

3.0 Response to Comments

3.1 Introduction

This chapter documents the comments on the Draft Environmental Impact Report (Draft EIR) and Recirculated Draft EIR that were submitted by agencies, organizations, individuals during the respective public review periods for the South Orange County Reliability Enhancement Project (proposed project). Comments could be submitted by letter, fax, email, or verbally at the public meetings for the Draft EIR. A list of all commenters is provided in Section 3.2. All of the comments received and the responses to those comments are presented in Section 3.3. A total of 353 comments were received during the Draft and Recirculated Draft public comment periods.

3.2 List of Comment Letters Received

The comment letters received on the Draft EIR and Recirculated Draft EIR were organized by government agencies, organizations, and individuals. Table 3-1 details the government agencies that commented on the Draft EIR and Recirculated Draft EIR. Table 3-2 details the non-government organizations that commented on the Draft EIR and Recirculated Draft EIR. Table 3-3 details the individuals that commented on the Draft EIR and Recirculated Draft EIR.

Table 3-1 Comments Received on the Draft EIR and Recirculated Draft EIR from Federal, State, and Local Government Agencies

Last Name	First Name	Title	Draft EIR Comment #	Recirculated Draft EIR Comment #
Federal				
United States Fish and Wildlife Service				
Goebel	Karen	Assistant Field Supervisor	260	-
Gower	Patrick	Fish and Wildlife Biologist	91	-
State				
California Legislature				
Bates	Patricia	Senator (Thirty-Sixth Senate District)	-	329
Brough	William	Assembly Member	212	343
Wagner	Donald	Assembly Member	51	-
California Public Utilities Commission				
Como	Joseph	Acting Director	-	340
Mee	Charles	Senior Utilities Engineer-Specialist	-	323
Pinjuv	Jordan	Counsel	-	345
California State Board of Equalization				
Harkey	Diane	Board Member	34	-
Department of Transportation				
Carver	Leila	Assoc. Transportation Planner	-	334
El Harake	Maureen	Branch Chief	58	-

Table 3-1 Comments Received on the Draft EIR and Recirculated Draft EIR from Federal, State, and Local Government Agencies

Last Name	First Name	Title	Draft EIR Comment #	Recirculated Draft EIR Comment #
Local				
Capistrano Unified School District				
Caster	Ryan	Representative	303	-
Forney	John	Capistrano Unified School District	44	
Hampton	Clark	Deputy Superintendent, Business Support Services	11	-
City of Aliso Viejo				
Chun	Ross	City Councilmember	38, 306	-
Munzing	Mike	City Councilman and Mayor Pro Tem	284	-
Phillips	William	Mayor	14	-
City of Dana Point				
Olvera	Carlos	Mayor	77	-
City of Laguna Hills				
Gilbert	Dore	Mayor	210	-
City of Laguna Niguel				
McCloskey	Jerry	Mayor	103	-
City of Mission Viejo				
Hamm	Chris	Mayor	83	-
Raths	Greg	Mayor Pro Tem	86, 215,301	-
Reardon	Rhonda	Former Mayor	271	-
Schlicht	Cathy	Mayor	97	-
Wood	Lynn	CEO (Chamber of Commerce)	192	-
City of San Clemente				
Pechous	James	City Planner	-	337
City of San Juan Capistrano				
View	Charles	Development Services Director	6, 307, 308	-
County of Orange				
Arnau	John	OC Waste and Recycling	4	
Bartlett	Lisa	Supervisor (Orange County Board of Supervisors)	23	330
Broming	Richard	Senior Vice President (Orange County Board of Supervisors)	80	320
Burnett	Betty	General Manager (South Orange County Wastewater Authority)	53	-
Cao	Victor	Representing Lisa Bartlett (Orange County Board of Supervisors)	264	-
Tieu	David	Senior Civil Engineer (OC Waste and Recycling)	5	-
Wright	Dylan	Director (OC Waste and Recycling)	88	-

Table 3-1 Comments Received on the Draft EIR and Recirculated Draft EIR from Federal, State, and Local Government Agencies

Last Name	First Name	Title	Draft EIR Comment #	Recirculated Draft EIR Comment #
Ladera Ranch Civic Council				
McCormick	Jett	Chairman	96	-
Metrolink - Southern California Regional Rail Authority				
Mathieu	Ron	Sr. Public Projects Specialist	85	-
Moulton Niguel Water District				
Lopez	Joone	General Manager	209	352
Serna	Marc	Director of Engineering	296	-
Municipal Water District of Orange County				
Baez	Heather	Government Affairs Manager	263	-
Hunter	Robert	General Manager	12	-
Saddleback College				
Ozurovich	John	Senior Director of Facilities	30, 273	-
Santa Margarita Water District				
Ferons	Daniel	General Manager	32	-
Leach	Jim	Director of External Affairs	262	-
South Coast Air Quality Management District				
Wong	Jilian	Program Supervisor	-	341, 342
South Coast Water District				
Rayfield	Wayne	President	188	-

Table 3-2 Comments Received on the Draft EIR and Recirculated Draft EIR from NGO and Non-profit Organization Personnel

Last Name	First Name	Title	Draft EIR Comment #	Recirculated Draft EIR Comment #
Anderson	Joe	Citizens for Safe and Reliable Power	206, 276	-
Armstrong	Jeanne	Goodin, MacBride, Squeri, & Day, LLP	102	-
Ayer	Jacqueline	FRONTLINES	318	328
Balsamo	Mike	Building Industry Association of Southern California, Inc.	28	-
Bodenhamer	Mark	San Juan Capistrano Chamber of Commerce	24	-
Brown	Wayne	South Orange County Economic Coalition	207, 317	-
Brown	Garry	Orange County Coastkeeper and Inland Empire Waterkeeper	265	-
Burhenn	Thomas	Southern California Edison Company (Regulatory Affairs)	-	336
Burke	Mike	San Clemente Chamber of Commerce	268	-
Caveche	Carolyn	Orange County Taxpayers Association	293	-
Eisenberg	Laura	The Reserve at Rancho Mission Viejo	92	-
Erkneff	Rick	Surfrider Foundation	267	-

Table 3-2 Comments Received on the Draft EIR and Recirculated Draft EIR from NGO and Non-profit Organization Personnel

