

Appendix B

Comments Received on the Notice of Preparation



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

January 28, 2016

Rob Peterson, CPUC
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Dear Mr. Peterson:

Division of Water Quality Scoping Comments for the Suncrest Dynamic Reactive Power Support Project (Project) Proposed by NextEra Energy Transmission West, LLC

Please accept these comments in response to the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the subject Project, prepared by the California Public Utilities Commission (CPUC) and received at the State Water Resources Control Board (State Water Board) Division of Water Quality (DWQ) on January 7, 2016.

Authority

Pursuant to The Guidelines for the Implementation of the California Environmental Quality Act (Cal. Code Regs., tit. 14, sec. 1500 et seq.; hereinafter *CEQA Guidelines* or *Guidelines*), in particular, California Code of Regulations (CCR), title 14, section 15096, responsible agencies must specify the scope and content of the environmental information germane to their statutory responsibilities. The State Water Resources Control Board (State Water Board) is a responsible agency. Staff of the State Water Board has reviewed the NOP and considered the

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proposed Project project's potential impacts to water quality and the beneficial use of waters of the State.

We have identified a number of potentially significant impacts to water quality that must be evaluated in the environmental review. Without adequate mitigation; Project implementation could result in significant adverse impacts to water quality and hydrology; thereby adversely affecting beneficial uses of waters of the State. Staff

State Water Board Staff has reviewed the NOP for the Project in light of previous personal communication via e-mail and teleconference, and requests that the following comments be incorporated in the CPUC's environmental review process.

Role of the Regional Water Boards and Basin Plans

State law assigns responsibility for protection of water quality in the affected regions to the Regional Water Boards. Any discharges of waste that may affect water quality and, ultimately, the beneficial uses of waters of the state may be regulated by the State Water Resources Control Board and the Regional Water Quality Control Boards (collectively, the Water Boards).

All waters of the state are protected under California law. All surface waters and groundwater are waters of the State and include, but are not limited to, aquifers, drainages, streams, washes, ponds, pools, and wetlands. Surface water bodies may be permanent, intermittent, ephemeral or seasonal.

Additional protection is provided for waters of the United States under the federal Clean Water Act (CWA). The water quality control plans (basin plans) for the affected regions contain policies that the Water Boards use with other laws and regulations to protect water quality. The basin plans provide guidance regarding water quality and how the Water Boards may regulate activities that have the potential to affect water quality within the regions.

Water Board staff request that the final environmental document refer to the basin plans and incorporate mitigation measures that are consistent with all applicable water quality standards, prohibitions, and provisions in the basin plans.

Permitting

A number of activities associated with the Project may require permits issued by the State Water Board or the San Diego Regional Water Quality Control Board (RWQCB). These permitting requirements include, but are not necessarily limited to, those described below.

A Clean Water Act, section 402, subdivision (p) stormwater permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit, may be required for land disturbance associated with the Project. The NPDES permit requires the development of a Stormwater Pollution Prevention Plan and implementation of best management practices (BMPs). Industrial activities may require an NPDES General Industrial Stormwater Permit, obtained from the State Water Board, or individual stormwater permit obtained from the RWQCB.

Streambed alteration and/or discharge of fill material to a surface water may require a

Clean Water Act (CWA), section 401 water quality certification (WQC) for impacts to waters of the U.S., or dredge and fill Waste Discharge Requirements (WDRs) for impacts to "non-federal" waters of the state, or both. These permits would be issued by the RWQCB.

Determinations of the jurisdictional extent of the waters of the U.S. are made by the United States Army Corps of Engineers. Projects that have the potential to impact surface waters will require the appropriate jurisdictional determinations.

These determinations are necessary to discern if the proposed surface water impacts will be regulated under section 401 of the CWA or through dredge and fill WDRs issued by the Water Boards.

Additionally, waste discharge requirements (WDRs) for the discharge of waste in excess of water quality objectives may be required pursuant to California Code of Regulations (CCR), title 27 requirements.

We request that the environmental document list the permits that may be required, as outlined above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document.

Project proponents should continue to consult with the RWQCB to ensure that all regulatory obligations associated with all project alternatives are understood.

Beneficial Use Analyses

The DEIR should include a regional-scale map identifying all surface water resources potentially affected by the Project. These water resources should be tabulated and organized by waterbody type and described in detail in the appropriate sections of the DEIR.

We request that the DEIR identify and list the beneficial uses of the identified surface water resources, as outlined in the San Diego Regional Water Quality Control Plan (Basin Plan), and evaluate the Project's potential impacts to water quality with respect to those beneficial uses.

The environmental document must include alternatives to avoid those impacts or list specific mitigation measures that, when implemented, minimize unavoidable impacts to a less than significant level.

Project-Specific Comments

1. We understand that the Project must be placed within a limited distance from the existing Suncrest Substation in order to meet engineering limits, but alternatives to the precise location and placement of the proposed Dynamic Reactive Power Support structures do exist. All of those alternate locations should be described and analyzed in the Draft EIR (DEIR).
2. Location of the Project within the existing footprint of the Suncrest Substation is technically feasible, and should be fully considered in the DEIR. This alternative would have essentially no new impacts on the environment.

3. As we have stated before, DWQ's interest in this project stems from its potential impacts to the recently established Suncrest compensatory mitigation site which surrounds the Suncrest Substation. This mitigation site was set aside to compensate, in part, for impacts to waters of the State, including waters of the U.S., that were caused by the construction of the Sunrise Powerlink Project which included the Suncrest Substation. Therefore analysis of any project alternatives that could adversely affect the compensatory mitigation site's hydrology or ecological functions must be included in the Draft EIR.

4. Alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through direct fill. In general, these types of impacts should be avoided whenever possible, and minimized when avoidance is not possible. When permanent unavoidable impacts would result from a project alternatives, these impacts should be clearly identified, and compensatory mitigation for any such permanent impacts should be provided in the mitigation measures for those alternatives.

5. Alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through alteration of watershed functions. Impacts from previous development in the area would be exacerbated by a new, hardscape industrial facility. These potential impacts should be fully described in the DEIR, and mitigations for those impacts should be presented.

Mitigation for these impacts should consider the approaches found in the Revised Draft Strategy to Optimize Resource Management of Storm Water (Storm Water Strategy), which can be accessed at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/strategy_initiative.shtml

The final Project should include design elements that treat stormwater as a resource to be managed for multiple benefits. State Water Board staff are available to assist CPUC and Project proponents in development of alternatives that better achieve the goals of the Storm Water Strategy.

6. As described in comment 5 above, alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through alteration of watershed functions. Those alternatives could include construction that would significantly excavate and re-build the existing access road, the Bell Bluff Truck Trail.

This road, in its current form, does not exhibit design features that would be consistent with the goals of the Storm Water Strategy mentioned in comment 5. If such alternatives that entail substantial excavation and re-construction of the road are described, mitigation for the impacts to waters of the state, including waters of the U.S. should include measures to re-configure the existing drainage system of the road.

We note that runoff is currently diverted and concentrated in a series of concrete lined V-ditches. Alternatives that moderate the rate and concentration of discharge into the affected watershed area should be analyzed as part of the development of alternatives.

In Conclusion

State Water Board staff thanks the CPUC for the proactive outreach to the Water Boards in the development of the Project to date. We look forward to cooperating with the CPUC and the Project proponents in development of a Draft EIR that provides a full and accurate analysis of all potential project impacts to waters of the state.

