

Attachment A - San Diego Gas & Electric Company (SDG&E) Comments  
 Sycamore to Peñasquitos 230kV Transmission Line Project  
 Draft Environmental Impact Report



Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
<b>Executive Summary</b>					
1.	1.0			<p>Cumulative Project MS-PQ – The details of the Mission-Peñasquitos (MS-PQ) project scope are yet to be determined, and should be noted as such throughout the DEIR.</p> <p>As stated within SDG&amp;E Partial Response No. 2 to Energy Division Data Request 14 (dated June 23, 2015):</p> <p>“SDG&amp;E is currently developing a proposed plan of service for the PQ-MS project and has not determined the final route, system configuration, etc. A significant amount of load-flow study, engineering, and route development remain to be completed, and there is a possibility that the final plan of service will look significantly different than was initially proposed by the CAISO.”</p>	
2.	1.3.2 1.3.4	1-10 1-11	Table 1.3-1	The California Coastal Commission should be included in the list of responsible agencies for the Proposed Project in Table 1.3-1.	
3.	ES.9	ES-68		The Comparison of the Proposed Project with the No Project Alternative does not include a statement that the No Project Alternative does not meet the project objectives, as stated on ES-62. A sentence should be added to this sentence stating such (see suggested text revision).	<p>Both the 15-mile-long Mission—Peñasquitos 230-kV transmission line and 2.6-mile-long Poway—Pomerado 69-kV line would be overhead. The No Project Alternative would require 17.6 miles of new overhead transmission and power lines compared with 13.3 miles of overhead transmission line for the Proposed Project. The No Project Alternative would not require underground transmission or power lines.</p> <p><u>It is important to note that the No Project Alternative would not achieve most basic project objectives.</u></p>
4.	ES.7.2	ES-53		<p>The discussion of the cumulative impacts in section ES.7.2 is as follows:</p> <p>“A new 230-kV transmission line was approved by CAISO in the 2014 – 2015 Transmission Plan that would connect the Mission and Peñasquitos Substations. The CAISO-approved Mission—Peñasquitos 230-kV transmission line would involve reconfiguring the southern 10-mile portion of the existing Mission—San Luis Rey 230- kV transmission line TL 23001 between the Mission Substation and Peñasquitos Junction to form part of the new Mission—Peñasquitos 230-kV transmission line (CAISO 2015). An additional new 230-kV transmission line would then be installed between Peñasquitos Junction and the Peñasquitos Substation to complete the new circuit between these substations.</p> <p>From Peñasquitos Junction to Peñasquitos Substation, the new 230-kV transmission line would be installed on a new set of approximately sixteen TSPs in SDG&amp;E ROW following the same alignment as Segment D of the Proposed Project. The new transmission line would require installation of either new 230-kV TSPs adjacent to the proposed 69-kV TSPs or installation of the new 230-kV transmission line on the existing steel lattice tower (opposite side from the Proposed Project 230-kV transmission line) and relocation of the existing 138-kV power line to new 138-kV TSPs. In either case, the Mission—Peñasquitos 230-kV transmission line would add three conductors and a new set of TSPs approximately 65 feet south of the Proposed Project double_circuit 69-kV TSPs within Los Peñasquitos Canyon.</p>	

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				<p>(Note: The Mission—Peñasquitos 230-kV line is also considered as an alternative to the Proposed Project [refer to the Appendix D: Alternatives Screening Report] and is a component of the No Project Alternative [refer to the No Project Alternative description in Chapter 3: Alternatives and the No Project Alternative analysis in Chapter 4: Environmental Analysis]).” (DEIR section ES7.2, pgs. ES-53 to ES-54)</p> <p>This appears to double-count the impacts of the Mission- Peñasquitos 230 kV line, by including it as both an alternative and as an incremental project. The MS-PQ 230 kV line should be properly considered as a part of the <b>baseline</b> analysis, as it is a CAISO-approved project, it is independent of the Proposed Project, and is required to meet NERC reliability criteria. This discussion should be removed from the cumulative impact section to avoid double counting impacts.</p>	
<b>1.0 – Introduction</b>					
5.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>2.0 – Project Description</b>					
6.	PD	20	4	Underground facilities will have the following dimensions: Splice Vaults have dimensions of 24 feet by 10 feet by 10 feet (not 24x10x8). Dimensions should be updated on page 20 of the Project Description.	
7.	2.3.2	2-36	Table 2.3-1	Footnote 3 – As discussed in more detail in the comment below in the Biological Resources Section (Section 4.1.7.1, pages 4.1-41 & 42), SDG&E disagrees with the 2-foot wide buffer included along all access roads.  For further discussion of why it is not appropriate to include a 2-foot buffer, please see Section II.A.2 of the comment letter.	<u>The 2-foot buffer should be removed from the project description. It should also be removed from all impact analyses that discuss this buffer.</u>
8.	2.3.3.1	2-40		The City of San Diego has provided permission for SDG&E to utilize the 11.7 acre Camino Del Sur staging yard area owned by the City of San Diego if it is available at the time of construction. SDG&E is proposing to use only up to 2.3 acres within the staging yard. The text on page 2-40 should be revised to reflect this clarification.	<b>Camino Del Sur</b> SDG&E has received permission from the City of San Diego to potentially use the 11.7-acre Camino Del Sur vacant parcel as a staging yard during construction, provided the land is vacant and available at such time. <u>SDG&amp;E is proposing to use up to 2.3 acres within this staging yard.</u>
<b>3.0 – Description of Alternatives</b>					
9.	3.5.3	3-23	Paragraph 6	Within the “Substations and Other Work Areas” section, the FEIR should add that there is a chance that SDG&E may have to install new shunt reactors to address light load/high voltage issues caused by the additional (i.e. longer) 230 kV underground alignment associated with Alternative 3. SDG&E believes that the probability of needing to install these new shunt reactors is low, but this possible additional work should be included in the description of Alternative 3. If the shunt reactors are ultimately required, they would be located at either the Sycamore Canyon or Peñasquitos Substation, and would be completely within the existing substation fence line. Total cost is anticipated to be on the order of \$1-3 million.	

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10.	3.5.5	3-35	Paragraph 3	<p>Although Alternative 5 is generally feasible, it raises a few transmission planning concerns. The DEIR articulates CPUC Project Objectives 1 and 2 as follows:</p> <ul style="list-style-type: none"> <li>• CPUC Project Objective 1: Maintain long-term grid reliability in the absence of San Onofre Nuclear Generating System generation</li> <li>• CPUC Project Objective 2: Deliver energy more efficiently to the load center in San Diego</li> </ul> <p>Alternative 5 generally meets these objectives. However, Alternative 5 differs in some significant ways from the Proposed Project, and those differences have potential reliability impacts that should be considered before a final route is selected.</p> <p>This alternative, as configured in the DEIR, would install a section of the new Proposed Project’s 230kV line on existing structures for approximately two miles south of Peñasquitos Substation. The other line occupying this structure line is TL23013, which connects Peñasquitos and Old Town Substations. The concurrent outage of the Proposed Project and TL23013, under the system configuration proposed by SDG&amp;E, would result in an overload of TL13810, an existing 138kV circuit connecting Peñasquitos and Friars Substation. The CAISO has approved a project (Mission-Peñasquitos (“MS-PQ”) 230kV line) in the CAISO’s 2014/2015 planning cycle to mitigate multiple post-contingency overloads, including this one, and to meet the CAISO’s planning standard for avoiding load shed in dense urban areas. Under the configuration as proposed by SDG&amp;E, the combined outages of the Proposed Project and TL23013 is a non-simultaneous, or N-1-1 contingency, as there are no common structures and thus no common mode of failure. NERC planning criteria allows for the assumption of operator intervention between the loss of each transmission line, permitting generation adjustments after the first contingency to prevent the second contingency from causing a thermal violation.</p> <p>In contrast, the Alternative 5 configuration would place both 230kV lines on common structures, thus creating the possibility of a common-mode failure and changing the concurrent outage of both lines from an N-1-1 event to an N-2, or simultaneous, event. This is a more severe contingency, and does not permit the assumption of operator intervention to mitigate potential overloads. SDG&amp;E performed a brief load flow analysis and determined that an overload of approximately 108% of the emergency rating would occur on TL13810 for this N-2 contingency in 2019. SDG&amp;E also confirmed that the system can be readjusted as a temporary measure until the approved MS-PQ project is complete and in service.</p> <p>Thus, in order to fully meet the project objectives, one of the following strategies would be required if the Alternative 5 route is constructed until the completion of the permanent mitigation in the form of the MS-PQ 230kV transmission line:</p> <p>1) Limiting import and adjusting San Diego generation so as to prevent the post-</p>	

