Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.6.11	E.6-179	1	This Section in the DEIR addresses criteria emission from the operation of a new natural-gas fired power plant that would replace the existing South Bay Power Plant. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a). This mitigation measure appears to be speculative and not roughly proportional to the impacts since the operating parameters, level of emissions, and air impacts from the replacement facility have yet to be determined.	E0003-193
E.6.11	E.6-180	2	This Section in the DEIR addresses dust and criteria emissions impacts from construction activites associated with the San Diego Community Power Project (also known as "ENPEX"). The construction mitigation measures identified in the DEIR for the construction of ENPEX generation facilities 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 for ENPEX and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.	E0003-194
E.6.11	E.6-181	2	This Section in the DEIR addresses criteria emission from the operation of a new generation facilities that would be constructed as part of the ENPEX project. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a). This mitigation measure appears to be speculative and not roughly proportional to the impacts since the operating parameters, level of emissions, and air impacts from the new generation facilities have yet to be determined.	E0003-195
E.6.11	E.6-182	4	This Section in the DEIR addresses dust and criteria emissions impacts from construction activites associated with the development of 4 proposed peaks in San Diego and Orange Counties. The construction mitigation measures identified in the DEIR for the construction of the peakers 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 for the peakers and to the construction of the Proposed Project). See comments on Mitigation Measures AQ-1a, AQ-1b, AQ-1g, & AQ-1h.	E0003-196

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.6.11	E.6-183	4	This Section in the DEIR addresses criteria emissions from the operation of the 4 new proposed peakers that would be constructed in San Diego and Orange County. The DEIR indicates that offsets will probably be needed for ozone precursors (NOx and VOC) and PM10 to mitigate impacts (Mitigation Measure AQ-3a) because the 4 peakers would collectively have significant impacts on the region. It is evident that the four peakers would be dispersed in the different locations in the region (e.g. Pala, Borrego, Miramar etc.) and would be operated intermittently at different times and it would be unrealistic to treat emissions from the units collectively. Furthermore (based on projected emissions provided for each Peaker in Table E.6.11-4) of the DEIR, it appears that each peaker will emit much less than the 50 tons/yr of NOx and VOCs major stationary source/offset trigger level (per SDAPCD NSR rules). It is therefore unlikely that offsets would be needed from each individual peaker to mitigate impacts. Also recent permitting of peakers in San Diego County (e.g. Miramar I peaker) has shown that the air impacts from these low/intermittent use units (that are extensively controlled and meet BACT standards) are less than significant (based on an Air Quality Impact Analysis, AQIA).	E0003-197
E.5.12 & E.6.12	E.5-220 to E.5-234 & E.6.188 to E.6.199	N/A	While chapters E.5.12 and E.6.12 provide information on some general potential impacts to streams, wetlands, and riparian areas that could occur as a result of the New In-Area All Source and Renewable Generation Alternatives, it is also important to acknowledge that true impacts cannot be determined until these areas have been properly surveyed. Please add that impacts on coastal resources in San Diego Bay are unknown for the area indicated by red circle #1 on Figure C-8. There are also unknown impacts on vernal pools (for the area indicated by blue circle #4 on Figure C-8), and unknown impacts on coastal resources at Aqua Hedionda for the area indicated by red circle #3 on Figure C-8, all of which need to be acknowledged.	E0003-198
E.6.2	E.6-47	4	The text states that impacts to green sea turtles would be mitigable to less than significant (Class II), "eliminating the warm water effluent would benefit the South Bay ecosystem by returning the water conditions to their state prior to the operation of the SBPP. However, the green sea turtle is known to occur in the South San Diego Bay throughout the year and is attracted to the existing warm water effluent of SBPP. Because the existing warm water discharge from SBPP would cease, abruptly stopping the warm water discharge in the wintertime could adversely affect the turtles. Impacts to green sea turtles would be significant but reduced to less than significant with Implementation of mitigation measures B-1h, B-6a, and B-12d. The impact of maintenance activities on wildlife would be less than significant with Implementation of mitigation measures below (Class II)." The mitigation measures for Impact B-15 do not address how impacts to the turtle will be reduced to less than significant. The mitigation measures do not apply to the turtle at all and there is no attempt to address the impact that will be caused by eliminating warm water discharges in the bay. As written, with no mitigation measures specific to the turtle, this should be categorized as a Class I impact.	E0003-199

