

7.0 Responses to Comments

On December 6, 2018, the California Public Utilities Commission (CPUC) circulated a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for San Diego Gas and Electric Company's (SDG&E's, or the applicant's) Permit to Construct (PTC) the TL674A Reconfiguration and TL666D Removal Project (proposed project) (Application A.17-06-029) to the public and public agencies pursuant to the California Environmental Quality Act (CEQA), Section 15072. The CPUC sent the NOI to the County of San Diego, 859 property owners, 17 tribes, and other interested parties. The Draft Initial Study (IS)/MND was also announced in the *San Diego Union Tribune* newspaper on December 6, 2018. The CPUC posted the Draft IS/MND on its website and made electronic and hard copies of the document available at the San Diego County Public Library's Central and Del Mar branches. The IS/MND is available online at <http://www.cpuc.ca.gov/environment/info/ene/delmar/delmar.html>.

During the public review period for the Draft IS/MND, the CPUC received comments from public agencies and the applicant. Table 7-1 lists the persons and agencies that submitted comments on the Draft IS/MND. If revisions were made to the Draft IS/MND, they are provided with the response to the specific comment. Revisions are indicated in the text of this Final MND with ~~strikeout~~ for deletions of text and in underline for new text.

Table 7-1 Index of Commenters and Responses

Commenter	Affiliation	Type	Date of Comment	Response Code
Public Agencies				
Darren Smith, Services Manager	California State Parks, San Diego Coast District	Letter	01/07/2019	A-1 – A-8
Cindy Kimmel	California State Parks, San Diego Coast District	Email	12/19/2018	B-1
Jacob Armstrong, Branch Chief	California Department of Transportation	Letter	01/07/2019	C-1 – C-10
Native American Tribes				
Ray Teran, Resource Management	Viejas Band of Kumeyaay Indians	Letter	12/10/2018	D-1 – D-2
Applicant				
Elizabeth A. Cason, Senior Counsel	San Diego Gas & Electric	Letter	01/07/2019	E-1 – E-87
Individuals				
Andrew Kahng	Self	Email	12/15/2018	F-1
Betty Hertel	Self	Email	12/10/2018	G-1 – G-2
Kevin Patrick	Self	Email	12/11/2018	H-1 – H-2
Maali Mohsen	Self	Email	12/26/2018	I-1

Public Agencies

Comment Letter A

California State Parks, San Diego Coast District



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
San Diego Coast District
4477 Pacific Highway
San Diego, CA 92110
(619) 688-3260 FAX (619) 688-3229

Lisa Ann L. Mangat, Director

January 7, 2019

TL674A Reconfiguration and TL666D Removal Project
c/o Ecology and Environment, Inc.
Attn: Silvia Yanez, Project Manager
505 Sansome Street, Suite 300
San Francisco, CA 94111

Fax: (415) 398-5326
Email: TL674A.CPUC@ene.com

Re: TL674A Reconfiguration and TL666D Removal Project

Dear Ms. Yanez,

Thank you for the opportunity to comment on the Draft IS/MND for proposed TL674A Reconfiguration and TL666D Removal Project (Project). A portion of this project occurs within Torrey Pines State Natural Reserve (TPSNR) including the removal of Poles 71-77 and 82-89 and a proposed lay down area within the North Beach Day Use Lot. California State Parks (CSP) is a public trust agency that owns and operates TPSNR. SDG&E/CPUC has a number of transmission lines and associated easements within CSP property. CSP has long sought to reduce the impacts of public utility infrastructure within TPSNR by removing or relocating utility lines within sensitive habitats and public use areas. SDG&E/CPUC has been a good neighbor and partner in previous maintenance and relocation projects at TPSNR and we support this project. Several issues need to be addressed or resolved before the Final IS/MND is certified and the Project is implemented: review of State Park plans, policies, and regulations, biological monitoring and coordination with State Parks staff, protection of geological resources, use of the North Beach Lot for lay down area, and issuance of a Right-of-Entry Permit.

A-1

While the Draft IS/MND reviews other Federal, State, and local laws, policies, and ordinances, the DRAFT IS/MND does not discuss or provide analysis of the CSP's planning documents, regulations or policies. These documents provide guidance and legal framework for projects at TPSNR and California State Parks in general. (for example Torrey Pines General Plan http://www.parks.ca.gov/pages/21299/files/ar_630_1569.pdf; Department Operations Manual Chapters 300 (Natural Resources); 400 (Cultural Resources), 500 (Park Planning), The Los Penasquitos Lagoon Enhancement Plan Update <http://www.lospenasquitos.org/wp-content/uploads/2017/05/LosPenEnhancementPlan-Aug2016.pdf>, and others. TPSNR has been included as part of the City of San Diego's Multiple Species Conservation Program Multiple Habitat Preserve Area and this program is generally consistent with State Parks natural resource plans and policies. The Final IS/MND should include a brief discussion of State Park policies and regulations and their consistency with the findings of the DRAFT IS/MND.

A-2

A-3

The proposed Draft IS/MND prescribes biological and cultural resources monitoring programs in the mitigation and monitoring plan. Because of the sensitivity of the habitats within close proximity to the Project and the narrow workspaces, we strongly recommend adding to the

A-4

mitigation and monitoring plan additional the biological monitoring onsite for all work in upland habitats (including trails and bare areas) at TPSNR. For the wetland habitats we support SDG&E's use of a helicopter to minimize impacts while working in sensitive areas with difficult access. We understand the safety constraints with using a helicopter and would recommend always having a biological monitor in communication with technicians. This should include before and at the end of each day's work and collecting before and after pictures for each pole after each day's work. All biological monitoring work will need to be coordinated with the State Environmental Scientist.

Cont.
A-4

A cultural resources monitor will need to be onsite for all work within or near sensitive cultural sites and features. A cultural resource permit will be required for any cultural resources monitoring within TPSNR. This permit will require a lead-time of four weeks before work can begin. All biological monitoring work will need to be coordinated with the State Archaeologist.

A-5

Although there are no expected impacts to geologic features mentioned in the Draft MND/IS, there are several poles in the south end of the TPSNR Extension (Red Ridge) that are located on significant geologic features along Red Ridge in the TPSNR Extension. For the Red Ridge area, CSP recommends adding geologic resources monitoring to the Mitigation and Monitoring plan and providing either a cultural or biological monitor to avoid any work that would impact geologic resources.

A-6

The Draft MND/IS proposes using a large area of the North Beach Day Use lot at TPSNR for a lay down area. The configuration, timing and size of the area will have to be coordinated to minimize coastal access impacts and disruption to State Park visitors and operations. Additionally, a private contractor operates the lot's fee collection and use of a lay down area may require reimbursement to recover their revenue for reduced parking spaces.

A-7

Because access to the North Beach lot and other access points or paths are outside the SDG&E easement, a Right of Entry Permit (ROE) will need to be issued by CSP. The ROE will specify the State's requirements for temporary use of the land and will specify a consideration for the ROE. The ROE will need a lead-time of approximately four weeks before work can begin.

A-8

Thank you for providing the opportunity to comment on the Draft IS/MND. CSP looks forward to working with you on this project. Please call me at (619) 952-3895 if you have any questions or need any information.

Sincerely,



Darren Smith, District Services Manager, San Diego Coast District, California State Parks

Cc.

Lisa Urbach, North Sector Superintendent
Kimberly Weinstein, Administrative Chief
Dylan Hardenbrook, Senior Supervising Ranger
Susan Kosek-Kelly, Maintenance Chief III
Georgia Schneider, Maintenance Chief I
Cara Stafford, District Environmental Scientist
Nicole Turner, District Archaeologist
Cindy Krimmel, District Environmental Planner
Mike Hastings, Los Penasquitos Lagoon Foundation
Reading File

Responses to Comment Letter A California State Parks, San Diego Coast District

A-1 The commenter describes the issues that the State of California Department of Parks and Recreation (Cal Parks) request be addressed in the Final IS/MND. The commenter states that the issues that will be discussed in greater detail in their comment letter pertain to including an adequate review of State Park plans, policies, and regulations; biological monitoring and coordination with State Parks staff; protection of geological resources; use of the North Beach Lot as a laydown yard; and issuance of a Right-of-Entry Permit.

The CPUC appreciates Cal Parks' involvement in the proposed project, components of which would cross Cal Parks land. The CPUC has responded to Cal Parks' comments individually, as discussed in detail below. Furthermore, on January 18, 2019, the CPUC submitted a formal letter to Cal Parks requesting clarification of a comment from Cal Parks' original comment letter on the Draft IS/MND. On February 6, 2019, the CPUC submitted a follow-up email to Cal Parks, reiterating the clarification request. Cal Parks did not respond to the CPUC letter or email. The CPUC has therefore responded to the Cal Parks letter to the best of their capacity, given the understanding of the proposed project and present conditions at the Cal Parks facilities that would be crossed by the proposed project.

A-2 The commenter requests that in the Final IS/MND, the CPUC provides an analysis of project compatibility with Cal Parks' planning documents, regulations, and policies, including the San Diego Coastal State Park System General Plan: Torrey Pines State Beach and State Reserve, the California Department of Parks and Recreation Department Operations Manual, and the Los Peñasquitos Lagoon Enhancement Plan Update. Appendix G, "Land Use Policy Matrix" of the Draft IS/MND, did not include a compatibility analysis of these three planning documents.

Revisions to the Draft IS/MND in response to this comment have been made to Appendix G, "Land Use Policy Matrix". Please refer to Appendix G to review applicable updates. While a consistency analysis of policies from the Los Peñasquitos Lagoon Enhancement Plan Update was not incorporated into Appendix G because the plan is currently in a draft stage, a brief summary of the overall intent of the document and its consistency with the proposed project has been provided. Chapter 300: Natural Resources from the State of California Department of Parks and Recreation Department Operations Manual was also summarized and evaluated in Appendix G for overall consistency of the proposed project with described policies. Overall, the proposed project is not expected to conflict with existing plans and policies pertaining to California State Parks. Additionally, **APM REC-01** and **APM REC-02** require that SDG&E coordinate with California State Parks prior to the start of project-related activities within California State Parks land; this would ensure that project activities do not conflict with such plans.

A-3 The commenter requests that the Final IS/MND include a brief discussion of State Park policies and regulations and their consistency with the findings of the Draft IS/MND.

As described in the response to Comment A-2, a brief discussion of State Park policies and regulations and their consistency with the findings of the Draft IS/MND has been included in Appendix G, "Land Use Policy Matrix", which has been updated for the Final IS/MND.

A-4 The commenter notes that the Draft IS/MND prescribes biological and cultural resources monitoring programs in Chapter 6.0, "Mitigation Monitoring and Reporting Plan (MMRP)," and requests that the plan clarify that additional onsite biological monitoring will be incorporated into the MMRP for all work in upland habitats, including trails and bare areas, at Torrey Pines State Natural Reserve. The commenter also states that Cal Parks supports the biological monitoring strategies for sensitive wetland habitat areas as described in Chapter 6.0 and Section 5.4, "Biological Resources" of the Draft IS/MND. However, the commenter requests that in instances in which a biological monitor must observe project activities from outside of the sensitive wetland habitat areas, the monitor should have the means to maintain communication with pole removal technicians, both before and after each workday. Furthermore, the commenter states that biological monitoring work must be coordinated with the Cal Parks State Environmental Scientist.

As described in the response to Comment A-1, the CPUC submitted a formal clarification request letter to Cal Parks on January 18, 2019. This letter requested clarification that Cal Parks' request for biological monitoring in upland habitats, including trails and bare areas, refers to the upland areas at Torrey Pines State Natural Reserve Extension, not the wetland lagoon habitat within Torrey Pines State Natural Reserve. The CPUC requested this clarification because the wetland lagoon habitat within Torrey Pines State Natural Reserve supports no upland habitat areas within the project area. A Contact Report documenting this correspondence, as well as copies of all correspondences between CPUC and Cal Parks, is included as Appendix K to the Final IS/MND.

The commenter notes that the portions of the proposed project that span Torrey Pines State Natural Reserve include Poles 71–77, and Poles 82–89. The Draft IS/MND identifies Poles 71–77 as spanning Torrey Pines State Natural Reserve Extension, and Poles 82–89 as spanning Torrey Pines State Natural Reserve. Based on the CPUC's evaluation of the San Diego Coastal State Park System General Plan: Torrey Pine State Beach and Reserve (Cal Parks 1984) (see Comment A-2), the CPUC has noted that Cal Parks defines Torrey Pines State Natural Reserve as a facility supporting "1,256 acres (502 hectares) of coastal terrace, bluffs, coastal wetlands, and floodplain. Included in the reserve are 183 acres (74 hectares) of rugged ridges and canyons, commonly referred to as the 'Extension,' which is separated from the rest of the unit by private development. North Torrey Pines Road, a mostly four-lane portion of Highway 101, divides both the state beach and state reserve" (Cal Parks 1984).

Due to the distinct environmental conditions between the wetland lagoon environment within Torrey Pines State Natural Reserve and the upland bluff areas within Torrey Pines State Natural Reserve Extension, the CPUC identified these two disjointed branches of the state park as separate facilities with distinct monitoring needs, as discussed in detail in Section 5.4, “Biological Resources.” The mitigation strategies described in Chapter 5.4, “Biological Resources” and Chapter 6.0, “Mitigation, Monitoring, and Reporting Plan” of the Draft IS/MND are intended to ensure that effective biological monitoring occurs from outside of sensitive wetland areas to ensure that the biological monitor’s presence does not cause additional impacts to biological resources. Otherwise, biological monitors shall be present where appropriate within all upland work areas in which the presence of a biological monitor would not threaten additional impacts to biological resources. To clarify that the monitoring strategy presented in the Draft IS/MND is consistent with Cal Parks’ requests, **MM BR-4: Construction Monitoring** has been revised in both Section 5.4 and Chapter 6.0 MMRP, as follows:

“MM BR-4: Construction Monitoring. The applicant shall ensure that a qualified, CPUC-approved biological monitor is present at all times to monitor ground-disturbing activities (e.g., grading, vegetation removal, trenching, digging, etc.) in areas that have the potential to support special status species. All ground-disturbing activities that would occur within 50 feet of Environmentally Sensitive Areas (areas supporting special status species, sensitive natural communities, and aquatic features), ESHAs, and all potentially jurisdictional aquatic features (non-wetland waters of the state, wetlands, streambeds, open water, tidal waters, and jurisdictional natural communities) will be monitored. To minimize the potential for human-related impacts in sensitive areas and to maintain worker safety, a biological monitor shall not be present to observe project activities within helicopter access-only work areas in San Dieguito Lagoon or Los Peñasquitos Lagoon. The CPUC-approved biological monitor shall observe project activities within such areas from a safe distance, assisted by binoculars as needed. When the CPUC-approved biological monitor must observe project activities from a safe distance, the monitor will maintain communication with pole removal technicians, both before and after each workday, to ensure that appropriate biological resource protection protocols are implemented. In work areas located outside of the lagoons, including upland habitat within Torrey Pines State Natural Reserve Extension, and in work areas ~~or~~ within the lagoons ~~by~~ but fully accessible by foot, the CPUC-approved biological monitor shall be present to observe project activities as described above. Areas within existing pavement that do not have the potential to support special status species will receive a pre-construction survey and spot-checks, as determined by the biological monitor in accordance with SDG&E’s NCCP. The biological monitor shall have temporary stop-work authority if he or she determines that project-related activities present a threat to sensitive biological resources. If the biological monitor must stop work due to threat to a biological resource, work may resume once the biological monitor determines that activities will no longer risk or endanger the resource, or upon further consultation with the appropriate agencies (CDFW, USFWS, USACE, RWQCB, or CCC).”

To ensure that pole removal plans and scheduling is compatible with Cal Parks' needs, SDG&E would coordinate with Cal Parks regarding planned pole removal dates and activities within Cal Parks' lands, including coordinating project work with the State Environmental Scientist. **APM REC-02** requires that SDG&E contact authorities of facilities that may experience access restrictions, including California State Parks facilities, no fewer than eight weeks prior to construction. **APM REC-02** therefore ensures that coordination between SDG&E and California State Parks authorities occurs prior to the start of project construction, including coordination with the State Environmental Scientist, as needed.

A-5 The commenter states that a cultural resources monitor would be required onsite for all project work conducted within or near sensitive cultural sites and features. Additionally, the commenter states that a cultural resource permit would be required for any cultural resources monitoring within Torrey Pines State Natural Reserve. For consistency with Comment A-4, the CPUC has interpreted this to refer to all cultural resources monitoring within the Torrey Pines State Natural Resources Reserve and Torrey Pines State Natural Resources Reserve Extension.

To clarify permitting needs associated with conducting archaeological investigations on California State Parks lands, and to accommodate additional revisions made in response to Comment E-76, and Native American involvement requests discussed in greater detail in response to Comment D-2, **MM CUL-2** has been revised as follows.

"MM CUL-2: Cultural Resources Monitoring. The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project's qualified archaeological monitor.

A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan shall include, at minimum, information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeological monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities of the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order has been installed to protect potential cultural resources, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified

archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.”

A-6 The commenter asserts that while no impacts to geologic features are expected as part of the proposed project, the CPUC should consider incorporating a geologic resources monitor into appropriate MMRP measures to ensure that potential impacts are minimized at the geologic features along Red Ridge within Torrey Pines State Natural Reserve Extension.

The analysis presented in Section 5.6, “Geology and Soils,” of the Draft IS/MND does not identify the potential for any significant project-related impacts to geology and soils. However, **APM GEO-1** would ensure that SDG&E will consider the recommendations and findings of a final geotechnical investigation regarding potential concerns about soil instability, landslides, and other geologic hazards. If the final geotechnical investigation identifies a need for supplemental mitigation and/or monitoring protocols associated with the Red Ridge features within Torrey Pines State Natural Reserve Extension, SDG&E would be obligated to consider those recommendations and implement a geological monitoring protocol as needed.

To ensure that a geological monitor is incorporated if needed based on the findings of the final geotechnical investigation required per **APM GEO-1**, the “Monitoring/Reporting Action” column on Draft IS/MND page 6-15 has been revised as follows:

“SDG&E submits final geotechnical study to CPUC prior to, and in support of, issuance of any permits necessary for project construction. Relevant geotechnical recommendations would be incorporated into final project design as feasible. If identified as necessary based on the final geotechnical study, a geological monitor will monitor project activities occurring in geologically sensitive areas within Torrey Pines State Natural Reserve Extension.”

A-7 The commenter notes that the timing and exact dimensions of the proposed laydown yard within the Torrey Pines State Natural Reserve North Beach Day Use Lot would be required to be coordinated with Torrey Pines State Natural Reserve to minimize coastal access impacts and disruption to State Park visitors and operations personnel. Additionally, the commenter notes that because a private contractor manages parking fee collection at the North Beach Day Use Lot, the private contractor may separately request reimbursement to recover the lost revenues resulting from reduced parking spaces.

As discussed in response to Comment A-4, SDG&E would coordinate with Cal Parks regarding planned project activities. This coordination would address facility access, such as North Beach Day Use Lot access for both a laydown yard and project activities. SDG&E would coordinate with the parking lot fee collection contractor to ensure that required dues are paid for leasing the lot space for the laydown yard. **APM REC-02** requires that SDG&E contact authorities of facilities that may experience access restrictions, including California State Parks facilities, no fewer than eight weeks prior to construction. **APM REC-02** therefore ensures that coordination between SDG&E and California State Parks authorities occurs prior to the start of project construction, including coordination regarding North Beach Day Use Lot facility use and compensation fees, as needed.

A-8 The commenter notes that because access to the North Beach Day Use Lot and other access points or paths is outside of SDG&E's existing easement, Cal Parks would be required to issue a Right of Entry (ROE) Permit to SDG&E for proposed project activities. The ROE would specify temporary land use requirements and ROE considerations. It would take approximately four weeks for SDG&E to obtain the ROE from Cal Parks.

As discussed in response to Comment A-4, **APM REC-02** would ensure that SDG&E coordinate with Cal Parks regarding planned project activities at least eight weeks prior to the start of project construction. This ensures that SDG&E would contact Cal Parks with adequate time to obtain the ROE permit.

Comment Letter B
California State Parks, San Diego Coast District

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Wednesday, December 19, 2018 3:44 PM
To: Yanez, Silvia A.
Subject: FW: TL674A Project

Follow Up Flag: Flag for follow up
Flag Status: Completed

From: Krimmel, Cindy@Parks
Sent: Wednesday, December 19, 2018 3:41:37 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A Project

Please add my name or email to your mailing list for this project:

Cindy Krimmel
San Diego Coast District, California State Parks
4477 Pacific Highway
San Diego, Ca 92110

Cindy.krimmel@parks.ca.gov

Thank you,

Cindy Krimmel
Environmental Planner (619) 278-3771
San Diego Coast District, California State Parks

B-1

Responses to Comment Letter B
California State Parks, San Diego Coast District

B-1 The commenter requests to be added to the email and mailing list for the proposed project.