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				<p>contingency overload of TL13810 following the N-2 contingency. This would prevent the thermal violation on TL13810, but would increase the risk of requiring a non-economic dispatch across many hours, potentially resulting in significant congestion costs and partially defeating the purpose of the Proposed Project's new 230kV line.</p> <p>2) Installation of a system protection scheme (or SPS) to shed load following the N-2 contingency until the MS-PQ 230kV project is in service. This strategy would also prevent the thermal violation on TL13810, but would increase the risk of load shedding in a densely populated urban area.</p> <p>It would be necessary to address this thermal violation (also known as a "NERC violation") as soon as Alternative 5 goes into service in order to realize the benefits of the Proposed Project and meet the project objectives. A similar mitigation would also be required for the Proposed Project as proposed by SDG&amp;E; however, that mitigation would simply be to readjust generation and import following the first N-1 contingency, which would limit the re-dispatch and congestion costs to only a few hours per year. Ratepayers would then immediately realize the benefits of the Proposed Project.</p> <p>SDG&amp;E notes that the CAISO approved a project to split the existing TL23013 line into two separate 230 kV circuits in the 2010/2011 planning cycle. This project has not yet been implemented, as the plan of service is still under study due to the significant system changes in the years following the project approval, and SDG&amp;E continues to carry out its due diligence. Currently, this project is being evaluated as part of the plan of service for a more extensive reconfiguration of the 230 kV system in the southern San Diego area. If Alternative 5 is approved as final routing, this would preclude the use of the TL23013 structures for this purpose and would require SDG&amp;E to find a different route for the new line.</p> <p>Both SDG&amp;E and the CPUC are in agreement as to the need to provide reliable service, and also agree that Peñasquitos is the de facto load center for San Diego. This is expressed in CPUC's Objective #2. With the configuration of the proposed SX-PQ line, or Alternatives 1-4, this load center will be connected by three electrically independent 230 kV sources (north from Encina, east from Sycamore Canyon, and south from Old Town/Silvergate) with no common mode of failure. However, with Alternative 5, a common mode of failure is introduced in the sources from Sycamore Canyon and Old Town/Silvergate, which if it occurred would leave Peñasquitos connected to a single 230 kV source at Encina. This is an improvement over the current situation, but is somewhat less reliable than the Proposed Project or Alternatives 1-4.</p> <p>Please note that while the routing for the MS-PQ line is still in early stages of development, as indicated in section ES7.2 of the DEIR, the most direct and economic route for the MS-PQ line would be to utilize the other side of SX-PQ towers in Segment D:</p>	

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				<p>“A new 230-kV transmission line was approved by CAISO in the 2014 – 2015 Transmission Plan that would connect the Mission and Peñasquitos Substations. The CAISO-approved Mission—Peñasquitos 230-kV transmission line would involve reconfiguring the southern 10-mile portion of the existing Mission—San Luis Rey 230- kV transmission line TL 23001 between the Mission Substation and Peñasquitos Junction to form part of the new Mission—Peñasquitos 230-kV transmission line (CAISO 2015). An additional new 230-kV transmission line would then be installed between Peñasquitos Junction and the Peñasquitos Substation to complete the new circuit between these substations.”</p> <p>From Peñasquitos Junction to Peñasquitos Substation, the new 230-kV transmission line would be installed on a new set of approximately sixteen TSPs in SDG&amp;E ROW following the same alignment as Segment D of the Proposed Project. The new transmission line would require installation of either new 230-kV TSPs adjacent to the proposed 69-kV TSPs or installation of the new 230-kV transmission line on the existing steel lattice tower (opposite side from the Proposed Project 230-kV transmission line) and relocation of the existing 138-kV power line to new 138-kV TSPs. In either case, the Mission—Peñasquitos 230-kV transmission line would add three conductors and a new set of TSPs approximately 65 south of the Proposed Project double-circuit 69-kV TSPs within Los Peñasquitos Canyon.” (DEIR section ES7.2, pgs. ES-53 to ES-54)</p> <p>In this respect, for the final buildout of both projects (SX-PQ and MS-PQ) the combination of Alternatives 3 and 4 would result in full utilization of the 230 kV towers in Segment D (i.e. two 230 kV lines on the same tower structures), and would likely be the most feasible, cost-effective, and have the least overall environmental impact in this area of any of the alternatives. With Alternative 5, once the SX-PQ line is moved to the TL23013 tower line, the MS-PQ line would still need to occupy one side of the 230 kV tower line in Segment D.</p> <p>Within the “Substations and Other Work Areas” section, the FEIR should add that there is a chance that SDG&amp;E may have to install new shunt reactors to address light load/high voltage issues caused by the additional (i.e. longer) 230 kV underground alignment associated with Alternative 5. SDG&amp;E believes that probability of needing to install these new shunt reactors is low (although because of the amount of additional underground involved, the risk is higher than for Alternatives 3 or 4), but this possible additional work should be included in the description of Alternative 5. If the shunt reactors are ultimately required, they would be located at either the Sycamore Canyon or Peñasquitos Substation, and would be completely within the existing substation fenceline. Total cost is anticipated to be on the order of \$1-3 million.</p> <p>For further discussion of the proposed Alternatives, please see Section I of the comment letter.</p>	

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11.	3.5.6	3-37	N/A	The three upgrades identified in the DEIR as comprising the No Project Alternative are not correct, because the combination of these three upgrades does not meet the project objectives as outlined in section ES-3.2 of the DEIR. These upgrades are not sufficient to mitigate all of the identified NERC reliability criteria violations that will be addressed by the Proposed Project, and therefore will not meet Objective #1, maintaining the long-term reliability of the grid. Also, these upgrades by themselves will not meet part of Objective #2, alleviating congestion on the power lines out of Sycamore Canyon Substation, as they do not increase outlet capability from Sycamore Canyon substation. These upgrades will not meet Objective #3, deliverability of renewable resources, as renewable energy entering the Sycamore Canyon Substation via the Sunrise Powerlink will still be constrained by the 69 kV and 138 kV electrical systems emanating from Sycamore Canyon Substation. Finally, the Mission—Peñasquitos 230-kV Transmission Line and Second Poway—Pomerado 69-kV Power Line upgrades are incremental to, not a substitute for, the Proposed Project, and are required in addition to, and independent of, the Proposed Project in order to ensure grid reliability.	
12.	3.5.1.1	3-17	1	Alternative 1: Eastern Cable Pole Option 1b - A detailed and comprehensive engineering analysis is required to confirm the pole location, height, retaining wall and grading plan details. However, based upon additional preliminary engineering, SDG&E has made revisions and corrections to Alternative 1b that more accurately depict what a cable pole structure at this location would be. SDG&E has made slight revisions to the civil design and impact areas for the structure, and has updated the design of the structure (see Attachment A, Minor Design Revisions). If a single cable pole structure were to be installed at this location, the design of the structure would be similar to all of the other 230kV cable poles with 138kV in a vertical spacing configuration (and not the horizontal configuration shown in Figure 4.2-40). In addition, required clearances and existing topography at this location would require the structure to be approximately 210 feet tall. With respect to operation and maintenance of the Alternative 1b cable pole structure, the height of the structure is taller than any structure currently in the SDG&E transmission system and would exceed the maximum height that SDG&E's largest boom truck can extend to (maximum extension of the Condor boom truck is 175 – 180 feet). Operation and maintenance of this structure would require the use of maintenance vehicles that could not safely operate within the amount of space available, even with the enlarged work area provided within Attachment A. SDG&E anticipates that maintenance of this structure would require partial closure of Carmel Valley Road and the use of traffic control. In addition,	
13.	3.5.5	3-33	All	Alternative 5: This option discusses the 2.1 mile overhead segment reuse, but as stated in SDG&E's response to Data Request No. 10 (Question 4), the structural adequacy of the structures is yet to be confirmed after acquisition of LiDAR survey data. In order to accurately validate the structural integrity of the existing structures based on proposed loading, additional LiDAR survey data is required for the Segment C Transmission lines. This survey data will help accurately identify the location and height of the Cable pole north of Carroll Canyon Rd as well as display updated field conditions due to recent major site work in the vicinity. Additionally, the survey data will support analysis needed to verify adequate electrical clearances from proposed installations to ground and existing	