Please continue to list me as the State Water Board staff contact for the proposed Project.

Cliff Harvey, Environmental Scientist
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Sincerely,



Cliff Harvey

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EDMUND G. BROWN JR., Governor
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February 2, 2016

Mr. Robert Peterson, Project Manager
 Infrastructure Permitting and CEQA, Energy Division
 California Public Utilities Commission
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suncrestproject@horizonh20.com

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project, Unincorporated San Diego County, San Diego County, California (SCH # 2016011004)

Dear Mr. Peterson:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Suncrest Dynamic Reactive Power Support Project Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The County of San Diego (County) participates in the NCCP program through a signed Planning Agreement for the East County Multiple Species Conservation Program (MSCP).

The Suncrest Dynamic Reactive Power Support Project (Project) is located in unincorporated south-central San Diego County, approximately 5.75 miles southeast of the community of Alpine, off of Bell Bluff Truck Trail Road. The lands surrounding the proposed Project are primarily undeveloped, with some rural-residential development to the east and south, and the existing Suncrest Substation at the Project's western terminus. The Project is located approximately 1.8 miles south of Interstate-8 and Japatul Valley Road (State Highway 79) is approximately 1.2 miles to the southeast. The Project would be located on private property within the administrative boundary of the Cleveland National Forest.

The Proposed Project includes two primary components: 1) a Static Var Compensator (SVC) facility, to be located approximately 1 mile east of the existing Suncrest Substation; and 2) a 230 kilovolt (kV) transmission line from the proposed SVC facility to the existing Suncrest substation.

The proposed SVC facility would produce and consume reactive power for voltage support and would interconnect with the Suncrest bus via the proposed transmission line. The facility would be approximately 6 acres in total size (with a fenced area of approximately 2.58 acres) and would be located on an area previously used as a construction staging and materials storage area during construction of the Suncrest Substation (completed in 2012).

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The SVC facility would include various structures and electrical equipment, such as power transformers, power circuit breakers, control buildings, capacitors, and reactors, all of which would be installed on concrete foundations. The four power transformers within the proposed SVC facility would each require a maximum of approximately 10,000 to 12,000 gallons of oil. The tallest structures within the SVC would be the lightning shielding masts, which would be approximately 75-feet-tall.

In addition to the electrical equipment, the SVC facility would include the following components: signage and lighting; access driveway improvements; stormwater drainage system and detention basin; retaining wall; 7-foot-high chain link and barb wire security fencing; and transformer oil containment basins. A retaining wall would be installed on the east side of the SVC facility to minimize the potential for erosion and would be approximately 480 feet long and 15 feet tall at its highest point.

The proposed 230 kV transmission line would be approximately 1 mile in length and would connect the proposed SVC facility to the existing Suncrest Substation. The proposed transmission line would be installed primarily underground beneath Bell Bluff Truck Trail Road, with approximately 300 feet of the line transitioning aboveground via an 85- to 95-foot-tall riser pole connecting with the existing substation. The underground transmission line would be installed in polyvinyl chloride conduits within a concrete-encased duct bank system. The duct bank would be approximately 5 feet deep, and would be approximately 30 inches wide by 24 inches tall. The underground transmission line would include up to five underground splice vaults spaced roughly every 900 feet to facilitate installation of the underground cables and operation and maintenance of the transmission line. The majority of the underground transmission line would be installed within Bell Bluff Truck Trail; however, installation of the splice vaults may require temporary disturbance outside of the roadbed.

The 85- to 95-foot-tall riser pole, for transition of the transmission line to an overhead span and entry into the existing Suncrest Substation, would be installed north of Bell Bluff Truck Trail. The base of the riser pole would be approximately 7 feet in diameter and require an additional approximately 15 foot radius of permanent disturbance around the riser pole.

In total, the Project would impact 12.2 acres of land, 6.2 acres of temporary impacts and 6 acres of permanent impacts. Construction is projected to be completed within 10 months with a targeted operation period of June 2017.

The Department offers the following comments and recommendations to assist the California Public Utilities Commission (CPUC) in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources.

Specific Comments

Project Scope

1. The Project is proposed to be constructed on an active habitat restoration site associated with the construction of the Sunrise Powerlink's Suncrest substation. Pursuant to the Sunrise Powerlink Project Final Environmental Impact Report (FEIR) Mitigation Measure B-1a, a minimum of 5 years of success monitoring (or until successful restoration is achieved)

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is required for "...all areas temporarily impacted by construction, such as tower construction sites, laydown/staging areas, temporary access and spur roads..." and by Condition 2.52 and 3.12 for impacts addressed under Sunrise Powerlink's Streambed Alteration Agreement (1600-2009-0365-R5). Currently, the Suncrest substation restoration is in its 4th year (fall 2012) of restoration efforts. The Department recommends that the DEIR analyze the need for siting the Project in an active restoration area rather than within previously developed locations. When evaluating the significance of impacting a restoration site, it is prudent to base that analysis on what the required condition of the land would have been following successful restoration pursuant to the restoration plan (see mitigation measures referenced above). For any development proposals within restoration areas, a fully restored habitat should be assumed when determining the baseline biological conditions for the DEIR's analysis.

Draft East County Plan

2. A Planning Agreement for the East County Multiple Species Conservation Program (MSCP) Plan was executed between the County of San Diego, the Department, and the U.S. Fish and Wildlife Service (USFWS) on November 18, 2008 and subsequently amended in May 2014 (Planning Agreement). The Planning Agreement guides the planning and preparation of the MSCP plan including defining the parties' goals and commitments, defining the scope of the conservation planning areas, and establishing an interim review process intended to meet the preliminary conservation objectives and reserve assemblage. The assemblage of the regional reserve system (as defined per the NCCP/Habitat Conservation Plan process) has been an ongoing process for well over a decade in San Diego County, led by not only the state (Department/CA State Parks) and federal (USFWS/Bureau Land Management/U.S. Forest Service) contingency, but also through partnerships with the local governments that have elected to work towards and adopt multi-species planning documents.

While the CPUC is not a party to the East County MSCP Planning Agreement, the Project is located within a Focused Conservation Area, a reserve planning tool for developing the draft East County MSCP. At the core of this plan (and as it exists under adopted MSCP Subarea Plans) is the preservation of large blocks of contiguous habitat in exchange for the participating local jurisdictions receiving permitting authority to regulate loss of the covered species. The underlying expectation is that the preserve areas remain whole or, if affected by development, be made whole again by replacing the functions and values lost. In order to address these aforementioned concerns we encourage the CPUC to coordinate with the Department and the USFWS in identifying potential areas for habitat acquisition or develop opportunities for habitat restoration within eastern San Diego County, to offset direct impacts to environmentally sensitive lands from the Project. Additionally, the Department recommends that the DEIR include a discussion regarding the Project's conformance to the guidance provided in the Planning Agreement's Interim Review Process to ensure successful implementation of the Project and draft MSCP plan.

Jurisdictional Delineation

3. The Project is proposed to be built within the existing laydown yard of the Suncrest substation. As part of the permitting process associated with that project a jurisdictional

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delineation (JD) identified multiple ephemeral drainages within the Department's jurisdiction. In order to document the current conditions, the Department recommends that a subsequent JD is performed for the Project. The Department recommends notification pursuant to Fish and Game Code section 1600 *et seq.* for any impact that will divert or obstruct the natural flow, or change or use any material from the bed, channel, or bank (which may include associated riparian resources) of any river, or stream (see comment 5 below).