The commenter has been added to the proposed project's mailing list.

Comment Letter C California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
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4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
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TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

January 7, 2019

11-SD-5

PM VAR

TL674A Reconfiguration and TL666D Removal Project
SCH#2018121014

Mr. John Forsythe
California Public Utilities Commission
300 Capitol Mall, Suite 418
Sacramento, CA 95814

Dear Mr. Forsythe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the TL674A Reconfiguration and TL666D Removal Project located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Hydrology and Drainage Studies

Please see attached the drainage as-builts for the Via de la Valle work in the Caltrans Right-of-Way (R/W) (Appendix J Map 2 of 13 in the IS-MND Report.) The typical trench section for the 69-kV Duct Bank (pg. 4-14) shows the depth as "Per Spec." Please review the attached drainage culvert as-builts to determine how close the proposed work is to the cross culverts under Via de la Valle.

C-1

Noise and Hazardous Waste and Air

A health and safety plan for lead and asbestos, PCB, prepared by a Certified Industrial Hygienist (CIH) shall be provided by the contractor, including items in 8 CA of Regs \$1532.1. It shall be implemented for all workers handling the soil, asbestos containing material, PCB within the R/W and dispose of them in accordance with all applicable environmental regulations.

C-2

If any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or has a total lead concentration at or below 80mg/kg.

C-3

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to enhance California's economy and livability"*

1

Mr. John Forsythe
January 7, 2019
Page 2

Electrical System

Please see the attached As Builts for the existing Caltrans' Electrical System at Via De La Valle. The attached As Builts may not cover all existing electrical facilities. Because of this the Contractor will need to reference the Subsurface Locator as a work item prior to excavating in Via De La Valle to identify the existing Caltrans' underground facilities.

C-4

Please also contact the Caltrans Electrical Maintenance staff prior to work on this project.

Traffic Control Plan/Hauling

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System. Additional information is provided online at:
<http://www.dot.ca.gov/trafficops/permits/index.html>

C-5

A Traffic Control Plan will need to be submitted to Caltrans District 11, including the interchanges at Interstate 5/Via de la Valle, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (Interstate 5) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

C-6

Right-of-Way

The ongoing Caltrans I-5 North Coast Corridor (I-5 NCC) project along I-5 is in the area of this projects. Any work near the construction zone may require coordination with the Caltrans construction contractor.

C-7

California Public Utilities Commission shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times as to create the least possible inconvenience to the traveling public and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, traffic, including routes and signage.

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to enhance California's economy and livability"*

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3

Mr. John Forsythe
January 7, 2019
Page 3

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' R/W until an encroachment permit is approved.

C-8

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies. Please highlights the following that occur within the Caltrans' R/W: specific environmental impacts (depth of trench), mitigation elements that could impact, and any resource agency permits that would be required.

C-9

Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/trafficops/ep/manual.html>

C-10

Please see Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/design/cadd/manuals/ppm.html>

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch

Attachments:
Appendix J: Detailed Project Components Maps
As-Built for Existing Caltrans' Electrical System at Via De La Valle

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

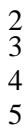
Appendix J
Detailed Project Components Maps

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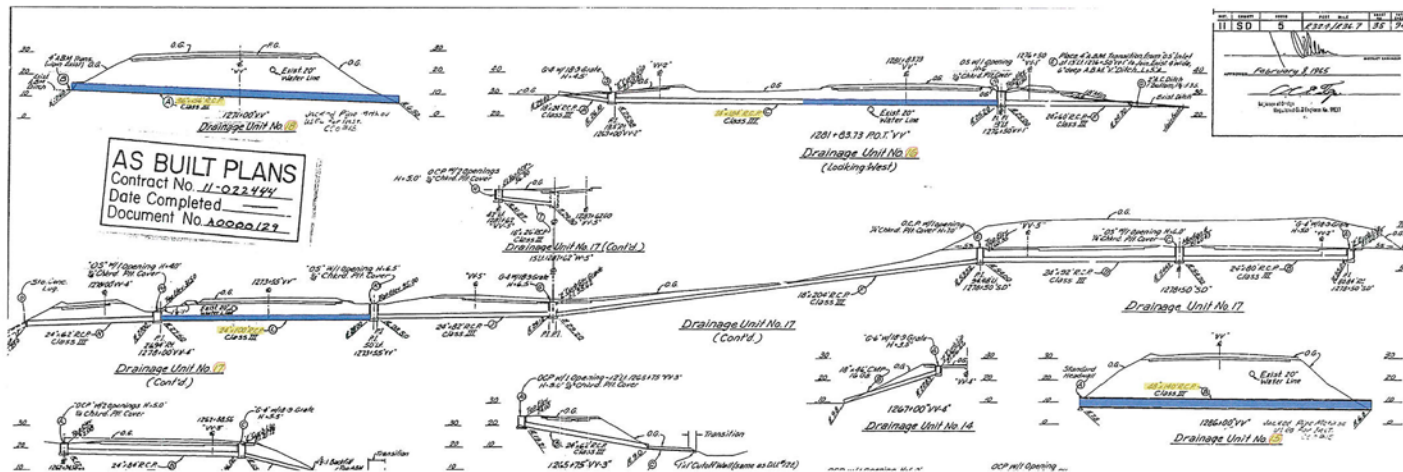


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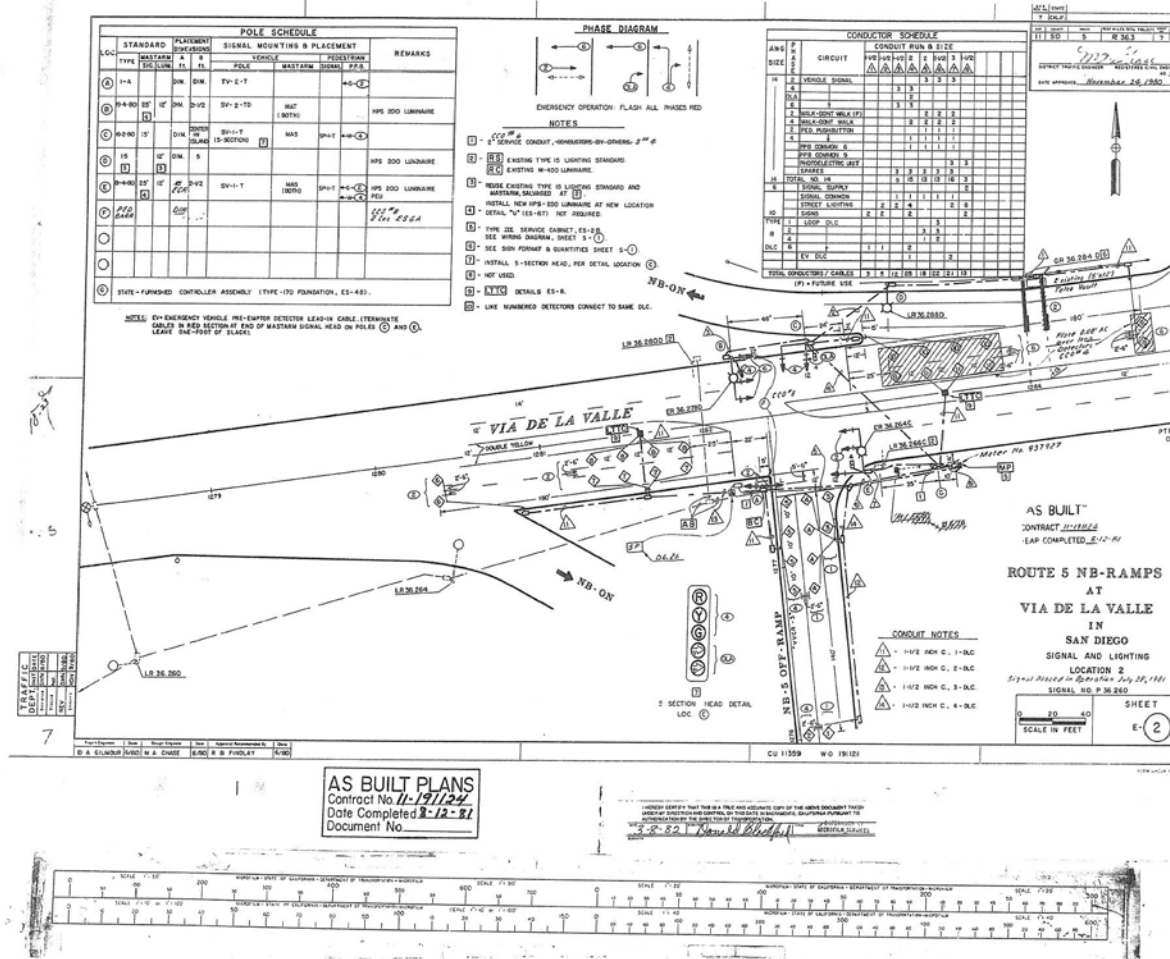
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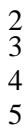
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Response to Comment Letter C California Department of Transportation

C-1 The commenter requests that the applicant review attached drainage as-built drawings for the Via de la Valle work in the California Department of Transportation (Caltrans) right-of-way (ROW) to determine the proximity of the proposed work to the cross culverts under Via de la Valle.

The letter containing the attached drainage as-built drawings has been forwarded to the applicant. These drawings would be considered when determining how close the proposed work would be to the cross culverts under Via de la Valle during the final engineering design phase of the project.

C-2 The commenter requests that a health and safety plan for lead, asbestos, and polychlorinated biphenyls (PCBs), prepared by a Certified Industrial Hygienist, be provided by the contractor, including items in 8 California Code of Regulations §1532.1. The health and safety plan would be implemented for all workers handling soil, asbestos-containing material, and PCBs within the ROW, and would direct workers to dispose of them in accordance with all applicable regulations.

Section 5.8 discusses hazards and hazardous materials. According to the applicant, management practices documented in SDG&E's "Best Management Practices Manual for Water Quality Construction," (BMP Manual; Appendix F) would be implemented during construction to reduce potential impacts from hazardous materials.

In addition to implementing BMPs, the applicant would comply with all applicable regulations pertaining to the management of hazardous materials and hazardous wastes. Removal or relocation of utility lines with components suspected to contain asbestos may require notification to the San Diego Air Pollution Control District (SDAPCD), an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M). The CPUC expects the applicant to adhere to all applicable laws and regulations, implement the applicant's BMP Manual, and conduct Safety and Environmental Awareness Program training. Furthermore, **MM HAZ-1** requires the applicant to prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. Refer to Draft IS/MND pages 5.8-18 and 5.8-19 to see the full mitigation measure.

C-3 The commenter requests that if any import borrow takes place, it shall be obtained from an established commercial source (and defined as "Clean Soil") or have a total lead concentration at or below 80 milligrams per kilogram.

As part of the proposed project, the applicant proposes to backfill holes and trenches with excavated soils as necessary. Should contaminated soil be encountered during trenching activities, the applicant would sample in place, test, profile, and transport the material to an appropriately permitted disposal facility in accordance with all federal, state, and local laws

- and regulations. If any import borrow takes place, the CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including Health and Safety Code Section 57008, to adhere to the California Human Health Screening Level for lead and lead compounds in soil.
- C-4** The commenter requests that the applicant review attached as-built drawings for the existing Caltrans' electrical system at Via de la Valle. However, the commenter indicates that the as-built drawings may not cover all existing electrical facilities, so they also request that the contractor reference the subsurface locator as a work item prior to excavating in Via de la Valle to identify the existing Caltrans underground facilities and contact the Caltrans electrical maintenance staff prior to starting work for the proposed project.
- The letter containing attached as-built drawings for the existing electrical system at Via de la Valle has been forwarded to the applicant. Since the as-built drawings may not cover all existing electrical facilities, the Contractor will reference the Subsurface Locator as a work item prior to excavating in Via de la Valle, in order to identify the existing Caltrans underground facilities, and contact the Caltrans electrical maintenance staff prior to starting work for the project.
- C-5** The commenter indicates that Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle, combination of vehicles, or special mobile equipment whose size and/or weight (including load) exceeds the maximum limitations specified in the California Vehicle Code. In addition, the commenter requests that a traffic control plan be submitted to Caltrans District 11, including the interchange at Interstate 5 (I-5)/Via de la Valle, at least 30 days prior to start of any construction. This plan would include suggested detours to use during closures, including routes and signage.
- Impacts associated with construction traffic are addressed in Section 5.16, "Traffic and Transportation." Draft IS/MND page 5.16-6, Table 5.16.1, outlines relevant transportation policies and regulations, such as the need for the applicant to "obtain an encroachment permit for all proposed activities related to the placement of encroachment within, under, or over state highway right-of-way. The applicant must also obtain a special permit to operate a vehicle or combination of vehicles with special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations on state highways." The CPUC expects the applicant to comply with applicable state and municipal codes and regulations. Furthermore, the sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all highway crossings." Therefore, a Traffic Control Plan (TCP) would be submitted to Caltrans District 11, including the interchanges at I-5/Via de la Valle, at least 30 days prior to the start of any construction. The TCP would comprise outlining suggested detours to use during closures, including routes and signage.

C-6 The commenter requests that the IS/MND discuss and address potential impacts to I-5 and traveling public from detours, demolition, and other construction activities.

See response to Comment C-5. The proposed project would not involve demolition activities. Potential impacts from the proposed construction activities have been properly analyzed using criteria outlined in Appendix G of the CEQA Guidelines, as discussed in Section 5.16, "Traffic and Transportation" of the Draft IS/MND. Furthermore, the applicant would acquire encroachment permits and road crossing approvals, if required, and would meet the requirements of these authorizations, including implementation of a TCP that would outline detours, including routes and signage.

C-7 The commenter indicates that the ongoing Caltrans I-5 North Coast Corridor project along I-5 is in the area of the proposed project. Further, any work near the construction zone may require coordination with the Caltrans construction contractor. The commenter also states that the CPUC shall prepare and submit to Caltrans closure plans as part of the encroachment permit application. The plans shall require that closure or partial closure of I-5 be limited to times that would create the least possible inconvenience to the traveling public and that signage be posted prior to the closure in accordance with Caltrans requirements. In addition, the plans shall also outline suggested detours during the closures, including routes and signage.

See response to Comment C-5. Draft IS/MND Section 5.19, "Mandatory Findings," page 5.19-3, Table 5.19-1, lists the foreseeable projects considered in conjunction with the proposed project in the analysis of cumulative impacts. The I-5/State Route 56 Interchange Project (part of the I-5 North Coast Corridor Project) was one of the projects identified to be approved but not funded and has an estimated completion date of 2025. Since this foreseeable project has an unknown timeline, it may or may not overlap with the proposed project. Thus, the CPUC concurs that any work near the construction zone may require coordination with the Caltrans construction contractor to minimize a potential cumulative impact to traffic. Furthermore, as indicated in the Draft IS/MND, the applicant would acquire encroachment permits and road crossing approvals, if required, and would implement the requirements of these authorizations, including implementation of a traffic control plan that would outline closures and detours, including routes and signage.

C-8 The commenter indicates that the Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans' ROW until an encroachment permit is approved.

See response to Comment C-5. The CPUC concurs that as part of the encroachment permit, the Highway Closure Plan should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. The sentence beginning on Draft IS/MND page 5.16-14, line 22, states that "Crossing I-5 would be conducted pursuant to Caltrans' approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by

- Caltrans for all highway crossings.” Therefore, the CPUC expects the applicant to adhere to Caltrans’ procedure and recommendations of submitting a Highway Closure Plan to Caltrans District 11, as part of the encroachment permit.
- C-9** The commenter indicates that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans, and an encroachment permit would be required for any work within the Caltrans ROW prior to construction. In addition, as part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans ROW, and any corresponding technical studies. The commenter requests that the IS/MND highlight all of the following that occur within the Caltrans ROW: specific environmental impacts (depth of trench), potential impacts of the proposed project, and any resource agency permits that would be required to be involved.
- The CPUC concurs that any work performed within the Caltrans ROW would require discretionary review and approval by Caltrans and that an encroachment permit would be required for any work within the Caltrans’ ROW prior to construction. Prior to construction, the CPUC expects the applicant to obtain a Caltrans encroachment permit pursuant to Caltrans’ approved methods, which could include traffic control, guard structures, netting, or any combination of these methods; these approved methods would be outlined within the encroachment permit issued by Caltrans for all work within the Caltrans ROW.
- The CPUC prepared the MND to comply with the requirement of CEQA. Pursuant to CEQA, including Public Resources Code Section 21064.5 and 21082.2, the CPUC prepared the IS to determine whether significant adverse effects on the environment would result from implementation of the proposed project. The IS used the significance criteria outlined in Appendix G of the CEQA Guidelines as a basis for analysis. Potential impacts from the proposed project have been fully disclosed in the IS, which was used to support the MND. Furthermore, the Draft IS/MND, page 4-7, Table 4-1 identifies the permits that the lead and responsible agencies may require of the applicant in order to implement the proposed project.
- C-10** The commenter recommends that the applicant see Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW.
- Comment noted. The letter containing the references to Chapter 600 of the Encroachment Permit Manual Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state ROW has been forwarded to the applicant. The CPUC expects the applicant to comply with applicable state and municipal codes and regulations, including the requirements regarding utilities and state ROW.

1 **Native American Tribes**
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3 **Comment Letter D**
4 **Viejas Band of Kumeyaay Indians**
5



P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

December 10, 2018

Phone: 6194453810
Fax: 6194455337
viejas.com

Silvia Yanez
Project Manager
Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

RE: TL674A Reconfiguration and TL666D Removal Project

Dear Ms. Yanez,

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.

D-1

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

D-2

Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314 or email, rtaran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ray".

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

Responses to Comment Letter D Viejas Band of Kumeyaay Indians

D-1 The commenter indicates that the Viejas Band of Kumeyaay Indians (“Viejas”) has reviewed the proposed project and states that the project site has cultural significance or ties to the Viejas.

The CPUC notes that the project area crosses culturally sensitive traditional territory of the Viejas.

D-2 The commenter requests that a Kumeyaay cultural monitor be on site during ground-disturbing activities to inform the Viejas of any new developments, such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

See response to Comment D-1. The commenter’s request for onsite Viejas cultural monitoring of ground-disturbing activities is acknowledged, and that the Viejas will receive notification at least 30 days prior to ground-disturbing construction activities is verified. The Viejas will also be invited to voluntarily observe ground-disturbing activities and offer any recommendations to the qualified archaeological monitor for the proposed project. Please refer to **MM CUL-2: Cultural Resources Monitoring** for clarification of the specific steps by which cultural resources would be avoided. Beginning on Draft IS/MND page 5.5-21, line 4, MM CUL-2 has been revised as follows, “**MM CUL-2: Cultural Resource Monitoring.** The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project’s qualified archaeological monitor. ~~MM CUL-2: Cultural Resource Monitoring.~~ A Secretary of Interior–qualified archaeologist shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities ~~results report~~ conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines.” In the event of an unanticipated discovery of cultural resources or human remains during construction, **MM CUL-4: Cultural Resources Discovery** and **MM CUL-6: Treatment of Human Remains** would be implemented, respectively, as outlined in Section 5.5, “Cultural Resources.”

Applicant
Comment Letter E
San Diego Gas & Electric



Elizabeth A. Cason
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January 7, 2019

Sent Via Electronic Mail

John Forsythe, CPUC Project Manager
CPUC TL674/TL666D Project
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102

Re: Draft Mitigated Negative Declaration for San Diego Gas & Electric Company's TL 674 & TL666D Proposed Project (A.17-06-029)

Dear Mr. Forsythe:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Draft Mitigated Negative Declaration (MND) prepared by the California Public Utilities Commission (CPUC) for the proposed TL674/TL666D Project (Proposed Project) (A.17-06-029). SDG&E commends the CPUC on its careful analysis of the Proposed Project. SDG&E's primary goal in preparing these comments is to ensure an accurate and complete record. SDG&E would be happy to provide additional information upon request. SDG&E's comments and suggested revisions are provided in the attached comment matrix.

Thank you again for the opportunity to comment on the MND and for your efforts to reach this significant milestone. We look forward to continuing to work with you to implement this important project.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth A. Cason".