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				<p>facilities in the corridor are maintained.</p> <p>The existing double circuit structures are designed to support bundled 1033.5 KCMIL ACSR “Ortolan” conductor on both circuits which is larger than the proposed bundled 900 KCMIL ACSS for the new Transmission Line from Sycamore Substation to Peñasquitos Substation. However, these structures were designed to carry an overhead shield wire much smaller than the proposed optical ground wire (OPGW) required for communication between the two Substations. These structures and foundations were originally designed in 1974. One option SDG&amp;E is considering to address this concern is to install ADSS communication cable as an underbuild and leave the overhead shield wire as is. This would ensure that the structures would not be subject to increased loads from the OPGW level, but the required communication would still be provided by the ADSS underbuild. SDG&amp;E is currently working on gathering detailed loading information to assess adequacy of the structures for the increased loads and ground clearance information to ensure the feasibility of installing the ADSS as underbuild. In order to complete the assessment of the structure adequacy, field investigation may be required amongst other measures to confirm the feasibility of reusing the existing structures and foundations with proposed loads.</p> <p>As previously stated in SDG&amp;E’s data responses and in light of the facts stated above, modifications/replacement of existing structures may be required to accommodate future loading conditions. This will potentially have an impact on Construction and Engineering design schedules which are yet to be determined.</p>	
14.	3.5.5	3-33	Figure E-6	<p>Alternative 5: The new pole locations and heights previously provided were based on preliminary engineering studies performed during the data request period. The identification of structure heights, final locations, marker ball and lighting requirements of these structures with certainty requires acquisition of current LiDAR survey data and a rigorous, comprehensive engineering analysis. Additionally, the vicinity of the CC-MM cable pole is in the process of being developed by Caltrans, and the final location will have to accommodate final Caltrans design. SDG&amp;E has provided an updated location for the CC-MM cable pole (refer to Attachment B), but the design would still require additional revision prior to construction.</p>	
15.	3.5.5.3	3-35	2	<p>The DEIR states that “Alternative 5 would utilize the same staging yards and materials storage areas as the Proposed Project for equipment staging and materials storage.” However, given that Alternative 5 results in shifting the project alignment further to the south, additional staging yard(s) would be needed closer to the underground alignment for Alternative 5. The need for an additional staging yard(s) is due to the additional vehicle miles travelled based on the lack of roads crossing Peñasquitos Canyon which separates the Proposed Project alignment (north of Peñasquitos Canyon) from the alignment of Alternative 5 alignment (south of Peñasquitos Canyon). SDG&amp;E has identified four potential locations that could potentially be utilized as staging yards if Alternative 5 were approved by the CPUC. These sites are further described in Attachment A (Minor Design Refinements). As shown in Attachment B, one potential staging yard location is at the west end of Alternative 5 within a disturbed but undeveloped portion of the El Camino Cemetery. Three other potential sites are located east of the El Camino Cemetery within</p>	

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				<p>sand and gravel quarry areas. SDG&amp;E has not contacted the property owners regarding the potential use of these sites as staging areas at this time. However, SDG&amp;E requests that these potential sites be considered as part of the geographic area reviewed as part of Alternative 5 to avoid the need for a Petition for Modification for additional staging yards if Alternative 5 were approved by the CPUC. Site specific environmental resource studies of these disturbed sites would be conducted if Alternative 5 were to be approved and if the property owners were interested in renting a portion of their properties.</p> <p>Locating staging yards closer to underground transmission alignment improves construction efficiency, reduces traffic impacts resulting from ferrying construction materials and equipment, reduces greenhouse gas emissions and reduces the overall construction duration, thereby improving the construction schedule. Comparing use of the Evergreen Nursery staging yard located adjacent to the west end of Segment B on Carmel Valley Road, which is approximately 8 miles from the closest point along Alternative 5, to a yard located less than a mile from the construction site, such as at the El Camino site, would reduce impacts. Alternative 5 would require approximately 365,000 feet of 8" duct and 242,000 feet of 2" duct, or total of 607,000 feet of duct. This could potentially result in 300 to 600 trips based on truck capacity and specific construction needs. This is a significant amount of additional vehicle miles travelled, emissions, and traffic impact as well as cost for the additional transportation based on the 7 miles difference of staging yards to the job site. This additional 7 miles will remain constant for the transport of all materials and equipment staged in the yard.</p>	
16.	3.5.5.2	3-36	Tables 3.5-1, 3.5-2, & 3.5-3	<p>Based upon the information contained within the DEIR for Alternatives 3, 4, 5, and ¾ Combined, SDG&amp;E anticipates that the In Service Date for the Project will be delayed if any of these alternatives is selected. Based upon preliminary review, SDG&amp;E anticipates that engineering and design will require 8 to 10 months to complete for each of these alternatives. Note the underground portions of DEIR Alternatives 3, 4, and 5 have no benefit from the design and engineering completed over the past 2 years on the Proposed Project since none of the alternative underground routes have common alignment with the Proposed Project. SDG&amp;E has identified other changes that are anticipated to affect the construction schedules, including a suggested design change on Alternative 5 (see Attachment B). Specifically, SDG&amp;E has identified the potential to maintain an underground system through the overpass on I-15, rather than spanning over this section using steel poles, as described in the DEIR. Utilizing an all underground system for the Alternative 5 crossing of I-15 is the preferred design, but will require additional engineering and permitting, as compared to the previously identified overhead crossing.</p> <p>In addition, the duration of trenching and cabling is also anticipated to increase based upon preliminary design and coordination, as well as mitigation and other restrictions outlined within the DEIR. For example, SDG&amp;E has identified anticipated increases in the duration of trenching and cabling activities based the on work limitations (e.g. limitations on the sequencing, duration, and timing of underground construction) required by DEIR mitigation measures as well as the expectation that the City of San Diego (based on recent conversations with the City) will require similar or additional restrictions on underground</p>	

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				<p>construction including (but not necessarily limited to): night work with reduced hours, limits on the number of crews working concurrently, or otherwise restricted construction capacity. The preliminary construction schedules provided by SDG&amp;E during the data response process did not include restrictive mitigation measures or assumptions of restricted construction from the City of San Diego.</p> <p>Additional discussion of construction schedules and anticipated delay of the IN Service Date is provided in Section I of the comment letter.</p>	
17.	3.5.6.1	3-38 3-43	1 1 & 2	<p>The No Project Alternative under CEQA should identify the impacts associated with not approving the Proposed Project. As correctly stated in the DEIR on page ES-62, the No Project Alternative does not meet the objectives of the Proposed Project and therefore is not a feasible alternative and should not be ranked as number 3 in the DEIR on pages ES-62 and 6-2. This information on the infeasibility of the No Project Alternative should be added in the following sections of the EIR: the Executive Summary (ES.8.2), Alternatives (3.5.6) and Comparison of Alternatives (6.5).</p> <p>Section 3.5.6.1 No Project Alternative Description incorrectly identifies a list of electrical system improvements that would be needed to maintain electrical system reliability without the Proposed Project. Two of the three listed projects (Mission- Peñasquitos 230-kV Transmission Line and Second Poway-Pomerado 69kV Power Line) are projects already approved by CAISO and determined to be needed in addition to the Proposed Project, and therefore do not replace the need for the Proposed Project.</p> <p>The combination of the three upgrades identified in the DEIR as comprising the No Project Alternative does not meet the project objectives as outlines in section ES-3.2 of the DEIR. These upgrades are not sufficient to mitigate all of the identified NERC reliability criteria violations that will be addressed by the Proposed Project, and therefore will not meet Objective #1, maintaining the long-term reliability of the grid. Also, these upgrades by themselves will not meet part of Objective #2, alleviating congestion on the power lines out of Sycamore Canyon Substation, as they do not increase outlet capability from Sycamore Canyon substation. Also, these upgrades will not meet Objective #3, deliverability of renewable resources, as renewable energy entering Sycamore Canyon substation via the Sunrise Powerlink will still be constrained by the 69 kV and 138 kV electrical systems emanating from Sycamore Canyon substation. Finally, the Mission—Peñasquitos 230-kV Transmission Line and Second Poway—Pomerado 69-kV Power Line upgrades are incremental to, not a substitute for, the Proposed Project, and are required in addition to the Proposed Project in order to ensure grid reliability.</p> <p>The Final EIR should be revised to describe and analyze the No Project Alternative (what happens without the Proposed Project and the impacts resulting from that) and to state that it does not meet the objectives of the Proposed Project and therefore is not feasible.</p>	
18.	3.5.6.5	3-46	3	<p>The DEIR discusses installation of a series reactor in the Sycamore Canyon-Scripps 69 kV line in section 3.5.6.5:</p>	