Proposed Blasting

4. Multiple golden eagle (*Aquila chrysaetos*) territories are known within the Project vicinity. The NOP identifies "...hammering, cutting and localized low energy blasting" within the scope of potential Project related construction. The Department is concerned with the potential effects that the proposed blasting may have on golden eagle. As a fully protected species (Fish and Game Code § 3511), take (Fish and Game Code § 86) of Golden Eagle is prohibited in addition to protections already afforded by the federal Bald and Golden Eagle Protection Act (as amended, 16 U.S.C. § 668). The DEIR should analyze the potential effects of the Project development on golden eagle and explore feasible alternatives that avoid impacting or take of golden eagle.

General Comments

Streambeds and Riparian Habitats

5. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, Project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, or stream, or use material from a river, or stream. For any such activities, the Project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the lead agency's Environmental Impact Report for the Project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully

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identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹

Threatened, Endangered, and Candidate Species

6. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085, 2835). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, and is not covered under an approved NCCP, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c), and 2835). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
7. To enable the Department to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives to ensure that alternatives to the proposed Project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

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Biological Resources within the Project's Area of Potential Effect

8. To provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.
 - a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008²). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
 - c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

9. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.

² Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

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- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
- b) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c) The zoning of areas for development Projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

- 10. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
- 11. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 12. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

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13. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the Project area would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary flagging, and remain in effect as long as construction is occurring or until the nest is no longer active. No Project construction shall occur within the flagged nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
14. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
15. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on this NOP. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858-467-4289) or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

cc: State Clearinghouse, Sacramento
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad

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Literature Cited:

Community Conservation Program Plans and Habitat Conservation Plans. NCCP Planning Agreement No. 2810-2007-00205_October 29, 2008.

County of San Diego, 2013. North and East County MSCP Planning Agreement and related amendment. PA# 2810-2007-00205. Amendment to County of San Diego, the California Department of Fish and Wildlife and the United States Fish, and Wildlife Service Regarding the North and East County Multiple Species Conservation Program Plans: Natural Community Conservation Plans and Habitat Conservation Plans. November 15, 2013.



County of San Diego

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February 8, 2016

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Via email to: suncrestproject@horizonh20.com

COMMENTS ON NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE SUNCREST DYNAMIC REACTIVE POWER SUPPORT PROJECT PROPOSED BY NEXTERA ENERGY TRANSMISSION WEST, LLC

Dear Mr. Peterson,

The County of San Diego (County) has received the California Public Utilities Commission's Notice of Preparation of an Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project (Project) and appreciates this opportunity to comment. County staff has completed their review and have the following comments regarding the Project:

Hazardous Materials

The Project is expected to require the storage of between 10,000 – 12,000 gallons of oil for the transformers. Typical transformer oils are hazardous substances under State law. This storage will require a ministerial Unified Program Facility Permit, issued by the County Department of Environmental Health. For questions related to this permit, please contact Wendy Martinez at 619-247-2008 or Wendy.Martinez@sdcounty.ca.gov.

Watershed Protection

For storm water quality standards, the 2007 MS4 Permit (Order No. R9-2007-0001) and the County of San Diego SUSMP, dated August 1, 2012, are currently in effect and may apply. Please note that the Project may need to comply with the recently adopted San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100) if prior lawful approval is not established prior to the implementation of the BMP Design Manual and other development regulations related to the 2013 San Diego Municipal Storm Water Permit (Order No. R9-2013-0001). County staff will provide additional review comments during the draft EIR period.

Mr. Peterson
February 8, 2016
Page 2 of 3

The Project may generate potential storm water quality impacts onto unincorporated County of San Diego lands; therefore, the Project may need to consider the following items:

- Post-construction Best Management Practices (BMPs), Low Impact Development (LID), Source Control BMPs and hydromodification management plan (HMP) in accordance with the relevant San Diego Municipal Storm Water Permit (2007 MS4 Permit or 2013 MS4 Permit pending the time of project approval/construction).
- Construction BMPs and associated plans for conformance with the County of San Diego' Grading Ordinance, Watershed Protection Ordinance and State of California's Construction General Permit.

Parks and Recreation

The adopted Alpine Community Trails and Pathways Plan and Map, included in the County Trails Master Plan (CTMP), identifies proposed community trail alignment #23 as the Bell Bluff Trail (see attachment A). The trail locations shown on the maps on the CTMP represent general corridors and do not represent exact trail alignment locations. The Department of Parks and Recreation recommends coordination with the Alpine Community Planning Group regarding any proposed trail accommodation through the site.

Noise

The Project should be designed to comply with the County's Regulatory Section: Section 36.401 for operation and construction of the facilities.

Fire

County Fire Services has completed a review of the Fire Protection Plan prepared by Dudek, dated December 2015 and has provided the following comments to the Project applicant:

- Page 1, Footnote 1: Please update the timeline for the completion of the dissolution of the SDRFPD to be by mid-2016.
- It is stated in the FPP that there will be a 2,500 sq. ft. Control House (Sec. 1.1.2.2). Please specify in the FPP that the Control House will be non-combustible construction.
- Sec. 3.1.1 *Emergency Response*, Page 37: Please revise that initial response will be from the SDCFA Descanso Fire Station, which is staffed with CAL FIRE firefighter / paramedics via Schedule A contract with the SDCFA.
- Sec. 3.1.1 *Emergency Response*, Page 38, second paragraph: Replace this entire paragraph with discussion that the next due in will be the SDCFA Pine Valley Fire Station, which is staffed with CAL FIRE firefighter / paramedics via Schedule A contract with the SDCFA.
- Sec. 3.1.1 *Emergency Response*, Page 38: Provide discussion on how the applicant is to contract with a private fire industrial brigade to conduct operations on electrical-related fires within the facility (similar to SDG&E's contract with Capstone).

Mr. Peterson
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- Sec. 3.1.1 *Emergency Response—Emergency Services*: Revise this section to state that Mercy is the contract ambulance provider to this area. The Mercy ambulance is in the Alpine area during the day and at night is housed in the Descanso Fire Station.
- Sec. 3.2.1 *Fire and Maintenance Access* in FPP & Sec. 3.5 *Fire Access* in the Tech Report: Revise the discussion regarding gates to state that they are to be two feet wider than the access roads (gates 22' wide) and that the gates are to be setback 30' from Bell Bluff Truck Trail.
- Sec. 3.2.1 *Fire and Maintenance Access*: Revise the discussion regarding access roads to state that they are to be capable of supporting 75,000 lbs.
- Sec. 3.3 *Water*, Second Paragraph: Replace the sentence that begins "If a water tank is built next to the SVC location..." with "A 10,000 gallon water storage tank will be situated to the southwest of the northernmost access driveway and accessible by fire engines".
- Sec. 3.7 *Defensible Space and Vegetation Management* of the FPP & Sec. 4.2 *Fuels Management* of the Tech Report: Clearly state that a minimum of 100' of defensible space will be provided around the facility, which will include the first 50' being devoid of any vegetation.
- Sec. 4.0 *Mitigation Measures*, Item 2: Reference to Appendix G should be replaced by Appendix F.
- Please provide a Project Facilities Availability – Fire form with Section 1 completed and signed to our department for us to complete so that you may add it to Appendix C of the next revision of the FPP.

If you have any questions regarding these comments, please contact Danny Serrano, Land Use/Environmental Planner, at (858) 694-3680, or via email at Daniel.serrano@sdcounty.ca.gov.