Last Name	First Name	Title	Draft EIR Comment #	Recirculated Draft EIR Comment #
Fisher	Dick	Aliso Viejo Chamber of Commerce	214, 274	-
Fisher	Heidi	Laguna Niguel Chamber of Commerce	7, 184	-
Geier	David	San Diego Gas and Electric (Vice President)	98, 258, 259	346, 347
Hickey	Joe	South OC Business Community	316	-
Lamotte	Steve	Building Industry Association of Orange County	270	-
Newman	Debbie	Laguna Niguel Chamber of Commerce	266	325
Penrose	Lou	Apartment Association of Orange County	208	-
Schaffner	Shawna	CAA Planning	90, 280	-
Scognamiglio	Enzo	Dana Point Chamber of Commerce	203, 282	-
Starr	Bryan	Orange County Business Council	31, 309	-
Stefanides	Dave	Orange County Association of Realtors	105	-
Struthers	Tonny	Saddleback Memorial Medical Center	204, 275	353
Thomas	Larry	San Juan Capistrano Chamber of Commerce	261	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Agoni	A (illegible)	227	-
Aguilar	Hector and Lauren	-	331
Aguire	Tito	223	-
Alarcon	Michael	15	-
Alexade	Patty	225	-
Allen	Carole	179	-
Apodaca	Beth	39, 294	-
Aschel	Linda	157	-
Atkinson	David	40	-
Banks	Maria Elena	89, 219	-
Barnum	Kathy	41	-
Beal	Bruce	66	-
Beas	Ricardo	16, 290	-
Beeman	Brian	17, 288	-
Bentall	Dominic	311	-
Beveridge	Edward	126	-
Bialek	Susan	180	-
Bieber	Jim	269	-
Bishop	Dennis	134	-
Bock	Vern	107	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Boden	Jeff	300	-
Bott	Jeffery	182	-
Boudreau	Alan	67	-
Bridge	Gary	131	-
Brown	Robert	183	-
Bucknum	Wendy	70, 279	-
Burnett	Barry	173	-
Burnett	Tod	18	-
Byrnes	Ilse	295	-
Cadotte	Chris	71	-
Cadotte	Jackie	72	-
Campbell	Gail and Bill	229	-
Card	Les	42, 73	-
Carter	James	74, 75	-
Cerchio	Gina	152	-
Chiose	Daniel	138	-
Chong	Kim	-	321
Coleman	Tari	106	-
Conte	Mike	9	-
D.	M.	235	-
Dahl	Jim	29, 281	-
Diaz	Amelia	253	-
Diaz	Antero	250	-
Diaz	Esmerelda	254	-
DiCandia	Carla	1	-
Ditty	Marilyn	19, 81	-
Divel	Reeca	193	-
Dow	Sandy	128	-
Dugan	J.	234	-
Dutchik	Arlene	130	-
Duzich Rohde	Angela	230	-
Ewing	William	246	-
Faubel	Roger	68	-
Faulkner	Lanette	304	-
Ferguson- Babcock	Candy	162	-
Finney	Michael	245	-
Flores	Arlen	248	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Flores	Domingo	252	-
Franks	Carolyn	305	-
French	Nancy	43	-
Frisch	Stephanie	59	-
Fusco	Joe & Dawn	10, 211	-
Gaughan	Mark	54, 82	-
Gerrald-Jones	Debra	170	-
Gibson	Charles	33	326
Gila	Jones	-	344
Girod	Vivian	129	-
Godfrey	Chris	147	-
Goldfarb	Bruce	151	-
Goodwin	Bill	125, 175	-
Graeber	Cam	144	-
Gray	Natalie	123, 171	-
Greystock	Steve	45	-
Groos	Eric	93	-
Hangen	Ledeem	158	-
Hannifan	Jerry	111	-
Hansen	Bonnie	142	-
Hansen	Maurice	141	-
Hazard	Reed	110	-
Hendry	Mark	176	-
Hernandez	Norma	185, 249	-
Hernandez	Ric	117	-
Hildabrand	Gary	69	-
Holmes	Cindy	241	-
Host	Joshua	299	-
Hovey	Leslie	-	332
Hunt	Nancy	169, 195, 277	-
Illegible	Lara	240	-
Illegible 1	Illegible	139	-
Illegible 2	Illegible	140	-
Illegible 3	Illegible	155	-
Illegible 4	Illegible	156	-
Illegible 5	Illegible	165	-
Illegible 6	Illegible	186	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Illegible 7	Illegible	217	-
Illegible 8	Illegible	224	-
Illegible 9	Illegible	231	-
Illegible 10	Illegible	232	-
Illegible 11	Illegible	174	-
Inman	Karen	94	-
J.	D.	161	-
Jackson	Alan	256	-
Janis	Vickie	153	-
Johnson	Jessica	121	-
Johnson	Memit	199	-
Jorgensen	Sam	112	-
Kampp	Gigi	132	-
Keena	Kate	21	-
Keller	Kam	114	-
Kim	Illegible	221	-
Kindred	Don	243	-
Kindred	Shelly	244	-
Koffs	David	145	-
Kohan	Rhen	13, 285, 286	333
Kohler	Deborah	127	-
Kramer	Lawrence	84	-
Krause	Frank	222	-
Kutnick	Erin	36	-
Larkin-Reed	Heidi	37	-
Larson	Nipper	137	-
Lenkoski	Peter	-	351
Lewis	Erin	247	-
Lhummedieu	William	251	-
Lubert	Randy	302	-
Maisen	Theresa	76	-
Maney	Romona	120	-
Mantander	Doug	148	-
Mantander	Janet	149	-
Martinez	Ana	135	-
Mason	Breanne	146	-
McCann	Michael	60	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
McCauley	Patricia	95	-
McCurry	Pam	133	-
McGrorty	Kathleen	196	-
Mckevitt	Sean	-	349
Mclaughlin	Nora	159	-
Medina	Ben	181	-
Medina	Rachel	238	-
Medina	Tony	239	-
Mendez	Araceli	257	-
Menge	Jim	154	-
Minor	Judy	150	-
Molina	Edwardo	164	-
Montandon	Doug and Janet	122	-
Montes	Maria	237	-
Moore	Donna	187	-
Morceles	Elizabeth	226	-
Neitzke	Jay and Thia	-	350
Nelson	Lisa	218	-
Nelson	Tommy	297	-
Nevin	Shawn	116	-
Newcomer	Michelle	2	-
Oborne	Stacey	3	-
O'Brian	James	313	-
Okamoto	Jeffrey	56	-
Page	Jamie	166	-
Patterson	Pam	314, 315	-
Pearce	Laer	46, 278	-
Pellareo	Linda	236	-
Perez	Jon	136	-
Petersen	Kathleen	35, 291	319, 335
Pictor	Danika	178	-
Porter	Jamie	200	-
Pride	Joseph	-	322
Putnam	Maxine	177	-
R.	D.	228	-
Rabalais	Lois	213	339
Relis	Fausto	108	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Riggs	Maureen	115	-
Roberts	Paul	87	-
Roberts	Ted	8	-
Robertson	David	47	-
Rodriguez	Al	109	-
Ronan	Ann	216, 312	-
Rottmann	Mark	61	-
S.	Kim	233	-
S.	Robert	163	-
Sanderson	Carey	48	-
Sanderson	Lou	62	-
Sanford	David	205	-
Segal	Mario	189	-
Shields	Eric	63	-
Shields	Greg	220	-
Shipley	Christel	242	-
Smith	Dianne	201	-
Smith	Scott	-	338
Snider	Mark	197	-
Somji	Mohamed	64	-
Stanley	Curt	99, 272	-
Stein	Richard	25, 298	-
Stocks	Elizabeth	78	-
Suits	Tammy	-	327
Sutton	James	113	-
Suydam	Michael	49	-
Talley	Vickie	26	-
Tayenaka	Rita	50, 310	-
Taylor	Nancy	104	-
Treff	Cary	57	-
Vance	Peggy	255	-
Vandermost	Julie	20, 287	-
Vandorpe	Tom	79	-
Varner	Donna	27, 283	-
Vega	Auri	172	-
Vollebregt	Jake	100	-
Volzke	Jonathan	101, 289	-

Table 3-3 Comments Received on the Draft EIR and Recirculated Draft EIR from Individuals

Last Name	First Name	Draft EIR Comment #	Recirculated Draft EIR Comment #
Wall	Dianne	124	-
Ware	Charles	52	-
Wark	Carolyn	118	-
Wark	Gary	167	-
Welch	Victoria	55	-
White	Donna	65	-
Whitelock	Judy	190	-
Whitelock	Paul	191	-
Williamson	Fran	160	-
Winsor	Kelly	202	-
Winstead	Stephanie	198	-
Winterswyk	Alisha	-	348
Woodfill	Peter	22, 292	324
Wootan	Casey	119, 168	-
Zuniga	Mayra	143	-

3.3 Responses to Comments

This section presents responses to issues raised in comments received on the Draft EIR and Recirculated Draft EIR during the review period related to environmental effects of the proposed project. The California Environmental Quality Act (CEQA) Guidelines indicate that a Final EIR should address comments on the Draft EIR. Comments that state opinions about the overall merit of the proposed project are included in the California Public Utilities Commission’s (CPUC’s) public record and will be taken into account by decision-makers (the CPUC Commission) when they consider the proposed project, but are generally not responded to unless a specific environmental issue is also raised.

Each letter received is reproduced here in its entirety. Responses are identified based on the system described above and are provided for each comment; the comment numbers are shown within each letter. Changes to the Draft EIR are referenced in the response and shown in Exhibit 1. Added text is underlined and deleted text is stricken.

Master Responses to Comments

Master responses in this section address general subjects not necessarily related to a specific section of the EIR, and in some cases address a number of interrelated topics discussed in various sections of the EIR. Master responses include:

- **Master Response A:** Significant Impacts
- **Master Response B:** Former Utility Structure
- **Master Response C:** Environmentally Superior Alternative
- **Master Response D:** Adequacy of Alternatives

- **Master Response E:** Electric and Magnetic Fields
- **Master Response F:** Recirculation of the Draft EIR

Master Response A: Significant Impacts¹

An impact, as defined under CEQA, includes direct and indirect effects that are caused by a project and are related to a physical change (CEQA Guidelines Section 15358). The CPUC used Appendix G of the CEQA Guidelines as the criteria for assessing the proposed project's impacts. The CPUC also identified and used applicable thresholds of significance in the environmental analyses to determine if impacts under each criterion would be significant. All feasible mitigation measures were applied to impacts that were determined significant. Implementation of these mitigation measures often reduced the impacts of the proposed project to below the threshold of significant level (less than significant). In some instances, the application of all feasible mitigation measures to a significant impact would not reduce the significant impact to less than significant. Impacts under these criteria were labeled "significant."

The CPUC has authority to approve a proposed project despite significant impacts (Public Resource Code [PRC] Section 21083; CEQA Guidelines Section 15043); however, the CPUC would need to prepare a Statement of Overriding Considerations, which provides an explanation of the economic, legal, social, technological, or other benefits that would outweigh the unavoidable environmental risks (PRC Section 21083; CEQA Guidelines Section 15093).

Draft EIR

Chapter 4, "Environmental Analysis," of the Draft EIR included analyses of the impacts of the proposed project on the environmental resources identified by CEQA. The environmental and regulatory setting, methodology and significant criteria, and environmental analysis were provided for each resource. The CPUC incorporated mitigation measures that would feasibly reduce impacts found to be significant even if the measures would not reduce the impact to a less than significant level.

The Draft EIR identified three resources that would have significant and unavoidable impacts, including air quality, transportation and traffic, and cumulative impacts. Significant and unavoidable impacts identified in the Draft EIR would be short-term and only occur during construction of the proposed project. Section 6.6, "Significant and Unavoidable Adverse Impacts," of the Draft EIR provided a summary of the specific significant impacts, stating:

Construction of the proposed project would result in significant impacts on air quality, transportation and traffic, and cumulative impacts. As further discussed in Section 4.3, "Air Quality," impacts on air quality standards, cumulatively considerable net increase in criteria pollutants, and exposure of sensitive receptors to pollutant concentrations would be significant and unavoidable during construction after the implementation of all feasible mitigation. The proposed project would result in maximum daily construction emissions of ROG, PM10, and PM2.5 that would exceed SCAQMD regional significance thresholds. Additionally, the proposed project would result in emissions of PM10 and PM2.5 during various substation and transmission line construction phases that are above the SCAQMD's local significance thresholds. The SCAQMD is currently in nonattainment for ozone, PM10, and PM2.5. Therefore, the proposed project's ozone, PM10, and PM2.5 emissions would result in a cumulatively significant impact on ambient air quality during construction activities.