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				<p>“The ORA prepared testimony as part of the proceeding on the Proposed Project and defined an alternative to the Proposed Project which included upgrades to the same systems that are included in the No Project Alternative scenario. ORA suggested installation of a series reactor at the Sycamore Canyon Substation (ORA 2015) to address overloads on the Sycamore – Scripps 69-kV line. Because reconductoring the Sycamore—Scripps line would not mitigate the overload, it is therefore reasonable to assume that SDG&amp;E would install a series reactor at Sycamore Canyon Substation, as suggested by ORA in its revised alternative (ORA 2015).”</p> <p>ORA’s analysis failed to demonstrate the effectiveness of the series reactor and its impact on the balance of the transmission system, as discussed extensively in SDG&amp;E’s rebuttal testimony and evidentiary hearings. SDG&amp;E does not agree that installation of a series reactor as described in section 3.5.6.5 of the DEIR would, by itself, be a valid, feasible alternative to the Proposed Project. It would not meet any of the three project objectives, as described in DEIR section ES-3.1, and therefore should be removed from the alternatives discussion.</p>	
<b>4.0 – Environmental Analysis</b>					
19.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.1 – Biological Resources</b>					
20.	4.1	4.1-1	First paragraph	<p>The DEIR states: “<i>This section presents the environmental setting and impact analysis for biological resources that <b>would</b> be affected by the Proposed Project or its alternatives.</i>” The use of “would be affected” for impact analysis should be changed to “could be affected” or “may be affected” throughout this section as appropriate.</p>	Example recommend language revision, “ <i>This section presents the environmental setting and impact analysis for biological resources that <del>would</del> could be affected by the Proposed Project or its alternatives.</i> ”
21.	4.1.1.3	4.1-2	No. 6, 11 and 12	<p>The report identified “Special-Status Species” based on the criteria listed. While it may be true that these species are considered sensitive or locally sensitive, it should be noted that not all species are covered under CEQA, including bird species on the CDFW Watch List and CRPR 3 and 4 species.</p>	Recommend removing bullet numbers 6 (Bird species on the CDFW watch list), 11 (Plant species with a CRPR3 listing), and 12 (Plant species with a CRPR 4 listing) from the Special-Status Species list.
22.	4.1	4.1-5	N/A	<p>The DEIR does not include the biological reconnaissance surveys conducted by Busby Biological in late summer/fall of 2013.</p>	Add the biological reconnaissance surveys conducted by Busby Biological in late summer/fall 2013 to the Initial Surveys list.
23.	4.1	4.1-5	Lines 4-7	<p>It is unclear whether the CPUC utilized the data in the BTR. If so, the DEIR will need to add County of San Diego SanBIOS database.</p>	<p>The following databases listed below were also reviewed to identify potential sensitive habitats, special-status plant species, and special-status wildlife species in the vicinity of the Proposed Project:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> California Native Plant Society Electronic Inventory of Rare and Endangered Vascular Plants of California</li> <li><input type="checkbox"/> SanGIS database</li> <li><input type="checkbox"/> San Diego Natural History Museum</li> </ul> <p><u>County of San Diego SanBIOS database</u></p>
24.	4.1.2 Biological Resources	4.1-5	Under Surveys bullet list	<p>Biological resources surveys for the Camino Del Sur staging yard were not conducted as a part of the initial surveys, as listed in the bullet points under <b>Surveys</b>. This bullet should be moved under the ‘additional work areas’ bullet list.</p>	Move biological resource surveys for the Camino Del Sur Staging Yard to the ‘additional work areas’ list.

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25.	4.1	4.1-7	Line 19	The DEIR states 25 vegetation communities (consistent with BTR), but Table 4.1-2 lists 26. Baccharis Scrub-Disturbed (BS-D) is not a community listed in the PEA or the Busby BTRs for the main alignment or Encina Hub. However, on page 1 of the Helix memo “Proposed Habitat Mapping Changes” dated Sept 4, 2015 this community was added for the Stonebridge Staging Yard.	<b>4.1.3.1 Proposed Project Setting</b> “A total of <del>25</del> <u>26</u> vegetation communities and other land cover types....”
26.	4.1	4.1-10	Line 6	Earlier in Table 4.1-1, 17 different USGS quads were listed. This line says 10.	“A total of 144 special-status plant species have potential to occur within the <del>10</del> <u>17</u> USGS quadrangles sampled based on the literature review and database queries.”
27.	4.1	4.1-10 and G-11	Table 4.1-3 and Appendix G-1 Table G-2	<p>The BTR/PEA and the DEIR define the potential for occurrence differently; therefore the potential for occurrence for the species in the documents are not the same. The BTR/PEA include historical records within or adjacent to the BSA. The DEIR only requires habitat and quality of habitat and it is unclear how they developed the plant species list. In addition, the DEIR does not include the focused survey results (as part of their evaluation for potential to occur for species that were not called out in the report); however, these species would have been observed during the focused survey effort and should be considered low or absent along areas that were surveyed. In addition, the Encina Hub area was surveyed and the results are not included in the DEIR.</p> <p>The following species have PFO determinations that are not consistent with the BTR and focused survey plant results and are listed as moderate to high potential:                  Chaparral sand-verbena (<i>Abronia villosa</i> var. <i>aurita</i>) (list 1B.1),                  Dean’s milk-vetch (<i>Astragalus deanei</i>) (list 1B.1)                  South coast saltscale (<i>Atriplex pacifica</i>) (list 1B.1)                  Round-leaved filaree (<i>California macrophylla</i>) (list 1B.1)                  Lewis’ evening primrose (<i>Camissoniopsis lewisii</i>) (List 3)                  Orcutt’s spineflower (<i>Chorizanthe orcuttiana</i>) (FE, SE, 1B.1, NCCP NE)                  seaside cistanthe (<i>Cistanthe maritima</i>)                  Small-flowered morning-glory (<i>Convolvulus simulans</i>) (List 4.2)                  San Diego sand aster (<i>Corethrogyne flaginifolia</i> var. <i>incana</i>) (List 1B.1)                  Paniculate tarplant (<i>Deinandra paniculata</i>), (list 4.2)                  Palmer’s grapplinghook (<i>Harpagonella palmeri</i>) (List 4.2)                  Graceful tarplant (<i>Holocarpha virgata</i> ssp. <i>elongate</i>) (List 4.2)                  Vernal barley (<i>Hordeum intercedens</i>) (List 3.2)                  Coulter’s goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>) (List 1B.1)                  Small-flowered microseris (<i>Microseris douglasii</i> ssp. <i>platycarpha</i>)                  California spineflower (<i>Mucronea californica</i>) (List 4.2)                  Little mouse-tail (<i>Myosurus minimus</i> ssp. <i>apus</i>) (List 3.1, NCCP)                  spreading navarretia (<i>Navarretia fossalis</i>) (FT, List 1B.1, NCCP, MSCP)                  spreading navarretia (<i>Navarretia prostrata</i>) (List 1B.1)                  Chaparral nolina (<i>Nolina cismontane</i>) (List 1B.2)                  California adder’s tongue (<i>Ophioglossum californicum</i>) (List 4.2)                  Golden-rayed pentachaeta (<i>Pentachaeta aurea</i> ssp. <i>aurea</i>) (List 4.2)                  Chaparral rein orchid (<i>Piperia cooperi</i>) (List 4.2)                  Fish’s milkwort (<i>Polygala cornuta</i> var. <i>Fishiae</i>) (List 4.3)                  Delta woolly-marbles (<i>Psilocarphus brevissimus</i>) (List 4.2)</p>	<p>The below PFO determinations for the plant species listed in Table 4.1-3 should be revised to low potential or absent for areas that were surveyed for and where these species were not observed.</p> <p>The following species have PFO determinations that are not consistent with the BTR and focused survey plant results and are listed as moderate to high potential:                  Chaparral sand-verbena (<i>Abronia villosa</i> var. <i>aurita</i>) (list 1B.1),                  Dean’s milk-vetch (<i>Astragalus deanei</i>) (list 1B.1)                  South coast saltscale (<i>Atriplex pacifica</i>) (list 1B.1)                  Round-leaved filaree (<i>California macrophylla</i>) (list 1B.1)                  Lewis’ evening primrose (<i>Camissoniopsis lewisii</i>) (List 3)                  Orcutt’s spineflower (<i>Chorizanthe orcuttiana</i>) (FE, SE, 1B.1, NCCP NE)                  seaside cistanthe (<i>Cistanthe maritima</i>) (List 4.2)                  Small-flowered morning-glory (<i>Convolvulus simulans</i>) (List 4.2)                  San Diego sand aster (<i>Corethrogyne flaginifolia</i> var. <i>incana</i>) (List 1B.1)                  Paniculate tarplant (<i>Deinandra paniculata</i>), (list 4.2)                  Palmer’s grapplinghook (<i>Harpagonella palmeri</i>) (List 4.2)                  Graceful tarplant (<i>Holocarpha virgata</i> ssp. <i>elongate</i>) (List 4.2)                  Vernal barley (<i>Hordeum intercedens</i>) (List 3.2)                  Coulter’s goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>) (List 1B.1)                  Small-flowered microseris (<i>Microseris douglasii</i> ssp. <i>platycarpha</i>)                  California spineflower (<i>Mucronea californica</i>) (List 4.2)                  Little mouse-tail (<i>Myosurus minimus</i> ssp. <i>apus</i>) (List 3.1, NCCP)                  spreading navarretia (<i>Navarretia fossalis</i>) (FT, List 1B.1, NCCP, MSCP)                  spreading navarretia (<i>Navarretia prostrata</i>) (List 1B.1)                  Chaparral nolina (<i>Nolina cismontane</i>) (List 1B.2)                  California adder’s tongue (<i>Ophioglossum californicum</i>) (list 4.2)                  Golden-rayed pentachaeta (<i>Pentachaeta aurea</i> ssp. <i>aurea</i>) (List 4.2)                  Chaparral rein orchid (<i>Piperia cooperi</i>) (List 4.2)                  Fish’s milkwort (<i>Polygala cornuta</i> var. <i>Fishiae</i>) (List 4.3)                  Delta woolly-marbles (<i>Psilocarphus brevissimus</i>) (List 4.2)                  Ashy spike-moss (<i>Selaginella cinerascens</i>) (List 4.1)                  Chaparral ragwort (<i>Senecio aphanactis</i>) (List 2B.2)                  Rush-like bristelweed (<i>Xanthisma junceum</i>) (List 4.3)</p> <p>In addition the list 3 and 4 CNPS species that are not also NCCP covered species included in this table should be removed from the list as well.</p>