Sincerely,



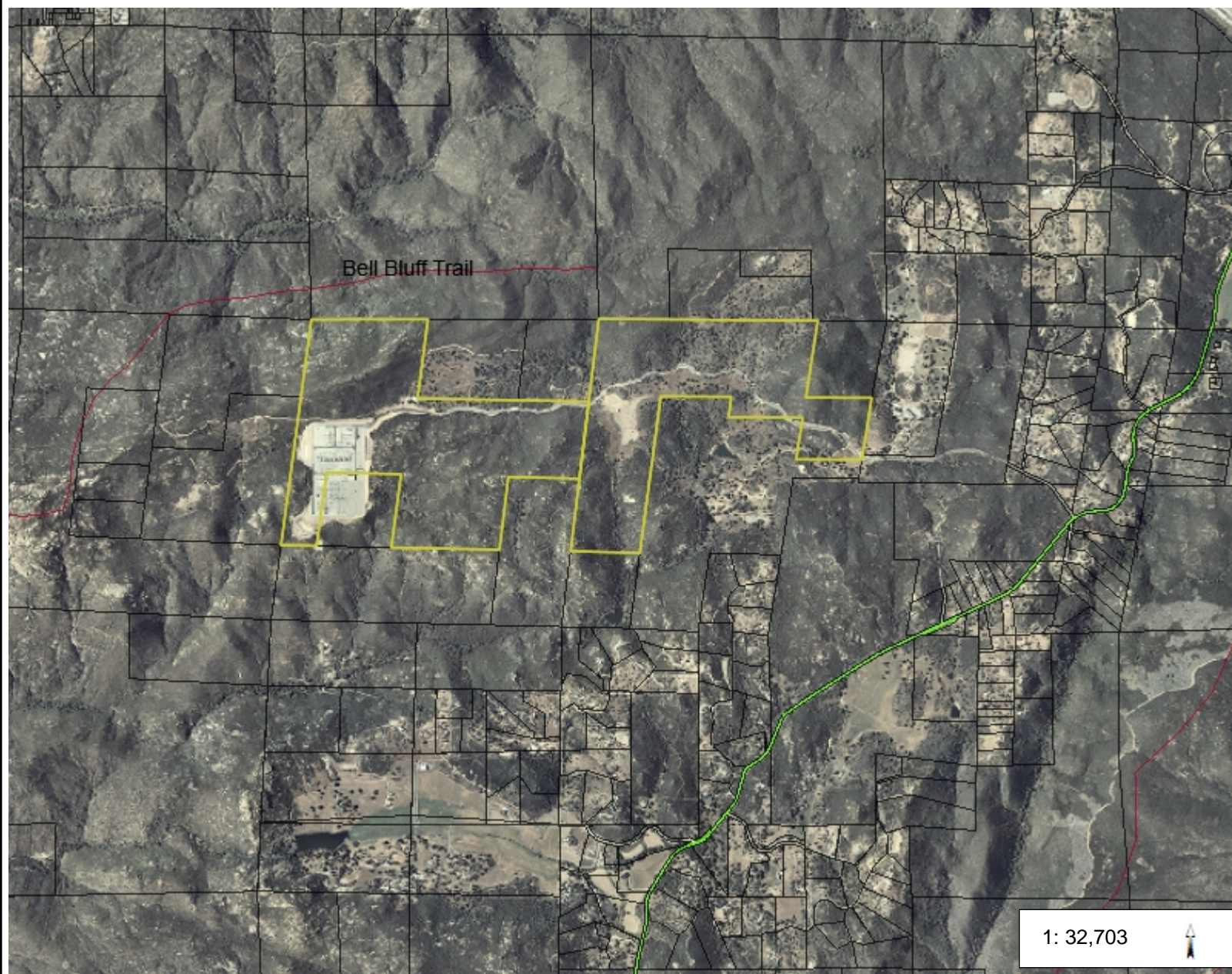
Joseph Farace, AICP
Group Program Manager
Advance Planning Division
Planning & Development Services

Attachment A: Bell Bluff Trail

Email cc:

Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Conor McGee, CAO Staff Officer, LUEG
Eric Lardy, Land Use/Environmental Planning Manager, Planning & Development Services
Ashley Smith, Land Use/Environmental Planner, Planning & Development Services
Nick Alex, Planner, Department of Public Works
Mary Wells Bennett, Department of Environmental Health
Marcus Lubich, Park Project Manager, Department of Parks and Recreation

Bell Bluff Trail



Legend

- ☐ Parcels
- Circulation Element**
 - Expressway/Freeway
 - Prime Arterial
 - Major Roads Series
 - Boulevard Series
 - Community Collector Series
 - Light Collector Series
 - Minor Collector Series
 - Local Public Roads
- Trails**
 - Regional Regional
 - Community Trail
- ☐ Trail Easements

1: 32,703



1.0 0 0.52 1.0 Miles

NAD_1983_StatePlane_California_VI_FIPS_0406_Feet
Planning and Development Services

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Notes



ORA
Office of Ratepayer Advocates
California Public Utilities Commission

LINDA SERIZAWA
Interim Director

505 Van Ness Avenue
San Francisco, California 94102
Tel: 415-703-25250
Fax: 415-703-2057
<http://ora.ca.gov>

February 8, 2016

Rob Peterson, Project Manager
Infrastructure Permitting and CEQA, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments on the Notice of Preparation of an Environmental Impact Report for the
Suncrest Reactive Power Support Project, Proposed by NextEra Energy Transmission
West, LLC; Application (A.) 15-08-027

Dear Mr. Peterson:

The Office of Ratepayer Advocates (ORA) hereby submits the following comments to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Suncrest Reactive Power Support Project (Project) proposed by NextEra Energy Transmission West, LLC (NextEra). ORA seeks to ensure that the EIR considers all the potential environmental impacts of the Project, including the difference between placing the Project outside the locational footprint of the Suncrest substation and inside the locational footprint. ORA believes that placing the Project inside the site of the Suncrest substation will prove the preferable alternative on environmental and other grounds, and requests that the Commission evaluate this among the alternatives considered.

Table 1 of the NOP identifies the summary of potential impacts and issues for the EIR and notes the following with respect to alternatives to the Project:

Alternatives.

- Concerns regarding inclusion, evaluation of a project alternative co-located within existing Suncrest substation site, (i.e. concerns that such an alternative wouldn't be evaluated in an MND,¹) which could have induced environmental impacts.²

¹ Mitigated Negative Declaration, California Code of Regulations, Section 15070.

² Notice of Preparation of EIR, p. 3.

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Page 2

Locating the proposed Project within the site of the existing Suncrest substation mitigates significant impacts and should be studied even if the Commission decides to prepare an MND for the project. As well as being lead agency for California Environmental Quality Assessment (CEQA), the Commission is also the agency ultimately charged with determining if a project can be located within the site of the existing Suncrest substation³. Thus, ORA has requested that the scope of this proceeding include a determination of whether locating the proposed Project outside the existing Suncrest substation was based on the assumption that California Independent System Operator (CAISO) and/or San Diego Gas & Electric company (SDG&E) would need to authorize or approve co-locating the proposed Project within the Suncrest substation.⁴

Public Utilities Code, Section 762, in relevant part states:

Whenever the commission, after a hearing, finds that additions, extensions, repairs, or improvements to, or changes in, the existing plant, equipment, apparatus, facilities, or other physical property of any public utility or of any two or more public utilities ought reasonably to be made, or that new structures should be erected, to promote the security or convenience of its employees or the public, or in any other way to secure adequate service or facilities, the commission shall make and serve an order directing that such additions, extensions, repairs, improvements, or changes be made or such structures be erected in the manner and within the time specified in the order. If the commission orders the erection of a new structure, it may also fix the site thereof. If the order requires joint action by two or more public utilities, the commission shall so notify them and shall fix a reasonable time within which they may agree upon the portion or division of the cost which each shall bear.

