Comment Set A0030, cont.
U.S. Environmental Protection Agency

The CPUC authorized SDG&E to sign a 10-year power purchase agreement (PPA) with Calpine for the purchase of energy from the Otay Mesa Energy Center (573 MW) in 2006. In conjunction with this project, the utility also signed agreements for the building of two peaker plants. This project, however, and the revised PPA were not mentioned as a component of the *New In-Area All-Source Generation Alternative,* and were only very briefly mentioned in the 6-volume DEIR/EIS. A0030-11

Recommendation:
The FEIR/EIS should discuss: 1) the PPAs signed in conjunction with the Otay Mesa Energy Center; 2) whether new peaker plants will be required in addition to those planned in conjunction with the Otay Mesa Energy Center; and 3) why the Otay Mesa Energy Center is not considered to be part of the *New In-Area All-Source Generation Alternative* or the *No Project/No Action Alternative.*

No Project/No Action Alternative A0030-12

Although it is difficult to predict exactly what would occur in the absence of the SRPL Project, we believe that this scenario should be updated based on the most recent data available. The DEIR/EIS states that the *LEAPS Transmission-Only Alternative* would substantially satisfy two of the major project objectives, to maintain reliability in the delivery of power and reduce the cost of energy in the region (pg. E.7-7). In conjunction with this alternative, the DEIR/EIS also states that the Green Path Coordinated Projects would provide a path for importing renewable power from the Imperial Valley and other locations into SDG&E territory (pg. E.7-7); however, the DEIR/EIS does not follow up with this concept. The *Green Path Coordinated Projects Alternative* was eliminated from consideration as an alternative by a screening process earlier in the review process (pg. ES-33; pg. C-140). The DEIR/EIS states that these projects are not considered to be more likely to occur in the absence of the SRPL Project, so they were not considered as a component of the *No Project/No Action Alternative* (pg. C-152). We submit the following recommendations for further consideration.

Recommendations:
The Green Path Coordinated Projects is mentioned in conjunction with the *LEAPS Transmission-Only Alternative.* It would seem reasonable to discuss it in greater detail within the FEIR/EIS as a component of the *LEAPS Transmission-Only Alternative* or the *No Project/No Action Alternative.*

The Otay Mesa Energy Center should be discussed as a component of the *No Project/No Action Alternative*, due to the revised PPAs providing SDG&E with the opportunity to purchase the plant after a 10-year period. This effectively extends the opportunity to secure clean energy for a 30-year period.

The Presidential Permit application filed by Sempra Generation to construct, operate, maintain, and connect an electric transmission line across the U.S. border with Mexico should be discussed as a component of the *No Project/No Action Alternative.*

6

Comment Set A0030, cont.
U.S. Environmental Protection Agency

The analysis of environmental impacts for the *No Project/No Action Alternative* should be expanded in Section E.8 and Section H.7 and should include the most recent data available.

A0030-12 cont.

Conciseness, Clarity, and Organization of the DEIR/EIS

A0030-13

National Environmental Policy Act (NEPA) documents should be "concise and clear" (40 CFR Part 1500.2 (b)). The DEIR/EIS for the SRPL Project is not concise, as it contains approximately 7,500 pages and is 6 volumes in length. Although many aspects of the project are expressed clearly within the document, the overall layout of the 6-volume document was difficult to understand for those not intimately involved with the project. In particular, it was difficult to understand: 1) how the Proposed Project and 27 alternatives were pared down to the seven Environmentally Superior Alternatives plus the *No Project/No Action Alternative*; 2) the location of the detailed analysis of these alternatives within the multi-volume document; and 3) the location of the detailed analysis for *Environmentally Superior Southern Route Alternative*.

The Executive Summary provided a good description of the conclusions of the DEIR/EIS, including the ranking of the Environmentally Superior Alternatives (pg. ES-2 through ES-4). If the analysis for each of the Environmentally Superior Alternatives had been presented within the 6-volume DEIR/EIS as specific (easy-to-identify) alternatives, the 6-volume report would have been easier to decipher. Comparing the eight different alternatives described in the Executive Summary with Sections D and E, we note the following:

a. *New In-Area All-Source Generation Alternative* (#1) placed into Section E.6;
b. *New In-Area Renewable Generation Alternative* (#2) placed into Section E.5 (missing in our copy);
c. *LEAPS Transmission-Only Alternative* (#3) placed into Section E.7.1;
d. *Environmentally Superior Southern Route Alternative* (#4) discussed in Sections E.1, E.2, E.3, and E.4, but it does not appear to have been consolidated as the Environmentally Superior Southern Route Alternative within Section E.
e. *Environmentally Superior Northern Route Alternative* (#5) placed into Section D;
f. *Northern Route Alternative (Proposed Project)* (#6) placed into Section D;
g. *LEAPS Generation and Transmission Alternative* (#7) placed into Section E.7.2; and
h. *No Project/No Action Alternative* (#8) placed into Section E.8.

Recommendation:
The FEIR/EIS should more clearly define the overall layout of the 6-volume report, specifically addressing how the Environmentally Superior Alternatives are presented within the 6-volume document.

Water Resources

A0030-14

Clean Water Act Section 404

EPA is concerned about the potential adverse impact to aquatic resources that would result from the Proposed Project. The DEIR/EIS states that a formal jurisdictional delineation of the extent of waters, including wetlands, on the project site has not yet been conducted and

7

Comment Set A0030, cont.
U.S. Environmental Protection Agency

verified by the U.S. Army Corps of Engineers (Corps) because the final route has not been selected (pg. D.2-93). EPA is concerned that the impacts to aquatic resources may be underestimated since the formal jurisdictional delineation has not been conducted. A0030-14 cont.

SDG&E should coordinate with the Corps to determine if the proposed project will require a Section 404 permit under the Clean Water Act (CWA). If it is determined that there are jurisdictional waters within the project area, a Section 404 permit will be necessary for any discharges of dredged or fill material into these waters, including wetlands and other special aquatic sites. If a Section 404 permit is required, EPA will review the project for compliance with *Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials* (40 CFR 230), promulgated pursuant to Section 404(b)(1) of the CWA. Pursuant to 40 CFR 230, any permitted discharge into waters of the United States must be the *Least Environmentally Damaging Practicable Alternative* (LEDPA) available to achieve the project purpose. No discharge can be permitted if it will cause or contribute to significant degradation of the waters of the U.S.

Based on information provided in the DEIR/EIS, a review of National Wetland Inventory (NWI) maps identifies 19 major drainages that the proposed project would cross (pg. D.2-32). Based on the hydrology study for the Proposed Project, there are approximately 167 identified watercourses the Proposed Project would cross (pg. D.2-32). The Proposed Project would impact classes of wetlands/waters including riverine, slope and depressional wetlands. According to the DEIR/EIS, permanent, temporary and secondary/indirect impacts to waters would occur from construction of the Proposed Project. Direct impacts include the removal of wetland vegetation and/or filling of waters from construction and vehicular stream crossings. Indirect impacts include bank erosion and stream sedimentation (pg. D.2-93).

To determine the extent of impacts to waters and identification of the LEDPA, a jurisdictional delineation should be conducted for the alternatives presented in the DEIR/EIS. At this time, it is difficult to discern the extent of impacts to waters based on information provided in the DEIR/EIS. The NWI maps are at such a large scale that they cannot be relied upon to sufficiently disclose the extent of waters located within the alternatives under consideration.

EPA recognizes that with certain projects, such as transmission lines, there are opportunities to avoid and minimize impacts to waters through sensitive design criteria such as the placement of towers out of waters. Additional avoidance and minimization alternatives should be explored such as the use of directional drilling and Arizona crossings. The project proponent, however, bears the burden of clearly demonstrating that the preferred alternative is the LEDPA that achieves the overall project purpose, while not causing or contributing to significant degradation of the aquatic ecosystem. Based on the information available within the DEIR/EIS, EPA believes that the alternatives analysis in the DEIR/EIS does not demonstrate compliance with the 404(b)(1) Guidelines. EPA offers the following recommendations to help facilitate compliance of the project with the Section 404 Guidelines:

Recommendations:
The FEIR/EIS should include an evaluation of the project alternatives in order to demonstrate the project's compliance with the 404(b)(1) Guidelines and authorization of LEDPA.

8

Comment Set A0030, cont.
U.S. Environmental Protection Agency

The FEIR/EIS should describe the status of consultations with the Corps regarding a CWA Section 404 permit, and how the Proposed Project meets 404 (b)(1) Guidelines which require that projects first avoid, then minimize, and finally mitigate any impacts to waters of the United States (WOUS), including wetlands and other special aquatic sites. A0030-14 cont.

The FEIR/EIS should quantify potential impacts to WOUS to the best extent possible and disclose the inherent uncertainty associated with using the NWI data.

The FEIR/EIS should analyze the feasibility of additional avoidance and minimization alternatives, such as directional drilling and Arizona crossings.

The FEIR/EIS should include a table and clear narrative on the direct, indirect/secondary and temporary impacts to waters, including wetlands.

Pursuant to the 404 Guidelines, SDG&E must mitigate for unavoidable impacts to waters. Based on the information provided in the DEIR/EIS, SDG&E should prepare a detailed compensatory mitigation plan for impacts to waters, including wetlands. Given the difficulty of restoring and creating wetlands, this mitigation plan should include a comprehensive plan to mitigate for adverse effects to all waters including wetlands, such as vernal pools.

To the extent any aquatic features that could be affected by the project are determined not to constitute waters of the United States, EPA recommends that the FEIR/EIS characterize the functions of such features and discuss mitigation. Under Executive Order 11990 Protection of Wetlands, the FEIR/EIS should specifically discuss mitigation opportunities for impacts to non-jurisdictional wetlands.

Air Quality Resources

A0030-15

General Conformity

The DEIR/EIS should ensure that the emissions from both the construction and the operational phases of the Proposed Project conform to the approved SIP and do not cause or contribute to violations of the National Ambient Air Quality Standards (NAAQS). The Proposed Project will be constructed in Imperial County and San Diego County. The Imperial County Air Pollution Control District (ICAPCD) and the San Diego Air Pollution Control District (SCAPCD) are the local agencies responsible for implementing SIPs in nonattainment areas. Imperial County is currently a "*moderate*" nonattainment area for 8-hour ozone NAAQS and a nonattainment area for particulate matter less than 10 microns (PM_{10}) NAAQS (table D. 11-7). The ICAPCD does not currently have a federally approved SIP demonstrating attainment for either the 8-hour ozone or PM_{10} NAAQS. Both of these attainment demonstration SIPs are due to EPA in December 2008.

San Diego County is currently a "*basic*" nonattainment area for the 8-hour ozone NAAQS and an attaining maintenance area for the former 1-hour ozone NAAQS. The SDAPCD does not have a federally approved SIP for 8-hour ozone. An attainment demonstration SIP was

9

Comment Set A0030, cont.
U.S. Environmental Protection Agency

due on June 15, 2007, and the California Air Resources Board submitted the required SIP on that date. Because of a national court case, EPA stated in a June 15, 2007 guidance memorandum that basic areas need not submit their SIPs on that date. Additionally, EPA has undertaken a national rulemaking that, when final, will determine: 1) what the new classification of basic areas will be; 2) what type of SIP such reclassified areas must submit; and 3) the submittal due dates. On March 12, 2008, EPA finalized a new lower 8-hour ozone NAAQS. A0030-15 cont.

Where a SIP or recent SIP revisions are not submitted or approved, a general conformity determination can be demonstrated by air quality modeling, obtaining emissions offsets, or determining that the action does not increase emissions with respect to the baseline emissions. Thus, the obligation to determine that federal actions will not cause or contribute to NAAQS violations under Clean Air Act Section 176(c)(1)(B) applies even where SIPs have not been submitted or approved.

Recommendation:
The responsible agency should ensure that emissions from both the construction and operational phases are included in both the Imperial County SIPs and the San Diego County SIPs. This should be discussed within the FEIR/EIS. For San Diego County, the responsible agency should determine the impact of emissions on the new 8-hour ozone SIP requirements, as well as the impact on the already submitted June 15, 2007 8-hour ozone SIP. Regarding general SIP development, consideration should be given to the new, lower 8-hour ozone NAAQS when determining the impact of emissions.

Construction Emissions Mitigation Plan

A0030-16

Because the project area is in nonattainment for PM_{10}, the responsible agencies should commit to every feasible measure to reduce PM_{10} emissions. We recommend including a *Construction Emissions Mitigation Plan* in the FEIR/EIS and adopting this plan in the Record of Decision (ROD). In addition to all applicable local, state, or federal requirements, EPA recommends that the following mitigation measures be included in the *Construction Emissions Mitigation Plan* in order to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.

10

Comment Set A0030, cont.
U.S. Environmental Protection Agency

- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, only Tier 2 or newer engines should be employed in the construction phase, given the scale of the construction project and the high background levels of pollutants in the area.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

A0030-16 cont.

Administrative Controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop construction traffic and parking management plan that minimizes traffic interference and maintain traffic flow. This plan should describe how any traffic estimates were developed and how these traffic estimates may affect regional transportation.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

Greenhouse Gas Emissions

A0030-17

On January 25, 2007, as part of a wider rulemaking on greenhouse gas policies (R.06-04-009), the CPUC adopted an interim *Greenhouse Gas Emissions Performance Standard* to help mitigate climate change. Utilities are not allowed to enter into a long-term commitment to buy baseload power from power plants that have carbon dioxide (CO_2) emissions greater than 1,100 pounds per megawatt hour, which is roughly the amount emitted by a combined cycle turbine fueled with natural gas. The standard is aimed at coal-fired power stations operating outside

Comment Set A0030, cont.
U.S. Environmental Protection Agency

California and exporting electricity to the state of California. California utilities are barred from buying electricity from most coal-fired power plants unless specific standards are met, effective February 1, 2007. The *Greenhouse Gas Emission Performance Standard* applies to new power plants, new investments in existing power plants, and new or renewed contracts with terms of five years or more, including contracts with power plants located outside of California (pg. D.11-16).

A0030-17 cont.

The DEIR/EIS indicates that most of the existing electrical system is provided by generators within San Diego County, southern California, Arizona, and Mexico (pg. D.11-8). Agencies, organizations, and private citizens have expressed concern about the project's potential to be used to import power from Mexico (pg. ES-22). The Imperial County Air Pollution Control Board of Directors expressed concern that the project would allow further fossil-fuel burning facilities to be built in the Mexicali Valley, Mexico, where air quality standards are not as stringent as those in California, and that this would further degrade air quality in Imperial Valley (pg. ES-24). Concern has also been expressed that the proposed project will be used to supply electricity to the Los Angeles area, instead of the San Diego area.

Recommendation:
EPA recommends that the FEIR/EIS clarify: 1) whether the *Greenhouse Gas Emission Performance Standard* applies to power plants in Mexico that sell electricity to the United States; and 2) what institutional measures exist to ensure that air quality in the Imperial Valley is not further degraded should new fossil-fuel burning facilities in the Mexicali Valley be constructed in order to transmit electricity to the United States via the Proposed Project.

A0030-18

The DEIR/EIS states that GHG emissions would occur as a result of project-related construction activities and operation, maintenance, and inspection activities. Over the life of the Proposed Project, high GHG emissions during the years of construction would be followed by much lower GHG emissions. "*As power plant operation shifts to accommodate the new transmission line and renewable resources replace conventional power plants, indirect GHG reductions are forecasted to occur. But because total construction GHG emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact*" (pg. ES-25).

Recommendations:
EPA recommends that the FEIR/EIS substantiate the finding that the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact[1].

[1] Since the issuance of the April 2, 2007 Supreme Court opinion in Massachusetts, et al. v. EPA, 549 U.S. (2007), EPA has begun to develop regulations to address greenhouse gas emissions from motor vehicles and fuels under the direction of the President's May 14, 2007 Executive Order and relevant Clean Air Act authorities. The Agency continues to evaluate the potential effects of the Court's decision with respect to addressing emissions of greenhouse gases under other provisions of the Clean Air Act. Thus, neither this comment letter nor the EIS for an individual project reflects, and should not be construed as reflecting, the type of judgment that might form the basis for a positive or negative finding under any provision of the Clean Air Act.

12

Comment Set A0030, cont.
U.S. Environmental Protection Agency

EPA recommends the FEIR/EIS present a general, qualitative discussion of the anticipated effects of climate change, including potential effects at a regional scale, on the Proposed Project. A0030-18 cont.

GHG emissions from construction associated with the Proposed Project are estimated to be 109,000 tons of CO_2 (pg. D.11-52). Estimates for GHG emissions from a 1,590 MW power plant proposed in 2007 in Nevada are 20.1 million tons per year; estimates for a combined cycle gas-fired power plant of the same capacity are 5.7 million tons per year (DEIS for the White Pine Energy Station, April 2007). By our calculations, 109,000 tons of CO_2 would be approximately equivalent to 1.92 % of the yearly CO_2 emissions from a 1,590 MW combined cycle gas-fired power plant, or approximately 7 days of emissions. Comparing this to the coal plant, 109,000 tons of CO_2 would be approximately equivalent to .054 % of the yearly CO_2 emissions from a 1,590 MW coal plant, or approximately 1.97 days of emissions. A0030-19

Recommendation:
We are surprised that the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission are not greater. We recommend that this analysis be reexamined in the FEIR/EIS.

The DEIR/EIS states that the California Independent System Operator (CAISO) forecasts that with the SRPL Project and development of renewable generation projects, emissions from liquid fuel and coal-fired power plants outside of the southwestern U.S. and Mexico would generally increase and natural-gas fired power plant emissions would generally decrease in Arizona, Mexico, and San Diego, resulting in the avoidance of 1,650 tons of CO_2 emissions in 2015 (pg. D.11-51). Avoided emissions would otherwise occur from fossil fuel-fired power plants in 2015 in the absence of the SRPL and the accompanying renewable generation projects. The DEIR/EIS concludes that the Proposed Project would facilitate an overall indirect net decrease in emissions from power plants and would allow existing fossil fuel-fired plants inside San Diego County to decrease operation, regardless of where new renewable generation occurs. A0030-20

Recommendation:
The magnitude of the calculations seems erroneous considering that 1,650 tons of CO_2 emissions are approximately equivalent to 0.0289 % of yearly emissions from a combined cycle gas fired power plant and 0.0082% of yearly emissions from a coal plant. We suggest that this analysis be reexamined and clarified within the FEIR/EIS.

Factual Inconsistencies and Editorial Recommendations A0030-21

Listed below are factual inconsistencies EPA identified in our review of the DEIR/EIS. We recommend that all of these inconsistencies be corrected in the FEIR/EIS. We also provide editorial recommendations.

a. *Revisions in the FEIR/EIS should be clearly marked.*

We recommend that any revisions in the FEIR/EIS be clearly marked. We suggest including a bar in the margin beside the text that has been revised and underlining the new text.

13

Comment Set A0030, cont.
U.S. Environmental Protection Agency

b. *Inconsistent numbering of significant, unmitigable impacts within the DEIR/EIS*

A0030-22

Section H.5 states that the LEAPS Transmission and Generation Alternative would have 41 significant impacts (pg. H-115); however, the Executive summary states that this alternative would have 44 significant impacts (pg. ES-4).

Section H.5 and Section H.6 state that the LEAPS Transmission-Only Alternative would have 27 significant impacts (pgs. H-117 and H-133); however, the Executive Summary states that this alternative would have 30 significant impacts (pg. ES-3).

Section H.6 states that the New In-Area Renewable Generation Alternative would have 32 significant impacts (pg. H-133); however, the Executive Summary states that this alternative would have 34 significant impacts (pg. ES-3).

Section H.6 states that the New In-Area All-Source Generation Alternative would have 38 significant impacts (pg. H-134); however, the Executive Summary states that this alternative would have 35 significant impacts (pg. ES-2).

c. *Maps, figures, references, and additional editorial recommendations*

The locations of the Esmeralda-San Felipe Geothermal Project and La Rumorosa Wind Project are not shown on Figure ES-1. The FEIR/EIS should revise the map or the text accordingly (pg. ES-9).

A0030-23

The Executive Summary should clarify that the geothermal project at Truckhaven is referred to as the Esmeralda-San Felipe Geothermal Project within the FEIR/EIS.

A0030-24

We recommend that the Executive Summary reference Section B.6 on pg. ES-9, as Section B.6 describes the *Connected Actions and Indirect Effects* in detail.

We recommend that the Executive Summary reference Section H more frequently, as Section H describes the *Comparison of Alternatives* in greater detail.

Section C.5.8.23 is listed as a reference for the Green Path Coordinated Projects on pg. C-152. This should be revised to Section C.5.8.25.

A0030-25

14

Responses to Comment Set A0030
U.S. Environmental Protection Agency

A0030-1 As a result of information that became available after completion and publication of the Draft EIR/EIS, the analysis presented in the Draft EIR/EIS on the Sempra Presidential Permit and related facilities has been revised. The revised analysis is included in Section 2 of the Recirculated Draft EIR/Supplemental Draft EIS. The analysis in this section replaces two sets of analysis presented in the January 2008 Draft EIR/EIS: (1) the Connected Action – Jacumba Substation and (2) Indirect Effect – La Rumorosa Wind Developers II. These actions were originally described in Draft EIR/EIS Sections B.6.1.4 and B.6.2 (Project Description). The impacts of the two components were analyzed in Sections D.2 through D.15.

A0030-2 Please refer to Response to Comment A0030-1.

A0030-3 Please refer to General Response GR-12 for a discussion of costs and benefits of the project.

A0030-4 The status of the Otay Mesa Generating Project would not be affected or influenced by the Proposed Project. SDG&E's power purchase agreement with the Otay Mesa Generating Project was established prior to the September 15, 2006 Notice of Preparation (NOP) for Sunrise and is therefore part of the baseline. All of the analysis of Sunrise Purpose and Need assumes that the Otay Mesa agreement will go forward and that power can be delivered to SDG&E by Otay Mesa starting in 2009. In the Draft EIR/EIS, the Otay Mesa Generating Project is considered part of the existing generation within the San Diego area (Section A.4.1). As noted in the description of the No Project/No Action Alternative (Section C.6.1.1), power will be procured from the Otay Mesa Generating Project with or without approval of the Proposed Project. Thus, it would not be appropriate to analyze Otay Mesa as part of the No Project/No Action Alternative.

A0030-5 The Executive Summary is intended to provide an overview of the results of the entire EIR/EIS, therefore, it presents a ranking and a brief summary of conclusions. It is Section H in the Draft EIR/EIS that describes the significant impacts of each alternative and explains the comparison rationale. Please refer to General Response GR-12 for a discussion of costs and benefits of the project.

A0030-6 Section D.1.4 in the Draft EIR/EIS describes the overall environmental assessment methodology and impact classifications. Subsequently each issue area section within Section D includes a section that discusses significance criteria and the approach to impact assessment. An impact would be considered significant if project construction or operation would exceed the thresholds established in the significance criteria. Each individual impact analysis also provides a discussion of how and why its impact classification was determined.

A0030-7 Should FERC issue a license for the LEAPS project and the CPUC and BLM select an alternative other than the LEAPS Transmission-Only Alternative or the LEAPS Generation and Transmission Alternative, it is anticipated that both projects could proceed simultaneously. Should FERC deny the hydropower license for the LEAPS project and the CPUC and BLM select the LEAPS Transmission-Only Alternative, it is anticipated

that the LEAPS Transmission-Only Alternative would proceed (pending other discretionary approvals) either by SDG&E or another entity because of it's reliability and cost-savings benefits despite the lack of a pumped storage unit. Please also see General Response GR-4, on the feasibility and permitting background of the LEAPS Project Alternatives.

A0030-8 With regard to the Agency's concern about the potential for the LEAPS Transmission-Only Alternative to adversely affect habitat, see Responses to Comments A0024-58 and A0024-61, which discuss USFWS- and NMFS-issued Biological Opinions on the LEAPS Project. With regard to the concern about impacts from noxious weeds being adequately disclosed and mitigation incorporated, please see Impact B-3 and Mitigation Measure B-3a(LE) (Weed Control Plan) in Section E.7.1.2 of Volume 5 of the Draft EIR/EIS. With regard to the Agency's concern about nesting birds, please see the discussion under Impact B-1 in Section E.7.1.2 and mitigation measure B-1c(LE) (Conduct biological monitoring). With regard to the Agency's concern that the intake ought to be designed to avoid entrainment of zooplankton, B-PME-9 commits the project applicant to "design and install physical barrier screens consistent with National Marine Fisheries Service (NMFS) criteria in areas of underwater intakes to prevent impingement and entrainment". With regard to the Agency's request that a leak detection monitoring and mitigation plan be required, please see Mitigation Measure H-14a (Develop and implement a water spill, release, and/or leak prevention plan) in Section E.7.2.12.

With regard to the Agency's concern that the air quality impacts and conformity with the applicable SIP of the LEAPS alternatives have not been adequately disclosed, the Draft EIR/EIS (Impact AQ-1, Section E.7.1.11) shows that depending on the construction schedule the LEAPS alternatives could exceed the General Conformity *de minimis* levels, which means that the federal agency approving any LEAPS alternative would be required to complete a full conformity determination or adopt additional mitigation (similar to Mitigation Measure AQ-1h) to reduce emissions to below the General Conformity *de minimis* levels. See Response A0009-25 for updated emission information and comparisons of the LEAPS alternatives to the *de minimis* levels.

A0030-9 An update on the status of the Encina Power Plant is included in General Response GR-1.

A0030-10 See the description of the New In-Area All-Source Generation Alternative in the Draft EIR/EIS Section C.4.10 and Section E.6 (pages E.6-1 and E.6-10) for information on the projects considered in the analysis. The CPUC and BLM have evaluated the various components of the non-wires alternatives in the EIR/EIS to demonstrate the types of impacts that could result from the various types of generation. The alternative is representative of a generation scenario because it includes reasonably foreseeable projects that have been identified in SDG&E's current or past Request for Offers (RFOs) or in other proceedings/applications. Analysis of representative projects allow for a comparison between transmission and generation alternatives. However, the party selected to construct and operate the generation would initiate permitting and CEQA and/or NEPA compliance for each project. General Response GR-1 provides further discussion addressing the feasibility of the alternative and limitations of the assumptions.

A0030-11 Contracts previously signed by SDG&E for power procurement from the Otay Mesa Generating Project and peaking power plants are considered part of the existing genera-

tion scenario for San Diego. (See Section A.4.1 of the Draft EIR/EIS.) The Draft EIR/EIS identifies projects that would provide power in addition to Otay Mesa and provide generation resources beyond those already signed by SDG&E. See Response A0030-4 for information on the consideration of the Otay Mesa Generating Project.

A0030-12 The Green Path Coordinated Projects were analyzed in Section C.5.8.25 of the Draft EIR/EIS. As discussed in that section, the Green Path Projects would not provide a transmission path into San Diego. Without accessing San Diego, these transmission projects would not satisfy basic project objectives. In contrast, the LEAPS Transmission-Only Alternative would be able to meet most project objectives without the Green Path Coordinated Projects. The Green Path Coordinated Projects do not qualify as connected actions (see Section B.6.1) that need to be considered in conjunction with the LEAPS Transmission-Only Alternative. As noted in Response A0010-13, the Los Angeles Department of Water and Power (LADWP) would be the Lead Agency for Greenpath North.

See Response A0030-4 for information on the consideration of the Otay Mesa Generating Project. The Recirculated Draft EIR/Supplemental Draft EIS addresses the potential impacts of the application filed by Sempra Generation for the cross-border transmission line.

A0030-13 The comparison of all alternatives and the compilation of the Environmentally Superior Southern Alternative are contained in Section H in the Draft EIR/EIS. The locations of the individual alternatives analyses listed by the commenter are correct. Table 3 (Contents and Organization of Draft EIR/EIS) in the Notice of Availability (NOA) of the Draft EIR/EIS lists the contents of the Draft EIR/EIS by volume and includes a listing of where all of the alternatives can be found within the document.

A0030-14 The commenter is concerned about the project's potential impacts to aquatic resources and jurisdictional waters and wetlands and the need for associated permits. The analysis provides sufficient detail as required by NEPA and CEQA to identify impacts, to allow for a reasonable comparison of the alternatives in terms of their potential impacts to "waters of the U.S." and "waters of the state" Please refer to General Response GR-15 with regard to the timing of the jurisdictional delineation and associated permit evaluation criteria. The commenter's recommendations to help facilitate compliance with Section 404 Guidelines are acknowledged.

The commenter also states that the document should specifically discuss mitigation opportunities for impacts to non-jurisdictional wetlands pursuant to Executive Order 11990. Mitigation opportunities for impacts to all vegetation communities, including non-jurisdictional wetlands, are discussed in Mitigation Measure B-1a. No changes to the Draft EIR/EIS will be made based on these comments.

A0030-15 The Draft EIR/EIS includes Mitigation Measure AQ-1h (Obtain NOx and particulate matter emission offsets), which would require emission reductions in sufficient quantities to keep emissions below *de minimis* levels and thus avoid applicability of the General Conformity rule. The measure requires the emission reductions to comply with local air district rules and regulations, which will help to ensure that the emissions and reductions conform to the local attainment strategies and State Implementation Plan (SIP). The goal of this mitigation measure is to allow the BLM to demonstrate General

Conformity by forcing SDG&E to obtain offsets, thus allowing BLM to determine that the project with offsets would not increase emissions above the *de minimis* levels. Operational emissions would not occur in sufficient quantities to trigger applicability of the General Conformity rule.

Threshold levels on General Conformity rule applicability from 40 CFR Part 93 and 40 CFR Part 51 are shown in Table D.11-9 of the Draft EIR/EIS. The comment notes ongoing efforts to classify the current attainment designations or consider new designations. However, it does not seem likely that imminent rulemaking would change the *de minimis* levels for the Proposed Project or alternatives. Only a reclassification to a "*serious*" ozone nonattainment area or worse would lead to lower thresholds, and the comment does not indicate that such a reclassification is likely. With the mitigation identified in the Draft EIR/EIS, the BLM would be able to determine that project-related emissions would not exceed the *de minimis* levels, meaning that they would conform to the SIP and would not cause or contribute to violations of the National Ambient Air Quality Standards.

A0030-16 The Applicant Proposed Measures (APM) that are part of the Proposed Project incorporate most of the suggestions made by the comment for reducing impacts. The commenter's suggestions for specific controls strategies are noted as follows. The fugitive dust source controls suggested by the comment are included in Mitigation Measure AQ-1a [namely in paragraphs (a), (d), and (i)], which specifies watering and stabilization of active and inactive surfaces, and SDG&E's APMs (especially AQ-APM-2 and AQ-APM-3), which specify fencing, speed limits on equipment, and stabilization of piles. The mobile and stationary source controls suggested by the comment are included in AQ-APM-4 and AQ-APM-5, which will reduce vehicle trips and idling. Mitigation Measure AQ-1b incorporates the suggestions on proper maintenance, using newer equipment, and installing appropriate tailpipe controls. Also, note that California state law includes stringent fleet emission reduction requirements and idling limitations (Section D.11.3.3). Administrative controls suggested by the comment would generally be included in the MMCRP. The CARB fleet rules require an inventory of equipment and advancement of clean engines as would Mitigation Measure AQ-1b. Traffic management is addressed in AQ-APM-4 and in the Draft EIR/EIS, Section D.9.

The Draft EIR/EIS (Table D.11-10) incorporates those measures, and where necessary to avoid an impact, identifies Mitigation Measures AQ-1a for dust control and Mitigation Measure AQ-1b for mobile source controls. The existing local air district requirements, the APMs, and the mitigation measures ensure that every feasible measure to reduce construction emissions is incorporated. Mitigation Measure AQ-1a would require SDG&E to file a Dust Control Plan incorporating the strategies recommended by the air quality management agencies including those of the comment. The Dust Control Plan would become part of the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) enforceable by the BLM and CPUC (described in the Draft EIR/EIS, Section I).

The Final EIR/EIS includes a revision to Mitigation Measure AQ-1a to clarify that sensitive receptors must be identified and addressed in the Dust Control Plan.

AQ-1a Suppress dust at all work or staging areas and on public roads. SDG&E shall: […] (j) prepare and file 30 days in advance of construction with the ICAPCD, SDAPCD, BLM, and CPUC a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. The Dust Control Plan shall identify nearby sensitive receptors, such as land uses that include children, the elderly, the acutely ill and the chronically ill, and specify the means of minimizing impacts to these populations (for example, by locating equipment and staging areas away from sensitive receptors).

A0030-17 The CPUC Greenhouse Gas Emissions Performance Standard is identified in the regulatory setting in Draft EIR/EIS Air Quality, Section D.11.3.3. General Response GR-8 provides more information on GHG emissions from power plants compared to the Proposed Project. Please refer to General Response GR-7 for a discussion of the Sunrise Powerlink Project and its connection to Mexican generation, greenhouse gas emissions standards applicable to SDG&E power purchases, and institutional measures to ensure that air quality in the Imperial Valley is not further degraded by new facilities exporting electricity from Mexico. The Proposed Project and alternatives would improve the ability of San Diego to import electricity or locally generate power rather than export or supply power from San Diego to the Los Angeles area.

A0030-18 See Draft EIR/EIS, Section D.11.13.3 and General Response GR-8 for information on how the GHG emissions from Proposed Project construction activities compare with those indirect and somewhat uncertain changes in GHG emissions from power plants connected to the grid. A general, qualitative discussion of the effects of climate change is provided in the Draft EIR/EIS, Section D.11.1.2 (page D.11-6).

A0030-19 The comment suggests that the Proposed Project would cause an overall reduction in regional GHG emissions because, while project construction would create 109,000 tons of CO_2, the project would spur renewable generation that could eliminate up to 20 million tons/year of CO_2. However, as noted in Section D.11.13.3 of the Draft EIR/EIS and General Response GR-8, the proposed transmission line is not a generator of electricity. Because the Proposed Project would provide transmission rather than generation, it would not directly achieve substantial GHG reductions by avoiding power plant emissions. See General Response GR-8 for more information on how the transmission line would indirectly affect GHG emissions from power plants connected to the grid.

A0030-20 The magnitude of avoided GHG emissions is based on production cost modeling from the Initial Testimony of the CAISO in the General Proceeding A.06-08-010 (Phase 1, Part II, filed March 1, 2007) with updates filed by CAISO in August 2008. With or without the Sunrise Powerlink Project, CAISO expects renewable resources to be developed across California assuming a Renewable Portfolio Standard (RPS) penetration of 26.5% RPS in 2015 (or halfway between the mandated 20% target in 2010 and the 33% goal that is presently under consideration for 2020). The Final EIR/EIS includes revisions to show these assumptions that statewide renewables policies can be implemented with or without the Proposed Project, and that developing renewable generation projects would occur with or without the transmission line. Emissions avoided by generating power from renewable resources rather than fossil fuels are not

attributable to the project, but relatively small changes in emissions at power plants including some avoided emissions are attributable to the project. The project would provide a new means of power delivery rather than the power itself. See General Response GR-8 for more information on avoided GHG emissions.

A0030-21 All changes to the text of the Draft EIR/EIS are included in the associated response and are shown in tracked changes in the document itself (included in the Final EIR/EIS on DVD) using underline or ~~strikeout~~ formatting.

A0030-22 The number of significant impacts for the LEAPS Transmission and Generation Alternative, LEAPS Transmission-Only Alternative, New In-Area Renewable Generation Alternative, and New In-Area All-Source Alternative have been reviewed and updated for consistency in Sections ES.2 and H.6 of the Final EIR/EIS. LEAPS Transmission and Generation Alternative would have 44 significant impacts, LEAPS Transmission-Only Alternative would have 31 significant impacts, New In-Area Renewable Generation Alternative would have 34 significant impacts, and New In-Area All-Source Alternative would have 32 significant impacts.

A0030-23 The location of the Esmeralda–San Felipe Geothermal Project is included on Figure ES-1 in the reference to the Truckhaven Geothermal Leasing Area. Please see Response to Comment A0030-24 for a discussion of how the text was clarified to explain that these are the same connected action. In addition, the text box on Figure ES-1 has been modified to include reference to the Esmeralda–San Felipe Geothermal Project.

In addition, the Sempra Presidential Permit and related facilities (including La Rumorosa Wind Project) have been revised on Figure ES-1 based on new project information that was included in Section 2 of the Recirculated Draft EIR/Supplemental Draft EIS.

A0030-24 Section ES.3.1 and ES.5.7 have been modified as follows to clarify that the Esmeralda–San Felipe Geothermal Project is in the Truckhaven Geothermal Leasing Area as is shown on ES-1 as follows:

> ...the Esmeralda–San Felipe Geothermal Project (in the Truckhaven Geothermal Leasing Area),...

The Executive Summary is intended to be a stand-alone document that briefly summarizes the contents of the EIR/EIS. However, Section ES.3.1 has also been modified as follows to include a reference to where in the EIR/EIS a description of the Connected Actions and Indirect Effects can be found:

> These projects are described in Section B.6 and include:...

Section ES.2 (page ES-2) of the Draft EIR/EIS has been modified as follows to clarify that Section H is where the comparison of alternatives can be found in greatest detail.

> Additional information ~~detail~~ on these conclusions and how they were reached is presented in Section ES.6 of this Executive Summary and in greater detail in Section H of the EIR/EIS.

A0030-25 The reference to the Green Path Coordinated Projects on page C-152 of the Draft EIR/EIS (Section C.6.2.3) has been corrected as follows:

Other transmission projects that could occur in the region are the Green Path Coordinated Projects (Section C.5.8.~~23~~ 25, and Appendix 1, Section 4.9.27)