¹ La traducción al español de esta Respuesta Principal se encuentra en el Apéndice T.

As further discussed in Section 4.15, "Transportation and Traffic," temporary impacts from generated project traffic along Camino Capistrano in the City of San Juan Capistrano during partial road closures would result in an unacceptable LOS. Additionally, full road closures along Camino Capistrano, Via Pamplona, and Calle San Diego in the City of San Juan Capistrano would be significant and unavoidable during construction after the implementation of all feasible mitigation.

As discussed above in Section 6.4.15, the proposed project would significantly contribute to a cumulative traffic impact along Camino Capistrano in the City of San Juan Capistrano during partial road closures (Table 6-4).

Recirculated Draft EIR

As a result of additional information obtained after the public release of the Draft EIR, the CPUC decided to prepare and release a Recirculated Draft EIR in accordance with CEQA Guidelines Section 15088.5. The Recirculated Draft EIR's Chapter 2, "Revisions to the Draft EIR," reanalyzed impacts from the proposed project for three resources (i.e., biological resources, cultural resources, and land use). The Recirculated Draft EIR identified that significant and unavoidable impacts would occur on these three resources. The significant and unavoidable impacts identified in the Recirculated Draft EIR would be short- and long-term and occur during construction and operation of the proposed project.

Biological Resources. During the public review process, the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) determined that a portion of the new right-of-way (ROW) required under San Diego Gas & Electric Company's (SDG&E's, or the applicant's) proposed project would cross land within the boundaries of the Talega Conservation Easement (unrecorded) and that impacts associated with project construction may occur within the Prima Deshecha Landfill Conservation Easement (recorded) that are outside of the applicant's existing ROW. Establishing new ROW in the Talega Conservation Easement and ground-disturbing activities occurring outside of the applicant's existing ROW and within the Prima Deshecha Landfill Conservation Easement (recorded) were not disclosed in the Draft EIR, and potential impacts were not evaluated. Both conservation easements were established in association with the Orange County Southern Subregion Habitat Conservation Plan (HCP). The proposed project may conflict with two conservation easements established within the Orange County Southern Subregion HCP and considered preserve areas under the SDG&E Natural Community Conservation Plan (NCCP)/HCP. The two conservation easements in question are the Talega Conservation Easement (unrecorded) and the Prima Deshecha Landfill Conservation Easement (recorded). Based on recent discussions with the USFWS, establishing new ROW or impacting areas outside of the applicant's existing ROW and within the boundaries of the conservation easement(s) would conflict with both conservation easements, resulting in a significant impact.

Cultural Resources. After release of the Draft EIR, the State Historic Resources Commission voted unanimously in favor of recommending the 1918-constructed building that fronts Camino Capistrano on the Capistrano Substation property, known as "the former utility structure" (historic site 30-179873), eligible for listing in the National Register of Historic Places (NRHP). The recommendation was forwarded to the Keeper of the NRHP on July 17, 2015. The nomination of the structure for listing in the NRHP changes the baseline condition of the Cultural Resources evaluation. Because the former utility structure's eligibility for listing in the NRHP has not yet been determined, it is assumed for the purposes of this analysis that the structure will be determined to be eligible for listing in the NRHP. Therefore,

construction and operation of the proposed project would have a significant impact on a historical resource.

Land Use. During the public comment period on the Draft EIR, the City of San Juan Capistrano filed a comment letter that, among other things, identified that the applicant's proposal exceeded the City's building height restrictions in the Commercial Manufacturing District zone. Section 9-3.305 of the San Juan Capistrano Municipal Code limits the height of buildings in the Commercial Manufacturing District to 35 feet. Therefore, the proposed San Juan Capistrano Substation, which includes the construction of 50-foot-tall buildings, would conflict with applicable building height limits under the San Juan Capistrano Municipal Code. The regulatory setting and impact analysis portions of Section 4.10 have been updated with this information.

Final EIR

The Final EIR includes revisions based on comments received during public comment periods for the Draft EIR and Recirculated Draft EIR (see Exhibit 1). Chapter 4, "Environmental Analysis," of the EIR identifies that the proposed project would result in significant and unavoidable impacts on air quality and cultural resources. These significant impacts would be short- and long-term impacts and would occur during construction and operation.

Significant impacts on transportation and traffic, biological resources, land use, and cumulative impacts on transportation and traffic have been reduced to less than significant or less than significant with mitigation as further discussed below.

Transportation and Traffic/Cumulative Impacts on Transportation and Traffic. The applicant submitted minor project design refinements (Comment Letter 98) during the public comment period for the Draft EIR. The minor project design refinements included a drafted traffic control plan, which would maintain three lanes of travel along Camino Capistrano during construction and avoid partial or full road closures along Camino Capistrano. Additionally, the drafted traffic control plan included revisions to the proposed project that would avoid full road closures along Via Pamplona and Calle San Diego and provided additional details on the partial closures of these roads.

The traffic analysis was conducted again, incorporating information from the drafted traffic control plan. A Revised Traffic Memorandum, prepared by the traffic engineering firm Linscott, Law, and Greenspan Engineers, is provided in Appendix Q. The Revised Traffic Memorandum shows that the impacts to roadway Level of Service (LOS) levels would no longer exceed the established threshold of significance. Table 4.15-5 in the Draft EIR (Exhibit 1) has been revised in the Final EIR to show that the LOS threshold would not be exceeded along Camino Capistrano.

Section 4.15.3.3 of the Draft EIR (Exhibit 1) has been revised in the Final EIR to incorporate findings from the Revised Traffic Memorandum. Impacts on Transportation and Traffic have been revised to less than significant with mitigation.

Similarly, the minor project design refinements, which would maintain three lanes of travel along Camino Capistrano during construction and avoid partial or full road closures along Camino Capistrano, had a similar impact on cumulative impacts on traffic and transportation. The cumulative traffic analysis was conducted again, incorporating information from the drafted traffic control plan. The Revised Traffic Memorandum shows that the impacts to roadway LOS levels would no longer exceed the established threshold of significance (Appendix Q). Table 6-4 in the Draft EIR has been revised in the Final EIR to

show that the LOS threshold would not be exceeded along Camino Capistrano. Additionally, text revisions have been made to Section 6.4.15 of the Draft EIR (Exhibit 1) to remove significant cumulative impacts on transportation.

Biological Resources. Since the release of the Recirculated Draft EIR, the CPUC has decided that determining the applicant's ability to obtain new ROWs within the Talega Conservation Easement (unrecorded) and the Prima Deshecha Landfill Conservation Easement (recorded) are beyond of the scope of this CEQA document. It is assumed, as it is for all new ROWs, that it is feasible for the applicant to obtain ROW along their proposed route. Therefore, the significant impact that was identified in the Recirculated Draft EIR as a result of the unknown outcome for the new ROW in the conservation area is no longer applicable.

The significant impact that was identified in the Recirculated Draft EIR as a result of noncompliance with the SDG&E NCCP/HCP has been reduced to less than significant with mitigation. Mitigation Measure (MM) BIO-10 has been revised to require the applicant to put together a Mitigation Plan detailing how they intend to consult with and record the completion of their consultation with USFWS and CDFW as required under SDG&E NCCP/HCP.

Additionally, the CPUC has decided since the release of the Draft EIR that coordination with all landowners and conservation easement holders is not necessary in order to avoid conflicts with SDG&E NCCP/HCP. Coordination with USFWS and CDFW, which are implementing agencies for the SDG&E NCCP/HCP, would be sufficient to avoid conflicts with the SDG&E NCCP/HCP and other NCCPs and HCPs.

The following revisions have been made to the discussion under Impact BR-6 in Section 4.4.3.3 of the EIR (Exhibit 1):

All proposed project components would be constructed within the plan area of the SDG&E Subregional NCCP/HCP, as well as the Orange County Southern Subregion HCP (Figure 4.4-3). The SDG&E Subregional NCCP/HCP states that it is independent of other NCCPs or HCPs; therefore, it is neither dependent upon the implementation of other NCCPs or HCPs, nor is it superseded by other plans. However, the SDG&E Subregional NCCP/HCP also states that it takes the objectives of other HCPs and NCCPs in the area "into consideration," and the SDG&E Subregional NCCP/HCP implementation would include coordination with other HCPs and NCCPs (SDG&E 1995a). The proposed project is considered a covered action under the SDG&E Subregional NCCP/HCP (Ponce pers. comm. 2013).