If co-location of the proposed Project and the Suncrest substation is not studied in this EIR, and the Commission ultimately determines that the project should be located inside the substation site, then another EIR would likely ensue to study the co-location alternative.

Therefore, ORA recommends that the following issues be included in the scope of the EIR:

1. Whether the proposed Project should be co-located within the footprint of the existing Suncrest Substation.

³ See Public Utilities Code, Section 762 et. seq; see also Public Utils. Code, Section 851 et seq.

⁴ Id.; See also ORA's Response to NextEra's Application.

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Page 3

2. Whether the existing Suncrest substation needs to be expanded to accommodate inclusion of the proposed Project within its site or current footprint.

There is no need for the one mile 230 kV transmission line interconnecting the proposed Project and the existing Suncrest substation. Locating the Project within the footprint of the Suncrest substation would more effectively provide voltage support services to the Suncrest substation, operate more reliably and be easier to coordinate from an engineering standpoint. Co-locating the Project within the substation also costs less and might have less impact on the environment than building the Project outside the site of the substation.

Sincerely,

/s/ LINDA SERIZAWA

Linda Serizawa Interim Director,
Office of Ratepayer Advocates

Cc: Tom Engles, Horizontal Water and Environment, LLC
Administrative Law Judge Todd Edmister
Service List for A.15-08-027



Adrianna B. Kripke
Senior Environmental Counsel

San Diego Gas & Electric Company
8330 Century Park Court, CP32C
San Diego, CA 92123
Tel: 858-654-1536
akripke@semprautilities.com

February 8, 2016

SENT BY EMAIL

Rob Peterson, California Public Utilities Commission
c/o Tom Engels, Horizon Water and Environment, LLC
180 Grand Avenue, Suite 1405
Oakland, CA 94612
<suncrestproject@horizonh2o.com>

Re: San Diego Gas & Electric Company's Comments on the Notice of Preparation of an Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Dear Mr. Peterson:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Suncrest Dynamic Reactive Power Support Project (Proposed Project). San Diego Gas & Electric Company (SDG&E) agrees that the EIR should address the potentially significant impacts and issues listed in the NOP. SDG&E especially encourages the EIR's consideration of: (1) the Proposed Project's potential conflicts with SDG&E's ongoing, legally binding mitigation obligations for the Suncrest Substation; and (2) an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation.

I. The Proposed Project Should Not Conflict with SDG&E's Ongoing, Legally Binding Mitigation Obligations for the Suncrest Substation

The NOP's list of potentially significant impacts and issues includes "[i]mpacts on existing mitigation sites/conflicts with existing mitigation obligations related to the existing Suncrest Substation."¹ SDG&E owns and operates the Suncrest Substation and will continue to honor these ongoing, legally binding mitigation obligations. SDG&E therefore requests that the Proposed Project not conflict with any of these obligations, which include restoring habitat on the site of the Proposed Project and transferring nearby land to the U.S. Forest Service for conservation purposes.

¹ NOP at 2.

Rob Peterson, California Public Utilities Commission
 February 8, 2016
 Page 2 of 4

II. SDG&E Requests Analysis of an Alternative that Locates an SDG&E-Owned Dynamic Reactive Device Within the Suncrest Substation

SDG&E requests that the EIR analyze an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation. This will help to meet the requirement in the California Environmental Quality Act (CEQA) Guidelines to analyze a “range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.”²

A. The Alternative Is Feasible

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation meets the criteria for inclusion in the alternatives analysis. This alternative is feasible, which the CEQA Guidelines define as meaning “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”³

The NOP states:

The Proposed Project originates from the California Independent System Operator’s (CAISO’s) 2013-2014 transmission planning process, which identified a need for a 300-million volt-ampere reactive (megavar) dynamic reactive device at the existing Suncrest Substation’s 230 kilovolt (kV) bus to meet California’s 33% Renewable Portfolio Standard.⁴

SDG&E submitted a project sponsor bid to CAISO to locate an SDG&E-owned dynamic reactive device within the Suncrest Substation based on SDG&E’s determination that doing so was feasible. While CAISO selected NextEra Energy Transmission West, LLC (NEET West) to be the project sponsor, CAISO emphasized in its selection report that it considered both NEET West and SDG&E “to be highly qualified to finance, construct, own, operate, and maintain” the device.⁵ CAISO’s selection report therefore confirms SDG&E’s determination that locating an SDG&E-owned device within the substation is feasible.

² Cal. Code Regs. tit. 14, § 15126.6(a).

³ *Id.* § 15364.

⁴ NOP at 4.

⁵ CAISO, Suncrest Reactive Power Project – Project Sponsor Selection Report at 1 (Jan. 6, 2015), *available at* <https://www.caiso.com/Documents/SuncrestProjectSponsorSelectionReport.pdf>.

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February 8, 2016
Page 3 of 4

In the Proponent's Environmental Assessment for the Proposed Project, NEET West stated correctly that SDG&E will not agree to NEET West's construction of the dynamic reactive device within the Suncrest Substation. NEET West then stated that its construction of the device within the substation would be infeasible due to issues with site control and timing.

While these issues affect the feasibility of NEET West's construction of the dynamic reactive device within the Suncrest Substation, they do not affect the feasibility of locating an SDG&E-owned device within the substation. As discussed below, an alternative that locates an SDG&E-owned device within the substation could avoid or substantially lessen any significant environmental effects from the Proposed Project.

SDG&E requests that the EIR analyze this alternative regardless of the ultimate conclusions about site control and timing. This will ensure that the EIR provides a complete analysis under CEQA of the Proposed Project's environmental impacts.

B. The Alternative Meets the Project Objectives

The NOP lists the Proposed Project's objectives as follows:

- Meet the CAISO's identified need for reactive support at the Suncrest Substation's 230 kV bus;
- Improve and maintain the reliability of the transmission grid;
- Facilitate delivery of renewable energy generation from the Imperial Valley area to population centers to the west;
- Support achievement of the state's 33% Renewable Portfolio Standard.⁶

An alternative that locates an SDG&E-owned device within the substation meets all these objectives.

C. The Alternative Could Avoid or Substantially Lessen Any Significant Environmental Effects

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation could avoid or substantially lessen any of significant environmental effects from the Proposed Project.

The Proposed Project would construct: (1) a Static Var Compensator facility approximately one mile east of the Suncrest Substation; and (2) a new, approximately one-mile

⁶ NOP at 4.

Rob Peterson, California Public Utilities Commission

February 8, 2016

Page 4 of 4

230 kV transmission line, which would connect the Static Var Compensator facility to the substation. The Static Var Compensator facility would have a total footprint of approximately six acres, located in an area previously used for staging and storage during construction of the substation. The transmission line would be installed primarily underground beneath Bell Bluff Truck Trail road. The last approximately 300 feet would transition above ground at an 85- to 95-foot riser pole that would connect via SDG&E-owned overhead conductors to the 230 kV bus at the substation.