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				Ashy spike-moss ( <i>Selaginella cinerascens</i> ) (List 4.1) Chaparral ragwort ( <i>Senecio aphanactis</i> ) (List 2B.2) Rush like bristelweed ( <i>Xanthisma junceum</i> ) (List 4.3)	
28.	4.1.3.2 Biological Resources	4.1-13, et seq.	e.g., Table 4.1-3, second from last on pg. 4.1-13	The DEIR references San Diego fairy shrimp ( <i>Branchinecta sandiegoensis</i> ) and vernal pool fairy shrimp ( <i>Branchinecta lynchi</i> ). Per the USFWS, the vernal pool fairy shrimp is not known to occur within the vicinity of the Proposed Project. From the FWS.gov website, “However, vernal pool fairy shrimp are currently absent from San Diego County, despite the presence of vernal pool habitats there. It is possible the vernal pool fairy shrimp is absent from the San Diego Vernal Pool Region as a result of competition with other species, such as the San Diego fairy shrimp. However, this hypothesis has not been formally tested.” ( <a href="http://www.fws.gov/sacramento/ES/Recovery-Planning/Vernal-Pool/Documents/vp_fairy_shrimp.pdf">http://www.fws.gov/sacramento/ES/Recovery-Planning/Vernal-Pool/Documents/vp_fairy_shrimp.pdf</a> ).	Recommend references to vernal pool fairy shrimp be removed from the document globally.
29.	4.1	4.1-15 and G-55	Table 4.1-3 and Appendix G-1 Table G-3	The DEIR assigns Burrowing owl ( <i>Athene cunicularia</i> ) a moderate potential to occur in Segments A, B, and D, and a low potential to occur in Segment C and MSL, EH, CDS, CVR, and SR-56 staging yards. However, protocol-level focused surveys were conducted within the Proposed Project main alignment BSA and the Encina Hub BSA burrowing owl was not observed. Therefore, the burrowing owl is not expected to occur in the areas surveyed.  Appendix G-1: Table G-3 of the DEIR says “The BSA is within the known range of this species, and species is known to occur within 1 mile of the BSA. Moderate potential to occur in Segments A, B, and D due to the presence of potentially suitable habitat. Low potential to occur in Segment C; at the Mission San Luis Rey Phase Transposition and Encina Hub; and at the Camino del Sur, Carmel Valley Road, and SR-56 staging yards because potential habitat is limited. Likely absent from the remaining other work areas due to lack of suitable habitat.”	Change potential for burrowing owl to low or absent for all segments and other work areas, with the exception of Carmel Valley Road staging yard. This species was not observed during focused burrowing owl surveys.
30.	4.1	4.1-15 and G-68	Table 4.1-3 and Appendix G-1 Table G-3	The DEIR assigns least Bell’s vireo ( <i>Vireo bellii pusillus</i> ) a low potential to occur in Segments A and B, a moderate potential to occur in Segments C and D, and a high potential to occur in Encina Hub. However, protocol-level focused surveys were conducted within the Proposed Project main alignment BSA and the Encina Hub BSA and least Bell’s vireo was not observed. Therefore, the least Bell’s vireo is not expected to occur in the areas surveyed.  Appendix G-1: Table G-3 of the DEIR says, “The BSA is within known range of this species, and species is known to occur within 1 mile of the BSA. High potential to occur in, or in proximity to, the Encina Hub because of presence of suitable habitat and CNDDDB records for the species. Moderate potential to occur in, or within proximity to, Segments C and D because of presence of moderately suitable nesting habitat.”	Change potential for least Bell’s vireo to low or absent for all segments and other work areas. This species was not observed during focused least Bell’s vireo surveys.
31.	4.1.3.2 Biological Resources	4.1-17	Table 4.1-3, end of table	“Subregional NCCP coverage is assumed to be inapplicable”. This statement is incorrect as the SDG&E NCCP is currently valid as demonstrated by the letter from the USFWS and CDFW to the CPUC June 29, 2015. For a more detailed discussion of this issue, please see Section II.A of the comment letter.	Recommend removing this statement globally from the document, “ <del>Subregional NCCP coverage is assumed to be inapplicable</del> ”.
32.	4.1	4.1-19	Line 18	Earlier in Table 4.1-1, 17 different USGS quads were listed. This line says 10.	Recommend revising to, “A total of 129 special-status wildlife species have potential to occur within the <del>10</del> 17 sampled USGS quadrangles based on the literature review and

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					<i>database queries.”</i>
33.	4.1	4.1-20	Line 4	Update results to incorporate focused coastal California gnatcatcher survey results for Encina Hub. (CAGN were detected).  DEIR states: “ <i>There is a high potential for the coastal California gnatcatcher to occur in the Encina Hub site because this site supports the species’ Diegan coastal sage scrub habitat.</i> ”	Change potential to present at the Encina Hub; this species was detected during focused coastal California gnatcatcher surveys, “ <i>There is a high potential for the Coastal California gnatcatcher to occur is present within the Encina Hub site as this species was observed during protocol surveys conducted for the Proposed Project because this site supports the species’ Diegan coastal sage scrub habitat.</i> ”
34.	4.1	4.1-20	Line 31	Protocol burrowing owl surveys have been conducted over the majority of the BSA with the exception the area near the Mission—San Luis Rey Phase Transposition site, the Carmel Valley Road staging yard and the newly added alternatives. Wintering surveys for these areas will be performed during the 2015/2016 winter season.	Recommend removing the following sentence, “ <i>Based on the vegetation communities mapped Mission—San Luis Rey Phase Transposition work areas and the Carmel Valley Road staging yard site (i.e., non native grassland and disturbed habitat), these locations are considered to support potentially suitable burrowing owl habitat. Overall, there is low to moderate potential for burrowing owl to use potentially suitable habitat with the entire BSA.</i> ” And replacing it with, “ <i>No burrowing owls were identified during focused surveys for the majority of the BSA. Burrowing owl surveys were conducted within the BSA with the exception of the Mission—San Luis Rey Phase Transposition site and the Carmel Valley Road staging yard. Portions of these areas are considered to support potentially suitable burrowing owl habitat. Wintering surveys will be performed at these locations. There is a low to moderate potential for burrowing owl to occur along the BSA within suitable habitat for these locations.</i> ”
35.	4.1.3.6	4.1-24	Vernal Pools and Road Pools, first sentence.	This paragraph incorrectly states that ‘road pools’ are jurisdictional features. The Proposed Project alignment includes disturbed jurisdictional vernal pools and road ruts located within existing access roads. Although road ruts may provide suitable habitat for fairy shrimp species, they do not meet jurisdictional wetland parameters and are not properly considered vernal pools.	Recommend changing sentence to only refer to vernal pools as jurisdictional features, “ <i>In addition to the jurisdictional features described above, other jurisdictional features (vernal pools and road pools) were mapped in Segments C and D of the Proposed Project...</i> ”
36.	4.1.3.8	4.1-25	Table 4.1-5	This table incorrectly lists coastal California gnatcatcher (CAGN) Critical Habitat (CH) as being located within the Encina Hub work area. SDG&E’s utility ROW’s are exempt from CAGN CH designation via pg. 72057 et.al. of the Federal Register	Recommend revising Table 4.1-5 to state that CAGN critical habitat is adjacent to but outside of the Encina Hub work area.
37.	4.1.3.9	4.1-27	Figure 4.1-2	This figure incorrectly shows coastal California gnatcatcher (CAGN) Critical Habitat (CH) as being located within the Encina Hub work area. SDG&E’s utility ROW’s are exempt from CAGN CH designation via pg. 72057 et.al. of the Federal Register.	Recommend revising Figure 4.1-2 to show that CAGN critical habitat is adjacent to but outside of the Encina Hub work area.
38.	4.1.4.2	4.1-32	Ca. Fish and Game Code bullet list, third bullet	<b>Protection for Birds.</b> This bullet mentions the proposed draft regulations (published Aug. 14, 2015) that are intended to clarify Fish and Game Code Section 3503 and 3503.5.	Recommend that this bullet also state that if the draft regulations are adopted as written, those changes to the Fish and Game Code Sections 3503 and 3503.5 should be incorporated into this document, “ <b>Protection for Birds.</b> <i>Makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird; it is also unlawful to take possess or destroy of birds of prey or their nests or eggs; CDFW prepared draft regulations (published August 14, 2015) to guide its implementation of Fish and Game Code Sections 3503 and 3503.5, which prohibits the take, possession, or destruction of bird nests or eggs. If the draft regulations are adopted as written those changes to the Fish and Game Code Sections 3503 and 3503.5 should be incorporated into this document.</i> ”
39.	4.1.4.3	4.1-34	Third paragraph	The DEIR states, “ <i>In a recent audit of NCCP habitat impacts, the USFWS and the CDFW (collectively, the wildlife agencies) determined that SDG&amp;E’s habitat take is nearing the maximum impact acreage authorized under their 1995 NCCP (Goebel and Sevrens June 2015).</i> ” This statement is factually incorrect and misrepresents the contents of the letter	Recommend that this section be re-written to state that the SDG&E is currently in compliance with its NCCP permit, and that the NCCP permit remains a valid option for take coverage under ESA/CESA, “ <i>Take authorization under the current NCCP is nearing the maximum impact cap acreage remains at 129.4 acres, as confirmed by the</i>