Elizabeth A. Cason
Senior Counsel
San Diego Gas & Electric

Cc: Sylvia Yanez, E&E
Robert Fletcher, SDG&E
Chris Terzich, SDG&E
Stacie Atkinson, SDG&E

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Proposed Comments on the Mitigated Negative Declaration

PROPOSED COMMENTS ON THE DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)					
Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
1.0 Mitigated Negative Declaration					
1.	1-2	Line 27	Recommend including the Peñasquitos Lagoon as an environmentally sensitive area.	SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito Lagoon.	SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito <u>and Los Peñasquitos</u> lagoons.
3.0 Introduction to the Initial Study					
2.	3-2	Line 24	There are 20 topics listed in the Introduction to the Initial Study.	The content and analysis in this Initial Study is based on the current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in the 19 topics presented below.	The content and analysis in this Initial Study is based on the current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in the <u>19 20</u> topics presented below.
4.0 Project Description					
3.	4-1	Line 11	The span of TL674A that spans Via de la Valle will be reconfigured, not reconductored. In addition, the Proposed Project involves construction along C510 and C738, not C630.	The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), reconductoring of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also entail conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and C630) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.	The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), <u>reconductoring reconfiguring</u> of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also entail conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and <u>C630-C738</u>) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.
4.	4-2	Line 7	Del Mar Substation should be characterized as an existing substation to avoid confusion with the reader.	The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in San Diego).	The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the <u>existing</u> Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in <u>the City of</u> San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in <u>the City of</u> San Diego).
5.	4-7	Table 4-1	This table is missing the required permits to conduct archaeological and paleontological investigations/collections on state lands.	N/A	<u>Permit to Conduct Archaeological Investigations/Collections on State Parks Land and Permit to Conduct Paleontological Investigations/Collections on State Parks Land</u>

E-1

E-2

E-3

E-4

E-5

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
6.	4-8	Line 15	This sentence should be revised to indicate that the conductors will be removed. The tap pole will remain and continue to function as a tap.	Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead tap and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;	Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead tap conductor and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;	E-6
7.	4-8	Line 17	This sentence should be revised to indicate that TL666D is a tie line, not a tap.	Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead tap line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;	Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead tap tie line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;	E-7
8.	4-11	Line 7	This sentence should be revised to clarify that multiple conductors will terminate at the new riser pole.	The remaining conductor would terminate at a new steel riser pole, where the line would transition to an underground configuration.	The remaining conductors would terminate at a new steel riser pole, where the line would transition to an underground configuration.	E-8
9.	4-11	Line 42	As described on page 3-20 of the PEA, six 6-inch-diameter conduits will be installed.	The Underground duct bank would consist of one approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduit encased in concrete, as illustrated in Figure 4-7.	The Underground duct bank would consist of one six approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete, as illustrated in Figure 4-7.	E-9
10.	4-15	Line 3	This sentence should be revised to indicate that the splice vaults will be pre-cast. The duct bank will be cast on site.	Ducts would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.	Ducts Splice vaults would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.	E-10
11.	4-16	Line 7	This sentence should be revised to indicate that a distribution line will not be removed from the Del Mar Substation.	The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line, eliminating a distribution line from the Del Mar Substation.	The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line -eliminating a distribution line from the Del Mar Substation.	E-11
12.	4-16	Line 27	This sentence should be revised to indicate that this portion of the Proposed Project is located in the extension area.	It reaches the Torrey Pines State Natural Reserve and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.	It reaches the Torrey Pines State Natural Reserve Extension and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.	E-12
13.	4-25	Line 6	This sentence should be revised to indicate that one new riser pole will be installed. As described in the PEA, the second riser pole will be converted to a riser pole by reconfiguring an existing pole.	A single 1,000-kcmil aluminum cable installed within the duct bank would connect the two new riser poles.	A single 1,000-kcmil aluminum cable installed within the duct bank would connect the two new riser poles to the newly converted riser pole.	E-13
14.	4-33	Line 8	This sentence should be revised to indicate that a permit will be obtained from Caltrans.	For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment from Caltrans.	For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment permit from Caltrans.	E-14
5.1 Aesthetics						
15.	5.1-28	Line 23	The structure that is in view of this simulation is a pole, not a tower.	The height of the existing tower would remain unchanged.	The height of the existing tower pole would remain unchanged.	E-15

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
5.3 Air Quality						
16.	5.3-10	Line 42	Revision requested to accurately characterize the status of the Ozone Air Quality Management Plan.	The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O ₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA will likely designate San Diego County as a nonattainment area for the new 0.075-ppm 8-hour O ₃ standard; thus, the SDAPCD submitted an updated SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.	The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA will likely designate San Diego County as a nonattainment area for the new 2008 0.075-ppm 8-hour O₃ NAAQS standard; thus, the SDAPCD subsequently submitted an updated SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.	E-16
5.4 Biological Resources						
17.	Page 5.4-44	Line 29	The Draft IS/MND should be revised to reference MM BR-5, not MM BR-3.	MM BR-3 would require that the applicant wash vehicles and equipment prior to staging onsite, and to develop a Weed Control Plan to prevent the colonization of noxious and invasive weeds that could outcompete special status plants in areas disturbed by construction activities.	MM BR- 35 would require that the applicant wash vehicles and equipment prior to staging onsite, and to develop a Weed Control Plan to prevent the colonization of noxious and invasive weeds that could outcompete special status plants in areas disturbed by construction activities.	E-17
18.	Various	Various	In the Draft IS/MND, there are multiple references indicating that MM BR-4 requires all ground-disturbing activities within 100 feet of ESAs, ESHAs, and all potentially jurisdictional aquatic features to be monitored. In the MMRP, MM BR-4 specifies that monitoring during ground-disturbing activities is required within 50 feet of areas that have the potential to support special status species. The Draft IS/MND should be revised to ensure consistency between the MMRP and other sections.	N/A	N/A	E-18
19.	Page 5.4-46	Line 27	The Draft IS/MND should be revised to be consistent with the measure language in the MMRP. This edit should be applied throughout the document.	MM BR-6 prohibits construction activities within or within 500 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Reserve Extension during nesting bird season (February 1 to August 31).	MM BR-6 prohibits construction activities within at least 500 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State Reserve Extension during nesting bird season (February 1 to August 31).	E-19
20.	Various	Various	In the Draft IS/MND, there are multiple references indicating that MM BR-7 requires vehicle speeds to comply with a 10-mile-per-hour (mph) speed limit on unpaved roads during nighttime activities. In the MMRP, MM BR-7 indicates that the appropriate limit should be 15 mph. The Draft IS/MND should be revised to ensure consistency between the MMRP and other sections.	N/A	N/A	E-20
21.	Pages 5.4-48	Line 42	The Draft IS/MND refers to the incorrect measure in this location and should be revised.	MM BR-4 would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.	MM BR- 48 would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.	E-21

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
22.	5.4-58	Line 31	As acknowledged in this document and within the Implementing Agreement of the NCCP, local and regional guidelines do not supersede the NCCP in order to prevent conflict or confusion. As a result, the Draft IS/MND should be revised to reflect this.	Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures and Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP.	Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures and Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP. <u>When the direction in these respective guidelines are in conflict, SDG&E's NCCP will supersede the direction of the other referenced documents.</u>	E-22
5.5 Cultural Resources						
23.	5.5-1	Line 41	The Draft IS/MND should be revised to correctly refer to the institution's name.	These reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coast Information Center at San Diego State University.	These reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coast Information Center at San Diego State University.	E-23
24.	5.5-2	Line 1	The Draft IS/MND should be revised to refer to the correct type of search conducted. In addition, Appendix H does not contain information about the applicant's Sacred Land File Search. That information can be found in Appendix D as part of the Cultural Resources Technical Report.	The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands Record Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC's response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix H for additional information.	The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands Record File Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC's response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix DH for additional information.	E-24
25.	5.5-2	Line 14	The Draft IS/MND should be revised to refer to the correct appendix. The Paleontological Technical Study is in Appendix I.	See Appendix H for additional information.	See Appendix IH for additional information.	E-25
26.	5.5-7	Line 14	The Draft IS/MND should define what an "indefinite association" is so impacts can be assessed appropriately.	N/A	N/A	E-26
27.	5.5-7	Line 1	The Draft IS/MND should be revised to accurately describe the applicant's archaeological survey area. The 150-foot buffers around the linear alignments create a 300-foot corridor on the center of the transmission line.	An archaeological survey was conducted for an area generally matching the project's utility corridors in addition to a 300-foot buffer around the linear alignments as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).	An archaeological survey was conducted for an area generally matching the project's utility corridors in addition to a 150-foot <u>300-foot corridor</u> around the linear alignments as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).	E-27
28.	5.5-7	Line 36	The Draft IS/MND indicates three sites may be eligible for listing in the CRHR and Table 5.5-1 indicates four sites may be eligible. Confirm which number is accurate and which sites have been ruled out for eligibility testing.	As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CA-SDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the three sites overlapping the project's potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant's subcontractor deemed other areas too unsafe to test.	As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CA-SDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the three <u>four</u> sites overlapping the project's potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant's subcontractor deemed other areas too unsafe to test.	E-28

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Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
29.	5.5-9	Line 13	The Draft IS/MND should be clarified. The architectural survey was reconnaissance-level only, while the archaeological survey was intensive pedestrian. More description is needed to avoid confusion.	This survey covered the same area as the archaeological survey.	This <u>reconnaissance-level</u> survey covered the same area as the archaeological survey.	E-29
30.	5.5-9	Line 16	The Draft IS/MND should be revised to accurately reflect the citation. Isolate resources have limited research potential as stated in Foglia, Cooley, and Mello 2017, which is the citation for the given text.	P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, though as isolates may have research potential (Foglia, Cooley, and Mello 2017).	P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, <u>though</u> as isolates <u>may</u> have <u>limited</u> research potential (Foglia, Cooley, and Mello 2017).	E-30
31.	5.5-10	Line 12	The Draft IS/MND is incorrect with regards to the building evaluation. The applicant did not complete any new evaluations for this study relating to the Sorrento Valley Industrial Park. All evaluations were completed by Caltrans in 2016 and AECOM concluded that Caltrans' evaluation was accurate (see Appendix D and confidential DPR523 forms for more details).	One of the buildings within the Sorrento Valley Industrial Park was evaluated as part of this study and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP (Foglia, Cooley, and Mello 2017).	One of the buildings within the Sorrento Valley Industrial Park was <u>previously</u> evaluated <u>in 2016 as part of this study</u> and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP (Foglia, Cooley, and Mello 2017).	E-31
32.	5.5-16	Line 4	The Draft IS/MND should be revised to provide the correct name of the register.	City of San Diego Register of Historical Places	City of San Diego Register of Historical <u>Resources Places</u>	E-32
5.8 Hazards and Hazardous Materials						
33.	5.8-2	Table 5.8-1	ZIP (1,1,1-trichloroethane) and Insecticide (1,1,1-trichloroethene carrier) should be removed from this table. These materials are not approved for use by SDG&E and will not be used during the Proposed Project.	N/A	N/A	E-33
34.	5.8-3	Line 1	The Draft IS/MND should be edited to reflect the removal of insecticide from Table 5.8-1.	Besides the insecticide, none of the hazardous materials listed in Table 5.8-1 are acutely hazardous.	<u>Besides the insecticide, n</u> None of the hazardous materials listed in Table 5.8-1 are acutely hazardous.	E-34
35.	5.8-3	Line 11	The insulation used on the Proposed Project's facilities do not contain asbestos; however, other asbestos-containing materials may be present. As a result, this clarification is being requested.	The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), asbestos insulation, and universal waste materials.	The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), asbestos <u>insulation - containing materials</u> , and universal waste materials.	E-35
36.	5.8-12	Line 19	A Hazardous Materials Business Plan (HMBP) is not required until the material is actually on site, not prior to construction.	Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to project construction.	Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to <u>project construction hazardous materials being brought on site</u> .	E-36
37.	5.8-13	Line 30	The poles on the Proposed Project have not been treated with pesticides; therefore, an edit has been requested for clarity. In addition, Section 25150.7 was developed to address many unique circumstances associated with the generation and management of treated wood waste.	Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with pesticides or other chemicals. Because the chemical treatments could leach into water supplies after the disposal of the wood, Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.	Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with <u>pesticides insecticides</u> or other chemicals. <u>Because the chemical treatments could leach into water supplies after the disposal of the wood</u> , Section 25150.7 was developed to restrict how and where treated wood waste can be disposed of.	E-37

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38.	5.8-18	Line 19	Utility lines do not contain asbestos; however, some components may contain asbestos. As a result, an edit is being requested for clarity.	For example, removal or relocation of utility lines suspected to contain asbestos requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M).	For example, removal or relocation of utility lines <u>with components</u> suspected to contain asbestos <u>may</u> requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal Regulations 61, Subpart M).
5.10 Land Use and Planning					
39.	5.10-1	Line 26	Revisions have been suggested in this location to make the proximity of the project consistent with existing land uses.	<p>The northernmost corridor alignment (TL6973D and TL674A) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and open spaces, including San Dieguito River Park, Del Mar Horse Park, and Del Mar Fair Grounds.</p> <p>North of Via Del La Valle, immediately west of I-5, the TL666D corridor follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian. The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard.</p> <p>The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. South of Crest Canyon Park, north of the Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to Minorca Cove and behind the Del Mar Hills Elementary School grounds, adjacent to I-5. Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open space. TL666D spans approximately 0.5 miles across the Torrey Pines Reserve Extension in a southerly alignment, where power lines cross residences and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through the Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner</p>	<p>The northernmost corridor alignment (TL6973D-and TL674A) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and open spaces, including San Dieguito River Park, and Del Mar Horse Park, and Del Mar Fair Grounds.</p> <p>North <u>South</u> of Via Del La Valle, immediately west of I-5, the TL666D corridor <u>roughly parallels Jimmy Durante Boulevard, passing by Del Mar Fairgrounds, follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.</u> The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard. <u>TL666D then follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.</u></p> <p>The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. South <u>North</u> of Crest Canyon <u>Open Space</u> Park, north of the and the Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to Minorca Cove and behind the Del Mar Hills Elementary School grounds, adjacent to west of <u>I-5.</u> Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open</p>

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				passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to a 12-kilovolt (kV) tap on the eastern side of the freeway.	space. TL666D spans approximately 0.5 miles across the Torrey Pines <u>Natural Reserve Extension Area</u> in a southerly alignment, where power lines cross residential areas and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through <u>the</u> Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to an <u>existing riser pole 12-kilovolt (kV) tap</u> on the eastern side of the freeway.
5.14 Public Services					
40.	5.14-2, 5.14-14	5.14-2: Paragraph 1; Figure 5.14-1: Sheet 5, 5.14-14: Line 7; 5.14-16: Line 40	The PEA includes an additional school within 150 feet of the Proposed Project that is not included in the Draft IS/MND. The Del Mar Nursery School (13692 Mango Drive, Del Mar, California 92014) is located approximately 175 feet west of TL666D. The closest pole (Z90268) is located southeast of the Del Mar Nursery School.	Three schools are within 1,000 feet of the proposed project's utility corridors: Solano Santa Fe Elementary School, Del Mar Hills Elementary School, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area – TL674A (WA-2). Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard.	Three <u>Four</u> schools are within 1,000 feet of the proposed project's utility corridors: Solano Santa Fe Elementary School, Del Mar Hills Elementary School, <u>Del Mar Nursery School</u> , and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area – TL674A (WA-2). <u>Del Mar Nursery School is located approximately 175 feet northwest of Work Area TL666D (WA-67).</u> Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard.
5.17 Tribal Cultural Resources					
41.	5.17-1	Line 13	The incorrect reference was used in Draft IS/MND and should be revised.	Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. (AECOM, 2017)	Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. (AECOM, 2017) <u>(Foglia, Cooley, and Mello, 2017)</u>
5.19 Mandatory Findings of Significance					
42.	5.19-12	Line 13	The Draft IS/MND should be revised to include three planned and proposed projects that also have potential to impact paleontological resources and could potentially have overlapping construction timelines.	N/A	N/A
43.	5.19-14	Lines 10 and 28	Line 10 indicates that three projects could occur simultaneously with the Proposed Project while Line 28 states that two projects could occur simultaneously. The Draft IS/MND should be revised for consistency.	N/A	N/A
44.	5.19-14	Line 14	In this location of the Draft IS/MND, only one project is described in the analysis while two/three are mentioned as overlapping elsewhere. The Draft IS/MND should be revised for consistency.	N/A	N/A

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6.0 Mitigation Monitoring and Reporting Plan						
45.	6-9	MM BR-6	The Draft IS/MND should be revised so that the timeframe for MM BR-6 (currently 14 days) is consistent with the Effectiveness Criteria and Timing (currently seven days).	N/A	N/A	E-45
46.	6-12	MM CUL-1 (Effectiveness Criteria)	The effectiveness criteria currently included describes MM CUL-2: monitoring in areas with the potential to contain previously unidentified arch resources. The mitigation measure is to set up buffers and ensure known resources are avoided. Suggested effectiveness criteria would be the CPUC ensuring ESA buffers are in place. The suggested language was taken from MM CUL-2, Monitoring/Reporting Action.	CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.	CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.	E-46
47.	6-12	MM CUL-1 (Timing)	The mitigation measure refers to ESA buffers at known sites only. Suggest removing “may” from sentence.	During construction – SDG&E and/or its contractors will install fencing as buffer around sites that may contain sensitive resources that will be avoided.	During construction – SDG&E and/or its contractors will install fencing as buffer around sites that may contain sensitive resources that will be avoided.	E-47
48.	6-12	MM CUL-2, (Monitoring/Reporting Action)	Suggest deletion of text that should be included in MM CUL-1. Suggest deletion of unclear text that does not go with the rest of the sentence.	The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors and the archaeological monitor documenting the results of archaeological monitoring.	The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas. The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors and the archaeological monitor documenting the results of archaeological monitoring.	E-48
49.	6-12	MM CUL-2, (Effectiveness Criteria)	The proposed edits to MM CUL-2’s effectiveness criteria are intended to remove some text and clarify the requirements.	The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described in implement the procedures in MM CUL-4 if an unanticipated archaeological resource is discovered during construction.	The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described in implement the procedures in MM CUL-4 if an unanticipated archaeological resource is discovered during construction.	E-49
50.	6-13	MM CUL-4, (Effectiveness Criteria)	This criterion incorrectly references fossil remains, which are covered in MM CUL-5.	Work is halted if unanticipated fossil remains are discovered and the proper protocols implemented pertaining to the treatment of said artifacts.	Work is halted if unanticipated fossil remains artifacts or other cultural resources are discovered, and the proper protocols implemented pertaining to the treatment of said artifacts.	E-50
51.	6-17	MM NOI-2	The Draft IS/MND should be revised to ensure consistency between the measure timing (20 days), Monitoring/Reporting Action (30 days), and Timing (30 days).	N/A	N/A	E-51
52.	6-18	APM REC-01	The Monitoring/Reporting Action for APM REC-01 appears to be a duplicate of the one for APM PS-01 and should be revised.	N/A	N/A	E-52

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Appendix C: Master Species Table					
53.	3	N/A	This page of the Draft IS/MND includes a reference to Appendix B; however, this is Appendix C. Recommend revising to avoid confusion.	N/A	N/A
Appendix G: Land Use Policy Matrix					
54.	1	Row 1	C738 is not located in the City of Del Mar.	The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's underground 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.	The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's undergrounding of 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.