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation would not require any construction outside the substation footprint and would require only a minimal amount of new transmission conductors within the substation. Using the existing substation footprint, as well as avoiding construction of an approximately one-mile transmission line, could avoid or substantially lessen the potentially significant impacts identified in the NOP. These potentially significant impacts are for biological resources, cultural resources, hydrology and water quality, land use, noise, and public services.

For these reasons, the alternative analysis should include an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation. SDG&E looks forward to reviewing the alternatives analysis, as well as the analysis of potential conflicts with SDG&E's ongoing, legally binding mitigation obligations for the substation.

Thank you for considering these comments. Please contact me if you have any questions.

Sincerely,



Adrianna B. Kripke
Senior Environmental Counsel
San Diego Gas & Electric Company

cc: Wendy D. Johnson, Regulatory Business Manager, SDG&E

California Public Utilities Commission

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Scoping Comment Form

Name:	[REDACTED]
Group/Organization (optional):	[REDACTED]
Mailing Address:	[REDACTED]
Telephone Number (optional):	[REDACTED]
Email (optional):	

SEND EIR review INFO

Comments/Issues:
① Reference the EPA Clean Water Act in EIR
② Send me a copy of EIR
③ Please EXPLAIN the need for and the actual technical process used in Facility
④ GASEOUS EMISSIONS, OZONE ETC.?
⑤ Fire DANGER - FROM FACILITY PROCESS
⑥ EXISTING SUBSTATION EIR EFFECT
⑦ Need FOR Project?
⑧ MORE POWER THRU ALPINE + LUGANEA?
We need more INFO TO prevent DANGER.

Please use additional sheets if necessary.

Submit written comments (postmarked no later than February 8, 2016) to:

Mail: Rob Peterson, CPUC Project Manager
c/o Tom Engels
Horizon Water and Environment, LLC
180 Grand Avenue, Suite 1405
Oakland, CA 94612

Email: suncrestproject@horizonh2o.com

Questions? Please contact us or visit our website:
<http://www.cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html>

February 1, 2016

Rob Peterson, CPUC
% Tom Engels
Horizon Water and Environment
180 Grand Avenue, Suite 1405
Oakland, CA 94612

Subject: Response to the Scoping Meeting on the Sun Crest Dynamic Reactive
Power Support Project Meeting held in Alpine, CA January 21st 2016

The meeting discussed adding another facility next to the existing Transformer Facility near Bell Bluff in Alpine. Both the present facility and the proposed facility used oil filled transformers and possibly capacitors. Both facilities in my opinion create a serious fire danger. The oil filled transformers and capacitors can explode due to internal shorting. In a Santa Ana wind condition the fire can spread to adjacent transformers.

The combustion can attach and flame-hold to the downstream side of adjacent transformers which act as bluff body flame-holders and create a long conflagration, which can create in wind conditions a firestorm which could burn Alpine Viejas Casino, the town of Alpine and perhaps El Cajon, California.

However, the fire danger can be mitigated by installing a steel containment barrier around the facilities to contain the fire, allow for suppression installation, prevent ignition from stray bullets and errant vehicles. Advanced Engineering will provide preliminary design for the two barriers as a public service in return for some Powerlink information.

The January 21st meeting mentioned that the new facility would allow about 20% power increase through Alpine. Alpine has just recovered from the destruction caused by routing the Powerlink through its main street.

We are opposed to the increase of power levels through Alpine California because of the increase in EMF radiation levels associated with it, and the danger to children from leukemia. Measured EMF levels on Alpine, Blvd. appear to exceed the levels that increase the risk of childhood leukemia as reported in the references contained in the attached study. (Study of EMF Levels on Alpine Blvd., In Alpine California before and after Sunrise Powerlink Energization, January 21st, 2016).



January 21st 2016

**Study of EMF Levels on Alpine Blvd. in Alpine, CA Before and After
Sunrise Powerlink Energization**

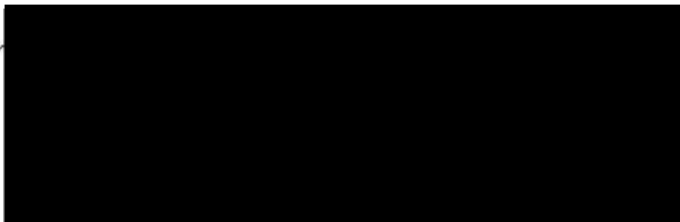
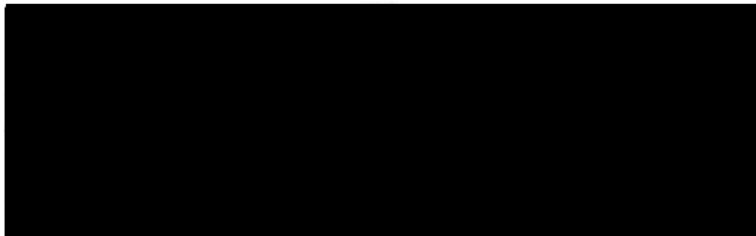
EMF measurements were taken along Alpine Blvd before and after the buried Powerlink cables were energized by Robie Faulkner and Michael Milligan of Alpine. Measurements were taken also inside an F150 truck on Alpine Blvd. at the same locations and on I8 E parallel to Alpine Blvd. The measurements taken inside the vehicle on Alpine Blvd. appear to be higher than measured on the roadside.

The reason the measurements were taken was to determine if levels may be harmful to health.

A synopsis of an Oxford University and Institute of Environmental Health in Stockholm Sweden studies are attached. The results of the study appear to indicate the risk of childhood leukemia increase with exposure to magnetic fields above .2 / .4 Micro Tesla.

It appears from the trend of the measurements taken and the information presented in the literature that children in Alpine may be at risk for leukemia.

We ask the Alpine Planning Group to ask the County of San Diego to examine the Alpine children for leukemia once a year as a precaution.



EMF measurements taken on Alpine Blvd with Lutron EMF Field Tester, Model EMF – 822A Measured in micro tesla for 30 sec.

	Date 3-11-12	06-24-12	01-25-16	01-26-16
<u>Location, Alpine</u>	<u>Before Pwrlnk</u>	<u>RD.</u>	<u>RD.</u>	<u>*Vehicle</u>
<u>Star Vly Rd.</u>	.01	.22	.27	.12
<u>Cranors house (SVR)</u>	.02	.22	.01	.9
<u>Star Vly Rd. Mail Box</u>	.1	.73	1.85 avg	.80
<u>Alpine Blvd. Bridge</u>	.3	.74	1.03 avg	.30
<u>High School site</u>	.6	.9	.155 avg	2.04
<u>Albertsons</u>	.2	1.7	1.01	1.75
<u>Donatos</u>	.2	.2	.36	1.06
<u>4 Way Stop</u>	.21	.38	.25	.18
<u>Elementary School</u>	.07	.27	.38 avg	.61
<u>Tavern & Alpine Blvd</u>	.03	.4	.43	.40
<u>Peutz Vly Rd.</u>	.015	1	.47	2.12

Note: Average measurements. Taken at center and side of road and averaged.

*Measurements taken in F150 Truck in West lane of Alpine Blvd.