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				<p>sent to the CPUC by the wildlife agencies on June 29, 2015. SDG&amp;E currently has 129.4 acres of take impact remaining under the current NCCP for future and pending projects.</p> <p>SDG&amp;E has demonstrated through a concurrence letter to CPUC from the CDFW and USFWS that the current NCCP does contain enough take coverage for the Proposed Project. The letter states, “SDG&amp;E has provided a list of completed and ongoing construction projects that will be included in the 2015 annual report. These projects will use 51.41 acres of the available take coverage under the NCCP, leaving 129.42 acres available for pending and future jobs. <b>By this letter we confirm that sufficient take acreage is available to SDG&amp;E to cover the four projects pending California Public Utilities Commission (CPUC) approval that were previously identified in our May 21, 2015 letter, and will rely, or are relying, on the NCCP take authorizations to ensure compliance with the Federal Endangered Species Act of 1973...</b>” A copy of the letter is attached to this submittal as Attachment C.</p> <p>SDG&amp;E is currently proposing to utilize the NCCP for three other pending projects referenced above (Salt Creek, SOCRE and CNF) in addition to the Proposed Project, however the impacts from these projects would not be counted against the NCCP impact cap until each project is completed, which will be anywhere between two and five years in the future. As SDG&amp;E has proven that the permit currently contains enough take coverage for the Proposed Project, it should be an available option for coverage under the FESA/CESA for the Proposed Project. The CPUC does not have the appropriate authority to deem the current NCCP invalid or unavailable for use on the Proposed Project. The USFWS and CDFW are the only regulatory agencies that have that authority.</p> <p>In addition, should one of the Proposed Alternatives be chosen over the Proposed Project, the impacts to sensitive habitat would be substantially reduced and there would be additional space under the NCCP impact cap. For example, if the environmentally superior alternative were approved by the Commission, impacts against the NCCP impact cap could be reduced by over 20 acres and there would be no reasonable threat of construction of the new Sycamore to Peñasquitos transmission line causing an exceedance of the NCCP permit cap, even if the other SDG&amp;E-planned projects were constructed concurrently. Therefore, the Final EIR should also specify that SDG&amp;E can utilize the NCCP if one of the alternatives is selected that significantly reduces impacts under the NCCP impact cap. This is especially true for Alternative 5 (the environmentally superior alternative), Alternative 3, and the Alternative 3/4 combination.</p>	<p><u>letter to the CPUC from the USFWS and CDFW received on June 29, 2015. The letter further stated, “By this letter we confirm that sufficient take acreage is available to SDG&amp;E to cover the four projects pending California Public Utilities Commission (CPUC) approval that were previously identified in our May 21, 2015 letter, and will rely, or are relying, on the NCCP take authorizations to ensure compliance with the Federal Endangered Species Act of 1973...” Therefore, take authorization for all of SDG&amp;E’s activities associated with this Proposed Project, including maintenance activities, <del>may not be available</del> is available through the current NCCP. Should the wildlife agencies, at any point in the future, determine that the current NCCP does not contain enough take coverage to support the construction of the Proposed Project; SDG&amp;E will be required to pursue alternative strategies for take coverage under the ESA/CESA.”</u> For a more detailed discussion of this issue see Section II.A of the comment letter.</p>
40.	4.1.4.3	4.1-34	Fourth paragraph	<p>“<i>In lieu of utilizing the current or an amended NCCP, federal take authorization would occur through new project-specific ESA Section 10 and CESA Section 2081 permits and authorizations.</i>” As discussed in the previous comment, SDG&amp;E currently has 129.4 acres of take impact remaining under the current NCCP for future and pending projects. Therefore SDG&amp;E does not currently need to pursue ESA Section 10 and CESA Section 2081 permitting and authorizations. As SDG&amp;E has demonstrated, and the wildlife agencies have concurred via their letter to the CPUC on June 29, 2015, the NCCP currently contains enough take coverage for the Proposed Project. Therefore, the NCCP should be an</p>	<p>Recommend that this section be re-written to state that the SDG&amp;E is currently in compliance with its NCCP permit, and that the NCCP permit remains a valid option for take coverage under ESA/CESA, “<i>If SDG&amp;E or the wildlife agencies determine that the current NCCP will not or cannot be utilized as take coverage under the ESA/CESA, then <del>in lieu of utilizing the current or an amended NCCP, federal take authorization would occur through new project-specific ESA Section 10 and CESA Section 2081 permits and authorizations.</del></i>”</p>

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				available option for coverage under the FESA/CESA for the Proposed Project.  In addition, should one of the Proposed Alternatives be chosen over the Proposed Project, the potential impacts to sensitive habitat would be substantially reduced and there would be additional space under the NCCP impact cap.	
41.	4.1.4.3	4.1-34/35	SDG&E's Low-effect HCP for QCB	The DEIR states that the SDG&E QCB HCP relies upon the 1995 Subregional NCCP. In fact, the SDG&E QCB HCP is a stand-alone document that does not rely upon the NCCP.	<i>"The HCP requires SDG&amp;E to implement general and QCB-specific operational protocols to avoid or minimize take of QCB and relies on the 1995 Subregional NCCP."</i>
42.	4.1	4.1-37	Table 4.1-6, APM BIO-1	Focused surveys for special-status plants have been performed in Segments A-D, as well as the Other Work Areas. Other Work Areas includes Encina Hub (EH), Mission— San Luis Rey Phase Transposition (MSL), Evergreen Nursery staging yard (EV), SR-56 staging yard (SR-56), Camino Del Sur staging yard (CDS), Carmel Valley Road staging yard (CVR), Stonebridge staging yard (SB), and Stowe staging yard (ST).	Recommend revising first bullet in APM BIO-1 to, <i>"Prior to construction, SDG&amp;E shall retain a qualified biologist to conduct focused, special status plant surveys during the spring and summer 2015 in suitable habitats where focused plant surveys were not previously conducted."</i>
43.	4.1.7.1	4.1-41	Species Take Authorization	The DEIR states that the USFWS and CDFW determined that SDG&E is nearing the maximum impact acreage authorized under the SDG&E NCCP. As noted previously, this statement is incorrect as the recent audit SDG&E conducted in conjunction with the wildlife agencies determined that SDG&E currently has 129.4 acres of take coverage remaining under the NCCP for current and proposed projects. Any projects in the planning stages that anticipate utilizing the NCCP for take coverage have not occurred yet, therefore any potential take that may occur from the construction of those projects cannot be counted against SDG&E's current remaining take amount in the NCCP permit.	Recommend revising this statement to clarify that SDG&E currently has 129.4 acres of take coverage remaining in the NCCP permit, as follows: <i>"In a recent audit of NCCP habitat impacts, the USFWS and the CDFW (collectively referred to as the wildlife agencies) determined that SDG&amp;E's habitat take is nearing the maximum impact acreage authorized under their 1995 NCCP. NCCP permit currently has 129.4 acres of take acreage remaining. The wildlife agencies further stated, "By this letter we confirm that sufficient take acreage is available to SDG&amp;E to cover the four projects pending California Public Utilities Commission (CPUC) approval that were previously identified in our May 21, 2015 letter, and will rely, or are relying, on the NCCP take authorizations to ensure compliance with the Federal Endangered Species Act of 1973..."</i>
44.	4.1.7.1	4.1-41	Beginning of last paragraph	The DEIR states, <i>"SDG&amp;E's impact assessment and that of the CPUC's environmental consultant were substantially different; the CPUC assessment of Proposed Project impacts, which was based on the SDG&amp;E PEA and the data request responses, was more than twice that of SDG&amp;E's estimate. In order to reduce the Proposed Project impacts to what was reported to the wildlife agencies, SDG&amp;E submitted revised work space data to the CPUC in July 2015 that reduced the size of select work spaces such that only 29.8 acres of NCCP sensitive habitats would be impacted; the most notable reductions were at staging yards, one of which (the Chicarita South Staging Yard) was removed completely from the Proposed Project."</i> These statements should not have been included in the DEIR as these revisions were made and communicated to the CPUC before the DEIR was issued, and therefore are irrelevant to analyses in the DEIR.	Recommend complete removal of these two sentences, <i>"SDG&amp;E's impact assessment and that of the CPUC's environmental consultant were substantially different; the CPUC assessment of Proposed Project impacts, which was based on the SDG&amp;E PEA and the data request responses, was more than twice that of SDG&amp;E's estimate. In order to reduce the Proposed Project impacts to what was reported to the wildlife agencies, SDG&amp;E submitted revised work space data to the CPUC in July 2015 that reduced the size of select work spaces such that only 29.8 acres of NCCP sensitive habitats would be impacted; the most notable reductions were at staging yards, one of which (the Chicarita South Staging Yard) was removed completely from the Proposed Project."</i>
45.	4.1.7.1	4.1-41	End of last paragraph	The DEIR states, <i>"SDG&amp;E's revised work space data, however, did not account for access road impacts identified in the PEA to accommodate construction and equipment and materials access to individual pole sites..."</i> SDG&E is not required to account for impacts to sensitive habitat against its NCCP impact cap when those impacts occur from the repair of existing access roads. Impacts for existing permanent access roads have already been accounted for as permanent impacts, and the repair of access roads within existing road beds is considered maintenance. If SDG&E has to install a NEW access road for the	Recommend removing this portion of this sentence as it is incorrect, <i>"SDG&amp;E's revised work space data, however, did not account for access road impacts identified in the PEA to accommodate construction and equipment and materials access to individual pole sites (per page 3-41 of the PEA: "smoothing or refreshing of the existing access roads and/or vegetation clearing would be necessary to improve some existing access roads and to re-establish unmaintained access roads");"</i>