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Global						
1.	N/A	N/A	Check all sections for CPUC’s pre-emption of local regulations. This language was missing from Section 5.5 Cultural Resources.	N/A	N/A	E-55
2.	N/A	N/A	All comments applied to the MMRP also apply to the remainder of the Draft IS/MND, where appropriate. Comments were limited to the MMRP in order to avoid duplication.	N/A	N/A	E-56
4.0 Project Description						
3.	N/A	N/A	<p>Since filing the PEA with the CPUC in June 2017, SDG&E has discovered the need to replace an existing circuit breaker at Del Mar Substation to accommodate the increased ampacity associated with TL6973. The replacement will occur within the existing substation fence line, utilizing the current foundation locations. As a result, no excavation or belowground work will be required to install the new circuit breaker. To commission the new circuit breaker, wiring within the boundary of the substation will be modified and/or replaced, as needed.</p> <p>The replacement process is anticipated to take up to four weeks to complete. In order to evaluate the potential air quality impacts associated with this replacement, a separate California Emissions Estimator Model (CalEEMod) simulation was prepared. The resulting output from this simulation is included as Attachment A: CalEEMod Reports. Modified versions of Table 5.3-8 and Table 5.3-9 incorporating these results have been provided in Attachment B: Revised Air Quality and GHG Calculations. As shown, the revised emissions will be below all applicable thresholds and the impact analysis in the Draft IS/MND adequately addresses this additional work.</p> <p>Because the new circuit breaker will contain approximately 33 pounds of sulfur hexafluoride, a revised version of Table 5.7-5 has been provided in Attachment B: Revised Air Quality and GHG Calculations incorporating the anticipated fugitive emissions associated with this new piece of equipment. As shown, the Proposed Project’s emissions will continue to be below all applicable thresholds. While this change to the substation will increase the total operations and maintenance emissions, this change will be small and is consistent with the conclusions presented in the Draft IS/MND.</p>	N/A	N/A	E-57

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Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
5.1 Aesthetics						
4.	5.1-25	Line 16	Work areas are not intended to be permanent and would not be visible from this location.	In some instances, work areas could also be permanent and would consist of the work pads (eight work pads), 69-kV vaults (four total), and 12-kV hand holes (five total).	In some instances, work areas could also be permanent and would consist of the work pads areas (eight work pads areas), 69-kV vaults (four total), and 12-kV hand holes (five total).	E-58
5.4 Biological Resources						
5.	N/A	N/A	All counts of species by potential to occur should be revised based on the comments in this table.	N/A	N/A	E-59
6.	5.4-17	Line 37	The Draft IS/MND considered species that were detected during all biological surveys (including surveys done in 2013 and 2014) as “present.” These records are more than four years old and should be considered occurrences rather than positive detections.	N/A	N/A	E-60
7.	5.4-18 5.4-19	Line 18 Line 3	The PEA analyzed the potential for species to occur within the BSA, while the Draft IS/MND analyzed the the potential for species to occur within one mile of the Proposed Project area. This one-mile expansion does not make sense due to the variation in habitats within one mile of the Proposed Project. This expansion will lead to multiple species with no or very low potential to occur within the Proposed Project workspaces to be analyzed in the Draft IS/MND.	N/A	N/A	E-61
8.	Page 5.4-44	Line 33	The WEAP describes the sensitive biological resources (plants, wildlife, and sensitive natural communities) that crews may encounter onsite, and measures to reduce impacts to these resources. It cannot be expected that construction workers would need to identify special-status species. A qualified biologist will be onsite for this purpose. This language is inconsistent throughout the Draft IS/MND and should be revised for consistency in all locations.	MM BR-3 would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would teach all project personnel how to identify the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification.	MM BR-3 would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would describe to teach all project personnel how to identify the sensitive biological resources they may encounter onsite and the measures to be used to reduce impacts to these resources.	E-62
9.	Page 5.4-44	Line 38	The language in the Draft IS/MND should be clarified. MM BR-5 is intended to minimize potential impacts to sensitive species, not address each species that would experience unavoidable disturbance.	MM BR-5 would require the applicant to develop a Natural Community, Tree, and Plant Protection Plan for each species that would experience unavoidable disturbance associated with proposed project construction.	MM BR-5 would require the applicant to develop a Natural Community, Tree, and Plant Protection Plan for sensitive species that would experience unavoidable disturbance provide measures to minimize impacts associated with proposed project construction.	E-63
10.	Pages 5.4-49	Line 2	The Draft IS/MND should be revised with regard to lighting. Directing lighting downward could disturb wandering skipper due to its host plant being <i>Distichlis spicata</i> .	MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat.	MM BR-7 would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat.	E-64

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11.	5.4-49	Line 35	Discharge of dredged or fill material within jurisdictional waters is not proposed and the Proposed Project will not substantially alter a streambed or adversely affect existing fish and wildlife resources. Proposed foot traffic, helicopter landing and wire pulling will not rise to the level of a potential impact to jurisdictional waters. The Draft IS/MND should be clarified to indicate that impacts would be limited to the flattening of existing vegetation.	Table 5.4-12 describes the acres of sensitive natural communities, including riparian communities, within proposed project workspaces. The exact location and acreage of impacts to each natural community cannot be fully determined at this time, because the exact location of the overhead wire-dragging footprint cannot be identified prior to wire removal, and the exact pole felling footprints and helicopter drop zones will be determined in the field based on safety and site conditions.	N/A	E-65
5.18 Utilities and Service Systems						
12.	5.18-7	Paragraphs 4 and 5	The Draft IS/MND does not provide an adequate justification for a determination of less-than-significant. The CEQA question is directly related to the construction of new facilities and subsequent environmental effects resulting from the construction and maintenance of these facilities. Because the Proposed Project will not require the construction of new water or wastewater treatment facilities, the impact determination should be no impact.	N/A	N/A	E-66
13.	5.18-8	Paragraphs 1 and 3	The response to question (c) in the Draft IS/MND does not provide an adequate justification for a less-than-significant impact determination. The Proposed Project will not require the construction of new facilities or the expansion of new facilities. Therefore, the impact determination should be no impact.	N/A	N/A	E-67
14.	5.18-9	Paragraph 3	The Draft IS/MND does not allow an option should the material be considered hazardous. As a result, an edit has been suggested to allow SDG&E the flexibility to find another appropriate facility.	This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. The impact would be less than significant.	This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the City of San Diego's Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. <u>Should the material be considered hazardous, SDG&E will dispose of the material at another site, consistent with applicable laws/regulations.</u> The impact would be less than significant.	E-68
6.0 Mitigation Monitoring and Reporting Plan						
15.	6-2	Line 33	If the proposed project involves a CPUC third-party monitor, disputes should be resolved with the third-party monitor at the field level to the extent feasible.	Disputes and complaints should be directed to the CPUC-designated Project Manager for resolution.	Disputes and complaints should be <u>resolved at the field level to the extent feasible. If disputes and complaints cannot be resolved in the field, they shall be</u> directed to the CPUC-designated Project Manager for resolution.	E-69

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Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
16.	6-6	MM BR-2	<p>Because the Proposed Project will be conducted along an approximately 8-mile alignment, a refinement to MM BR-2 has been requested to clarify that the demarcation of work area boundaries will occur prior to the use at each individual site rather than marking the entire Proposed Project at once.</p> <p>MM BR-2 also requires all refueling to be conducted no fewer than 50 feet from all aquatic resources, water features, and ESHAs. This may not be feasible due to the proximity of some workspaces located on pavement adjacent to these resources. As a result, the Draft IS/MND should be revised to allow secondary containment to be utilized when refueling in these areas is required.</p>	<p>MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features.</p>	<p>MM BR-2: Designation and Exclusion of Work Area Boundaries, Environmentally Sensitive Areas and Excavations. Construction activities, equipment, vehicles, and materials storage shall be restricted to approved work areas and laydown yards/fly yards, which shall be bordered by exclusionary fencing, flagging, or signage that shall be installed prior to the start of construction activities <u>at each location</u>. Setbacks for project activities including equipment storage, equipment maintenance, and fueling shall be no fewer than 50 feet from aquatic resources, water features, and ESHAs. These areas shall be situated in such a manner as to prevent any runoff from entering sensitive habitat and aquatic features. <u>Should minor equipment maintenance or refueling be required within 50 feet of these resources, secondary containment shall be used to prevent any runoff or spills.</u></p>
17.	6-7	MM BR-3	<p>The Hazardous Materials and Waste Management Plan required by MM HAZ-1 is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E's Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required. In order to ensure Proposed Project personnel receive adequate training for safe evacuation, those requirements will be incorporated into the WEAP.</p> <p>In our experience, these handouts are often disposed of and not referenced by the hundreds of crew members that are often trained during a project of this size. As a result, it is more ecologically friendly and sustainable to have these materials available in the construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator. This information will also be reinforced during tail board meetings.</p>	<p>MM BR-3: Worker Training Program...Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.</p>	<p>MM BR-3: Worker Training Program...<u>Training would also entail safe evacuation, which could be required due to an unanticipated major spill or emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the work affected work site and specified, approved evacuation route(s) in case of emergency.</u></p> <p>Additionally, the applicant shall develop an informational handout or booklet for each employee that will contain key aspects of the WEAP, including sensitive species that workers may encounter onsite, whom to contact in the event of such observations, and the roles and responsibilities of the CPUC, and of other applicable agencies (e.g., CDFW, USFWS, RWQCB). These materials will be posted in the onsite construction trailer(s) and provided to crew supervisors, monitors, and to the SDG&E Field Construction Administrator.</p>
18.	6-8	MM BR-5	<p>This measure should be limited to protected trees. Protected trees can extend to trees associated with the species potentially occurring and the local ordinances provide for that distinction.</p>	<p>MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP). To minimize project-related impacts to natural communities, trees, and special status plants... A Restoration Strategy, including a long-term monitoring strategy, for each tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities...In addition... "to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated..."</p>	<p>MM BR-5: Natural Community, <u>Protected</u> Tree, and Plant Protection Plan (NCTPP). To minimize project-related impacts to natural communities, <u>protected</u> trees, and special status plants... A Restoration Strategy, including a long-term monitoring strategy, for each <u>protected</u> tree species and special status plant species that is known to occur within or near (within 50 feet) proposed work areas, and that therefore could be impacted by proposed project activities...In addition... "to include appropriate restoration strategies for natural communities, <u>protected</u> trees, and special status plants that are not anticipated..."</p>

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Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language	
19.	6-9	MM BR-5	MM BR-1 provides for on-going surveys (at least 30 days prior to activities) and appropriate phenological surveys within MM BR-5. These surveys will document unanticipated impacts to vegetation and this documentation will provide the data necessary to incorporate appropriate restoration strategies into the NCTPP. SDG&E requests a 30-day period to have adequate time to modify the NCTPP to include any unanticipated qualifying resources.	MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP)... Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet) of a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP within fourteen days of initial observation, for review and approval.	MM BR-5: Natural Community, Tree, and Plant Protection Plan (NCTPP)... Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet of) a work area, SDG&E must avoid the resource, and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP within fourteen 30 days of initial observation, for review and approval.	E-73
20.	6-8	MM BR-5	Staking trees that are 50 feet away from the proposed project work areas draws unnecessary attention to these sensitive resources. In addition, the staking or flagging can easily blow away, creating unnecessary trash that can be difficult to collect. Because construction crews will be limited to approved workspaces, the benefit of not staking the trees outweighs the benefit of identifying them.	All accessible Del Mar manzanita observed within 50 feet of proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction.	All accessible Del Mar manzanita observed within 50 feet of directly adjacent to or within proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction.	E-74
21.	6-10	MM BR-6	MM BR-6 should allow the on-site avian biologist(s) to determine the appropriate buffers for avian species without prior approval from the CPUC. Requiring CPUC approval will unnecessarily delay Proposed Project construction. Further, a 100-foot minimum buffer distance may be overly protective given the construction activities, other sources of disturbance in the vicinity, topography, and other barriers between nests and construction.	The nest buffer distances described above may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.	The nest buffer distances described above may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.	E-75

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22.	6-12	MM CUL-2	<p>It is not feasible to always have a Secretary of the Interior–qualified archaeologist monitor ground-disturbing activities for the project. A Secretary of Interior–qualified archaeologist must have a Master’s degree and one year of professional experience, and four months of supervisory experience. Standard practice is to have the Secretary of Interior–qualified archaeologist oversee qualified archaeological monitors and the archaeological monitors would monitor during construction. This change would match the text in the Monitoring/Reporting Action, where it calls for a CPUC-approved archaeologist only.</p> <p>Clarifying text added to the mitigation measure to allow the qualified archaeologist to recommend if monitoring is no longer warranted in certain areas (fill, bedrock, etc.).</p>	<p>A Secretary of Interior–qualified archaeologist shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a monitoring results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines.</p>	<p>An Secretary of Interior–qualified archaeologist archaeological monitor, overseen by an archaeologist meeting the Secretary of the Interior’s standards, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project. Responsibilities for the archaeologist shall include monitoring, evaluation of any finds, analysis and curation of materials, and preparation of a monitoring results report conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. <u>The qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.</u></p>
23.	6-12	MM CUL-2 (Location)	<p>The location requirements for MM CUL-2 should be clarified text to match what is stated in the mitigation measure.</p>	<p>...entire project area</p>	<p>...entire all cultural resource sites of significance identified within the project area</p>
24.	6-13	MM CUL-4	<p>Curation may not always be feasible if there are landowner disagreements or per tribal requests. Added other options in case curation proves infeasible during construction.</p>	<p>For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.</p>	<p>For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution <u>or repatriated or redeposited in a secure location onsite if curation is infeasible.</u> All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.</p>
25.	6-13	MM CUL-5 (Monitoring/Reporting Action)	<p>Changes have been requested to clarify the measure and accurately reflect the text in MM CUL-5.</p> <p>In addition, the paleontologist should not be responsible for verifying that SDG&E submitted the report to the CPUC.</p>	<p>SDG&E and/or its contractors verify that a qualified CPUC-approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by Paleontological the applicant is submitted 30 days prior to the beginning of construction work.</p> <p>The paleontologist will monitor construction-related activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.</p>	<p>SDG&E and/or its contractors verify that a qualified CPUC-approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by Paleontological the applicant <u>and/or its contractor</u> is submitted 30 days prior to the beginning of construction work.</p> <p>The paleontologist will monitor construction-related ground-disturbing activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.</p>

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				At the conclusion of paleontological monitoring, the paleontologist prepares a monitoring report and verifies that SDG&E submits the report to the CPUC for review, approval, or request for changes.	At the conclusion of paleontological monitoring, the paleontologist prepares a monitoring report and verifies that SDG&E submits the report to the CPUC for review, approval, or request for changes.	Cont. E-79
26.	6-13	MM CUL-5, (Effectiveness Criteria)	The last sentence is not a complete sentence; suggest ending the sentence after “proper protocols.”	Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols relating to cleaning, storage, cataloging and...	Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols , relating to cleaning, storage, cataloging and...	E-80
27.	6-15	MM HAZ-01	A Hazardous Materials and Waste Management Plan is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E’s Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required. It is recommended that the required evacuation training be incorporated into the WEAP training described in MM BR-3.	N/A	N/A	E-81
28.	6-17	MM NOI-1	It is possible that other agencies will require construction to occur outside of the permitted hours in the local noise ordinances. Should this occur, SDG&E will meet and confer with the appropriate local agency to obtain relief from these hours.	MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction: <ul style="list-style-type: none">City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).	MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction: <ul style="list-style-type: none">City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays). <u>Should construction be required outside of these hours due to agency requirements, SDG&E shall meet and confer with the local jurisdictions, as needed, regarding these activities and obtain relief from these typical hours.</u>	E-82

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
29.	6-17	MM NOI-3	<p>MM NOI-3 should be revised to account for whichever threshold is higher (the local ordinance or ambient levels plus 10 dBA). Without the accommodation, the measure is too restrictive.</p> <p>As stated on Page 5.12-21 of the Draft IS/MND, temporary noise barriers near mobile noise sources are not feasible. As a result, edits to MM NOI-3 are proposed.</p>	<p>MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:</p> <ul style="list-style-type: none">Temporarily and safely installing and maintaining absorptive noise control barriers in the perimeter of construction sites and/or between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.	<p>MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the City of San Diego or Del Mar's noise ordinance, <u>whichever is higher</u>. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:</p> <ul style="list-style-type: none">Temporarily and safely installing and maintaining absorptive noise control barriers <u>in the perimeter of construction sites and/or</u> between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers.
Appendix C: Master Species Table					
30.	6	Table 1	The Draft IS/MND currently lists California adolphia (<i>Adolphia californica</i>) as having a high potential to occur. This determination is based on an "occurrence 1 mile southeast of Biological Study Area (BSA) in 2008." There is no reference provided for this occurrence. In addition, the species is easily detectable. Suggest adopting the PEA's low potential assessment.	N/A	N/A
31.	7	Table 1	Golden-spined cereus (<i>Bergerocactus emoryi</i>) is listed as having a high potential to occur due to three occurrences documented one mile east of the Proposed Project between Interstate 5 and Via de la Valle on iNaturalist. According to this website's copy, "iNaturalist is an online social network of people sharing biodiversity information to help each other learn about nature." As a result, this website should not be considered a reliable source and this species should be considered to have a moderate potential to occur as described in the PEA.	N/A	N/A
32.	8	Table 1	Sand-loving wallflower (coast wallflower) (<i>Erysimum ammodendrum</i>) is listed in the Draft IS/MND as present. The PEA had determined it to have a low potential to occur because plants were not identified correctly during the 2014 surveys. Plants mapped by RECON in 2014 were in fruit during the 2016 fall survey. The seeds of these plants were not winged and thus are more appropriately considered <i>E. capitatum</i> . As a result, this species should be considered to have a low potential to occur.	N/A	N/A

San Diego Gas & Electric Company
TL674A Reconfiguration & TL666D Removal Project

January 2019
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Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
33.	11	Table 2	Burrowing owl (<i>Athene cunicularia</i>) is listed in the Draft IS/MND as having a high potential to occur. The PEA had determined it to be low potential because this species has not been detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). Only wintering habitat is present; the species does not breed in or around the BSA. As a result, this species should be considered to have a low potential to occur.	N/A	N/A

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Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Line, Paragraph, or Table #	Comment/Justification	Original IS/MND	Proposed IS/MND Language
33.	11	Table 2	Burrowing owl (<i>Athene cunicularia</i>) is listed in the Draft IS/MND as having a high potential to occur. The PEA had determined it to be low potential because this species has not been detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). Only wintering habitat is present; the species does not breed in or around the BSA. As a result, this species should be considered to have a low potential to occur.	N/A	N/A

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Responses to Comment Letter E San Diego Gas & Electric

E-1 The commenter recommends that Peñasquitos Lagoon be characterized as an environmentally sensitive area in the description of surrounding natural features. To address this request, the following text change is included on the Final IS/MND page 1-2:

“SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito and Los Peñasquitos lagoons.”

E-2 The text on page 3-2 of the Draft IS/MND has been revised to correctly state the number of environmental topics included in the document:

“The content and analysis in this Initial Study is based on current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in ~~49~~ 20 topics presented below.”

E-3 The commenter recommends that the description of the span of TL674A that extends over Via de la Valle be revised. This portion of TL674A would be reconfigured as part of the proposed project, not reconducted as originally stated in the Draft IS/MND. The commenter further states that the proposed project would involve construction along C510 and C738, not C630 as incorrectly stated in the Draft IS/MND. To address this request, Draft IS/MND page 4-1 has been revised as follows:

“The proposed TL674A Reconfiguration and TL666D Removal Project (hereafter, “proposed project”) involves removal of an existing 69-kilovolt (kV) overhead tie line (TL666D), ~~reconductoring~~ reconfiguring of approximately 700 feet of TL674A, and installation of approximately 1.1 miles of new underground duct bank that would connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation. The proposed project would also include the ~~entail~~ conversion of a combined 4,530 feet of existing overhead 12-kV lines (C510 and ~~C630~~ C738) to an underground configuration and removal and elimination of service of 6 miles of existing 69-kV overhead line TL666D for the purpose of addressing safety, environmental quality, and reliability of the local area electrical network. SDG&E estimates that construction of the proposed project would take 12 months.”

E-4 The description of the Del Mar Substation on Draft IS/MND page 4-2 has been revised as follows to clarify that the substation is an existing facility:

“The main activity associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the existing Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in the city of San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in the city of San Diego).”

E-5 Table 4-1, on Draft IS/MND page 4-7 has been revised under the State Agencies subheading to include the following two additional permits that the proposed project may require:

Permit or Approval	Agency	Requirement
<u>Archaeological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Archaeological Investigations/Collections on State Parks Land</u>
<u>Paleontological Resources Investigation and Collection Permit</u>	<u>California Department of Parks and Recreation</u>	<u>Permit to Conduct Paleontological Investigations/Collections on State Parks Land</u>

E-6 Draft IS/MND page 4-8 has been revised as illustrated below to clarify that 700 feet of 69-kV conductor would be removed, rather than the tap as incorrectly stated in the original draft text:

“Reconfiguration of TL674A, which entails removal of approximately 700 feet of 69-kV overhead ~~tap~~ conductor and installation of about 1.1 miles of new underground duct bank to connect TL674A (renamed TL6973 as part of the proposed project) to the Del Mar Substation;”

E-7 The following sentence beginning on Draft IS/MND page 4-8, line 17, has been revised to indicate that TL666D is a tie line and not a tap as originally stated:

“Removal of TL666D, which would eliminate approximately 6 miles of 69-kV overhead ~~tap~~ tie line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza 18 Drive;”

E-8 The sentence beginning on Draft IS/MND page 4-11, line 7, has been revised to clarify that multiple conductors would terminate at the new riser pole that would be installed as part of the proposed project:

“The remaining conductors would terminate at a new steel riser pole, where the line would transition to an underground configuration.”

E-9 The number of conduits that would be installed as part of the proposed project has been revised from one, as reported on Draft IS/MND page 4-11, to six, as follows:

“The underground duct bank would consist of ~~one~~ six approximately 6-inch-diameter and one approximately 4-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete, as illustrated in Figure 4-7.”

E-10 The sentence beginning on Draft IS/MND page 4-15, line 3, has been revised to indicate that splice vaults, not duct banks, would be cast on site, as follows:

“~~Ducts~~ Splice vaults would be constructed of precast concrete measuring approximately 17 feet in length and 9 feet in width, extending to a depth of about 11 feet, as shown in Figure 4-8.”

E-11 The sentence beginning on Draft IS/MND page 4-16, line 7, has been revised to clarify that no distribution line would be removed from the Del Mar Substation as part of the proposed project.