Note: Measurements were taken on I8 E inside F150 Truck parallel Alpine Blvd. Readings measured .03 to .06 micro tesla except for Victoria Dr. underpass .13 and bridge underpass .2 micro tesla

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fighting the UK's biggest child killer

Fighting childhood cancer.
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07 February 2014

Press release: Overhead power line study does not overturn existing link with childhood leukaemia

Press release: embargoed until 00.01 hrs Friday 7th February 2014

[About childhood cancer](#)[What we do](#)[Fundraising and events](#)

Children with Cancer UK notes the publication of the Bunch et al paper in the British Journal of Cancer today [i] and its further exploration of the association between residential proximity to high voltage overhead power lines and childhood leukaemia risk.

[For researchers](#)

Researchers at the Childhood Cancer Research Group in Oxford extended their previous study of childhood leukaemia and proximity to power lines by including more recent data, cases and controls from Scotland, by considering 132 kV power lines as well as 275 kV and 400 kV and by looking at greater distances from the power lines. Their report published today concludes that the risk declines after the 1980s.

[About us](#)[Donate](#)

In 2005, the 'Draper Study' [ii], published in the British Medical Journal reported an increased risk of leukaemia in children born in England and Wales between 1962-1995 whose birth address fell within 600 metres of a high voltage power line.

[Latest family update](#)**Benji**

Three-year-old Benji was waking up screaming with terrible leg pains. He was diagnosed with leukaemia. Although still undergoing treatment, he has started school and is loving it.

Electric and magnetic fields (EMFs) are created by the presence of electricity. They are produced in varying degrees and strengths by all elements of the electricity supply system – from high-voltage power lines to domestic electrical appliances.

A doubling of the risk of childhood leukaemia with exposure to magnetic fields associated with the electricity supply above 0.3/0.4 microtesla is widely acknowledged. The robustness of this association has been re-affirmed in the recent EU SCENIHR draft Report [iii] and a new pooled analysis of international studies [iv].

Professor Denis Henshaw, Emeritus Professor of Human Radiation Effects at the University of Bristol and Scientific Advisor to Children with Cancer UK, said: "The report adds weight to the original 2005 findings that children living in proximity to power lines were, until after the 1980s, at increased risk of developing leukaemia.

"We are clear that this report does not alter the widely acknowledged robust association of power frequency magnetic fields with childhood leukaemia risk. That the risk now appears to have diminished is intriguing and at present we can only speculate as to why this may be. This paper highlights the clear need for further research."

Related Topics[acute lymphoblastic leukaemia](#)[acute myeloid leukaemia](#)[bake club](#)[brain and spinal tumours](#)[brain tumour initiative](#)[cancer treatments](#)[childhood cancers](#)[corporate partners](#)[cycling](#)[donate](#)[funding research](#)[fundraising stories](#)[patient stories](#)[running](#)[supporting families](#)[trekking](#)

Around 3,600 youngsters, including children and babies, are diagnosed with cancer every year in the UK. Children with Cancer UK funds life-saving research into the causes, prevention and treatment of childhood cancer and works to protect young lives through essential welfare and campaigning programmes.

ENDS**Notes to editors**

1. For quotes or interviews and further information about the charity please contact Tina Price, PR Manager
Email: tina@tinapriceconsultants.com Tel: 01258 861 221 Out of hours: 07966 239 092
2. Where possible, please include the contact details for more information: www.childrenwithcancer.org.uk or 020 7404 0808.

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American Journal of Epidemiology

aje.oxfordjournals.org

Am. J. Epidemiol. (1993) 138 (7): 467-481.

Magnetic Fields and Cancer in Children Residing Near Swedish High-voltage Power Lines

Maria Feychting and Michael Alhborn

+ Author Affiliations

Reprint requests to Maria Feychting, Institute of Environmental Medicine, Karolinska Institutet, Doktorsringen 18, Box 60208, S-104 01 Stockholm, Sweden

Received December 28, 1992.
Revision received June 10, 1993.

Abstract

A case-control study was conducted to test the hypothesis that exposure to magnetic fields of the type generated by high-voltage power lines increases cancer incidence in children. The study base consisted of everyone under age 16 years who had lived on a property located within 300 meters of any of the 220 and 400 kV power lines in Sweden during the period 1960-1985. Subjects were followed from their entry into the study base through 1985. A total of 142 cancer cases were identified through a record linkage to the Swedish Cancer Registry. There were 39 leukemia and 33 central nervous system tumor cases. A total of 558 controls were selected at random from the study base. Exposure was assessed by spot measurements and by calculations of the magnetic fields generated by the power lines, taking distance, line configuration, and load into account. Information about historical loads on the power lines was used to calculate the magnetic fields for the year closest in time to diagnosis. When historical calculations were used as exposure assessment for childhood leukemia with cutoff points at 0.1 and 0.2 microtesla (μT), the estimated relative risk increased over the two exposure levels and was estimated at 2.7 (95% confidence interval (CI) 1.0-6.3) for 0.2 μT and over; p for trend = 0.02. When the upper cutoff point was shifted to 0.3 μT , the relative risk was 3.8 (95% CI 1.4-9.3); p for trend = 0.005. These results persisted when adjustment for potential confounding factors was made. For central nervous system tumor, lymphoma, and all childhood cancers combined, there was no support for an association.

Key words: child, electromagnetic fields, leukemia, neoplasms

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Articles citing this article

A Pooled Analysis of Extremely Low-Frequency Magnetic Fields and Childhood Brain Tumors

Am J Epidemiol 1993;137(7): 752-761

Abstract Full Text (HTML) Full Text (PDF)

Exposure assessment and other challenges in non-ionizing radiation studies of childhood leukaemia

Paediatr Perinat Epidemiol 1993;7(1): 139-147

Abstract Full Text (HTML) Full Text (PDF)

Nighttime Exposure to Electromagnetic Fields and Childhood Leukemia: An Extended Pooled Analysis

Am J Epidemiol 1993;137(6): 563-567

From: [Peterson, Robert](#)
To: [Tom Engels](#)
Subject: public scoping comment Fwd: Suncrest Dynamic Reactive Power Support Project
Date: Monday, February 08, 2016 7:26:56 PM

Sent by Android.

----- Original Message -----

From: [REDACTED]
Sent: Monday, February 8, 2016 06:34 PM
To: "Peterson, Robert" <Robert.Peterson@cpuc.ca.gov>
Subject: Suncrest Dynamic Reactive Power Support Project

Rob Peterson, Public Utilities Commission Project Manager,
My name is [REDACTED] I reside at [REDACTED]. I have
several concern related to the proposed addition of 1,700 Mega Watts of power to the Sunrise
Power Link.

There has been completed a measurement of the EMF (radiation) currently being generated by
the Sunrise Power Link. The study shows the current emissions are at a level known in Europe to
cause Leukemia in children.

The amount of power which is attempting to be added to the Sunrise Power Link (1,700 Mega
Watts) will increase the EMF exponentially along Alpine Boulevard where the residents walk and
children play as well as wait for the school bus. The current EMF is damaging to children at
existing levels. When additional power for approximately 85,000 new all electric homes is added
to the Sunrise Power Link what will be the benefit be to the community of Alpine?

The Sunrise Power Link was promised by SDG&E to keep All our power bills low in San Diego,
However every rate payer in San Diego county received a power rate increase due to the NEW 4
tier system of billing, which the PUC allowed. Prior the this new tier system there was peak and
off peak power usage. Each and every time SDG&E has made promises they have been empty.
As a member of the PUC you represent the citizens of the county NOT SDG&E. Please oppose
the new power increase to the Sunrise Power Link. The health of Alpines' next generation
depends on you.