Under the SDG&E Subregional NCCP/HCP, certain areas containing habitat for Covered Species are considered preserve areas; specified mitigation activities and ratios are required for impacts on a preserve area. Preserve areas include existing reserve or conservation areas established by regional planning documents (e.g., HCPs); state, federal, and local preserve areas; and public or private areas set aside for the long-term protection of plants and wildlife (SDG&E 1995a, b). The SDG&E Subregional NCCP/HCP requires areas not defined as a preserve by an existing planning document will be subject to review by a qualified biologist to determine whether they consist of moderate, high, and very high quality habitat. These areas will be treated like a preserve and will be subject to the same mitigation as preserve areas. The proposed project would cross areas covered by the Orange County HCP that have been or are in the process of being designated as preservation areas, including the City of San Juan Capistrano open space; a Conservation Easement at Orange County's Prima Deshecha Landfill; City of San

Clemente open space, including a yet-to-be recorded Conservation Easement in the Talega Development; and San Onofre State Beach (see Section 4.4.1.7). Coordination with USFWS and CDFW is necessary to ensure that the proposed project is consistent with provisions of SDG&E Subregional NCCP/HCP that require these preserve areas to be mitigated appropriately, the lack of which could result in a significant conflict.

Section 6.2.1 of the SDG&E Subregional NCCP/HCP provides a consultation process with the USFWS and CDFW that SDG&E would follow for the proposed project when proposed new transmission facilities would occur in a preserve area. The process specifies that SDG&E shall provide the USFWS and CDFW with written notice of intent to construct in a preserve area, and then the wildlife agencies shall provide a written response with any objections or alternatives within 20 working days. The process continues with specified timelines for a reply from SDG&E, for USFWS and CDFW to object to this reply, and finally, for an appeal to a review panel who shall make a final decision, consisting of the Regional Director of the USFWS, Director of the CDFW, and SDG&E.

The processes specified in the SDG&E Subregional NCCP/HCP to consider the objectives of other HCPs/NCCPs and to coordinate within preserve areas would reduce conflicts with the provisions of an adopted HCP or other conservation plans, but not to a level that is less than significant. The SDG&E Subregional NCCP/HCP does not ~~specify a process for coordination with all landowners, conservation easement holders, and regional plans in the proposed project area to determine the locations of preserve areas (SDG&E 1995a,b) require the applicant to obtain written verification from the implementing agencies that consultation has concluded. In addition, the SDG&E Subregional NCCP/HCP was written in 1995, and land ownership and conservation easements and plans, as well as staffing levels and responsibilities of USFWS and CDFW staff, have changed since then. The CDFW has confirmed that the proposed project is an activity covered by the SDG&E Subregional NCCP/HCP (Ponce pers. comm. 2013).~~ The wildlife agencies have also affirmed that preserve areas under the SDG&E Subregional NCCP/HCP include any land the ownership or use of which has been conveyed or dedicated to, or is otherwise managed by, any entity for long term conservation. For example, dedicated conservation easements would be considered preserve areas under the SDG&E Subregional NCCP/HCP. Furthermore, the process described above provides timeframes that may be difficult for the wildlife agencies to meet.

The proposed project is considered a covered action under the SDG&E Subregional NCCP/HCP; the SDG&E Subregional NCCP/HCP contains measures to coordinate with the NCCP/HCP implementing entities and to provide additional mitigation in the event of permanent impacts on HCP/NCCP preserve areas. As described above, SDG&E would coordinate with the appropriate authorities during the proposed project's approval process to ensure that the impacts, mitigation measures, and operational protocols are implemented for the proposed project under the SDG&E Subregional NCCP/HCP. ~~However, the SDG&E Subregional NCCP/HCP does not specify a process for coordination with all landowners, conservation easement holders, and regional plans in the proposed project area to determine the locations of preserve area. Coordination is necessary to ensure that the proposed project is consistent with provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP, the lack of which could result in a significant conflict. MM BR-10 requires the applicant to participate in further coordination with the implementing agencies obtain written verification from USFWS and CDFW that requirements under the SDG&E Subregional NCCP/HCP have been completed prior to the start~~

of construction. Implementation of MM BR-10 would reduce potential conflicts with SDG&E Subregional NCCP/HCP to less than significant.

The proposed project may conflict with two conservation easements established within the Orange County Southern Subregion HCP and considered preserve areas under the SDG&E NCCP/HCP. The two conservation easements in question are the Talega Conservation Easement (unrecorded) and a conservation easement at the Prima Deshecha Landfill (recorded). Potential conflicts with the Talega Conservation Easement cannot be determined until the easement is recorded and the applicant conducts further consultation with the USFWS regarding the applicant's existing ROW, the establishment of new ROW, and use of ground disturbing construction techniques in the area. Much of the proposed project in the Talega Development would lie within the boundaries of the Talega Conservation Easement. Potential conflicts with the conservation easement near the Prima Deshecha Landfill cannot be determined until the construction disturbance limits of the proposed project have been delineated in relation to the conservation easement boundary and the applicant's existing ROW. A small part of the proposed project crosses through this easement. The CPUC is in the process of gathering additional information pertaining to the boundaries and allowable uses in each easement. Based on recent discussions with the USFWS, establishing new ROW or impacting areas outside of the applicant's existing ROW and within the boundaries of the conservation easement(s) would conflict with both conservation easements, resulting in a significant impact (Snyder 2015). The USFWS has indicated that establishing new ROW within the Talega Conservation Easement or impacting areas of the Prima Deshecha Landfill Conservation Easement that are outside of the applicant's existing ROW would directly conflict with the provisions of the aforementioned conservation easement(s), and thereby the provisions of the Orange County Southern Subregion HCP. MM BR 10 would require the applicant to participate in further coordination with the implementing agencies. While consultation with the USFWS may identify mechanisms for reducing potentially significant impact to less than significant levels, MM BR 10 on its own does not adequately ensure consistency with an adopted HCP at this time. Measures to avoid, minimize, and mitigate potentially significant impacts to less than significant levels cannot be evaluated until the Talega Easement is recorded and additional consultation between the applicant and the wildlife agencies occurs. Therefore, impacts under this criterion are being treated as significant and unavoidable until additional information is gathered.

The following revisions have been made to MM BR-10:

Mitigation Measure BR-10: Mitigation Plan Development. In order to prevent potential conflicts between the SDG&E Subregional NCCP/HCP and other conservation plans and land, the applicant will prepare a mitigation plan for the project. To ensure that the project is consistent with the SDG&E Subregional NCCP/HCP, the applicant will prepare and implement a Mitigation Plan Development for the project. The Mitigation Plan Development will:

- Detail a consultation process in accordance with Section 6.2.1 of SDG&E's NCCP/HCP. Alternatively, an updated process and timeline can be developed as allowed by both USFWS and CDFW.
- Require SDG&E to provide the CPUC with written confirmation from USFWS and CDFW that the consultation process has been carried out to the satisfaction of the agency and are consistent with the SDG&E Subregional NCCP/ HCP.

- ~~The plan will include a summary of the policies and procedures in the SDG&E Subregional NCCP/HCP that are relevant to other HCPs/NCCPs, conservation plans, and public or private conservation or preserve areas, including but not limited to:~~
 - Operational protocols used in sensitive habitat areas;
 - Mitigation for temporary and permanent impacts, including habitat enhancement and mitigation credits;
 - Coordination and consultation procedures with the USFWS and CDFW;
 - Definition of preserve area according to the SDG&E Subregional NCCP/HCP;
 - Identification and mapping of areas that may qualify as a preserve area within 100 feet of any project component; and
 - A review of locations where there may be potential conflicts among conservation plans.
- ~~In order to prevent potential conflicts, SDG&E will coordinate with all relevant jurisdictions, plan participants, and landholders associated with the preserve areas crossed by the project, including but not limited to the City of San Juan Capistrano, City of San Clemente, County of Orange, California Department of Parks and Recreation, Marine Corps Base (MCB) Camp Pendleton, CDFW, and USFWS.~~
- ~~The plan will outline how SDG&E will communicate with the relevant jurisdictions, plan participants, and landholders about the project activities in preserve areas. A process for resolving inconsistencies between SDG&E's transmission and distribution activities in a preserve area and the mission of the overlapping jurisdiction, conservation plan, or easement will be outlined.~~

This plan will be submitted to the USFWS, CDFW, and CPUC for review and comment ~~no more than six months prior to the start of construction,~~ with the intent to produce a final draft of the plan, approved by the CPUC, ~~no later~~ less than two months prior to the start of construction.

Implementation of the Mitigation Plan Development, excluding any restoration or other physical habitat improvements that are required as a result of the agency consultation, will be completed prior to the start of construction.

Land Use. Article XII, Section 8 of the California Constitution establishes the CPUC's preemption power over local jurisdictions with respect to regulation of investor-owned public utilities and electric utility construction and siting. Article XII, Section 8 states, "A city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the [Public Utilities] Commission."

Through the Public Utilities Code, the Legislature authorized the CPUC to "do all things, whether specifically designated in this act or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction" (California Public Utilities Code § 701). Other Public Utilities Code provisions authorize the CPUC to regulate modification or expansion of electrical facilities, require public utilities to provide service to customers, and oversee design and siting of public utilities' electrical facilities to promote health and safety. (See, e.g., California Public Utilities Code §§ 761, 762 768.) The CPUC's preemptive power extends to local land use regulations.

The CPUC has confirmed its intention to exercise exclusive jurisdiction over all utility-owned electric facilities in California, stating "[a]ll utility-owned electric transmission lines, power lines, distribution

lines, substations and facilities remain under the Commission’s exclusive jurisdiction and this jurisdiction may not be pre-empted by any local agency.” (Re Rules, Procedures and Practices Applicable to Transmission Lines Not Exceeding 200 Kilovolts (1994) 55 Cal. P.U.C. 2d 87.)