“The newly established TL6973 circuit at the Del Mar Substation would also facilitate removal of about 6 miles of existing TL666D overhead line ~~eliminating a distribution line from the Del Mar Substation.~~”

E-12 The sentence beginning on Draft IS/MND page 4-16, line 27, has been revised to indicate that the portion of the proposed project described in the text below is located in the Torrey Pines State Natural Reserve Extension, as follows:

“It reaches the Torrey Pines State Natural Reserve Extension and generally parallels Red Ridge Loop Trail for approximately 1,950 feet to the south.”

E-13 The sentence beginning on Draft IS/MND page 4-25, line 5, has been revised to indicate that one new riser pole, not two, would be installed as part of the project. As described in the Proponent’s Environmental Assessment (PEA), the proposed project would reconfigure a second, existing pole for use as a riser pole.

“A single 1,000-kcmil aluminum cable installed within the duct bank would connect the ~~two~~ new riser poles to the newly converted riser pole.”

E-14 The sentence beginning on Draft IS/MND page 4-33, line 8, has been revised to indicate that construction within ROWs under Caltrans jurisdiction would require the applicant to obtain a permit from Caltrans, as follows:

“For construction within ROWs under jurisdiction of Caltrans, any work involving highway crossings would require an encroachment permit from Caltrans.”

E-15 Draft IS/MND page 5.1-28, line 23, incorrectly characterizes the structure in the simulation as a tower when the text should reference a pole. This text has been corrected accordingly:

“The height of the existing ~~tower~~ pole would remain unchanged.”

E-16 The following text beginning at Draft IS/MND page 5.3-10, line 42, has been revised to accurately characterize the status of the Ozone Air Quality Management Plan, as follows:

~~“The SDAPCD SIP predicts that San Diego County will reach attainment status for the 0.08 ppm 8-hour O₃ NAAQS (per the SIP submitted to the EPA in June 2007). However, the EPA designated San Diego County as a nonattainment area for new the 0.075-ppm 8-hour O₃ NAAQS Standard; thus, the SDAPCD submitted an updated a SIP with the 8-hour ozone Attainment Plan to address this more stringent standard using the RAQS.”~~

E-17 Draft IS/MND page 5.4-44, line 29, references an incorrect mitigation measure. Instead of **MM BR-3** as presented on page 5.4-44, the correct mitigation measure is **MM BR-5**; the text has been revised as follows:

~~“**MM BR-3** **MM BR-5** would require that the applicant wash vehicles and equipment prior to staging onsite....”~~

E-18 Draft IS/MND pages 5.4-44, line 37; 5.4-46, line 23; 5.4-47, line 22; and 5.4-51, line 9 incorrectly state the setback distance for monitoring ground-disturbing activities in **MM BR-4** as 100 feet, whereas the buffer stated in the **MM BR-4** text on page 5.4-40 correctly states 50 feet. The following sentences have been revised at each of the pages and lines indicated above:

~~“**MM BR-4** would require onsite biological monitoring of construction activities that would occur within ~~100 feet~~ 50 feet...”~~

E-19 The commenter observes an inconsistency in buffer distances described on Draft IS/MND page 5.4-46, line 27, compared to text in **MM BR-6** in Chapter 6.0, “Mitigation Monitoring and Reporting Plan.” The commenter recommends that the text on Draft IS/MND page 5.4-46, line 27, be revised to prohibit construction activities within 100 feet of sensitive biological areas during nesting bird season, rather than 500 feet. **MM BR-6** has been revised as follows, with relevant updates incorporated throughout the Final IS/MND to ensure consistency and provide detail relating to required setback distances.

“MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections. Additionally, the applicant shall not conduct project-related activities within at least 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), or Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31). A CPUC-approved avian biologist who is knowledgeable about avian species native to the coastal San Diego region shall conduct special status avian surveys where construction would occur during nesting bird season. The avian biologist shall conduct focused avian preconstruction surveys no more than fourteen days before project activities begin in each workspace, in areas containing or adjacent to suitable habitat for special status avian species. For project areas within 500 feet of or within suitable habitat for Western Snowy Plover (*Charadrius alexandrinus nivosus*), the surveying

avian biologist must have documented experience surveying Western Snowy Plover. Surveys shall be conducted within work areas plus a buffer large enough to encompass the ~~next~~ nest buffer of any special status avian species for which suitable habitat is present (i.e., 100 to 500 feet). In work areas that contain no suitable or potentially suitable habitat for special status avian species, and that would not be subject to any ground disturbance or vegetation trimming/removal, focused avian preconstruction surveys are not necessary.

If nesting birds are observed ~~within 500 feet of work areas within or adjacent to the lagoons, Torrey Pines State Natural Reserve Extension, ESHAs, or other proposed work areas~~ during focused avian surveys or general preconstruction surveys (see **MM BR-1**), the avian biologist shall establish appropriate, species-specific vertical and horizontal buffers between project activities and established nests and territories. ~~to be no less than~~ The buffers shall be no less than 500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plover nests (unless otherwise approved by USFWS and/or CDFW). Buffers between project activities and other avian nests shall be established on a species-specific basis, based on USFWS and CDFW recommendations and avian biologist observations. ~~the following distances for each species:~~

- ~~500 feet (vertical and horizontal) for all raptors, Coastal California Gnatcatcher, and Western Snowy Plovers;~~
- ~~300 feet (vertical and horizontal) for all other special status avian species (passerine, waders, etc.); and~~
- ~~100 feet (vertical or horizontal) from nests of non-special status avian species.~~

If non-nesting special-status avian species are observed, project activities may resume at distances greater than 100 feet from San Dieguito Lagoon, Los Peñasquitos Lagoon (Torrey Pines State Natural Reserve), and Torrey Pines State Natural Reserve Extension during nesting bird season (February 1 to August 31), but a CPUC-approved biological monitor must be present. If project activities would occur between 100 and 500 feet of occupied (non-nesting) Western Snowy Plover habitat, then an avian biologist with documented experience surveying Western Snowy Plover must be present to observe all project activities.

~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests. The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer reductions to special status species and raptor nests and will provide verification to the CPUC of this coordination when reducing such buffers. Nest buffer reductions for common, non-special-status species shall be reduced as established by protocols established in the Nesting Bird Management Plan (NBMP). Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area.

The applicant shall develop an ~~Nesting Bird Management Plan (NBMP)~~ in accordance with the Avian Power Line Interaction Committee (APLIC) and USFWS guidelines (APLIC and USFWS 2005), to be submitted to the CPUC no fewer than 30 days prior to the start of construction. The plan shall contain, at a minimum, the following information and strategies intended to minimize impacts to avian species:

- Methods from APLIC Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012) that would minimize the risk of avian collisions, injuries, and electrocutions associated with new poles and aboveground utility features, including those associated with the C738 and C510 conversions;
- Species-specific USFWS and/or CDFW survey protocols and planned compliance procedures with the protocol(s);
- Survey timing, methods, and boundaries, protocols for determining whether a nest is active and how to protect active nests, documentation and reporting methods for observed active nests, and surveyor qualifications;
- Nest documentation (nest activity, active/inactive, etc.) and an established procedure for contacting the appropriate agencies (CPUC, CDFW, USFWS) with inactive nest removal requests for review;
- Nesting bird deterrent methods for activities to be conducted outside of the lagoons and Torrey Pines State Natural Reserve, but within nesting bird season; ~~and~~
- Species-specific buffer determinations relating to project components and protocols for requesting a reduced buffer distance from the CPUC and from the wildlife agencies; and
- Language indicating that buffer distances shall be based on biological data and site/species-specific observations, not generalized assumptions.

E-20 Draft IS/MND pages 5.4-47, line 29, and 5.4-48, line 15, refer to the vehicular speed limit included in **MM BR-7** that restricts vehicles traveling on unpaved roads during nighttime hours to 10 miles per hour (mph). The commenter notes that this is inconsistent with the version of this measure that appears in Chapter 6.0, “Mitigation Monitoring and Reporting Program,” which references 15 mph as the nighttime speed limit for vehicles traveling on unpaved roads. The 10 mph speed limit indicated on Draft IS/MND pages 5.4-47 and 5.4-48 has been revised to 15 mph for consistency with the text of mitigation measure as it appears in Chapter 1.0, “Mitigated Negative Declaration”; 5.4, “Biological Resources”; and 6.0, “Mitigation, Monitoring, and Reporting Plan.”

“**MM BR-7** additionally restricts project-related vehicles to an operating speed no faster than ~~40~~ 15 mph and requires vehicle checks for wildlife prior to moving equipment, which would reduce the risk of accidental vehicular collisions with nocturnal special status reptiles.”

E-21 The commenter states that the sentence on Draft IS/MND page 5.4-48, line 42, incorrectly references **MM BR-4**, when the correct measure is **MM BR-8**. The text has been corrected as follows:

~~“MM BR-4~~ **MM BR-8** would require biological monitoring whenever trees would be trimmed to eliminate the risk of impacts to overwintering western monarch butterfly populations.”

E-22 As described in Section 19, “Conflict with Subregional Plan” of the SDG&E Natural Community Conservation Plan (NCCP) Implementation Agreement, the commenter reiterates that local and regional guidelines do not supersede the NCCP. Therefore, Draft IS/MND pages 5.4-59, line 31, has been revised to prevent conflict or confusion, as follows:

“Habitat that is degraded or disturbed by proposed project activities would be restored as described in Chapter 7.2 Habitat Enhancement Measures, Chapter 7.4 Mitigation Credits of the NCCP, and in Table 5 in the County of San Diego Biology Guidelines for impacted natural communities outside of the MSCP, and as described in Table 2a, Table 2B, and Table 3 in the City of San Diego Biology Guidelines for impacted natural communities within the MSCP. Should there be any conflict between these guidelines, SDG&E’s NCCP would supersede the direction of the other referenced documents.”

E-23 Draft IS/MND page 5.5-1, line 41, incorrectly names the “South Coastal Information Center” as the “South Coast Information Center.” The Draft IS/MND text has been revised as follows:

“The reports were prepared on the basis of literature reviews of previous documentation about the area available from the South Coastal Information Center at San Diego State University.”

E-24 Draft IS/MND page 5.5-2, line 1, has been revised to clarify the types of records searches conducted for the proposed project’s cultural resources study, as shown below. Moreover, the text has been revised to correct the location in the Final IS/MND appendices where the Sacred Land “File” (not “Record”) Search is available for review. The Draft IS/MND incorrectly refers the reader to Appendix H in the Cultural Resources Technical Report, and has been corrected in the Final IS/MND to “Appendix D.” The text has been revised as follows:

“The applicant contacted the Native American Heritage Commission (NAHC) for a Sacred Lands ~~Record~~ File Search to obtain additional information regarding potential cultural resources within or near the project area and the NAHC’s response indicated that no Native American traditional cultural places are indicated within the project area (SDG&E 2017). See Appendix ~~H~~ D for additional information.”

E-25 Draft IS/MND page 5.5-2, line 14, incorrectly refers to the Paleontological Technical Study as located in Appendix H, instead of Appendix I. The IS/MND text has been corrected as follows:

“See Appendix ~~H~~ I for additional information.”

E-26 The commenter requests that the term “indefinite association,” Draft IS/MND page 5.5-7, line 14, be defined so impacts may be assessed appropriately. The following definition has been added as footnote 1 to elaborate and clarify the term “indefinite association” as follows:

“These resources include 124 prehistoric archeological sites and 41 prehistoric isolates; nine multi-component (prehistoric and historic) archaeological sites; 14 historic sites, structures or buildings; two historic isolates; and one with an indefinite association.¹”

¹ Per Foglia, Cooley, and Mello (2017), the resource noted as having an indefinite temporal association (i.e., no clear association with the prehistoric or historic periods) is a rock cairn. No site number is associated with the description of this resource when discussed in reference to the total number of resources within the CTR study area. The only other reference to a cairn within the CTR is Site Number P-37-029577. This site, however, is shown as having a prehistoric association.

E-27 Draft IS/MND page 5.5-7, line 1, has been revised to accurately describe the applicant’s archaeological survey area, a 300-foot corridor characterized by the utility line serving as the centerline with 150-foot buffers on either side. The text has been revised as follows:

“An archaeological survey was conducted for an area generally matching the project’s utility corridors in addition to a ~~300~~ 150-foot buffer (300-foot corridor) around the linear alignments, as well as a 100-foot buffer around noncontiguous temporary work areas (Appendix D).”

E-28 The commenter notes and inconsistency between Draft IS/MND page 5.5-7, line 37, which states that three sites are potentially eligible for listing in the CRHR, and Table 5.5-1, which states that there are four potentially eligible sites. The text has been revised to correct the inconsistency, as follows:

“As shown in Table 5.5-1, Sites CA-SDI-191, CA-SDI-193, CASDI-686, and CA-SDI-16653 are located in the project area and may be eligible for the CRHR under Criterion 1. The applicant determined that a testing program for these sites would be infeasible because the area associated with the ~~three~~ four sites overlapping the project’s potential disturbance area would be limited; these sites would not be universally accessible, because they are at least partially paved over; or the applicant’s subcontractor deemed other areas too unsafe to test.”

E-29 The commenter requests that the Final IS/MND clarify and correctly distinguish between *reconnaissance-level* and *intensive-pedestrian* surveys; the Draft IS/MND page, 5.5-9, line 13, has been revised as follows:

“This reconnaissance-level survey covered the same area as the archaeological survey.”

E-30 The following text passage beginning on Draft IS/MND page 5.5-9, line 16, citing Foglia et al. (2017) has been revised to more accurately characterize the eligibility of the two isolates referenced in the statement:

“P-37-016571 and P-37-034567 have been deemed ineligible for the CRHR, ~~though~~ as isolates ~~may~~ have limited research potential.” (Foglia, Cooley, and Mello 2017)

E-31 The Draft IS/MND page 5.5-10, line 12, incorrectly states that the applicant conducted new building evaluations of the Sorrento Valley Industrial Park. These evaluations were completed by Caltrans in 2016, and independent analysis by the firm AECOM concurs with Caltrans’ evaluation. The text has therefore been revised as follows:

“One of the buildings within the Sorrento Valley Industrial Park was previously evaluated in 2006 ~~as part of this study~~ and recommended as eligible under Criterion 3 of the CRHR and Criterion C of the NRHP.” (Foglia, Cooley, and Mello 2017)

E-32 The commenter notes that Draft IS/MND page 5.5-16, line 4, states the name of the historic register incorrectly; the text has been revised as follows:

“City of San Diego Register of Historical ~~Places~~ Resources”

E-33 According to the applicant, SDG&E has not approved ZIP (1,1,1-trichloroethane) and Insecticide (1,1,1-trichloroethane carrier) for workplace use and therefore these chemicals would not be used during project activities. The commenter requests revising Draft IS/MND Table 5.8-1, page 5.8-2, as follows:

Other Materials Used	
Methyl alcohol	Canned spray paint
Ammonium hydroxide	Paint thinner
ZIP (1,1,1 trichloroethane)	Safety fuses
Eyeglass cleaner (contains methylene chloride)	Contact Cleaner 2000 (precision aerosol cleaner)
Hot stick cleaner (cloth treated with polydimethylsiloxane)	WD-40
Insecticide (1,1,1 trichloroethane carrier)	ZEP (safety solvent)
Insulating oil (inhibited, non-polychlorinated biphenyl)	ABC fire extinguisher
	Air tool oil
	Mastic coating

E-34 The sentence beginning on Draft IS/MND page 5.8-3, line 1, has been revised to indicate removal of insecticide from Table 5.8-1 and to clarify that none of the referenced chemicals are acutely hazardous. The text has been updated as follows:

~~Besides the insecticide,~~ None of the hazardous materials listed in Table 5.8-1 are acutely hazardous.

E-35 The sentence beginning on Draft IS/MND page 5.8-2, line 11, has been revised as follows to clarify that insulation at the project facilities does not contain asbestos, though asbestos-containing materials may be present on the project site:

The proposed project's pole removal and transmission line rerouting activities may also generate waste materials such as chemically treated wood, transformers, transformer oil, polychlorinated biphenyls (PCBs), potentially asbestos insulation-containing materials, and universal waste materials.

E-36 The sentence beginning on Draft IS/MND page 5.8-12, line 19, has been revised to accurately describe when a Hazardous Materials Business Plan (HMBP) is required, as follows:

Facilities that handle more than these indicated quantities of hazardous materials must submit an HMBP to the CUPA prior to ~~project construction~~ hazardous materials being brought on site.

E-37 The sentence beginning on Draft IS/MND page 5.8-12, line 30, has been revised to clarify that project poles have not been treated with pesticides. The commenter notes that California Health and Safety Code (HSC) Section 25150.7 addresses the circumstances associated with generation and management of treated wood waste. The text has been revised as follows:

Section 25150.7 of the California HSC outlines procedures and regulations for the management and disposal of treated wood waste. Wood waste, including the type of wood utility poles that would be disposed of as part of the proposed project, may be treated with ~~pesticides~~ insecticides or other chemicals. ~~Because the chemical treatment could leach into water supplies after the disposal of the wood,~~ Section 25150.7 includes restrictions relating to how and where treated wood waste may be disposed of.

E-38 The sentence beginning on Draft IS/MND page 5.8-18, line 19, has been revised as follows to accurately indicate that utility lines do not contain asbestos, but that some components may contain asbestos:

For example, removal of relocation of utility lines with components suspected to contain asbestos may requires notification to the SDAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and proper removal and disposal techniques (National Emission Standards for Hazardous Air Pollutants 40 Code of Federal regulations 61, Subpart M).

E-39 The following revisions have been made in the text from on Draft IS/MND pages 5.10-1, line 25, to 5.10-2, line 9, to correct the description of surrounding land uses and geography in the project area and vicinity:

The northernmost corridor alignment (TL6973D and ~~TL674A~~) follows Via De La Valle westward adjacent hilly topography accommodating low-density residential neighborhoods, commercial businesses, and shopping centers, in addition to public parks, event centers, and

open spaces, including San Dieguito River Park, and Del Mar Horse Park, ~~and Del Mar Fair Grounds.~~

~~North~~ South of Via Del La Valle, immediately west of I-5, the TL666D corridor roughly parallels Jimmy Durante Boulevard, passing by the Del Mar Fairgrounds. follows a segment of the Coast to Crest Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian. The Del Mar Fairgrounds is a regional destination located northwest of the San Dieguito Lagoon. It hosts the San Diego County Fair and a number of horse racing events throughout the year. ~~The TL666D corridor spans the fairgrounds' surface parking lot, its alignment roughly paralleling Jimmy Durante Boulevard. TL666D then follows a segment of the Coast to Coast Trail within the San Dieguito River Park, a large regional open space that extends from the Pacific coast in Del Mar to Volcan Mountain in the town of Julian.~~

The TL666D corridor aligns southward along San Dieguito Drive. To the east is San Dieguito Lagoon, a protected riparian open space with trails and a coastal boardwalk accessible from San Dieguito Drive near Jim Durante Boulevard, north of Crest Canyon. Low-density residential neighborhoods are located on the hillside west of San Dieguito Drive. ~~South~~ North of Crest Canyon Open Space Park, ~~north of the and the~~ Del Mar Heights residential neighborhood, San Dieguito Drive becomes Racetrack View Drive. Existing TL666D pole and power line infrastructure continues overhead adjacent to west of Minorea Cove and behind the Del Mar Hills Elementary School grounds, adjacent to I-5. Along Mango Drive, land uses in the TL666D corridor are residential and commercial until the Torrey Pines State Natural Reserve Extension area, which is protected open space. TL666D spans approximately 0.5 miles across the Torrey Pines Natural Reserve Extension Area in a southerly alignment, where power lines cross ~~residences~~ residential areas and enter Los Peñasquitos Lagoon and Torrey Pines State Reserve, south of Carmel Valley Road and Portofino Drive. The utility corridor extends 0.8 miles through ~~the~~ Los Peñasquitos Lagoon, paralleling the Amtrak Pacific Surfliner passenger rail corridor and Peñasquitos Creek about a quarter mile to the east. It then follows Sorrento Valley Road for about 0.65 miles, at which point it crosses I-5 and connects to an existing riser pole 12-kilovolt (kV) tap on the eastern side of the freeway.

E-40 The commenter notes an inconsistency between the PEA and the Draft IS/MND regarding the number of schools within 150 feet of the proposed project site.

A review of the PEA indicates an additional school/educational facility near project components that is not identified in the Draft IS/MND. The Del Mar Nursery School (13692 Mango Drive, Del Mar, California 92014) is located approximately 175 feet west of TL666D. The closest project component, a pole (Z90268), is located southeast of the Del Mar Nursery School. Revisions have been made throughout Sections 5.8, "Hazards and Hazardous Materials"; 5.12, "Noise"; and 5.14, "Public Services" of the Final IS/MND to incorporate this information.

Figure 5.12-1 “Noise-Sensitive Receptors within 1,000 Feet of the Proposed Project” and Figure 5.14-1 “Public Services near the Proposed Project Vicinity” have been revised to include the omitted facility.

Additional revisions associated with the proximity of schools and educational facilities to project components have been made per clarifications to the list of schools identified within 1,000 feet of proposed project activities. These revisions have been incorporated into Figures 5.12-1 and 5.14-1, and the following text changes are intended to include all schools and educational facilities within 1,000 feet of proposed project components.

~~Three~~ Five schools are within 1,000 feet of the proposed project’s utility corridors: ~~Solano Santa Fe Elementary School~~, Del Mar Hills Elementary School, Therapeutic Learning Center, Del Mar Nursery School, Brighter Future Preschool and Child Development Center, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). ~~Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area TL674A (WA-2).~~ Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard. Therapeutic Learning Center is located approximately 75 feet west of the TL674A Underground Work Area and is across the street from the Del Mar Substation. Del Mar Nursery School is located approximately 175 feet west of the TL666D project component (WA-67). Brighter Future Preschool and Child Development Center is located approximately 400 feet west of the TL666D project component (WA-100 and WA-102).

E-41 The commenter states that the citation on Draft IS/MND page 5.17-1, line 13, incorrectly references its source. The text has been revised as follows to accurately reference the source documentation.

Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project. ~~(AECOM 2017)~~ (Foglia, Cooley, and Mello, 2017)

E-42 The commenter recommends revising the discussion of the Mandatory Findings of Significance, Draft IS/MND page 5.19-12, to include three reasonably foreseeable projects that, according to the commenter, also have potential to impact paleontological resources and could potentially have overlapping construction timelines.

As explained below, the authors of the MND do not consider this discussion to be incomplete or to contain an omission. As explained on the Draft IS/MND page 5.19-11, the geographic scope of cumulative cultural, paleontological, and tribal resources comprises all ground-disturbing projects within 100 feet of proposed project work areas. This scope is limited because cultural resources are discrete and typically not very large, such that two projects would need to be located near one another (and both engage in similar soils disturbing activities) to potentially impact—and exacerbate impacts—to the same resource.

Therefore, the following sentence, beginning on Draft IS/MND page 5.19-12, line 11, has been deleted:

~~“The following planned and proposed projects also have potential to impact paleontological resources and could potentially have overlapping construction timelines.”~~

The deleted sentence at the beginning on Draft IS/MND page 5.19-12, line 21 has been replaced with the following text:

“While the project may have the potential to adversely affect paleontological resources, it is not anticipated to result in or contribute considerably to any cumulative impacts because the conditions for cumulative paleontological resource impacts are not met—that is, none of the foreseeable projects would necessitate ground-disturbing activities within 100 feet of the proposed project such that soil disturbance resulting from the proposed project and from other reasonably foreseeable projects would exacerbate the potential for cumulative impacts. Therefore, no cumulative paleontological resource impacts are likely; potential impacts would be limited to project effects that would be subject to mitigation identified in this IS/MND and would not be cumulatively considerable.”

- E-43** Beginning on Draft IS/MND page 5.19-14, line 14, the commenter states that only one project is included in the analysis of cumulative hydrological impacts, while two or three reasonably foreseeable projects are commonly analyzed in combination with the proposed project in the other topical analyses in Section 5.19, “Mandatory Findings of Significance.”

The commenter is correct in noting that only one reasonably foreseeable project is specified by name—the El Camino Real Bridge/Road Widening Project—while the others, as illustrated in the excerpt from Draft IS/MND page 5.19-14, lines 10 to 12, below, are named specifically in other analyses.

“...As previously discussed, construction of the proposed project and three of the projects listed in Table 5.19-1 could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the proposed project.”

- E-44** The commenter implies that the Draft IS/MND should be revised to be consistent with other cumulative analyses in Section 5.19, “Mandatory Findings of Significance.”

As discussed on Draft IS/MND page 5.19-2, cumulative impacts may be evaluated based on a list-based or a projections-based approach and the CEQA Guidelines are not prescriptive as to which approach a lead agency may use in evaluating potential cumulative effects. In the case of cumulative hydrological impacts, the commenter states that the cumulative projects cited in the evaluation of hydrological impacts is inconsistent with other environmental topics included in the evaluation of mandatory findings in this Final IS/MND.

In consideration of these possible cumulative impacts, for example, the construction schedule of the El Camino Real Bridge/Road Widening Project could potentially overlap project construction activities, which may affect hydrology and water quality because of combined soil disturbance from grading, clearing, and excavation. These activities could cause erosion and sedimentation, and thus degrade water quality. However, the potential for soil erosion and sedimentation would be minimized at this site through the implementation of SWPPPs, which would be required for all projects that disturb one or more acres of soil. Further, while minor alterations to drainage patterns could occur during construction of the proposed project, all areas disturbed during grading would be restored to original contours, and surrounding areas would be restored and repaired, as appropriate. At other sites less than an acre in size where construction work could occur concurrent with and near project work areas, hydrological impacts would be minimized through implementation of municipal BMPs or other practices under a Conditional Exclusion permit, meaning that grading, earth-moving, and other activities would not, on a site-per-site basis result in substantial run-off or degradation of water quality. Therefore, with implementation of the SWPPP and BMPs requirements for the proposed project and potential cumulative work sites in the vicinity, cumulative impacts to hydrology and water quality are expected to be less than considerable.

E-45 The commenter states that the “Effectiveness Criteria” column on Draft IS/MND page 6-9 is inconsistent with the timeframe described in **MM BR-6**. The commenter asserts that the data point in the Effectiveness Criteria column for **MM BR-6** should be revised so that the timeframe described in **MM BR-6** (currently 14 days) is consistent with the timeframe described in the Effectiveness Criteria column (currently seven days). The text has been revised to correct this inconsistency:

“Preconstruction surveys for active bird nests are conducted within ~~7~~ 14 days of the start of construction, and appropriate measures are implemented to prevent disturbance to any nests within or near the construction area.”

E-46 The effectiveness criteria included in **MM CUL-1**, Draft IS/MND, page 6-12, describe monitoring of archeological resources in areas with the potential to contain previously unidentified resources. This mitigation measure requires establishing buffers to ensure that known resources would be avoided. The commenter therefore suggests that the appropriate effectiveness criterion be directed at the CPUC to ensure that buffers have been established around environmentally sensitive areas. The text in Chapter 6.0 has therefore been revised as follows:

“CPUC verifies that SDG&E and/or its contractors erect protective barriers with appropriate signage around any environmentally sensitive areas ~~approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and will verify construction work avoids fenced areas.~~”

E-47 **MM CUL-1**, on Draft IS/MND page 6-12, calls for the establishment of buffers around areas known to support sensitive archaeological resources. Because this measure deals with protecting

areas known to be sensitive for such resources, the text in the “Timing” column of Table 6-1 with respect to MM CUL-1 has been revised for clarity:

“During construction – SDG&E and/or its contractors will install fencing as buffers around sites that ~~may~~ are known to contain sensitive archaeological resources, and that will be avoided.”

E-48 The commenter suggests removing unclear text in the “Monitoring/Reporting Action” column on Draft IS/MND page 6-12 that is discordant with the requirements in **MM CUL-1**; this text has been revised as follows:

“The CPUC-approved archaeologist verifies that SDG&E and/or its contractors implement all described archaeological monitoring procedures during construction of the proposed project, and stops work if an unanticipated archaeological resource is discovered during construction. ~~CPUC verifies that SDG&E and/or its contractors erects protective barriers with appropriate signage around any environmentally sensitive areas.~~ The CPUC receives, reviews, and either approves or requests changes to the Archaeological Monitoring Report produced by SDG&E and/or its contractors ~~and the archaeological monitor documenting the results of archaeological monitoring.~~”

E-49 The text on Draft IS/MND page 6-12 has been revised as follows to clarify the effectiveness criteria in **MM CUL-2**:

“The CPUC-approved archaeological monitor is present during construction in locations within the project area with potential to contain previously unidentified archaeological resources and implements the procedures described ~~in implement the procedures in~~ **MM CUL-4** if an unanticipated archaeological resource is discovered during construction.”

E-50 The criterion shown in the text as part of **MM CUL-4** incorrectly references fossil remains, which are addressed in **MM CUL-5**. The text of **MM CUL-4** has therefore been revised to clarify that the measure’s actions refer to artifacts and other cultural resources as follows:

“Work is halted if unanticipated ~~fossil remains~~ artifacts or other cultural resources are discovered and the proper protocols implemented pertaining to the treatment of said artifacts.”

E-51 The commenter notes an apparent inconsistency in the timing of requirements in **MM NOI-2**, presented on Draft IS/MND page 6-17. This measure requires the applicant to notify residents within 50 feet of project components at least 30 days prior to commencement of construction work. **MM NOI-2** further requires the applicant to provide proof that the notification was carried out (e.g., in the form of an affidavit) to the CPUC 20 days prior to the start of construction.

The commenter’s requested revision to address inconsistencies in the timing of requirements in **MM-NOI-2** is not necessary because the measure’s notification requirements are not

contradictory. The measure's core requirement pertains to notifying residents within 50 feet of construction activities that would produce intermittent noise. After the applicant sends notices to affected parties, the measure then requires the applicant to submit proof of this notification and related coordination to the CPUC 20 days prior to the beginning of construction, meaning the applicant can supply the CPUC a proof of notice and coordination up to 10 days after sending this notice to affected residents. No text changes to this measure are warranted.

E-52 The commenter states that the "Monitoring/Reporting Action" column in Chapter 6.0, "Mitigation, Monitoring, and Reporting Plan" for **APM REC-01** appears duplicative of **APM PS-01** and should be revised.

The "Monitoring/Reporting Action" column for **APM REC-01** on Draft IS/MND page 6-18 has been revised so that it corresponds properly with the APM and is not duplicative of the "Monitoring/Reporting Action" column for **APM PS-01**.

"CPUC to verify that SDG&E and/or its contractors posts signage at access points to recreational facilities that may be subject to access restrictions no less than four weeks prior to the beginning of construction activities within or adjacent to the affected facilities. ~~has contacted the appropriate personnel at the facilities where construction would occur within 250 feet at least 60 days prior to the beginning of construction.~~"

E-53 The commenter notes that Appendix C: Master Species Tables of the Draft IS/MND incorrectly refers to Appendix B on a secondary cover page.

The secondary cover page in Appendix C that refers to Appendix B has been removed.

E-54 Draft IS/MND Appendix G: Land Use Planning and Policy Matrix, row 1, incorrectly states that distribution line C738 is located in the city of Del Mar. The text has been corrected as follows:

"The proposed project would entail removing Transmission Line 666D from service in the city of Del Mar and converting the 12 kV C510 distribution line from an overhead to an underground configuration. While some associated aboveground distribution equipment such as fuse cabinets, pad-mounted transformers, and the like would be required, the proposed project's undergrounding of 630 feet of C738 and 3,900 feet of C510 distribution lines would generally affirm, rather than conflict with, this policy.

E-55 The following passages pertain to the CPUC's preemptive authority in the regulation of specific resources. These passages have been added to the resources sections indicated, and one passage has been moved within 5.18, Utilities and Service Sections," as indicated below:

Section 5.5, "Cultural Resources," Draft IS/MND page 5.5-15, insert at line 30: "The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive

authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to historic preservation and archaeological and cultural resources within the project area and vicinity for informational purposes.”

Section 5.11, “Mineral Resources,” Draft IS/MND page 5.11-52, insert at line 1: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to mineral resources, this analysis presents local policies, ordinances, and guidelines pertinent to mineral resources within the project area and vicinity for informational purposes.”

Section 5.13, “Population and Housing, Draft IS/MND page 5.13-3, insert at line 38: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to population and housing, this analysis presents local policies, ordinances, and guidelines pertinent to population and housing within the project area and vicinity for informational purposes.”

Section 5.14, “Public Services,” Draft IS/MND page 5.14-13, insert at line 3: “The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to public services, this analysis presents local policies, ordinances, and guidelines pertinent to public services within the project area and vicinity for informational purposes.”

- E-56** The commenter states that all comments they have made in reference to Section 6.0, “Mitigation, Monitoring, and Reporting Plan” also apply to the remainder of the Draft IS/MND, where appropriate. Comments were limited to the MMRP in order to avoid duplication.

Where appropriate, revisions to the Draft IS/MND based on comment responses to this letter were made in both the applicable resource area sections, Chapter 1.0, “Mitigated Negative Declaration,” and in Chapter 6.0, “Mitigation, Monitoring, and Reporting Plan.”

- E-57** According to information provided by the applicant, increased ampacity associated with transmission line 6973, which would replace 666D as part of the proposed project, may also require replacing a circuit breaker at the Del Mar Substation. This process, described on page 4-41 of this Final IS/MND, may take up to eight weeks to complete, depending on whether foundation work would be required. The construction activities associated with the circuit breaker replacement would be scheduled, where feasible, to overlap other activities to maintain the original estimated 12-month timeline for project completion.

The proposed project’s air quality evaluation has been revised to incorporate supplemental emissions modeling that captures the potential incremental emissions output associated with

the removal and replacement of the circuit breaker at the Del Mar Substation. A California Emission Model Estimator (CalEEMod) simulator was prepared for the potential construction activities at the substation site, and the results of this supplemental analysis are reported in the Substation Modifications CalEEMod Report (see Final IS/MND Appendix A, Attachment 3). These results have also been incorporated into Table 5.3-8 and Table 5.3-9, as revised.

The revised emission outputs would be below applicable thresholds, and the less-than-significant conclusions reached for the analyses in the Draft IS/MND would adequately cover the supplemental emissions associated with the potential circuit breaker construction activities at the Del Mar Substation. As illustrated in the revised Table 5.7-5 in the Final IS/MND, the potential circuit breaker replacement work would generate approximately 33 pounds of sulfur hexafluoride not indicated in the Draft IS/MND emissions outputs, as well as additional fugitive dust associated with the circuit breaker. In light of the additional emissions source reported in the supplemental analysis, increases in operational and maintenance emission outputs would be negligible and total emissions outputs would be under applicable thresholds for all reported constituents, consistent with the conclusions presented in the Draft IS/MND.

In light of this supplemental analysis, Tables 5.3-8 (page 5.3-16), 5.3-9 (page 5.3-17), and 5.7-5 (page 5.7-8) have been revised as follows:

Table 5.3-8 Peak Daily Uncontrolled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	12.39	58.20	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	<u>0.61</u>	<u>0.66</u>	<u>11.45</u>	<u>0.02</u>	<u>8.59</u>	<u>1.13</u>
TOTAL	14.28 <u>14.89</u>	60.09 <u>60.75</u>	205.24 <u>216.69</u>	31.68 <u>31.70</u>	148.48 <u>157.07</u>	39.48 <u>40.61</u>
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

^(a) See Appendix A, "Air Quality Emissions Report" for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

1

Table 5.3-9 Peak Daily Controlled Construction Emissions

Year: 2019						
Emission Source	Emissions (pounds per day)					
	PM _{2.5}	PM ₁₀	NO _x	SO _x	CO	VOCs
Construction Equipment and Vehicles	9.20	26.23	137.44	0.30	116.56	13.67
Helicopter Use ^(a)	1.89	1.89	67.80	31.38	31.92	25.81
Substation Modifications	<u>0.61</u>	<u>0.66</u>	<u>11.45</u>	<u>0.02</u>	<u>8.59</u>	<u>1.13</u>
TOTAL	<u>11.09-11.70</u>	<u>28.12-28.78</u>	<u>205.24-216.69</u>	<u>31.68-31.70</u>	<u>148.48-157.07</u>	<u>39.48-40.61</u>
Threshold	55	100	250	250	550	75
Threshold Exceeded?	No	No	No	No	No	No

Note:

^(a) Appendix A, "Air Quality Emissions Report" for factors and assumptions contributing to helicopter air quality emission estimates during construction.

Key:

CO = carbon monoxide

NO_x = nitrogen oxides

PM₁₀ = particulate matter less than 10 microns

PM_{2.5} = particulate matter less than 2.5 microns

SO_x = sulfur oxides

VOC = volatile organic compounds

2

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO ₂	CH ₄	N ₂ O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use ^(a)	73.50	0.00	0.00
Substation Modifications	<u>23.31</u>	<u>0.01</u>	<u>0.00</u>
Total Construction Emissions	<u>973.16-996.47</u>	<u>0.16-0.17</u>	0.00
Global Warming Potential	1	21	310
Total CO ₂ e	<u>973.16-996.47</u>	<u>3.44-3.57</u>	0.00
Total CO ₂ e	<u>976.6-1000.04</u>		
Amortized Construction Emissions (Amortized over 30 years)	<u>32.55-33.33</u>		
Annual Fugitive SF ₆ Emissions ^(b)	<u>1.79</u>		
Total Annual CO ₂ e	<u>35.12</u>		
SCAQMD Significance Threshold	10,000		
SCAQMD Significance Threshold Exceeded?	No		

Key:

^(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

^(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF₆, with a maximum annual leak rate of 0.5 percent.

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT = metric tons

SCAQMD = South Coast Air Quality Management District

SDG&E = San Diego Gas & Electric Company

SF₆ = sulfur hexafluoride

3

E-58 The commenter note that Draft IS/MND page 5.1-25, line 16, indicates that work areas could be permanent. However, the work areas described would not be permanent. The text has been revised as follows.

~~In some instances~~ Work areas ~~could also be permanent and~~ would consist of the work pads (eight total), 69-kV vaults (four total), and 12-kV hand holes (five total).

E-59 The commenter requests that all counts of species by potential to occur be revised based on incorporated comment responses (see Comments E-84 through E-87). Species counts have been revised on Draft IS/MND Page 5.4-18, and where appropriate throughout the document, these counts have been revised.

“Based on the literature and database review described in Section 5.4.1, “Approach to Data Collection,” 51 special status plants have the potential to occur within 1 mile of the project area. Of these 51 species, ~~47~~ 16 are present within the BSA, ~~40~~ nine have a high potential to occur within the BSA and/or within 1 mile of the project area, and 24 have a low or moderate potential to occur within 1 mile of the project area or are not expected to occur.”

E-60 The commenter requests that the Final IS/MND not consider species that were detected during 2013 and 2014 surveys as “present” because such occurrences are more than four years old. Instead, the commenter requests that these species be considered occurrences, but not an indication of species present.

Identification of species observed during project-specific 2013 and 2014 surveys is consistent with the methodology described on Draft IS/MND page 5.4-17, line 34, through page 5.4-18, line 14. For analytical consistency, and based on biological analysis, these species will remain in the analysis under a “present” occurrence threshold.

E-61 The commenter notes that while the PEA analyzed the potential for special status species to occur within only the Biological Survey Area (BSA), Draft IS/MND pages 5.4-18 through 5.4-19 refer to the potential for species to occur within 1 mile of the proposed project area. The commenter states that because of habitat variation within 1 mile of the proposed project, the increased 1-mile analytical buffer could lead to multiple species with no or low occurrence potentials to be analyzed in the Draft IS/MND, and requests a revision to this methodology to ensure that this does not occur.

The special status species occurrence potentials described on Draft IS/MND pages 5.4-17 through 5.4-18 state that a special status species is only identified as “Present” if it was identified in the BSA during surveys. Special status species that have recently been documented within one mile of proposed project components may have a “High” or “Moderate” occurrence potential, based on nearby habitat suitability. Therefore, special status species recently observed outside of the BSA but within 1 mile of project components have not been identified as “Present” or analyzed as such in the IS/MND. Species with “Low” or

“No” occurrence potential have been identified as such, and were not further analyzed in the Draft IS/MND (see pages 5.4-18 through 5.4-21).

Additionally, while there is indeed substantial potential habitat variation throughout and surrounding the proposed project area, special status species that are fully restricted to habitat types that do not occur within the proposed project area but do occur within 1 mile of the proposed project (such as sandy beaches, open ocean, and the intertidal zone) were not included as part of the analysis. The following revisions have been made to Draft IS/MND page 5.4-18, line 22, and page 5.4-19, line 8, respectively, for clarification.

“Based on the literature and database review described in Section 5.4.1, “Approach to Data Collection,” 51 special status plants have the potential to occur within 1 mile of the project area. Of these 51 species, ~~47~~ 16 are present within the BSA, ~~40~~ nine have a high potential to occur within the BSA and/or within 1 mile of the project area, and 24 have a low or moderate potential to occur within 1 mile of the project area or are not expected to occur. Three of the special status plant species that are present or have a high potential to occur are listed as threatened or endangered by the ESA or CESA. Special status plant species that are fully restricted to habitats and natural communities that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as sandy beaches and the intertidal zone), were not identified as having a potential to occur. Special status plant species present in the BSA or having high potential to occur within 1 mile of the project area are listed in Table 5.4-3. Additional information, including habitat requirements of all special status plant species that could potentially occur within or near the project area, can be found in the Appendix C”

“Based on the literature and database review, 92 special status wildlife species have the potential to occur within 1 mile of the project area. Of these species, 24 are present within the BSA, 23 species have a high potential to occur within the BSA or within 1 mile of the proposed project, and 46 species have no, low, or moderate potential to occur within 1 mile of the proposed project area. Seven species that are present or have a high potential to occur are listed as endangered under the ESA or CESA, and one is a candidate for listing under CESA. Special status wildlife species that are fully restricted to habitats that may occur within 1 mile of the proposed project, but that do not occur within the proposed project area (such as sandy beaches, open ocean, and the intertidal zone) were not identified as having a potential to occur. Special status wildlife species that meet the criteria of “present” or “high potential” are listed in Table 5.4-4. Additional information, including habitat requirements of all special status wildlife species that could potentially occur within or near the project area, can be found in Appendix C.”

- E-62** The commenter requests that the language on Draft IS/MND page 5.4-44, line 33, be revised to better reflect the intent of **MM BR-3: Worker Training Program**. The commenter notes that the Draft IS/MND states that the Worker Environmental Awareness Program (WEAP) should not require all project personnel to fully identify all potential biological resources on site, but rather should appropriately describe such resources to them, as biological resource identification is the

role of the qualified biologist. The commenter notes that this language should be revised throughout the Final IS/MND where appropriate. The following language has been revised on Draft IS/MND page 5.4-44, line 33, and where appropriate throughout the document.

“**MM BR-3** would require that the applicant develop a Worker Environmental Awareness (WEAP) program that would describe to ~~teach~~ all project personnel ~~how to identify~~ the biological resources onsite to prevent incidental impacts from trampling, incidental trimming, or misidentification.”

- E-63** The commenter requests clarification to language on Draft IS/MND page 5.4-44, line 38, and elsewhere throughout the document related to MM BR-5: Natural Community, Protected Tree, and Plant Protection Plan. The requested revision would clarify the intent of the mitigation measure, which is to minimize potential impacts to sensitive species rather than address each species that would experience unavoidable disturbance. To address this request, the following revisions on Draft IS/MND Page 5.4-44, and where appropriate throughout the document:

“**MM BR-5** would require the applicant to develop a Natural Community, Protected Tree, and Plant Protection Plan for ~~each~~ sensitive species. The Plan would provide measures to minimize impacts to sensitive plants that would experience unavoidable disturbance associated with proposed project construction.”

- E-64** The commenter requests that Draft IS/MND page 5.4-49, line 2, be revised with regard to nighttime lighting, because directing nighttime lighting downward could disturb the wandering skipper, which may be present on its host plant, *Distichlis spicata*.

The commenter’s concern that shielding nighttime lighting downward could disturb the wandering skipper, and that nighttime lighting should not be shielded downward, is inconsistent with surveyed biological findings at the site. Nighttime lighting is anticipated for project activities along Via de la Valle. The 2017 Wandering Skipper Report did not identify suitable habitat for wandering skippers at these work areas, but it did identify suitable habitat across the street, approximately 600 feet south of Via de la Valle. If nighttime lighting is not shielded downward, it could disturb wandering skippers within this suitable habitat area. Page 5.4-49, Line 2, of the Draft IS/MND has been revised as follows for clarification:

“**MM BR-7** would require the applicant to minimize nighttime lighting to times required to support worker safety, and to direct lighting that could disturb wandering skipper and western monarch butterfly downward, preventing spill from workspaces into occupied habitat, or into suitable wandering skipper habitat documented south of Via de la Valle. Combined, these measures would reduce impacts on wandering skipper and western monarch butterfly to less than significant.”

- E-65** The commenter requests a modification to language on Draft IS/MND page 5.4-49, line 35, to clarify that dredge or fill within jurisdictional waters is not proposed as part of project activities. The commenter also requests that scope of project-related impacts be clarified to reflect that these

impacts would be temporary and limited to the flattening of existing vegetation. This revision has been made to the text as follows:

“Table 5.4-12 describes the acres of sensitive natural communities, including riparian communities, within proposed project workspaces. Because all project-related biological resource impacts would be temporary and short term, only known and potential acreages associates with these impacts are described. The exact location and acreage of temporary impacts to each natural community cannot be fully determined at this time, because the exact location of the footprint associated with overhead wire-dragging cannot be identified prior to actual wire removal, similarly the footprint area associated with pole felling and helicopter drop zones would be determined in the field based on safety and site conditions. “Potential Temporary Impacts,” therefore, refer to the entire possible footprint (in acres) in which a more limited scope of impact (from activities such as walking, pole felling, etc.) could occur. Impacts to jurisdictional waters, such as those resulting from dredging and filling activities, are not included as part of the proposed project.”

E-66 The commenter asserts that the impacts analysis for CEQA criterion b on Draft IS/MND page 5.18-7 does not adequately justify a “less than significant” impact determination. The commenter notes that the CEQA checklist question relates directly to the construction of new facilities and to the subsequent environmental effects that could result from the construction of such facilities. Therefore, the commenter asserts that because the proposed project would not require the construction of new water or wastewater treatment facilities, the impact determination should be revised to “no impact.”

In addition to pertaining to the need to build new water or wastewater treatment facilities associated with the proposed project, the CEQA significance threshold criterion b for utilities and services systems requires an evaluation of whether or not existing water or wastewater treatment facilities would need to be expanded as a result of the proposed project. The question is directed toward projects or programs that would require new or expanded water or wastewater treatment facilities, the construction of which could cause significant environmental effects. While the proposed project would not directly require the construction or expansion of such facilities, it would generate wastewater that would need to be treated at existing facilities, in addition to current non-project treatment volumes. Therefore, the impact determination under CEQA criterion b in Chapter 5.8, “Utilities and Service Systems” remains “less than significant.” However, for clarification, the following revision has been made to Draft IS/MND page 5.18-7, line 42:

“For these reasons, the proposed project would not result in the need to construct new water or wastewater treatment conveyance or facilities. However, during project construction, the use of portable toilets would temporarily generate a minimal amount of wastewater that would be transported to existing treatment facilities. ~~and the~~ Therefore, project-related impacts to wastewater treatment facilities would be less than significant.”

E-67 The commenter asserts that the impact analysis for CEQA criterion c on Draft IS/MND page 5.18-8 does not adequately justify a “less than significant” impact determination. The commenter notes that the CEQA checklist question relates directly to the construction of new stormwater drainage facilities and subsequent environmental effects that could result from the construction of such facilities. Therefore, the commenter asserts that because the proposed project would not require the construction of new stormwater facilities or the expansion of existing stormwater facilities, the impact determination should be revised to “no impact.”

The proposed project would not interfere with the existing storm drain system, nor would it create a need to construct new stormwater drainage facilities. The 0.01029 acres of new impervious surfaces associated with the proposed project would be the result of the installation of numerous poles, vaults, etc. spanning the entire project alignment and therefore would not present the potential to overwhelm existing stormwater drainage facilities at one location. The impact determination under CEQA criterion c in Chapter 5.18, “Utilities and Service Systems” has been revised to “no impact.” The text on Draft IS/MND page 5.18-8, line 39, has been revised as follows:

“The project components would not increase land use intensities to require the installation of stormwater drainage facilities, and ~~the impact would be less than significant~~ there would be no impacts to existing stormwater drainage facilities, nor would there be a need to construct new stormwater drainage facilities.

Significance: ~~Less than Significant~~ No Impact”

E-68 The commenter states that the Draft IS/MND, page 5.18-9, does not allow an option should the material be considered hazardous. The commenter suggests edits that have been incorporated into the text as shown below, that allow for flexibility should the applicant need to find another appropriate hazardous waste facility.

“This landfill does not accept treated wood unless certain provisions are completed prior to disposal, such as approval from the City of San Diego’s Hazardous Substances Enforcement Team and documentation that the treated wood is not considered hazardous. Should the material be considered hazardous, SDG&E will dispose of the material at another site, consistent with applicable laws/regulations. The impact would be less than significant.”

E-69 Regarding Draft IS/MND page 6-2, the commenter requests that any disputes be resolved with a third-party monitor, if available, at the field level to the extent feasible. The text beginning on Draft IS/MND page 6-2, line 33, has been revised as follows:

“Disputes and complaints should be resolved at the field level to the extent feasible. If disputes and complaints cannot be resolved in the field, they shall be directed to the CPUC-designated Project Manager for resolution.”

E-70 The commenter requests multiple revisions to **MM BR-2**, described on Draft IS/MND page 6-6, including clarifying that the demarcation of work area boundaries would occur prior to use at each individual site rather than marking all work areas at one time. The commenter also requests that **MM BR-2** be refined to allow for secondary containment when refueling in areas less than 50 feet from aquatic resources, because a setback of 50 feet may not always be feasible due to the proximity of some workspaces to existing resources.

Due to the highly sensitive nature of San Dieguito Lagoon and Los Peñasquitos Lagoon, and to maintain consistency with SDG&E's "Best Management Practices Manual for Water Quality Construction," included as Attachment 4-8B of the PEA, which states that, "Fuel storage and fueling areas should be located away from storm drain inlets, drainage systems, watercourses, and water bodies," **MM BR-2** will maintain a minimum 50-foot buffer between aquatic features and equipment fueling areas. The 50-foot setback does not interfere with the potential to fuel vehicles and equipment within staging areas that are located more than 50 feet from these lagoon areas. **MM HAZ-1** has been updated to clarify that if an accidental spill or fluid leak occurs at any time during project construction, including in locations within 50 feet of aquatic resources in unanticipated circumstances such as equipment malfunction, secondary containment strategies may be utilized to contain the spill. Please see the response to Comment E-71 for complete revisions to **MM HAZ-1**.

E-71 Regarding Draft IS/MND page 6-7, the commenter requests that a requirement for project personnel to receive adequate training for safe evacuation be incorporated into the WEAP, and that the worker safety and evacuation training included as part of **MM HAZ-1** in the Draft IS/MND should instead be incorporated into the Worker Training Program required per **MM BR-3**.

Additionally, the commenter asserts that the informational handouts and booklets required per **MM BR-3** and described on Draft IS/MND page 6-7 are not effective because they tend to be disposed of and requests instead that training materials be distributed to crew supervisors, monitors, and the SDG&E Field Construction Administrator, as well as made available in construction trailer(s). The commenter states that training information would be reinforced during tailboard meetings, and requests that **MM BR-3** be revised to reflect this strategy.

The Worker Environmental Training program has been revised to include a safety training module that would explain, among other things, safe evacuation procedures. This module has been incorporated into **MM HAZ-1**, which also reflects other revisions described in the responses to Comment E-70 and Comment E-81. **MM HAZ-1** has been revised as follows:

“MM HAZ-1: Hazardous Materials Waste Management Plan / Emergency Spill and Evacuation Training. Prior to construction, the applicant shall prepare a Hazardous Materials and Waste Management Plan, which shall be implemented during construction to prevent the release of hazardous materials and hazardous waste. The plan shall include the following requirements and procedures:

1. The Worker Training Program (see **MM BR-3**) would include training requirements for construction workers ~~such as~~ in appropriate work practices, ~~including~~ and spill prevention and response measures. Additional training for those performing excavation activities shall be required and shall include training on types of contamination and contaminants (e.g., petroleum hydrocarbons, asbestos, and hazardous materials as defined by the California HSC) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Training would also entail safe evacuation, which could be required due to an unanticipated major spill or other emergencies such as fires and/or natural disasters that could occur within the project area. Training would describe the means by which employees would safely vacate the affected work site and specified, approved evacuation route(s) in case of emergency. This training may be carried out as a stand-alone training module or in conjunction with the training required in **MM BR-3**.

[...] This plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction.”

E-72 Draft IS/MND pages 6-8 through 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**. The commenter requests that **MM BR-5** be revised such that the measure is limited to protected trees. “Protected trees” refer to special status trees that may occur on the site and trees protected under local ordinances. **MM BR-5** has been revised to reflect this. Additionally, references to **MM BR-5** throughout the Draft IS/MND have been updated to ensure that it is referred to consistently as the “Natural Communities, Protected Tree, and Plant Protection Plan.” Furthermore, the acronym used in the Draft IS/MND to refer to this plan (NCTPP) has been removed; it is now referred to as the “Plan,” in the context of the requirements outlined in **MM BR-5**. Additional revisions to **MM BR-5**, as requested in Comments E-73 and E-74, are incorporated into **MM BR-5**, as shown below:

“MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan. Natural Communities, Protected Tree, and Plant Protection Plan. To minimize project-related impacts to natural communities, protected trees, and special status plants, SDG&E shall adhere to the enhancement and restoration components of the NCTPP Natural Communities, Protected Tree, and Plant Protection Plan (Plan), including the Quality Assurance restoration protocols described in Chapter 7.2 Habitat Enhancement Measures. Additionally, prior to construction, the applicant shall ensure that special status plant surveys are conducted during appropriate phenological (blooming) periods within one year prior to

the start of construction to ensure detection. If detected, special status plants shall be flagged for avoidance. All reasonably accessible Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) observed ~~within 50 feet of~~ directly adjacent to, ~~or within, or proximal to~~ proposed work areas and access roads/paths shall be staked, flagged, and/or fenced by a qualified biologist prior to construction. This measure applies to Del Mar manzanita plants that could be inadvertently accessed and impacted by project activities, and does not apply to Del Mar manzanita plants that are difficult to access and that would be unlikely to be reached by construction crews or equipment. Additionally, no fewer than ~~fourteen~~ 30 days prior to the start of construction, the applicant shall develop and submit to the Plan to the CPUC, which shall include, at a minimum, the following:

- A Restoration Strategy, including a long-term monitoring strategy, for each protected tree species and special status plant species that is known to occur within or near (within 50 feet of) proposed work areas, and that therefore could be impacted by proposed project activities. If a single restoration strategy and/or long-term monitoring strategy would be effective for multiple species or groups of species, the discussion may include all applicable species, as appropriate long-term monitoring strategies should ensure successful restoration and recolonization by the intended species.
- Restoration and long-term monitoring plans for natural communities, including aquatic features and ESHAs that may experience project-related impacts.
- A Noxious and Invasive Weed Control Strategy to prevent the colonization of noxious and invasive weeds in areas disturbed by proposed project activities. The strategy shall include a procedure for washing, inspecting, documenting, and approving vehicles and equipment prior to being staged anywhere within the project area.
- Methods of communication between the applicant, the CPUC, and local qualified city arborists to discuss which protected trees, if any, may require trimming before or during project construction, and which protected trees may be subjected to construction activities within 20 feet of the Dripline Area.

Because SDG&E may feasibly encounter unanticipated vegetation during project construction, the NCTPP Plan shall be a live document, which may be updated on an as-needed basis to include appropriate restoration strategies for natural communities, protected trees, and special status plants that are not anticipated 30 days prior to the start of construction, but that may be later observed. If an unanticipated qualifying resource is observed within or near (within 50 feet of) of a work area, SDG&E must avoid the resource and must incorporate appropriate restoration and long-term monitoring strategies for the unanticipated biological resource into the approved NCTPP Plan within ~~fourteen~~ 30 days of initial observation, for review and approval.

E-73 Draft IS/MND pages 6-8 and 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**, which has been revised in the Final IS/MND per the recommendations described in Comment E-72 to the “Natural Communities, Protected Tree, and Plant Protection Plan” (Plan). The commenter notes that **MM BR-1** provides for ongoing surveys (at least 30 days prior to activities), and **MM BR-5** requires additional surveys to document unanticipated impacts;

the findings from these surveys will help guide appropriate restoration strategies in the Natural Community, Protected Tree, and Plan Protection Plan, a live document that may be modified as needed throughout the construction and restoration process. The commenter requests a 30-day period to have adequate time to modify the Plan to include any unanticipated qualifying resources.

Please refer to Comment E-72, which contains the revised **MM BR-5** that incorporates the changes requested in this comment, as well as the changes requested in Comment E-72 and Comment E-74.

E-74 Draft IS/MND pages 6-8 and 6-9 describe **MM BR-5: Natural Community, Tree, and Plant Protection Plan**, which has been revised in this Final IS/MND in accordance with edits described in Comment E-72. The commenter notes that staking trees that are 50 feet away from proposed project work areas draws unnecessary attention to these sensitive resources. In addition, the staking or flagging can easily blow away, creating unnecessary trash that can be difficult to collect. Because construction crews will be limited to approved workspaces, the commenter asserts that the benefit of not staking the trees outweighs the benefit of identifying them.

The requested change simplifies **MM BR-5** to ensure that biological monitors do not need to enter sensitive habitat areas to stake/flag any Del Mar manzanita individuals that are generally inaccessible. This ensures that Del Mar manzanita individuals that are not anticipated to be disturbed by project activities are not inadvertently disturbed by flagging or fencing activities. Please refer to the response to Comment E-72, which contains the revised **MM BR-5** to reflect the changes requested in this comment, as well as the changes requested in Comment E-72 and Comment E-74.”

E-75 Regarding Draft IS/MND page 6-10, the commenter requests a revision to **MM BR-6** to allow on-site avian biologist(s) to determine and delineate appropriate buffer areas for avian species without prior approval from the CPUC. The commenter states that a requirement for CPUC approval would result in “unnecessarily delay to proposed project construction,” and states that a 100-foot minimum buffer distance may be overly protective given the location and type of construction activities, in relation to topography, other sources of disturbances, and barriers protecting nests in the vicinity. **MM BR-6** has been revised as follows:

“MM BR-6: Avian Protection. To minimize impacts to avian species, SDG&E shall adhere to all applicable avian protection measures as described in the NCCP, including applicable Raptor Species protections...”

...~~The nest buffer distances described above~~ Nest buffer distances may be reduced on a case-by-case basis, based on scientific observations and biological reasoning by the avian biologist(s), taking nest sensitivity and proposed project activities into consideration. Vertical nest buffers shall also be established and defined in the Nesting Bird Management Plan where applicable, between helicopter activities and active bird nests.

The applicant shall notify the CPUC, USFWS, and CDFW of nest buffer reductions on a weekly basis. The applicant shall coordinate with the USFWS and CDFW for nest-buffer

reductions to special status species and raptor nests and will provide verification to the CPUC of this coordination when reducing such buffers. Nest buffers for common, non-special-status species shall be reduced per protocols established in the Nesting Bird Management Plan (NBMP). ~~Requests to decrease buffer distances must be submitted to the CPUC for review and approval prior to implementation. Buffer distances may not be reduced to less than 100 feet for special status avian species. All nests with a reduced buffer shall be monitored daily during construction activities until the young have fledged, the nest becomes inactive, or until construction activities have concluded within the buffer area...~~

E-76 In reference to **MM CUL-2**, the commenter states that it is infeasible for a Secretary of the Interior (SOI)-qualified archaeologist to constantly monitor the proposed project's ground-disturbing activities and requests that instead, an archaeological monitor be employed who is overseen by an SOI-qualified archaeologist.

To allow the use of an archaeological monitor under supervision of an SOI-qualified archaeologist per SDG&E's request, and to accommodate additional permitting needs discussed in greater detail in response to Comment A-5, and Native American involvement requests discussed in greater detail in response to Comment D-2, **MM CUL-2** has been revised as follows.

"MM CUL-2: Cultural Resources Monitoring. The applicant shall consult with all interested Native American groups, per the recommendation of the Native American Heritage Commission, prior to project construction. The tribes shall be notified at least 30 days prior to ground-disturbing construction activities and shall be invited to voluntarily observe such activities and offer any recommendations to the project's qualified archaeological monitor.

A CPUC-approved archaeological monitor, overseen by a Secretary of Interior (SOI)-qualified archaeologist, shall monitor ground-disturbing activities in all cultural resource sites of significance identified within project work areas. The requirements for archaeological monitoring shall be noted in construction plans for the proposed project via a Cultural Resources Monitoring Plan, to be submitted to the CPUC for approval no fewer than 30 days prior to the start of project activities. The Cultural Resources Monitoring Plan, at minimum, shall include information regarding the location of project work areas/sites requiring cultural resources monitoring, how monitoring will be conducted, and the respective roles and responsibilities of the CPUC-approved archaeological monitor and the SOI-qualified archaeologist. Responsibilities for the CPUC-approved archaeological~~st~~ monitor shall include cultural resources monitoring and implementing stop-work authority in the event of an unanticipated cultural resources discovery during project activities. Responsibilities for the SOI-qualified archaeologist shall include evaluation of any finds, issuing clearance to recommence project activities after a stop-work order has been installed to protect potential cultural resources, analysis and curation of materials, and preparation of a report detailing the results of monitoring activities ~~results report~~ conforming to the California Office of Historic Preservation Archaeological Resource Management Reports guidelines. The SOI-qualified archaeologist will determine when no further monitoring is required, such as in the event that bedrock or fill material is reached.

Where cultural resources monitoring is needed at project work areas/sites within California State Parks lands, a Permit to Conduct Archaeological Investigations on State Park Lands must be obtained by submitting Form DPR-412A at least four weeks prior to the start of project activities within State Park lands. All requirements of the permit must be fulfilled; documentation associated with the permit will be reviewed and approved by the CPUC Project Manager prior to submittal to the appropriate State Park.”

E-77 The commenter states that on page 6-12 of the Draft IS/MND, the “Location” requirements column for **MM CUL-2** should be clarified in the text to match what is stated in the mitigation measure. This text has been revised as follows:

“~~Entire~~ All cultural resource sites of significance identified within the project area.”

E-78 The commenter states that curation may not always be feasible in the event of landowner disagreement or tribal requests. The commenter requests that text on Draft IS/MND page 6-13 be revised to incorporate additional options in the event that curation is infeasible during construction. This text has been revised as follows:

“**MM CUL-4: Cultural Resource Discovery.** ...For significant cultural resources, a research design and, if needed, a data recovery program would be prepared and carried out to mitigate impacts. All collected cultural remains shall be cleaned, cataloged, and permanently curated at an appropriate institution or repatriated or redeposited in a secure location onsite if curation is infeasible. All artifacts shall be analyzed to identify their function and chronology as they relate to the prehistory or history of the area. Faunal material shall be identified as to species.”

E-79 The commenter requests that the **MM CUL-5** “Monitoring/Reporting Action” column” on Draft IS/MND pages 6-13 through 6-14 be revised to clarify the party responsible for the preparation of the Paleontological Monitoring Plan, which should also include reference to the applicant and/or its contractor(s). The commenter also requested that the revision clarify that the paleontologist is not the party responsible for verifying that the applicant has submitted the report to the CPUC.

“SDG&E and/or its contractors verify that a qualified CPUC approved paleontologist attends preconstruction meetings, and that a Paleontological Monitoring Plan, prepared by ~~Paleontological~~ the applicant and/or its contractor(s) is submitted 30 days prior to the beginning of construction work.

The paleontologist will monitor ~~construction-related~~ ground-disturbing activities in areas with the potential to contain paleontological resources and is authorized to stop work in sensitive areas if paleontological resources are discovered to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact the applicant’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery to determine the significance of the discovered resources. All fossil remains collected during monitoring and salvage will be

cleaned, repaired, sorted, cataloged, and deposited at a scientific institution with permanent paleontological collections.”

E-80 The commenter notes that the final sentence in the **MM CUL-5** “Effectiveness Criteria” column on Draft IS/MND page 6-13 is incomplete and suggests the following edits, which have been incorporated into the Final IS/MND:

“Work is halted if unanticipated fossil remains are discovered and determination is made regarding the significance of the discovery. Fossil remains are then handled in accordance with proper protocols, ~~relating to cleaning, storage, cataloging and...~~”

E-81 A Hazardous Materials and Waste Management Plan is required by existing laws and regulations and is incorporated in to the Project Description by reference, including SDG&E’s Project Design Features and Ordinary Construction Restrictions. The inclusion of this plan should be considered in the baseline for which the impacts are evaluated, and additional mitigation should not be required. It is recommended that the required evacuation training be incorporated into the WEAP training described in **MM BR-3**.

The commenter’s statement that, “The inclusion of this plan should be considered in the baseline for which the impacts are evaluated and additional mitigation should not be required,” is noted. To clarify, “plan” in the context of this mitigation measure and as applied to project activities means a document that includes applicable statutes, laws, and ordinances that regulate hazardous materials handling, use, and disposal for project activities. It could cross-reference measures that SDG&E and/or its contractors would employ to ensure requirements pertaining to hazardous materials use and disposal are carried out. This plan would also name relevant staff responsible for compliance with relevant rules and regulations.

The text of **MM HAZ-1** has been revised to reflect revisions made in response to this comment and response to Comment E-71; see response to Comment E-71 for the revised text.

E-82 The commenter noted that **MM NOI-1**, as written in the Draft IS/MND, could cause conflicts, as it is possible that other agencies would require that certain construction activities occur outside of the permitted hours in the local noise ordinances. Should this occur, SDG&E will meet and confer with the appropriate local agency to obtain relief from these hours. **MM NOI-1** has been revised as follows:

“MM NOI-1: Limit Construction Hours. Hours of operation of all construction equipment shall be limited to the following days and times as permitted by the noise ordinances in each jurisdiction:

- City of San Diego: 7:00 a.m. to 7:00 p.m. Monday through Saturday (no holidays).
- City of Del Mar: 9:00 a.m. to 7:00 p.m. on Saturday and 7:00 a.m. to 7:00 p.m. Monday through Friday (no holidays).

In the event that project scheduling necessitates work outside of the hours permitted under local noise ordinances, SDG&E would meet and confer with the local jurisdictions, as needed, for guidance on scheduling and managing such construction noise in compliance with Article 9.4: Noise Abatement and Control, of the City of San Diego Municipal Code.”

E-83 The commenter requests that **MM NOI-3** be revised to account for whichever threshold is higher (the local ordinance or ambient levels plus 10 A-weighted decibels) and notes that without the requested accommodation, the measure would be too restrictive. As stated on Draft IS/MND page 5.12-21, temporary noise barriers near mobile noise sources would not be feasible to implement. **MM NOI-3** has been revised as follows:

“MM NOI-3: Measures to Reduce Noise Levels. The applicant shall include measures to ensure that the project would not increase ambient noise levels in excess of 10 dBA or to exceed levels specified in the city of San Diego or Del Mar’s noise ordinance, whichever is higher. The measures shall be selected based on the specific equipment used, activity conducted in specific locations, and proximity to sensitive noise receptors and efficacy to reduce, avoid or eliminate sources of project-generated noise in excess of acceptable standards. Specific measures may include:

- Temporarily and safely installing and maintaining absorptive noise control barriers ~~in the perimeter of construction sites and/or~~ between stationary construction equipment and sensitive noise receptors when located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers...”

E-84 Draft IS/MND Appendix C: Master Species Table lists California adolphia (*Adolphia californica*) as having a high potential to occur. This determination is based on an “occurrence 1 mile southeast of Biological Study Area (BSA) in 2008.” The commenter suggests adopting the PEA’s low potential assessment, because this species is easily detectable.

While suitable habitat is present for this species along the project alignment, especially north of Via de la Valle, such habitat is limited. The isolated occurrence 1 mile from the BSA in 2008 is limited enough to decrease the occurrence potential for California adolphia to moderate, which is consistent with the Probability of Occurrence identified in the “2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project” cited in the PEA. This revision has been incorporated into Appendix C, as well as in appropriate locations throughout the Final IS/MND.

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
California Adolphia (<i>Adolphia californica</i>)	--/--, 2B.1, S2	Occurs in Diegan coastal sage scrub communities, chaparral, and valley and foothill grassland, especially in clay-dominant soils from 30-2,400 m. Blooms December – May.	<u>Moderate</u> : There is suitable habitat for this species north of Via De La Valle and throughout upland areas in BSA, <u>though this habitat is limited</u> . This species was most recently detected in 2008 on the south side of

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
			Gonzales Canyon, approximately one mile southeast of the BSA, though was not identified in surveys. The AECOM "2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project" identified California adolphia as having a moderate occurrence potential.

E-85 The commenter requests a revision to IS/MND Appendix C: Master Species Table, which lists golden-spined cereus (*Bergerocactus emoryi*) as having a high potential to occur because three occurrences had been documented 1 mile east of the proposed project between I-5 and Via de la Valle (iNaturalist). The commenter notes that "iNaturalist is an online social network of people sharing biodiversity information to help each other learn about nature," questions whether iNaturalist may serve as a reliable source, and requests that the occurrence potential for this species be considered moderate, as given in the PEA.

The commenter requests that golden-spined cereus (*Bergerocactus emoryi*) not be listed as having a high potential to occur because one referenced observance was documented in iNaturalist, a citizen-science-based application. However, the "2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project," (included in the Biotechnical Report attached to the PEA, and included as Appendix B to the Draft IS/MND), which identifies golden-spined cereus as having a moderate occurrence potential based on survey-specific parameters, states the following about the species: "Suitable habitat present throughout the BSA in upland areas west of I-5. This species is most likely to be found in upland areas of the BSA. The most recent detection for this species was in 1998 in the Torrey Pines State Natural Reserve Extension Area about 0.75 mile southwest of the BSA" (AECOM 2017a).

The occurrence threshold parameters established in the Draft IS/MND, pages 5.4-17 through 5.4-18, indicate that a species is considered to have a high potential to occur if the BSA is within the species' known geographic range, suitable habitat is present, and the species has recently (within the last 20 years) been observed within 1 mile of proposed project components. The golden-spined cereus observation described in the Biotechnical Report meets these parameters.

Draft IS/MND Appendix C: Master Species Table has been updated shown below to incorporate reference to an occurrence described in the 2017 Rare Plant Memo Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project and to remove the existing citation for iNaturalist.

Species	Rare Plant Rank	Habitat Description	Potential to Occur
Golden-spined cereus (<i>Bergerocactus emoryi</i>)	--/--, 2B.2, G2, S2	This species occurs in sandy soils primarily in maritime succulent scrub communities, but occasionally in closed cone coniferous forest, chaparral communities, and coastal scrub communities ranging from 10 to 1,300 feet in elevation. Blooms May–June.	<u>High:</u> As noted in the 2017 AECOM Rare Plant Memo Report, there is suitable habitat for this species within the proposed project area <u>and throughout upland areas of the BSA west of I-5. This species was observed approximately 0.75 miles southwest of the BSA in 1998, within Torrey Pines State Natural Reserve Extension, and there are three documented naturalist occurrence of this species approximately one mile east of the proposed project between I-5 and Via De La Valle.</u>

E-86 Draft IS/MND Appendix C: Master Species Table lists sand-loving wallflower (coast wallflower) (*Erysimum amorphilum*) as present. The PEA had determined this species to have a low potential to occur because plants were not identified correctly during the 2014 surveys. Plants mapped by RECON in 2014 were in fruit during the 2016 fall survey. The seeds of these plants were not winged and thus are more appropriately considered *Erysimum capitatum*. The commenter recommends that the sand-loving wallflower/coast wallflower (*Erysimum ammenophilum*) species should be considered to have a low potential to occur, because the observed plants were misidentified. Revisions have been made to Appendix C, as follows, and to other applicable portions of the Draft IS/MND.

Species	Rare Plant Rank	Habitat Description	Potential to Occur ¹
Sand-loving wallflower (coast wallflower) (<i>Erysimum amorphilum</i>)	--/--, 1B.2, G2, S2, MSCP	This perennial herb occurs in sandy substrate in maritime chaparral and coastal scrub communities below 200 feet in elevation. Blooms February–June.	Present: Approximately 175 individuals of this species were observed during 2014 surveys in coastal sage scrub and Torrey pine forest between Torrey Pines State Natural Reserve and Torrey Pines State Natural Reserve Extension, and within Crest Canyon Park. <u>Low:</u> The approximately 175 individual plants that were observed during 2014 surveys were later determined, based on subsequent surveys during the plant's blooming season, to be sand dune wallflower/western wallflower (<i>Erysimum capitatum</i> var. <i>capitatum</i>). Sand-loving wallflower (coast wallflower) has a low occurrence potential.

E-87 The commenter requests a revision to IS/MND Appendix C: Master Species Table, which lists Burrowing Owl (*Athene cunicularia*) as having a high potential to occur. The PEA had determined Burrowing Owl to be of low occurrence potential because the species has not been

detected in the BSA and the habitat is generally not suitable. Database records show that it has been detected along the Pacific Ocean near bluffs within the Torrey Pines State Natural Reserve Extension area as recently as the winter of 2012 (eBird 2016). The commenter requests that because only wintering habitat is present and the species does not breed in or around the BSA, it should be considered to have a low potential to occur.

Because the documented 2012 Burrowing Owl (*Athene cunicularia*) occurrence fulfills the “High Potential” threshold requirements described on Draft IS/MND pages 5.4-17 through 5.4-18, Burrowing Owl will remain in the Final IS/MND analysis as having a high potential to occur. While nesting Burrowing Owls are not expected in the project area, any observed wintering Burrowing Owls should not be disturbed by project activities and should be avoided when feasible and documented by a biological monitor. If a nest is observed, proper nest buffer protocols would be established per the requirements in **MM BR-6: Avian Protection**.

Species	Status	Habitat Description	Potential to Occur ¹
Birds			
Burrowing Owl (wintering) (<i>Athene cunicularia</i>)	--/--, SSC, BCC, MSCP	Inhabits open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	<i>High:</i> This species is known to occur in San Diego County, and there is a documented eBird occurrence of this species approximately 0.75 miles west of the proposed project site in Torrey Pines State Natural Reserve.

Individuals

Comment Letter F Andrew Kahng

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Saturday, December 15, 2018 2:09 PM
To: Yanez, Silvia A.
Subject: FW: small question regarding TL674A Reconfiguration and TL666D Removal Project

Follow Up Flag: Follow up
Flag Status: Flagged

From: Andrew B. Kahng
Sent: Saturday, December 15, 2018 2:06:30 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: small question regarding TL674A Reconfiguration and TL666D Removal Project

Dear Project Manager --

I am a homeowner at 2695 Mira Montana Place, Del Mar, CA 92014 who recently received the December 6, 2018 "To: Interested Parties" letter from Mr. John E. Forsythe, CPUC Project Manager.

Based on what I understand from the information at <http://www.cpuc.ca.gov/environment/info/ene/delmar/delmar.html> (especially, "Project Location"), it seems that poles near my home will be either removed or topped.

Could you please tell me how the poles adjacent to Mira Montana Place, and extending southward from my home's location, will be dealt with? I.e., which poles will be removed, and which poles will be topped? I am most interested in the ~6 poles immediately to the north of, next to, and south of my home. **F-1**

Thank you very much in advance for your reply and for providing this information.

Best regards,

-- Andrew Kahng
2695 Mira Montana Place
Del Mar, CA 92014
Tel. 858-509-9098

Responses to Comment Letter F
Andrew Kahng

F-1 The commenter requests clarification regarding whether the removal or topping of poles adjacent to Mira Montana Place would occur as part of the proposed project.

As illustrated on the Detailed Project Component Map (Map 7 of 13, Appendix J, Draft IS/MND), seven poles (Poles 67–73) would be removed from service as part of the proposed project.

Comment Letter G Betty Hertel

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Monday, December 10, 2018 10:25 AM
To: Yanez, Silvia A.
Subject: FW: TL674A & TL666D Project

From: Betty Hertel
Sent: Monday, December 10, 2018 10:23:08 AM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Cc: Betty Hertel
Subject: TL674A & TL666D Project

Attn: Silvia Yanez, Project Manager

I have taken hours to decipher the proposed projects and am seeking clarification on whether the existing wires in front of our home will or will not be removed. It is not entirely clear from the information contained in the proposal.

G-1

We reside at 13662 Mango Drive(parcel # 300-384-37-00) and there is an aging electrical pole on the southeast corner section of the property. It is fairly close to KOP 5 Viewpoint shown in the report. Being the manager of this project I am sure you could easily identify this location and know if the existing wires are to be removed or will remain.

G-2

I appreciate your help in identifying the potential impact the project will bring.
Thank you.

Sincerely,
Betty Hertel
bettyhertel@gmail.com
(858) 481-1000

Responses to Comment Letter G
Betty Hertel

G-1 The commenter requests clarification regarding whether existing wires in front of her home would be removed as part of the proposed project.

Appendix J, in the Draft IS/MND contains a series of maps illustrating detailed project components, including the removal of poles and 69 kV overhead wiring.

G-2 The commenter states that an aging electrical pole is situated near key observation point (KOP) #5 in the Draft IS/MND, and inquires whether this pole and wires would be removed as part of the proposed project.

See response to G-1 above. As illustrated in the Detailed Project Component Maps (Maps 6 and 7 of 13, Appendix J, Draft IS/MND), two poles (Poles 65 and 66) would be topped and seven poles (Poles 67–73) and the 69 kV overhead line would be removed from service as part of the proposed project.

Comment Letter H Kevin Patrick

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Friday, December 7, 2018 9:33 AM
To: Yanez, Silvia A.
Subject: FW: TL674A Comment
Attachments: Map 8 TL674A.png

Follow Up Flag: Follow up
Flag Status: Flagged

From: kevin patrick
Sent: Friday, December 07, 2018 9:30:36 AM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A Comment

Dear Ms. Yanez:

I am writing about this project, and specifically with a question about what is included in Map 8 of the materials that describe it. My property at 12963 Via Latina, Del Mar, Ca, (and a second lot that I own behind that address) directly abuts the power lines and poles that will be removed.

I have attached the Map 8 of that area and note that on that map an "Existing Footpath" or "Existing Footpath/ATV Access" is shown with blue dots going from Via Latina to the base of pole 77.

I have owned and lived on this property since 1988 and can assure you that there is NOT an Existing Footpath or ATV access to the area where that pole is located. The blue dots are on a very steep hillside and sandstone bluff that goes up behind my house.

H-1

I just wanted to make sure that you were aware of this if for some reason the project engineers were counting on access to that poll via that "path" as it does not exist. Long Boat Way and Long Boat Cove roads would be the logical access.

I would appreciate it if you would acknowledge receipt of this note.

H-2

Thanks,

Kevin Patrick
12963 Via Latina
Del Mar, Ca
858.663.0531

Responses to Comment Letter H
Kevin Patrick

H-1 The commenter indicates that the “Existing Footpath” or “Existing Footpath/ATV Access” from Via Latina to the base of Pole 77, as shown in Map 8 of 13, Appendix J, Draft IS/MND, does not exist.

As outlined in the Draft IS/MND Chapter 4.0, “Project Description,” page 4-30, “the various road types are intended to allow construction crews and their equipment access to pole locations where removal or topping work is planned. SDG&E may determine that smoothing or refreshing of access road surfaces and/or vegetation clearance along access ways may be necessary to ensure safe conveyance prior to use.”

The Draft IS/MND (Table 4-7 on page 4-31) states that “Existing ATV Roads” may necessitate vegetation clearing/removal, in contrast to “Existing Footpaths” which are not likely to require preparation work or restoration because existing footpaths are mostly grassy and relatively flat areas.

The applicant confirms it would utilize the “Existing Footpath/ATV Access” to remove Pole 77 and 69 kV overhead wiring. The applicant acknowledges that some vegetation clearance and removal for access may be required, consistent with the characterization of Existing ATV Roads in the Draft IS/MND.

H-2 The commenter requests that the CPUC acknowledge receipt of these comments.

The CPUC acknowledges receipt of this comment.

Comment Letter I
Maali Mohsen

Yanez, Silvia A.

From: CPUC TL674A & TL666D
Sent: Wednesday, December 26, 2018 2:39 PM
To: Yanez, Silvia A.
Subject: FW: TL674A and TL666D
Attachments: Scan 2018-12-26 13.53.57.pdf; Scan 2018-12-26 13.57.15.pdf

From: Mohsen Maali
Sent: Wednesday, December 26, 2018 2:37:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: CPUC TL674A & TL666D
Subject: TL674A and TL666D

Hi;

It appears that SDG&E is removing the 69 kv from overhead but not the 12 kv lines from the bridge toward Jimmy Durante Blvd. Why if they are moving the 69 kv underground, don't they do the 12 kv, too?

I-1

Thanks

Responses to Comment Letter I
Maali Mohsen

I-1 The commenter inquired if existing 12 kV lines from the bridge toward Jimmy Durante Boulevard would be removed.

As illustrated in the Detailed Project Component Map, Map 3 of 13, in Appendix J of the Draft IS/MND, the 69 kV overhead line would be removed from service and the 12 kV overhead line would be retained.

References

- AECOM. 2017a. Rare Plant Memo Report for the SDG&E Company TL674A Reconfiguration & TL666D Removal Project.
- AECOM. 2017b. Biological Technical Report for the San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project.
- eBird. 2018. An Online Database of Bird Distribution and Abundance. Ithaca, New York. <http://www.ebird.org> . Accessed January 5, 2018.
- Cal Parks. 1984. San Diego Coastal State Park System General Plan. Volume B: Torrey Pines State Beach and State Reserve. https://www.parks.ca.gov/pages/21299/files/ar_630_1569.pdf . Accessed February 15, 2019.
- Foglia, Shannon, Theodore G. Cooley, and Monica Mello. 2017. Cultural Resources Survey Report for the Proposed San Diego Gas & Electric Company TL674A Reconfiguration & TL666D Removal Project, San Diego County, California. Prepared for San Diego Gas & Electric Company. August.