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.6.2.	46, 55, 63	3, 3,4	While collisions with stacks are known to occur, studies have shown that birds (night migrants) are attracted to the glow of certain colored lights. When they are attracted they can strike the stacks or become disoriented and fly around until they are so exhausted they fall to the ground. Night migrant passerine birds are primarily at risk for this type of impact and generally occur during poor visibility conditions. These impacts can be mitigated; the FAA recommends specific lighting regimes for minimizing impacts relating to bird collisions. This impact should be changed to Class II and the FAA recommendations should be added as mitigation.	E0003-200
E.6.4	E.6-106	entire discussion	Discussion of South Bay Power Plant Repower project is speculative. Applicant LPS Energy withdrew its application for the project in October 2007. There is opposition by the City of Chula Vista and the Port of San Diego. As a result, it is infeasible and will not meet the in-service date. Discussions/studies have occurred about South Bay Power Plant location being the new SD Chargers stadium. This should be included in the Final EIR/EIS.	E0003-201
E.6.4	E.6-108	entire discussion	The San Diego Community Power Project has been "under development" since 2000 but has not filed a formal application. Its development is remote and speculative. This option will not meet the Sunrise in-service date.	E0003-202
E.6.4	E.6-109	entire discussion	The peaking power plants identified may also not be feasible depending on land availability, political legal and regulatory implications. These will likely not meet the Sunrise in-service date.	E0003-203
E.6.10	E.6-166	Impact P-3, after 2nd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 2nd sentence, insert: "The SDCPP site is located within the eastern edge of the Miramar Marine Corps Air Station boundary. Historically areas of Miramar have been used for bombing and munitions testing. There is a potential for lead waste to occur at gun and artillery practice ranges where lead munitions are used."	E0003-204
E.6.10	E.6-170	Impact P-3, after first sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After first sentence, add text: "The Miramar peaker site is located within the Miramar Marine Corps Air Station boundary. Historically areas of Miramar have been used for bombing and munitions testing. There is a potential for lead waste to occur at gun and artillery practice ranges where lead munitions are used."	E0003-205
E.7.1	page 70, Figures E.7.1.3 -2B	Figure	LEAPS Key Viewpoint L1 - Visual Simulation: the soil color selected for the new access road is too light, which overemphasizes the color contrast of the new road. The highly visible access road as shown in the simulation would be temporary, as the strong line and color contrasts would be mitigated by revegetation. In the event there is no revegetation, the surrounding grasses would encroach on the cleared roadway, significantly softening contrasts. Typical transmission line access roads (long-term) are visible as a lightly-used two-track road. It should be disclosed that the visual impact of the new access road is temporary, or the simulated access road should be replaced with a two-track road.	E0003-206

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.7	2-31	throughout section	The LEAPS FEIS identified the preferred alternative as the staff alternative (even though it had not been surveyed at the time the FEIS was issued), which includes a transmission alignment that generally follows the current LEAPS Transmission-Only Alternative. Two notable exceptions are where the LEAPS Transmission-Only Alternative for the SRPL Project crosses the San Mateo Canyon Wilderness north of MP 21 and again just south of MP 26. The LEAPS DEIS (pages 2-31 to 32) eliminated two segments of the transmission route because the USDA Forest Service opposed any segments that were in proximity to the San Mateo Canyon Wilderness. Since the SRPL DEIR LEAPS Transmission-Only Alternative crosses this same wilderness in two areas, it is likely that the USDA Forest Service will also oppose this segment. These two areas (north of MP 21 and south of MP 26) should be re-designed.	E0003-207
E.7.1.2	27	4	The EIS/EIR states "Most of the non-listed, sensitive species' habitats are sensitive vegetation communities; the mitigation for the loss of the sensitive vegetation communities (Mitigation Measure B-1a [LE]) would normally compensate for the potential loss of these sensitive species and their habitats. However, since adequate land required by Mitigation Measure B-1a(LE) may not be available, the impacts to non-listed, sensitive wildlife species are considered significant according to Significance Criterion 2.a. (impacts that directly or indirectly cause the mortality of candidate, sensitive, or special status wildlife species) and not mitigable to less than significant levels (Class I)." SDG&E is committed to compensate for impacts to sensitive species' and their habitats, and it is SDG&E's responsibility, working with land management agencies, to identify mitigation land; therefore, the assumption that mitigation lands are not available is premature. These impacts are mitigable and should be classified as a Class II impact, not a Class I impact.	E0003-208
E.7	E.7-110	1	Text notes that the significant impacts of 2.7 miles of transmission line and 1.1 miles of road in the FS BCNM zone are mitigated through a Land Management Plan amendment. Text should explain how such an amendment can even be considered, and if the project can successfully pass the pre-screening requirements for initiating such an amendment as well as the duration.	E0003-209
E.7	E.7.7-123	first bullet	Nine prehistoric resources are described for the LEAPS Transmission Alternative. The descriptions do not fully accord with those provided in Table Ap.9B-114 (referenced incorrectly in this discussion as Ap.9B-144). The table lists two loci made up of rock art and bedrock milling and no separate rock art site. Table Ap.9B-115 lists additional resources not discussed in the text, which seem to relate to substation impacts. Substations are not addressed for this alternative. The text and/or tables should be corrected for consistency, and substations should be discussed, if they are a part of this alternative.	E0003-210
E.7	E.7.7-123	first bullet	The text on page E.7.7-123 states that "the NRHP/CRHR eligibility of the nine prehistoric cultural resources has not been determined." For the proposed project, assumptions of eligibility are made in the DEIR based on site type. The same standard should be applied when evaluating alternatives. Here and wherever relevant throughout the document, all alternatives should state which and how many sites are assumed to be eligible based on site type.	E0003-211

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.7	E.7.7-129	7	The text on page E.7.7-129 states that the four resources listed in Table Ap9B-115 will be impacted. Only one of these resources was previously mentioned in the environmental setting section for this alternative. The other three appear to relate to substations, which are not discussed elsewhere. The text and tables should be corrected to state whether substations are part of the project, and, if so, whether they have been fully and adequately surveyed (and provide citations for previous adequate surveys).	E0003-212
E.7.10	E.7-159	Impact P-3, after 3rd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 3rd sentence, add text: " Lead contamination may occur within many areas of Camp Pendleton used for weapons and artillery training."	E0003-213
E.7.10	E.7-162	Impact P-3, after 3rd sentence	Impact P-3 needs to include the potential to encounter soils contaminated with lead in areas that have been historically been used as gun and artillery practice ranges. After 3rd sentence, add text: "Historically areas of Camp Pendleton have been used for bombing and munitions testing, resulting in a potential for lead contamination."	E0003-214
E.7	E.7 - 304	4	Section E.7 evaluates the LEAPS Transmission Only alternative, which is not a feasible alternative. The conclusion of the document is that the LEAPS Transmission Only alternative is environmentally superior; however, when coupled with the LEAPS Generation; it has serious implications to the water resources as outlined in the EIR in Table E.7.2-16 on page E.7-304, which shows Class I impacts to water resources from the LEAPS Generation component in a variety of areas. The analysis should be revised to indicate that the LEAPS Transmission Only alternative would not be implemented without the LEAPS Generation, and is therefore not a feasible alternative. This would also require a re-evaluation of the environmentally superior alternatives, as the LEAPS Transmission line coupled with the LEAPS Generation is not an environmentally superior alternative.	E0003-215