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				Proposed Project, those impacts will be accounted for and drawn down against the NCCP impact cap. However, there are only three new spur roads proposed, and those impacts were accounted for in SDG&E impact totals.	
46.	4.1.7.1	4.1-42	First sentence	The DEIR states, “Based on location, condition, topography of the existing access roads, and the need to accommodate construction equipment, the CPUC and its environmental consultant have determined that it is not reasonable to assume that no new access roads would occur as a result of the Proposed project.” As discussed in the above comment, SDG&E has accounted for impacts from three proposed new access spur roads.	Recommend removal of this sentence in its entirety, “ <del>Based on location, condition, topography of the existing access roads, and the need to accommodate construction equipment, the CPUC and its environmental consultant have determined that it is not reasonable to assume that no new access roads would occur as a result of the Proposed project.</del> ”
47.	4.1.7.1	4.1-42	Second paragraph	<p>The DEIR states, “An additional 2-foot buffer was also included on either side of the access routes (for a total width of 18 feet) to account for potential mapping inaccuracies and edge effects that may occur during grading thereby providing a reasonably conservative assessment of habitat loss for consideration and disclosure in the EIR biological resources analysis. Therefore, analysis in the EIR presumes existing access roads with a width narrower than 14 feet would be expanded to 14 feet and the habitat impacts associated with that expansion would be included in the EIR analysis. Where existing unpaved access roads are between 14 and 18 feet wide, habitat loss would be presumed and calculated only for the additional buffer area. Where existing unpaved access exceeds 18 feet in width, there would be no additional habitat loss calculated.”</p> <p>As stated in the above comments, existing SDG&amp;E access roads have already been accounted for as permanent impacts. Therefore, the re-establishing of existing access roads to their original and intended width are not considered new impacts under the NCCP. Requiring SDG&amp;E to mitigate and/or account for impacts against the NCCP impact cap for repairing of existing access roads that were originally accounted for as permanent impacts would constitute double mitigation.</p> <p>Moreover, it is not appropriate to add a 2-foot buffer to both sides of existing access roads. SDG&amp;E does not expect to create or use such a wide access corridor because in SDG&amp;E’s extensive experience constructing electric lines, it has learned that such a buffer is unnecessary, particularly along the entirety of the access corridor. Perhaps more importantly, one of the operational protocols in Section 7.1.1 of the NCCP requires SDG&amp;E to drive in designated areas only, which would preclude using a 2-foot wide buffer on each side of the road. See NCCP at p. 103.</p>	Recommend removal of these sentences in their entirety, “ <del>An additional 2 foot buffer was also included on either side of the access routes (for a total width of 18 feet) to account for potential mapping inaccuracies and edge effects that may occur during grading thereby providing a reasonably conservative assessment of habitat loss for consideration and disclosure in the EIR biological resources analysis. Therefore, analysis in the EIR presumes existing access roads with a width narrower than 14 feet would be expanded to 14 feet and the habitat impacts associated with that expansion would be included in the EIR analysis. Where existing unpaved access roads are between 14 and 18 feet wide, habitat loss would be presumed and calculated only for the additional buffer area. Where existing unpaved access exceeds 18 feet in width, there would be no additional habitat loss calculated.</del> ”
48.	4.1.7.1	4.1-42	End of second paragraph	The DEIR states, “Based on this formula, an additional 5.32 acres of habitat impacts (when compared to SDG&E’s calculations) would result from construction access improvements, and total habitat impacts (permanent, temporary, and access road impacts) from Proposed Project construction would be 34.94 acres.” As discussed in the above comments, adding any additional impacts for the repair of existing access roads up to their original width of 14 feet is inappropriate, as SDG&E is not required to account for impacts or to mitigate for those impacts under the NCCP as these access roads have already been accounted for previously as permanent impacts. It is also inappropriate to add impacts from a 2-foot buffer.	<p>Recommend removal of this sentence in its entirety, “<del>Based on this formula, an additional 5.32 acres of habitat impacts (when compared to SDG&amp;E’s calculations) would result from construction access improvements, and total habitat impacts (permanent, temporary, and access road impacts) from Proposed Project construction would be 34.94 acres.</del>”</p> <p>Recommend removing these additional impacts (5.32 acres) from Proposed Project impact calculations.</p>

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49.	4.1.7.1	4.1-42	Last paragraph and bullet list	<p>The DEIR states, <i>“The CPUC has determined that SDG&amp;E’s compliance with the 1995 NCCP over the life of the Proposed Project is uncertain and cannot be relied upon because:</i></p> <ul style="list-style-type: none"> <li><i>when construction access road impacts are accounted for, a commitment to limit the Proposed Project to 29.4 acres of habitat impacts is infeasible.”</i></li> </ul> <p>As stated in the previous comment, the CPUC has improperly accounted for impacts to habitat for the repair of existing access roads, which have already been mitigated and accounted for as permanent impacts under the NCCP. These impacts cannot be assessed against the NCCP impact cap twice.</p> <ul style="list-style-type: none"> <li><i>“assuming the wildlife agencies would consider and account for construction access road impacts as take under the NCCP, the remaining allowable habitat impact acreage would only be 2.2 acres,”</i></li> </ul> <p>As noted in the previous comment the wildlife agencies will not account for these impacts as take under the NCCP as they have already been assessed as permanent impacts previously.</p> <ul style="list-style-type: none"> <li><i>...”and if the wildlife agencies exclude access road impacts from the NCCP take accounting, only 7.4 acres [remain], leaving little flexibility for unknown contingencies.”</i></li> </ul> <p>SDG&amp;E has committed to remaining under the 29.4 acre impact total. If unknown impacts arise during construction, SDG&amp;E will reduce impacts at other Proposed Project sites commensurately in order to maintain that commitment. SDG&amp;E will have to submit a request for Minor Project Change (MPC) if work areas need to be added or shifted following issuance of the CPCN. If Minor Project Changes result in an increase in impacts to sensitive habitat that would count against the NCCP impact cap, SDG&amp;E would have to document within the request that the increase in impacts would not “trigger additional permit requirements” (DEIR at page 9-4). SDG&amp;E would do this by either documenting that additional impacts could be covered by the NCCP, or by documenting an equivalent reduction in impacts to another portion of the project that would result in a project-wide net increase of zero.</p> <ul style="list-style-type: none"> <li><i>“NCCP impact coverage is required by three other current SDG&amp;E projects that may have increased habitat take coverage requirements over the estimates provided by SDG&amp;E”</i></li> </ul> <p>Currently, as verified by the wildlife agency letter to the CPUC, SDG&amp;E has enough take coverage to cover all proposed projects in permitting stages with the CPUC.</p> <ul style="list-style-type: none"> <li><i>“other SDG&amp;E projects and operations and maintenance activities could also reduce the available NCCP habitat impact coverage depending on the timing of such activities relative to implement the four projects noted above.”</i></li> </ul> <p>As stated above, the NCCP permit is currently valid and will remain so until it is declared invalid by the wildlife agencies, which are the only agencies with the discretion to make that determination. If project-related impacts are ever anticipated to exceed the NCCP</p>	<p>Recommend revising the text to read:</p> <p><i>“The CPUC has determined that SDG&amp;E’s compliance with the 1995 NCCP over the life of the Proposed Project <del>may is uncertain and cannot be relied upon because.</del></i></p> <p>Recommend removing the following bullets:</p> <ul style="list-style-type: none"> <li><del><i>“when construction access road impacts are accounted for, a commitment to limit the Proposed Project to 29.4 acres of habitat impacts is infeasible.”</i></del></li> <li><del><i>“assuming the wildlife agencies would consider and account for construction access road impacts as take under the NCCP, the remaining allowable habitat impact acreage would only be 2.2 acres, and if the wildlife agencies exclude access road impacts from NCCP take accounting, only 7.4 acres, leaving little flexibility for unknown contingencies;”</i></del></li> <li><del><i>“NCCP impact coverage is required by three other current SDG&amp;E projects that may have increased habitat take coverage requirements over the estimates provided by SDG&amp;E”</i></del></li> <li><del><i>“other SDG&amp;E projects and operations and maintenance activities could also reduce the available NCCP habitat impact coverage depending on the timing of such activities relative to implement the four projects noted above.”</i></del></li> </ul>

