

## Comment Set E0003, cont.

### San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.3.2	5-6	Table E.3.2-2	The EIR/EIS assumes mitigation ratios from other similar projects will be applicable for the proposed project. Propose mitigation ratios that reflect the implementation of HMP's prior to any ground disturbing activities as proposed in the EIR <u>or</u> retain the proposed mitigation ratios which typically account for temporal losses of habitat and remove the requirement for the implementation of all mitigation and HMP's prior to any ground disturbing activities.	E0003-158
E.3.2	7	1	The EIR/EIS assumes that trimming and removal of native trees constitute Class I impacts and violation of the MBTA. Native tree removal dependent upon age can be significant; however, impacts are based on a preliminary project design and not the final project design. Use the final project design to determine if proposed impacts cannot be mitigated to a less than significant level.	E0003-159
E.3.2	9	5	Contrary to the statement that the rare plant survey for the proposed project conducted by ARCADIS in 2007 yielded poor results, the rare plant survey of the proposed project in 2007 yielded good results with the identification of 492 plant taxa, 25 of which are sensitive.	E0003-160
E.3	E.3.4.-5	4	Future transmission is proposed following the Route D Alternative. The USFS will not issue a special use permit for a route that will impact Back Country Non-motorized Zones. Thus, this alternative is not feasible.	E0003-161
E.3	E.3.5-1	1	The first paragraph states this alternative will not traverse a federal or state designated wilderness and any wilderness study areas. This chapter fails to make mention of the proposed wilderness areas within the CNF along this alternative.	E0003-162
E.4.2.2	10	3	The EIS/EIR states "The Modified Route D Alternative would impact the following listed or highly sensitive wildlife species: least Bell's vireo (Impact B-7D), golden eagle (Impact B-7H), QCB (Impact B-7J), arroyo toad (Impact B-7K), and" Delete ", and" or add and discuss other species if they were accidentally omitted.	E0003-163
E.4.5.2	E.4.5-2 & 3	Various	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives. Based on the land use compatibility matrix of the Forest Service Land Management Plan.	E0003-164
E.4	E.4.7-10 & Table E.4.7-3	bullet 3	Bullet 3 on page E.4.7-10 says that metavolcanic rocks have no paleontological potential; however, Table E.4.7-3 lists the same rocks as having marginal potential. The text and table needs to be consistent.	E0003-165
E		Figure E.1.1-3	The I-8 Alternative figure does not indicate the access road required to reach the public right-of-way (Highway 79). This is in contrast to the depiction of access road grading shown in Figure B-36 for the Central East substation.	E0003-166
E.4	E.4.1-1	4	MRD-10 to MRD-11 overhead span goes across CNF land. SDG&E proposes a route modification to avoid crossing CNF. See GIS shape files.	E0003-167

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CH#	Pg#	Par#	Comment	
E.4.3	15	1	The document states that a two-level pad would be used because of the sloping nature of the parcel. This is incorrect. The general arrangement depicted in Figure E.4.1-2 is designed for a single level substation pad.	E0003-168
E.4.12; E.1.12	4; 4 and 6	3; 2 and 5	<p>The Modified Route D Substation is noted to require a grading impact of approximately 35 acres. This is incorrect. The substation pad alone, without graded slopes, is approximately 40 acres in area. Preliminary grading plans associated with the General Arrangement of the substation (as depicted on Figure E.4.1-2) indicate a permanent pad and graded slopes impact area in excess of 60 acres.</p> <p>The I-8 Substation is noted to require a grading impact of approximately 37 acres. This is incorrect. The substation pad alone, without graded slopes, is approximately 40 acres in area. Preliminary grading plans associated with the General Arrangement of the substation (as depicted on Figure E.1.1-3) indicate a permanent pad and graded slopes impact area likely in excess of 60 acres.</p>	E0003-169
E.5	31	1	Utilizing the minimum spacing criteria for wind turbine generators as identified in the DIER, the turbine interconnection system will be 100.6 miles long by 3 feet wide. Soil conditions and location of the wind turbine collection substation will most likely require multiple trenches to not overheat the underground cable system increasing the trench length significantly above 100 miles.	E0003-170
E.5, E.6	222, 198	1, 9	Grading/drainage permits are typically obtained from the relevant local agency. SWPPP for construction and post-construction BMPs are prepared but are not routinely submitted to agencies for review and approval. Mitigation Measure H-1a should be revised accordingly.	E0003-171
E.5.4	E.5.4- 111	entire discussio n	The Solar Thermal option is not a feasible alternative given that the availability of the land identified for this option use is not known, and there is no proposal to develop such a facility on this property. The feasibility of this alternative is remote and speculative. Additionally, even if it were a feasible option, the transmission line that is proposed as a part of the option goes through ABDSP with unknown environmental impacts because the requisite environmental studies to determine such impacts have not been conducted, either for the transmission line or on the site itself.	E0003-172
E.5.4	E.5.4- 113	2	The Solar Photovoltaic Alternative is only vaguely described. This option would involve roof top installation of solar systems on individual homes and businesses which is infeasible due to the historical lack of installations. Additionally, thousands of systems would be needed which is infeasible. This option could not meet the project in-service date. Therefore, this alternative is remote and speculative.	E0003-173
E.5.4	E.5.4- 115	entire discussio n	The Biomass/Biogas Alternatives (one facility near Fallbrook and two near the Miramar Landfill) are not feasible alternatives given that the availability of the land identified for these options is not known, and there is no proposal to place such a facility on these properties. The feasibility of these alternatives is remote and speculative.	E0003-174

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### San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.5.4	E.5.4-117	3	The Wind Generation Alternative proposes wind turbine facilities on Indian Reservations (Campo, La Posta, and Manzanita). No indication is provided as to whether wind facilities have been or could be proposed by tribes. Therefore, this alternative and associated land use impacts is remote and speculative. This option could not meet the project in-service date. No specific locations for these facilities have been identified, nor for the associated transmission lines and substation that would be needed, and, as a result, no detailed land use analysis was conducted. Although a wind generation facility currently exists on the Campo Reservation, it is unknown if the tribe has plans for expansion of these facilities.	E0003-175
E.5	E.5.7-153	1, 2	The text on page E.5.7-153 states that only one site has been recorded within the 1,450-acre area, but no information is provided about whether the site was recorded as part of a systematic survey, and, if so, how much acreage the survey covered (what percentage of the 1,450 acres). The text also states that one other resource (no site number or description provided in text or Appendix 9B) is recorded within the transmission line corridor extending between Borrego Substation and the ABDSP boundary. The text should discuss previous survey work on the site and transmission corridor, provide site information about the unidentified site in the text and tables, and indicate whether this site was identified in a Class I record search.	E0003-176
E.5	E.5.7-154	2	Site CA-SDI-2367 identified as a "prehistoric habitation site" on page E.5-153 in the introductory paragraph, and is later changed to "an extensive temporary camp consisting of 20 or more camp sites" on page E.5.7-154. This site is a habitation site and the site description on both pages should reflect this.	E0003-177
E.5	E.5.7-154	4	DEIR states that site D2-S-106 (potential TCP) "is too expensive to be spared from direct construction impacts and indirect visual intrusion of the Proposed Project". This is not entirely accurate because the SDGE design crew has developed a work-around route for this site to avoid construction impacts to the site. The paragraph should be changed to include this information.	E0003-178
E.5; E.6	E.5-160; E.6-128	3	To assume that Pleistocene Age sediments may be present at an unknown depth is not an acceptable criterion to require paleo mitigation measures. This information is purely speculative and cannot be substantiated without extensive trenching.	E0003-179
E.5	E.5.7-160	2	The text on page E.5.7-160 states that the Fallbrook Facility Area is 80 acres in size and has had adequate previous survey over 99 percent of its 209-acre area. This is contradictory. Does the 209 acres include the Fallbrook Facility Area and the 0.5 mile record search buffer? If so, the text should state that the percentage of the actual 80-acre facility surveyed. Please clarify the text and provide citations for the previous adequate surveys that addressed the property.	E0003-180
E.5	E.5.7-164	4	For the Wind Energy Alternatives, no information is provided about the number of acres that were included in the record search (with and without the 0.5 mile buffer) or in the Campo Reservation portion of the Alternative, for which record searches could not be obtained. Also, no information has been provided about whether any portions of the record search area outside the reservation been subjected to systematic survey. The text should state whether the information can be used to project estimates of the numbers of sites which could be encountered in an intensive archaeological survey, as has been done for the proposed project and some of the alternatives, and include any projections that can be made.	E0003-181

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CH#	Pg#	Par#	Comment	
E.5	E.5.7-165	2, 4 bullets, 3	The second sentence of paragraph 2 on page E.5.7-165, which states "The BCD Alternative the Wind component along MP BCD-7 through MP BCD-12" is a non sequitor and needs to be corrected and clarified. Also, no site numbers are provided for the sites described in the four bullets, either in the text or in Appendix 9B (Table 9B-109) and need to be included in both places. It is not clear whether the prehistoric camp referred to in paragraph 3 is already accounted for in the record search results discussion. This needs to be clarified in the text, and any necessary corrections to the table should be made.	E0003-182
E.5	E.5.7-165	last	The text on page E.5.7-165 states there are three known sites in the Wind Component and goes on to mention the sites within the BCD alternative. Again, it is unclear how the two areas relate physically to one another. The text should be rewritten to clarify what is meant here.	E0003-183
E.5.8	E.5-171	Table E.5.8-1	Table E.5.8-1 conflicts with Table D.8-12. Table D.8-12 shows a higher dBA at 50 feet for jack hammer, dozer, air compressor and backhoe. The entire document should provide consistency for estimations of noise levels by types of construction equipment. Provide consistency throughout the document.	E0003-184
E.5.8	E.5-171	N-1 Construction	Impact N-1 states that noise would cause substantial disturbance. However, the resultant class is both III and I. A substantial increase can only result in Class I. Impact N-1 should be clarified to reflect substantial for Class I and not substantial for Class III. Suggest listing N-1 twice; one demonstrating a substantial Class I impact and one demonstrating less than significant, Class III or rewrite impact to clarify. This applies to all of Chapter E.	E0003-185
E.5.8	E.5-171	Table E.5.8-1	Table E.5.8-1 presents different types of construction equipment (specific to construction of solar thermal site only) than Table D.8-12 a separate calculation of noise impacts at distances greater than 50 feet should be conducted. The resultant noise level at 1,000 feet will differ from Table D.8-12 because the maximum instantaneous noise level is 88 as compared to 90 as estimated on page D.8-17.	E0003-186
E.5.8	E.5-172	N-1 Construction	The statement "because of sufficient distance to the solar thermal site, no nearby noise-sensitive receptors would be affected.... (Class III)" is not supported. Clarify the distance to the nearest receptor.	E0003-187
E.5.10	Global	Global, Impact P-3	This section needs to clarify that although spills could result in soil contamination, the most likely incidents would be minor spills that could easily be cleaned up. After the sentence "...spills could occur and cause soil contamination, resulting in significant impact", add text: "The most likely incidents involving these hazardous materials would be associated with minor spills and drips. Small spills can be easily cleaned up."	E0003-188

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### San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.5.11	E.5-212	4	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with building biogas/biomass facilities. The construction mitigation measures identified in the DEIR for the biomass/biogas facilities construction in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of biomass/biogas projects and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.	E0003-189
E.5.11	E.5-214	1	This Section of the DEIR addresses air impacts from the operation of biomass/biogas plants and combustion of gases. The DEIR suggests that emissions increases of PM10 and ozone precursors (i.e. NOx and VOC) from the new plants would have to be offset. This requirement seems excessive for small (non-major source) biomass plants that would emit much less than 50 tpy of ozone precursors (since APCD rule would not require offsets).	E0003-190
E.5.11	E.5-215	2	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with building wind generation facilities and associated substations. The construction mitigation measures identified in the DEIR for the wind generation facilities construction in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of wind generation projects and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.	E0003-191
E.6.11	E.6-176	8	This Section in the DEIR addresses dust and criteria emissions impacts from construction activities associated with the replacement of the South Bay Power Plant and associated substations. The construction mitigation measures identified in the DEIR for the construction of a replacement power plant in San Diego County are similar to those that would be required for SDG&E's Proposed Project (Chapter D.11 -- i.e. construction of 500 kV transmission line) and are listed in Appendix 12 (including Mitigation Measures AQ-1a, AQ-1b, AQ-1d, AQ-1e, AQ-1f, AQ-1g, and AQ-1h). SDG&E had specific comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h (which would apply to both to the construction activities of a new power generation plant and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.	E0003-192