In 1995, to further clarify its exercise of jurisdiction over electric transmission lines, particularly with respect to those operating at below 200 kilovolts (kV), the CPUC issued General Order (GO) 131-D, which governs the planning and construction of electric generation, transmission/power/distribution line facilities, and substations located in California. Section XIV.B of GO 131-D reiterates the CPUC’s preemptive power over local regulation, stating “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction.” This language did not restrict the CPUC’s preemptive powers with respect to all utility-owned electric transmission lines (regardless of capacity) and other utility facilities, which arise from Article XII, Section 8 of the California Constitution, but merely clarified that these powers include preemption of local jurisdictions’ regulation of electrical lines operating below 200 kV.

In light of the CPUC’s exclusive jurisdiction over the construction and siting of electric transmission lines, SDG&E will not be required to conform with local ordinances, policies, or plans, including height restrictions at the proposed San Juan Capistrano Substation, as they are not applicable to the proposed project. Because local ordinances are not applicable, the proposed project would not result in a significant impact under CEQA. However, conflicts and inconsistencies with local jurisdictions are given consideration by the CPUC during its review process. The following revisions have been made to Section 4.10.3.3 of the EIR (Exhibit 1):

However, the proposed project would directly conflict with applicable building height regulations defined within the San Juan Capistrano Municipal Code. This conflict is deemed to be unavoidable based on the proposed design of the San Juan Capistrano Substation. The CPUC has responsibility for and jurisdiction over substation and transmission line siting and approval, superseding local jurisdictions, which do not have jurisdiction. Therefore, impacts under this criterion would be ~~significant~~ less than significant. However, conflicts or inconsistencies with local jurisdictions are given consideration by the CPUC during its review process.

Additionally, for reasons described above under Biological Resources, the discussion under Impact LU-3 in Section 4.10.3.3 of the EIR (Exhibit 1) has been revised consistent with the changes made to Impact BR-6 in Section 4.4.3.3.

Master Response B: Former Utility Structure at Capistrano Substation

As discussed in Section 4.05, “Cultural Resources,” of the EIR, the applicant hired a qualified archaeologist to conduct a historic assessment of the 1918-constructed building at the Capistrano Substation that fronts Camino Capistrano, herein referred to as “the former utility structure,” to determine its eligibility for NRHP listing. The 2008 assessment determined that the former utility structure lacks the integrity required to meet the minimum eligibility criteria for a historic resource at the state or federal level and does not meet the definition of a “historical resource” under CEQA (McKenna et al. 2008; Appendix M-1). In 2013, the applicant retained ASM Affiliates to review the 2008 evaluation and to provide a second opinion regarding the former utility structure’s eligibility for NRHP. ASM Affiliates concurred with the conclusion of the 2008 report that the former utility structure was ineligible due to loss of integrity (TRC 2013; Appendix M-2).

In 2014, the CPUC hired a qualified historian to conduct a historic assessment of the former utility structure to provide an independent opinion of its eligibility for NRHP listing. The 2014 report concluded, as did the 2008 and 2013 historic assessments, that the former utility structure does not meet the minimum eligibility criteria for a historic resource at the state or federal level and that it does not meet the definition of a “historical resource” under CEQA (Moomjian 2014; Appendix M-3).

After release of the Draft EIR, the State Historic Resources Commission voted unanimously in favor of recommending the former utility structure eligible for listing in the NRHP. The recommendation was forwarded to the Keeper of the NRHP on July 17, 2015. The nomination of the structure for listing in the NRHP changed the baseline condition of the Cultural Resources evaluation. Therefore, the CPUC determined to recirculate the Cultural Resource section of the Draft EIR, with an updated project setting and impact analysis based on the update to eligibility status of the former utility structure.

The Recirculated Draft EIR identified a significant impact under *Impact CUL-1: Substantial adverse change in the significance of an historical resource*, stating, “because the former utility structure’s eligibility for listing in the NRHP has not yet been determined, it is assumed for the purposes of this analysis that the structure will be determined to be eligible for listing in the NRHP. Therefore, the demolition of the former utility structure would be considered a significant impact under CEQA because this structure is a potentially historic resource as defined by CEQA.”

On September 22, 2015, the Keeper of the NRHP declined to make a determination of eligibility of the former utility structure for listing on the NRHP based on the inadequacy of the nomination and returned the nomination to the State Historic Preservation Officer for substantive and technical revisions (Appendix S). The Keeper of the NRHP states the following in his letter:

It is our opinion that the building is eligible for inclusion in the National Register of Historic Places under Criterion A, but that the documentation submitted is inadequate to fully support this finding and fails to address significant questions brought up by the petitioner.

The Keeper of the NRHP further states:

Where the document falls short is in the analysis of integrity of the substation as a whole as it relates to the extant, nominated building. The petitioner rightly points out that a “substation” is more than a building, that it includes many elements that work together to facilitate the flow of power. The nomination as presented gives short shrift to the discussion of what the key components are and of how such a facility works. By limiting the boundaries and description and, for the most part, the focus of the nomination to the footprint of the building, the nomination does not truly provide an analytical discussion of integrity. The substation may have had many of its components moved or demolished but there are remnants evident on the ground that can help tell the story and illustrate the working facility. It might be best, if this property is resubmitted, to revisit the boundaries of the nominated property and to look at the entirety of the facility.

Although the Keeper of the NRHP declined to make a determination of eligibility based on the nomination package, the CPUC understands based on the above language that the former utility structure as well as the surrounding property may be determined eligible for listing on the NRHP. Therefore, the proposed project would have significant impacts on a historic resource.

As part of Exhibit 1 of SDG&E’s comment on the Recirculated Draft EIR (Comment Letter 347), SDG&E identifies a Preservation Alternative to the proposed project to avoid significant impacts on the

former utility structure. The Preservation Alternative includes a partial preservation and partial demolition of the former utility structure (Appendix S) and a redesign of the proposed San Juan Capistrano Substation to accommodate the preserved portion of the former utility structure. Although SDG&E presented the Preservations Alternative as an alternative to the proposed project, the CPUC has implemented the Preservation Alternative as a mitigation measure to the proposed project in accordance with Section 15126.4 of the CEQA Guidelines. The following mitigation measure has been added to Section 4.5, “Cultural Resources” of the Draft EIR (Exhibit 1).

MM CUL-8: Preservation of Former Utility Structure at Capistrano Substation. The applicant shall incorporate the following design specifications at the Capistrano Substation and features shown in Appendix S of this EIR with the purpose to rehabilitate the west wing of the former utility structure at Capistrano Substation per the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings:

- Replacement of the current landscaping with landscaping that returns the existing utility structure’s setting to an earlier appearance.
- Construction of an approximately 5-foot-tall retaining wall parallel to the northern and eastern walls of the retained West Wing.
- Construction of a masonry wall approximately 10 feet tall on the inside of the western perimeter of the substation. When viewed from the exterior, the masonry would vary from 12 to 15 feet in height due to grading behind the substation wall. The northern and southern perimeter walls would remain at approximately 10 feet in height.
- The existing utility structure shall remain approximately 4 inches from the western perimeter wall.
- The southern and western walls of the retained portion of the existing substation shall be located outside of the secured substation facility and will be visible from Camino Capistrano. The northern and eastern walls of the existing utility structure shall effectively act as part of the substation security wall.
- Installation of new steel doors to replace the doors in the southern, eastern and northern walls of the existing utility structure. The northern and eastern doors will serve as part of the security wall.
- Construction of a driveway from the main substation access to the structure’s southern door.
- Set back the southern driveway vehicle access gate by approximately 80 feet from Camino Capistrano.
- Set back the northern driveways access gate by approximately 35 feet from Camino Capistrano.
- The northern and southern vehicular access gate shall be approximately 30 feet wide. Each pair of gates will be made of black wrought iron and be approximately 15 feet in width.
- Grading and the phased site development would be similar to that of the Proposed Project Substation.

Modifications to the existing utility structure shall include:

- East Wing Demolition: Retain 12 inches of roof and walls where the east wing intersects the west wing of the existing structure. This will allow the remaining portion of the roof and wall visually to read as a “ghost” of the east wing once it is removed.
- West Wing Rehabilitation:
 - Western Wall: the exterior wall, concrete wall iron jacking, and windows will be repaired. Security bars will be installed on all interior windows.
 - Northern Wall: Deteriorated, non-original, sidelights and transom windows shall be replaced to match the original. Those that are replaced shall be made from steel rather than wood for increased security. Door assembly does not require glazing, but shall be constructed exclusively of steel following the original pattern. This wall and replacement door will only be accessible from the interior.
 - Eastern Wall: The interior door shall be replaced with a new exterior door that matches the original but is designed for exposure to the elements. Glazing is not required for the door or existing windows, but design should follow the original pattern. The eastern wall, window and door will only be accessible from the interior.
 - Southern Wall: Deteriorated, non-original, sidelights and transom windows shall be replaced to match the original. Those that are replaced shall be made from steel rather than wood for increased security. Door assembly does not require glazing, but shall be constructed exclusively of steel following the original pattern. Due to visibility from the street, the door should include translucent wire glass at the transom. Where glazing occurs at the transom, security bars shall be installed on the interior.
 - Interior Window Sills: Where water damage has occurred, windows sills shall be repaired.
 - Interior Crane: The movable crane shall be retained.
 - Lighting: A lighting plan shall be developed and implemented. It will include manually operating exterior wall scones on the north and south walls.

Applicant shall prepare and implement a historic architect monitoring plan. The plan shall include, but shall not be limited to, the following information:

- Qualifications of the historic architect monitor (must meet the Secretary of the Interior’s Professional Qualifications Standards);
- Activities that shall be monitored by the historic architect monitor;
- Authority given to the historic architect monitor to halt construction on the former utility structure in order to prevent damage to the structure;
- Procedures of how the historic architect monitor will halt construction and the procedures to restart construction; and
- Reporting procedures for the historic architect.

The historic monitoring plan shall be submitted to the CPUC for approval at least six weeks prior to start of construction on the former utility structure.

The applicant shall also prepare a Historic American Building Survey (HABS) photographic documentation for the utility structure before the east wing is removed. The applicant shall provide the HABS documentation to the CPUC at least six weeks prior to start of construction on the former utility structure.

Generally, implementation of the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, as discussed in MM CUL-8 would reduce impacts on a historic resource to less than significant (CEQA Guidelines Section 15064.5(b)(3)). However, because the entire former utility structure as well as the surrounding property may be determined eligible for listing on the NRHP and the Secretary of Interior’s standards would only be applied to the west wing of the former utility structure, the impact under Impact CUL-1 would remain significant. Additionally, the impact analysis in Section 4.1, “Aesthetics,” of the EIR (Exhibit 1) has been revised to address the incorporation of MM CUL-8.

Master Response C: Environmentally Superior Alternative¹

Chapter 3, “Description of Alternatives” of the Draft EIR (Exhibit 1) provides “sufficient information about each alternative to allow a meaningful evaluation, analysis, and comparison with the proposed project.” Chapter 5, “Comparison of Alternatives,” of the Draft EIR (Exhibit 1) compares the environmental impacts of the alternatives to the proposed project (CEQA Guidelines Section 15126.6(d)). If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative is discussed, but in less detail than the significant effects of the project as proposed.

Draft EIR

As further discussed in Master Response A regarding significant impacts, the Draft EIR identified three resources that would have significant impacts, including air quality, transportation and traffic, and cumulative impacts. Chapter 5 of the Draft EIR identified Alternative A (No Project) as the Environmentally Superior Alternative as it would avoid all significant impacts of the proposed project. However, as stated in Section 5.3 of the Draft EIR, when the Environmentally Superior Alternative is the No Project Alternative, CEQA requires the identification of an Environmentally Superior Alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). Therefore Alternatives B1 and D were found to be the Environmentally Superior Alternatives as:

- Both alternatives would substantially reduce the proposed project’s air emissions.
- Both alternatives would reduce significant impacts on transportation and traffic to less than significant.
- Both alternatives would reduce significant cumulative impacts to less than significant.

Alternative B1 was identified as the Environmentally Superior Alternative for air quality because it would reduce the proposed project’s air emissions more than all other alternatives (62 percent). However, Alternative D would reduce the proposed project air emissions by 61 percent. The difference of the percentage was negligible and, therefore, impacts on air quality were considered equivalent under both alternatives.

Alternative D would completely avoid the roads identified as having a significant impact under the proposed project without generating new traffic impacts. Alternative B1 may result in minor trip generation along Via Pamplona as well as a short-term partial closure of Via Pamplona; however, these impacts would be negligible and, therefore, impacts on transportation and traffic as well as cumulative impacts were considered equivalent under both alternatives.

Recirculated Draft EIR

As further discussed in Master Response A regarding significant impacts and Master Response F regarding recirculation of the Draft EIR, public comments on the Draft EIR identified a new significant impacts and a potentially feasible alternative, Alternative J.

The Recirculated Draft EIR identified a total of six resources that would have significant impacts, including biological resources, cultural resources, and land use, in addition to air quality, transportation and traffic, and cumulative impacts. Chapter 5 was revised in the Recirculated Draft EIR to include Alternative J and to include additionally analysis of each alternatives' impacts on biological, cultural, and land use resources. The Recirculated Draft EIR identified Alternative A (No Project) as the initial Environmentally Superior Alternatives as it would avoid all significant impacts of the proposed project. However, per CEQA Guidelines Section 15126.6, Alternative J was then found to be the Environmentally Superior Alternative as:

- Alternative J would substantially reduce air quality emissions when compared to the proposed project's air emissions.
- Alternative J would reduce significant impacts from conflicts with applicable NCCPs and HCPs to less than significant.
- Alternative J would reduce significant impacts on historic resources to less than significant.
- Alternative J would reduce significant impacts on transportation and traffic to less than significant.
- Alternative J would reduce significant cumulative impacts to less than significant.

Alternative J was identified as the Environmentally Superior Alternative for air quality because it would reduce the proposed project's air emissions more than all other alternatives (88 percent). Alternative J would not affect land set aside for conservation under an existing HCP or NCCP. Alternative J would avoid affecting a known potentially significant historic resource at the Capistrano Substation. Additionally, Alternative J would confine construction to mostly previously disturbed areas, which in turn would reduce the potential for impacts on biological and previously undiscovered cultural resources. Alternative J would completely avoid the roads identified as having a significant impact under the proposed project without generating new traffic impacts.

Final EIR

As further discussed in Master Response A regarding significant impacts, public comments on the Recirculated Draft EIR resulted in reducing significant impacts on biological resources, land use, transportation and traffic, and cumulative impacts to less than significant with mitigation. Chapter 5 was revised; however, Alternative J remains to be the Environmentally Superior Alternative (after Alternative A) as:

- Alternative J would substantially reduce air quality emissions when compared to the proposed project's air emissions.
- Alternative J would reduce significant impacts on historic resources to less than significant.

CPUC Decision

The CPUC commissioners are not required to approve the alternative identified as the Environmentally Superior Alternative in the Final EIR. The EIR is one piece of information that the commissioners consider when crafting their decisions. The commissioners can prepare a Statement of Overriding Considerations to approve a project with significant impacts, which balances the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks (CEQA Guideline Section 15093).

Master Response D: Adequacy of Alternatives¹

The EIR contains a reasonable range of alternatives to the proposed project that feasibly attain most of the basic project objectives and would avoid or reduce a potentially significant environmental impact associated with the proposed project (CEQA Guidelines 15126.6(a)). The EIR evaluates a total of 11 action alternatives to the proposed project, as well as a No Project alternative (Alternative A) as required by CEQA Guidelines 15126.6(e). A description of each alternative is provided in Chapter 3 and a comparison of the environmental impacts of each alternative to the proposed project is provided in Chapter 5, "Comparison of Alternatives" of the Draft EIR (Exhibit 1).

Feasibility

CEQA Guidelines require that the EIR "consider a reasonable range of *potentially* feasible alternatives" (emphasis added, Section 15126.6(a)). The CPUC used technological, economic, and legal considerations to determine the potential feasibility of the alternatives to the project. Publicly available information along with the applicant's responses to data requests and information received during the EIR process were used to determine if alternatives carried forward for evaluation were technically possible, legally possible, and not cost prohibitive. Although timing for the implementation of the alternative was not used as a primary screening criteria, the implementation timeframes for each alternatives are considered feasible given that any of the alternatives could be fully implemented before 2020, which is when Category C events within the South Orange County 138-kV system could require load shedding (CAISO 2011, 2014a, 2014b).

Objectives

The project objectives used to screen alternative are listed in Section 1.2.1 of the Draft EIR (Exhibit 1). As further discussed in Chapter 3, "Description of Alternatives," and Appendix B, Alternatives Screening Report, of the EIR (Exhibit 1), each of the 11 action alternatives evaluated in the Draft EIR attain most of the project objectives. The CPUC developed the project objectives to allow a reasonable range of alternatives to be reviewed. The project objectives are based on the applicant's objectives.

Providing a second 230-kV source to the South Orange County 138-kV system and providing redundancy to the existing system were not objectives used to screen alternatives.

Additionally, the CPUC finds that the No Project Alternative (Alternative A) also attains most of the project objectives. Noting that the CPUC finds that Alternative A meets most of the objectives of the project does not affect how the alternative is evaluated in the EIR as evaluation of the No Project Alternative is required by CEQA Guideline 15126.6 (e), but it may be relevant to the evaluation of the project by decision makers. The purpose of Alternative A is to compare the consequences of not approving the project to the consequences of approving the project.

The CPUC included Objective 2 (Replacing inadequate equipment at the Capistrano Substation) based on SDG&E's claims of aging equipment at Capistrano. Exemptions in GO 131D typically allow SDG&E to replace and rebuild equipment at substations without CPUC approval so long as the modifications do not change the footprint or capacity of the substation. As detailed in Section 3.2.1 of the Draft EIR (Exhibit 1), it is reasonably foreseeable that maintenance activities exempted by GO 131-D, such as replacement of substation and power line equipment at Capistrano Substation, would occur under the No Action Alternative. For this reason, the CPUC found Alternative A (No Project) meets this objective, as the applicant could replace equipment without a CPUC permit. However, the EIR does not assess the environmental impacts of these upgrades because the timing and scope of the upgrades is unknown and therefore speculative. Similarly, action alternatives that meet this objective do not necessarily require the substation upgrades to be included in the description of the alternative or the environmental impact analysis of the alternative. For instance, Alternative B1 meets Objective 2 because it would allow equipment at Capistrano Substation to be upgraded. However, implementation of Alternative B1 does not require upgrades at Capistrano Substation. Therefore, the exact scope and timing of upgrades that SDG&E would decide to implement is unknown and the associated environmental impacts are therefore speculative. Only action alternatives that require upgrades at the substation to feasibly complete the alternative are included in the description of the alternative.

Environmental Impacts

The alternatives evaluated in the EIR would substantially lessen a significant impact of the proposed project with the exception of Alternative G. The proposed project would have significant impacts on air quality and cultural resources. As summarized in Table 5-1 in the Draft EIR (Exhibit 1), each alternative would have less of an impact on either air quality or cultural resources compared to the proposed project with the exception of Alternative G. Alternative G would have similar impacts on air quality and greater impacts on cultural resources compared to the proposed project. As further discussed in Master Response C: Environmentally Superior Alternative, during the preparation of the Alternative Screening Report (Appendix B of EIR; Exhibit 1) Alternative G was thought to reduce potentially significant impacts on traffic and was therefore analyzed in detail in the EIR. As a result of the CEQA process, the scope of both Alternative G and the proposed project evolved and potentially significant environmental impacts associated with the proposed project (road closures) also changed. After further evaluation of the proposed project and Alternative G, the CPUC has determined that Alternative G would no longer substantially reduce a significant impact.

As further discussed in Master Response C: Environmentally Superior Alternative, the CPUC finds Alternative J to substantially lessen significant impacts of the proposed project more than the other alternatives.

Load Shedding

One aspect of the alternatives analysis that generated numerous comments is the assumption that any alternative to the project would result in load shedding or blackouts within the South Orange County 138-kV system. Load shedding, which is defined in Chapter 1, “Introduction” of the Draft EIR (Exhibit 1) as the deliberate disconnection of electric current from specific lines, is used sparingly by electrical system operators to maintain reliability when there is a system emergency, such as an unplanned outage of a transmission line or transformer. Load shedding should not be seen as a potential outcome of any action alternative, including the proposed project, but rather a tool that may be used by the system operator to protect electrical infrastructure during an unplanned outage. As further discussed in Appendix B “Alternative Screening Report” of the EIR (Exhibit 1), the applicant has identified several examples of common mode failures that could potentially occur under Alternative A (No Project) that would lead to load shedding. Shedding load in this instance, however, would likely be allowable and in compliance with North American Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), and California Independent System Operation (CAISO) standards. The 11 action alternative would fully mitigate all or the majority of the scenarios identified. The CPUC is unable to determine the precise number of common mode failure scenarios similar to those identified by the applicant that could still occur after implementation of each alternative. However, neither the proposed project nor any of the alternatives would eliminate all possible scenarios that would require load shedding. Therefore, the ability of the proposed project or an alternative to ensure that the applicant’s South Orange County 138-kV system remains in compliance with mandatory system performance requirements following a common mode failure does not serve as a useful criterion for comparing any of the alternatives to the proposed project.

CAISO and CPUC Approval of Alternatives

As discussed in Section 1.2 of the Alternatives Screening Report (Appendix B; Exhibit 1), the CAISO manages the flow of electricity across the high-voltage, long-distance power lines that referred to as the bulk-electric power grid. Transmission projects that would connect to the bulk-electric power grid managed by the CAISO are proposed by investor-owned utilities such as SDG&E for inclusion in the CAISO’s annual transmission planning process. If a project is approved by the CAISO, the applicant then submits the project for subsequent review and approval by the CPUC, if CPUC approval is required. CPUC approval is required for the proposed project because it meets the requirements specified in GO 131-D for a CPCN (CPUC 1995).

In the event that the CPUC Commissioners approve an alternative to the proposed project that would affect the bulk-electric power grid, the CPUC approval would provide the applicant with the CPUC permit needed to construct the approved alternative and subsequent environmental review under CEQA would not necessarily be required. The applicant then would submit the project to the CAISO during their annual transmission planning process and construction of a given alternative would not begin until the CAISO completes their review. Descriptions of the action alternatives have been revised to disclose reasonably foreseeable approvals that would be required prior to the implementation of a given alternative. As discussed above, the timing for the implementation of the alternatives was not used as a feasibility screening criteria. All of the alternatives remain potentially feasible from an implementation standpoint, and additional approval timeframes are reasonable given that any of the alternatives could be fully implemented before 2020, which is when the Category C events within the South Orange County 138-kV system could require load shedding (CAISO 2011, 2014a, 2014b).

Several alternatives evaluated in the EIR provide a second 230-kV source to the South Orange County 138-kV system. Alternatives C1, C2, D, F, and J provide a second source of 230 kV power, would likely affect the bulk-electric power grid, and would therefore require review by CAISO.

Replacement of Equipment to Capistrano Substation

Alternatives B2 and B3 have been modified to clarify the how Capistrano Substation would be modified if either alternative is implemented.

Through Flow

As part of the alternatives screening process, the CPUC reviewed the potential for through flows issues with Alternative D and Alternative J. Through flow events occur when a considerable amount of power is shunted through a lower voltage system as a result of a combination of outages of higher voltage power system transmission lines. See Appendix R in the Draft EIR (Exhibit 1). The CPUC could not replicate the through-flow concerns identified by SDG&E during our independent power flow modeling efforts. Therefore, the action alternatives contained in the EIR were determined to be potentially feasible from a technology perspective and have been retained in the Final EIR.

Alternative J

As further discussed in Master Response F: Recirculation of the Draft EIR, a public comment on the Draft EIR identified a potential alternative to the proposed project that included upgrading the Trabuco Substation instead of Capistrano and looping Trabuco Substation into SCE's 230-kV Santiago-SONGS transmission line. Alternative J has been found to be a potentially feasible alternative that meets most of the objectives of the project while reducing significant impacts on air quality and cultural resources.

Chapter 3, "Description of Alternatives" in the Draft EIR has been revised to clarify that the description of Alternative J includes construction of two parallel 230/138-kV transformers with a single breaker design at the Trabuco Substation. An approximate 0.5 double circuit transmission line would loop the Trabuco Substation into SCE's 230-kV Santiago-SONGS transmission line. Alternative J would require expanding into a 2 acre property, currently owned and used by AT&T, to the north of the existing Trabuco Substation in order to add the 230/138-kV equipment. The interconnection point for Alternative J would be located at the intersection of the new constructed double circuit 230-kV transmission lines and the existing SCE's 230-kV Santiago-SONGS transmission line. Appendix R includes a report prepared by ZGlobal Inc. which illustrates a potentially feasible substation design and interconnection routes that meet the necessary regulatory requirements (i.e., NERC, WECC).

NERC Standard TPL-001-4

NERC transmission planning standard TPL-001-4 became effective January 1, 2016. TPL-001-4 alters transmission planning efforts in significant ways, including a complete restructuring of nomenclature for outage contingencies, and most importantly to this project, when and to what degree non-consequential load loss is allowed under single contingency reliability events.

The previous set of NERC standards was applicable during the vast majority of the time frame of this project. Under the pre-January 2016 NERC standards, non-consequential load loss was not allowed for a reliability event resulting in the loss of a single element, or Category B, N-1 scenario. However, a footnote to this prohibition against load drop states that:

b) Planned or controlled interruption of electric supply to radial customers or some local network customers, connected to or supplied by the faulted element of by the affected area, may occur in certain areas without impacting the overall reliability of the interconnected transmission systems. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted firm electric power transfers.

This footnote can be interpreted to mean that in a radial, local area network, loss of load is allowed under a single contingency. This is relevant to the South Orange County Reliability Enhancement (SOCRE) project, as the South Orange County area could be classified as a local area network and thus subject to a lower reliability standard, reducing the need for system reliability improvements in the area. However, when TPL-001-4 took effect, the footnote that potentially provided an exemption for local area networks was removed. Under the new standard, most single contingency events are now subject to the following footnote:

12. An objective of the planning process should be to minimize the likelihood and magnitude of non-consequential load loss following planning events. In limited circumstances, non-consequential load loss may be needed throughout the planning horizon to ensure that BES performance requirements are met. However, when Non-Consequential Load Loss is utilized under footnote 12 within the near-term transmission planning horizon to address BES performance requirements, such interruption is limited to circumstances where the non-consequential load loss meets the conditions shown in Attachment 1. In no case can the planned Non-Consequential load loss under footnote 12 exceed 75 MW for US registered entities.

This language limits load drop under single contingencies to 75 MW. The limitation of load loss to a maximum of 75MW (that must be planned for on a five year horizon) only has an impact on project alternatives that risk a loss of load under a single contingency. The affected projects are Alternative A (No Project), Alternative B1 through B4, and Alternatives C1, C2, D, and E. TPL-001-4 does not impact the analysis or findings for Alternatives F, G, and J, as no Category B (P1, P2) overloads that would necessitate load loss were found in the reliability studies of those alternatives.

Master Response E: Electric and Magnetic Fields

The CPUC recognizes that there is a great deal of public interest and concern regarding potential health effects from human exposure to electric and magnetic fields (EMFs) from electrical devices. In response to public concern about EMFs and a lack of scientific evidence which either confirmed or denied a causal link between EMFs and health effects, the CPUC began an investigation (I.91-01-012) in January 1991, in order to determine the CPUC's role in mitigating health effects, if any, of EMFs created by electric utility power lines and by cellular radiotelephone facilities (CPUC n.d.). As a result of the investigation, the CPUC issued a decision (D.93-11-013) in 1993, which requires utilities to use "low-cost or no-cost" EMF reduction measures for EMFs associated with electrical facilities requiring certification under CPUC GO 131-D.

Pursuant to CPUC GO 131-D, all requests for a Certificate of Public Convenience and Necessity must include a description of the measures taken or proposed by the utility provider to reduce the potential for exposure to EMFs generated by their proposed project. The benchmark established by the CPUC for low-cost measures is 4 percent of the total budgeted project cost that results in an EMF reduction of at least 15 percent (as measured at the edge of the utility ROW).

In January 2006, the CPUC issued decision D.06-01-042, which affirms that health hazards from exposure to EMF have not been established and that the low-cost/no-cost policy to reduce EMF exposure for new utility transmission and substation projects should be continued. Additionally, Decision D.06-01-042 includes policies to improve utility design guidelines for reducing EMF. Despite the CPUC's ongoing efforts to pursue and review all available research results regarding EMF studies, the CPUC has been unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences, and no change to the CPUC EMF policy has been made to date. Additionally, the CPUC has not adopted any specific numerical limits or regulation of EMF levels related to electric power facilities. The CPUC will reconsider its EMF policies if new findings provide evidence of negative health impacts related to EMF exposure.

Refer to CPUC's EMF Policy website for more information:
<http://www.cpuc.ca.gov/Environment/emf/emfopen.htm>.

EMF Analysis in the EIR

The CPUC does not consider EMFs, in the context of CEQA, to be an environmental impact. This is because after decades of research there is no agreement among scientists regarding whether exposure to EMF creates a potential health risk. Additionally, CEQA does not define or adopt standards for defining any potential health risk from human exposure to EMFs. For these reasons, EMFs are discussed in Section 4.08, "Hazards and Hazardous Materials," of the EIR to fulfill the EIR's role as "an informational document" (PRC Section 21061), but EMF-related impacts are not analyzed.

The following additional information is presented in response to public interest regarding the quantification of EMFs generated by the proposed project components. Since no adopted CEQA standards exist for defining health risks and evaluating impacts related to EMF, disclosure of such information is for informational purposes only.

Levels of EMF Exposure from the Proposed Project and Applicant Proposed EMF Mitigation

In accordance with CPUC Decisions D.93-11-013 and D.06-01-042, SDG&E included a Field Management Plan as part of its application for the proposed project. The Field Management Plan, incorporated as Appendix H of the EIR, presents the estimated magnetic field levels along the existing, and proposed, transmission circuit locations associated with SDG&E's proposed project. In addition, the Field Management Plan includes the evaluation of "no cost" and "low cost" magnetic field reduction techniques specific to the proposed project (refer to Appendix H, Field Management Plan).

As discussed in Appendix H of the Draft EIR, magnetic fields can be reduced by using various methods, including cancellation or by increasing the distance between the EMF source and sensitive receptors. Cancellation can be accomplished by arranging phase wires (conductors) from the different circuits near each other. The distance between the source of fields and the public can be increased by either placing the wires higher aboveground, burying underground cables deeper, or by increasing the width of the ROW. For transmission lines, increasing the distance can prove effective in reducing fields because the reduction of the field strength increases greatly with distance.

As described in Appendix H, reduction of magnetic field values by increasing structure height and increasing trench depth field reduction techniques were adopted as viable methods to reduce magnetic fields at the edge-of-ROW for Segments 1a, 1b, 2, 3a and 3b of the proposed project (refer to Appendix H, Field Management Plan). Other techniques such as reducing conductor (phase) spacing and phasing

circuits to reduce magnetic fields were not found to be viable for the proposed project and were not implemented.

Master Response F: Recirculation of the Draft EIR

A lead agency is required to recirculate a Draft EIR prior to certification when “significant new information” is added to the EIR after the public review period begins (CEQA Guidelines Section 15088.5). New information is deemed significant if it reveals the following:

- A new significant environmental impact resulting from either the project itself or a new proposed mitigation measure;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project proponent declines to adopt it; or
- The Draft EIR was so fundamentally flawed that it precluded meaningful public review and comment.

In addition, a lead agency may choose to recirculate an EIR if additional studies or analysis is conducted for a project before a specific action is taken by local decision makers to approve a project. Recirculation may be limited to those chapters or portions of the EIR that have been modified. Public notice and circulation of the Recirculated Draft EIR is required, per CEQA Guidelines Sections 15086 and 15087.

The Draft EIR for the proposed project was submitted to the State Clearinghouse (SCH 2013011011) and released for public review and comment for 45 days (February 23, 2015, through April 10, 2015). A Notice of Availability was published in local newspapers and sent via mail to interested parties. Public meetings were held in San Juan Capistrano and San Clemente on March 25, 2015. The Draft EIR was also made available for public review at several locations, including local libraries and the CPUC’s website (<http://www.cpuc.ca.gov/Environment/info/ene/socre/socre.html>). The CPUC received 318 comments during the Draft EIR public comment period.

As a result of a new alternative identified for the proposed project as well as additional information obtained from federal agencies, the CPUC decided to recirculate the selected sections and chapters of the Draft EIR to disclose new information on alternatives, biological, cultural, and land use and planning resources. The following sections and chapters were included in the Recirculated Draft EIR and a summary of the revisions made to each section is provided below:

- **Chapter 3, Description of Alternatives.** Chapter 3 was revised to include a new alternative, called the Trabuco alternative, which was suggested during the public review of the Draft EIR. The Trabuco alternative involves the expansion of SDG&E’s existing Trabuco substation to add an additional source of 230-kV power into the South Orange County 138-kV transmission system. This alternative is geographically distinct from the applicant’s proposal, meets most of the basic project objectives, and reduces or avoids impacts identified as significant in the Draft EIR. The Trabuco alternative was added as part of the Recirculated Draft EIR.
- **Chapter 4.4, Biological Resources.** During the public review process, the USFWS and CDFW determined that a portion of new ROW required under the applicant’s proposed project would

cross land within the boundaries of the Talega Conservation Easement (unrecorded) and that impacts associated with project construction may occur within the Prima Deshecha Conservation Easement (recorded) that are outside of the applicant's existing ROW. Establishing new ROW in the Talega Conservation Easement and ground-disturbing activities occurring outside of the applicant's existing ROW and within the Prima Deshecha Conservation Easement were not disclosed in the Draft EIR, and potential impacts were not evaluated. Both conservation easements were established under the Orange County Southern Subregion Habitat Conservation Plan. A discussion of impacts associated with the proposed project's potential to conflict with an applicable habitat conservation plan or natural community conservation plan was added to Section 4.4, "Biological Resources."

- **Section 4.5, Cultural Resources.** After release of the Draft EIR, the State Historic Resources Commission voted unanimously in favor of recommending the former utility structure (historic site 30-179873) on the Capistrano Substation property eligible for listing in the NRHP. The recommendation was forwarded to the Keeper of the NRHP on July 17, 2015. The nomination of the structure for listing in the NRHP changes the baseline condition of the Cultural Resources evaluation. An updated project setting and impact analysis based on those updates was added to Section 4.5, "Cultural Resources."
- **Section 4.10, Land Use.** During the public comment period on the Draft EIR, the City of San Juan Capistrano filed a comment letter that, among other things, identified that the applicant's proposal exceeded the City's building height restrictions in the Commercial Manufacturing District zone. The regulatory setting and impact analysis portions of Section 4.10 was updated with this information. Additionally, Chapter 4.10 was updated to include a discussion of the proposed project's potential to conflict with an applicable habitat conservation plan or natural community conservation plan, as discussed above under "Section 4.4 Biological Resources."
- **Chapter 5, Comparison of Alternatives.** Chapter 5 was updated to include the analysis of the new Trabuco alternative identified during public review of the Draft EIR. The updated analysis contains a summary of the environmental effects of the new Trabuco alternative relative to the environmental effects of the proposed project. This chapter was also updated to include the Trabuco alternative as the new environmentally superior alternative.

The Recirculated Draft EIR for the proposed project was submitted to the State Clearinghouse and released for public review and comment for 45 days (August 10, 2015, through September 24, 2015). A Notice of Availability was published in local newspapers and sent via mail to interested parties. The Recirculate Draft EIR was also made available for public review at several locations, including local libraries and the CPUC's website (<http://www.cpuc.ca.gov/Environment/info/ene/socre/socre.html>). Public noticing and circulation of the Recirculated Draft EIR was completed in accordance with CEQA Guidelines Sections 15086 and 15087.

Further recirculation of the Draft EIR is not necessary as the revisions made to the EIR detailed in this chapter and shown in Exhibit 1 do not meet the criteria listed under CEQA Guidelines Section 15088.5.

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