Thank You for your time
[REDACTED]

California Public Utilities Commission
Suncrest Dynamic Reactive Power Support Project
Proposed by NextEra Energy Transmission West, LLC

Scoping Comment Form

Name:	[REDACTED]
Group/Organization (optional):	
Mailing Address:	[REDACTED]
Telephone Number (optional):	[REDACTED]
Email (optional):	[REDACTED]

Comments/Issues: the proposed Dynamic Reactive Power Support System to be installed along the Bell Bluff truck trail within the Cleveland National Forrest is in direct opposition to the health of every resident of Alpine. the addition of 1,700 mega watts of electrical power will increase the EAF of the Sunrise Power link exponentially. 1,700 mega watts does not sound like much when glazed over by SDG&E as well as contractor NextEra Energy Transmission West, LLC. However that is power enough for 85,000 all electric Residences. It is also power enough for 850 Post Office processing & Distribution Centers similar to the one located at 11251 Rancho Carmel Dr.

Please use additional sheets if necessary.

Submit written comments (postmarked no later than February 8, 2016) to:

Mail: Rob Peterson, CPUC Project Manager
 c/o Tom Engels
 Horizon Water and Environment, LLC
 180 Grand Avenue, Suite 1405
 Oakland, CA 94612

Email: suncrestproject@horizonh2o.com

Questions? Please contact us or visit our website:

<http://www.cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html>

cc Dianne Jacobs



February 9, 2016

Dianne Jacob
Supervisor, Second District

Dear Dianne,

I don't know if you received this from the PUC but the PUC wants to grant permission to NextEra Energy Transmission West LLC the right to construct a Static Var Compensator and a mile of 230 Volt transmission line in the same area as the existing Suncrest Substation in Japatul Valley.

Nowhere in the notice of the preparation of the EIR is a picture or description of what's proposed to be constructed so I thought you might be interested in what it looks like since it's made to sound so benign.

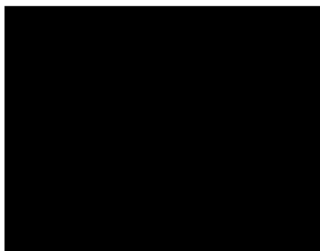
The pictures I've enclosed are of a similar unite located in El Cajon at SDG&E's office, and as you will note it's not a small thing.

Those of us that live in Japatul Valley and already are forced to look at the Suncrest Substation (that was to be screened by now, see enclosed 2011 email) and don't want another piece of power transmission equipment built that will further impede our views and further decrease property values.

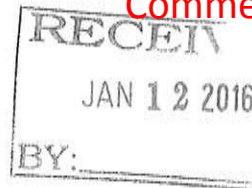
This proposed construction in no way benefits San Diego or San Diego County much less the residents of Japatul Valley.

If left unchecked in 20 years we will be looking at an electrical facility of a magnitude that will be unstoppable. Allowing Sempra Energy a foot in the door is like opening the floodgates to whatever they want to do, and you know as well as I the PUC will go along.

What is your position and your plan regarding the preparation of the EIR?



CC: Robert Peterson, CPUC, C/O Tom Engels, Horizon Water and Environment



Notice of Preparation

To: Responsible and Trustee Agencies

(Agency)

From: California Public Utilities Commission

(Agency)

505 Van Ness Avenue

(Address)

San Francisco, CA 94102-3298

Subject: **Notice of Preparation of an Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC**

The California Public Utilities Commission (CPUC) will be the lead agency and will prepare an environmental impact report (EIR) for the project identified below. We are requesting the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR and/or subsequent related environmental documents prepared by our agency when considering your permit or other approval for the project.

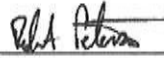
The project description, location, and potential environmental effects are contained in the attached materials. A copy of the initial study ☐ *is* ☒ *is not* attached.

Because of the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to suncrestproject@horizonh2o.com or Robert Peterson, CPUC, C/O Tom Engels, Horizon Water and Environment, 180 Grand Avenue, Suite 1405, Sacramento, CA 94612. Please include your name or the name of a contact person in your agency.

Project Title: Suncrest Dynamic Reactive Power Support Project

Project Applicant, if any: NextEra Energy Transmission West, LLC

Date: January 5, 2016Signature: Title: Project Manager, Energy Division,
Infrastructure Permitting and CEQATelephone: (844) 211-7510Email: suncrestproject@horizonh2o.com

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Notice of Preparation
of an
Environmental Impact Report
for the
Suncrest Dynamic Reactive Power
Support Project Proposed by
NextEra Energy Transmission West, LLC

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
Contact: Tom Engels
916/790-8548

January 5, 2016





2/9/16 DIANNE, 4 YEARS UNTIL A NO SIGN OF A TREE!
Email FROM 8/12

Thank you [REDACTED] however your response does not address my question, that is the EIR said the towers at the substation would blend in. If substation towers (the the parts that stick up above the transformers) were to blend in, you will note that's just not possible as the rise above the surrounding terrain(see my pictures). If your (Semptra) asking me to wait 30 to 50 years before the substation blends in with or is less visible assuming the trees continue to grow I will be dead.

If that's your premise it should have been disclosed to that effect in the EIR, why was it not?

The way I see it its a very clear statement that the "substation will blend in" what am I to do now that it doesn't?

Your welcom to come to my home and have a look for your self,, just give me a call [REDACTED]

Sincerely,

[REDACTED]

--- On Tue, 8/21/12, [REDACTED] wrote:

From: [REDACTED]
Subject: Status of visual screening at Suncrest Substation
To: [REDACTED]
Cc: [REDACTED]
Date: Tuesday, August 21, 2012, 7:19 PM

Hello [REDACTED]

Earlier this month you emailed CPUC regard screening of the Suncrest Substation as seen from your location on Japatula Valley Road.

I can report the following with regard to reducing visual impacts:

SDG&E has stained rock cut areas so they mimic and better blend with the natural landscape. Jute netting and hydroseeding have been applied where there is soil; shrubs, wildflowers, and grasses will take hold in these areas. On the manmade slope facing the valley, shrubs and other vegetation has been planted and are being irrigated. The retaining walls lower on this slope also have been stained. The chain link fence around the south side of the substation has had brown slats inserted into it to help obscure the lower elements of the substation.

AKZ →

From your vantage point, the most significant action will occur this fall. With cooler weather, 42 additional trees will be planted. These will be Coulter pine (*Pinus coulteri*) and Mondell or Afghan pine (*Pinus eldarica*). As they grow, they will provide a dense foliage and will establish a substantial visual screen. They will be irrigated and monitored for success. However, as with many trees, it will take time for them to grow. The Coulter pine is a relatively slow grower, at about a foot per year for its first 20 years. The Mondell or Afghan pine grows more rapidly, as much as 3 to 6 feet per year when young, up to about 30-40 feet. While a Coulter pine near Julian measures nearly 130 tall with a spread of 60 feet, a typical height at maturity is 80 feet. The Afghan/Mondell pine reaches 30-50 feet in height and will be planted under the power

lines

entering/exiting the substation. Many of the trees will be planted near the top of the slope, but a number will be scattered on the slope as well.

Information on the trees can be found on the internet. See, for example:

Coulter pine -- http://www.conifers.org/pi/Pinus_coulteri.php

Afghan pine -- <http://aces.nmsu.edu/county/donaana/mastergardener/documents/afghan-pine.pdf>

Coulter pine:

Photo of Coulter pines near Santa Ysabel, Ca.

Mondell or Afghan pine:

