation Measure WR-3a.

- A0018-45 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Implementation of this mitigation measure would avoid permanent trail closure. Coordination and funding direction are included in Mitigation Measure WR-3a.

A0018-46 Mitigation Measure WR-3a has been revised to require that the connectivity of trails be maintained in the event that trail segment reroutes are needed and to provide for the relocation of trails, including planning and trail construction; please refer to Response to Comment A0018-17. Implementation of this mitigation measure would avoid permanent trail closure. Coordination and funding direction are included in Mitigation Measure WR-3a.

A0018-47 The commenter states that the California Riding and Hiking Trail, Coast-to-Crest Trail, Trans-County Trail, and PCT may be impacted by Options 1 and 2 of the New In-Area Renewable Generation Alternative. Construction activities for Option 1 would impact The Trans-County Trail (shared with the California Riding and Hiking Trail in this segment), the PCT and the Coast-to-Crest Trail within the San Dieguito River Park. Construction impacts to these recreational resources are considered in Section E.5.5 in Volume 4 of the Draft EIR/EIS. Because the transmission line would be constructed underground, operational impacts to recreation would not occur. As stated in Section E.5.5 in Volume 4 of the Draft EIR/EIS, Option 2 would be nearly identical to portions of the Proposed Project route, the analysis of which considered impacts to the aforementioned trails.

A0018-48 San Diego County comments that lane and road closures along County [General Plan] Circulation Element roads are to be avoided.

The comment is noted. Lane and road closures would occur only where necessary to safely undertake construction. All closures would be based on a traffic management plan and as authorized by the county.

Please also refer to Responses A0018-49 and A0018-50.

A0018-49 The comment refers to the list of County Circulation Element Roads that are listed on Table D.9-18 (Roadway Level of Service Operations – 230 kV Future Transmission System Expansion), and whether there would be lane closures on the listed roads during construction. The assessment of impacts notes that lane closures may be necessary during construction and for delivery of materials and equipment. Mitigation Measure T-9a (Prepare Construction Transportation Management Plan) requires that SDG&E coordinate with local agencies and identify transportation and traffic issues during construction including the need and location of lane and road closures. Because final design has not been completed, the EIR/EIS does not identify the exact location of road cuts and lane closures. Thus, the clarification regarding which County roads would be impacted (lane closures) will be addressed in the Construction Transportation Management Plan (CTMP), which is a required mitigation measure (T-9a). As part of this plan, SDG&E will work with the County on how and when to conduct these lane closures. The CTMP would apply to all of the County roads listed on Tables D.9-2, D.9-3, D.9-14, D.9-15, D.9-16, D.9-18, and D.9-19, as noted in the comment.

It should also be noted that "...approval of the SRPL [Sunrise Powerlink] would not result in automatic approval of the potential future expansions to the SRPL and all future 230 or 500 kV lines would require new applications by SDG&E, followed by preparation of project-level environmental documents and separate approvals from the CPUC prior to permitting and construction."

- A0018-50 Comments regarding coordination with the County are acknowledged. Mitigation Measure T-9a (Prepare Construction Transportation Management Plan) requires that SDG&E prepare a plan that identifies proposed land closures, parking, traffic routes, as well as other traffic-related issues, and requires coordination with and approval from the respective local agency. In addition, Table A-1 (Permits and Other Actions Prior to Construction of SRPL) lists the anticipated permits and approvals necessary from local agencies, including the County of San Diego.
- A0018-51 The comment regarding identification of proposed access roads and impact to County roads, potential new driveways, and an operational assessment would be addressed through proposed mitigation measures in Section D.9 of the Draft EIR/EIS and required local agency permits. See Responses to Comments A0018-49 and A0018-50 for a discussion of specific mitigation measures.
- A0018-52 Comments regarding impact thresholds for County roads operating at an LOS F are acknowledged. Please see Responses to Comments A0018-49 and A0018-51.
- A0018-53 Comments regarding identification of where transmission lines would traverse existing and planned County roads would be addressed through proposed mitigation measures and required local agency permits. See Responses to Comments A0018-49 and A0018-51.
- A0018-54 Comments regarding the regional standards and County Guidelines are acknowledged. Please see Responses to Comments A0018-49 and A0018-51.