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				<p>permit cap limits, or a proposed project change would result in impacts exceeding the NCCP permit cap limits, SDG&amp;E would be required to submit a Petition for Modification (PFM) of the CPCN to the CPUC for review under CEQA. The PFM would address any new or additional ESA/CESA take permit requirements to address the increase in impacts and ensure the Project's impacts to sensitive biological resources are less than significant.</p> <p>In addition, this section of the DEIR does not take into account the potential for one of the project alternatives to be chosen, many of which have substantially fewer potential impacts to sensitive habitats. While SDG&amp;E maintains that the NCCP is a valid option for ESA/CESA coverage for the Proposed Project, if one of these project alternatives is chosen the potential impact on <i>future</i> take coverage under the NCCP will be substantially less. Therefore the NCCP should be included as a viable permitting option for ESA/CESA take coverage for the Proposed Project as well as all project alternatives.</p>	
50.	4.1.7.1	4.1-43	Third paragraph	The DEIR states, " <i>Specific biological resource mitigation measures may be satisfied through compliance with an amended NCCP, individual ESA permit conditions, or other authorizations obtained by SDG&amp;E, if these measures are equally or more effective than the mitigation identified in this EIR</i> " The existing SDG&E NCCP should also be included as an option for compliance with specific biological resource mitigation measures.	Recommend revising to include the SDG&E NCCP in its current state, as well as the other permitting options already listed, " <i>Specific biological resource mitigation measures may be satisfied through compliance with <u>the existing SDG&amp;E NCCP</u>, an amended NCCP, individual ESA permit conditions, or other authorizations obtained by SDG&amp;E, if these measures are equally or more effective than the mitigation identified in this EIR</i> "
51.	4.1.8	4.1-44	Table 4.1.7 Impact Bio-2	The Significance after APMs and before Mitigation column should also include APM BIO-2.	Add APM BIO-2 to Significance after APM's and before Mitigation column.
52.	4.1	4.1-44	Table 4.1-7 Impact Bio-1	<p>The DEIR states: "<i>Impact Bio-1: Potential for substantial adverse effect from project construction, either directly or through habitat modifications, on any plant species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.</i>"</p> <p>Under CEQA – federally and state listed as threatened or endangered or candidate species and CNPS List 1 and 2 species require focused surveys and therefore mitigation measures to reduce impacts to less than significant. Mitigation measures should not address CNPS List 3 and 4 species and bird species on the CDFW watch list to reduce impacts for significance.</p>	Recommend revising to, " <i>Potential for substantial adverse effect from project construction, either directly or through habitat modifications, on any plant species identified as a federally and state listed as threatened or endangered or candidate species and CNPS List 1 and 2 species, or listed as special status species by the CDFW or USFWS.</i> "
53.	4.1.8	4.1-45	Table 4.1.7 Impact Bio-7 and Bio-8, Operation and Maintenance	As the Operations & Maintenance (O&M) of the Proposed Project will be conducted under the SDG&E NCCP, the application of APM BIO-2 would reduce all O&M impacts to less than significant per the NCCP Implementing Agreement Section 6.2 (a 1-4), (b) and (c) and Section 6.3, which specifically states, " <i>USFWS and CDFG also agree that they will not seek to impose additional protective, mitigation or conservation measures upon SDG&amp;E, as a result of its Activities for the protection, preservation or conservation of any Covered Species or their Habitat through any other agency which may have permitting, approval or discretionary regulatory authority over any of SDG&amp;E's Activities and which is not a party to this Agreement. As a responsible, trustee or cooperating agency under CEQA, NEPA, or any other wildlife protection law, USFWS and CDFG will notify the lead federal or state agency that they consider any protective, mitigation or conservation</i>	Recommend the Significance after APMs and before Mitigation is changed from Significant to Less than Significant as the SDG&E NCCP satisfies all O&M requirements and reduces any significant impacts to less than significant, per the USFWS and CDFW agreement with SDG&E in the NCCP.

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				<p><i>measures otherwise required for any impact to or Incidental Take of any Covered Species or their Habitat resulting from SDG&amp;E's Activities, satisfied by SDG&amp;E's compliance with this Agreement, the Take Authorizations and the Subregional Plan."</i></p> <p>The increase in operation and maintenance requirements for the Proposed Project will be negligible, if there is any increase at all. Therefore the impacts to these resources cannot be are considered significant after APMs and before mitigation measures.</p>	
54.	4.1.8	4.1-45	Table 4.1.7 Impact Bio-8	The Significance after APMs and before Mitigation column should also include APM BIO-2.	Add APM BIO-2 to Significance after APM's and before Mitigation column. Recommend the Significance after APMs and before Mitigation is changed from Significant to Less than Significant as the SDG&E NCCP satisfies all O&M requirements and reduces any significant impacts to less than significant, per the USFWS and CDFW agreement with SDG&E in the NCCP.
55.	4.1.8	4.1-45	Table 4.1.7 Impact Bio-9	The Significance after APMs and before Mitigation column should also include APM BIO-2.	Add APM BIO-2 to Significance after APM's and before Mitigation column.
56.	4.1	4.1- 47	Table 4.1-8	It is unclear how impacts to individual special-status plant species were analyzed, and whether impacts to these plant species are indirect or direct. For example, on Figure G-1, map 10 of 45, coast barrel cacti exist outside of the BSA and are more than 400 feet away (and outside the BSA). Temporary impacts to these locations are unlikely based on the location and proximity to residential and commercial areas, and direct impacts to these species will not occur.	Recommend revising the table header to read " <i>Potential Impacts</i> " and, through spatial analysis, determine which species have a feasible potential to be impacted directly or indirectly. For example, if a special status-species is located within or immediately adjacent to a work area or access road, then the determination of a potential direct and temporary impact can be assigned. Following this criteria, the numbers of potential impacts to individual special-status plant species will be reduced significantly. Or, as an alternative, the table should follow the format of Table 4.1-9 – "Special-status Plants located in the Proposed Project area and Potential for Effect".
57.	4.1	4.1-53	Impact Bio-1	The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i> . For example, "damage or removal" of plants is considered a significant impact for Impact Bio-1. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR's articulated threshold of significance.	Recommend revising the significance findings to match the DEIR's articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i> . SDG&E anticipates that if the analysis properly considers <i>species</i> , then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.
58.	4.1	4.1-53	Paragraph 3	List of species that " <i>would</i> " be directly impacted during construction activities. This is not true, as temporary work areas can be adjusted to avoid sensitive plant species.	Recommend changing all " <i>would</i> " to " <i>could</i> " or " <i>could be potentially impacted</i> ".
59.	4.1	4.1-54	Impact Bio-1, Thread-leaved Brodiaea and San Diego button celery, third paragraph	<p>As explained more fully in the comment letter and herein, APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&amp;E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM Biology 2, are not necessary. This change should be made throughout the chapter.</p> <p>For example, page 4.1-54 says "...NCCP protocols and measures may not apply at the time of Proposed Project construction. Therefore, after implementation of APMs, impacts to thread-leaved brodiaea and San Diego button-celery would remain significant because the operational protocols and habitat compensation may not be implemented if the NCCP is not applied..."</p>	<p>Recommend revising to say, "...NCCP protocols and measures <del>may not will be applied</del> at the time of Proposed Project construction. Therefore, after implementation of APMs, impacts to thread-leaved Brodiaea and San Diego button-celery would <del>remain</del> <u>be less than</u> significant <del>because the operational protocols and habitat compensation may not be implemented if the NCCP is not applied...</del>" The remainder of the paragraph should also be deleted because no additional mitigation is required.</p> <p>This change should be made globally.</p>

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60.	4.1.8	4.1-54	Impact Bio-1, Thread-leaved Brodiaea and San Diego button celery, third paragraph	The DEIR states, "...NCCP protocols and measures may not apply at the time of Proposed Project construction. Therefore, after implementation of APMs, impacts to thread-leaved Brodiaea and San Diego button-celery would remain significant because the operational protocols and habitat compensation may not be implemented if the NCCP is not applied." As the thread-leaved Brodiaea and San Diego button-celery are NCCP covered species, and any incidental impacts to NCCP covered species have already been mitigated to less than significant by the implementation of the NCCP, this statement is incorrect if the NCCP is utilized as a viable take permit. SDG&E has proven the viability of its NCCP take permit in conjunction with the wildlife agencies.	Recommend that the significance finding for thread-leaved Brodiaea and San Diego button-celery be revised to less than significant with incorporation of APM-BIO-1 and -2, "... <u>The current NCCP will apply to the Proposed Project, as confirmed by the wildlife agencies in their letter to the CPUC on June 29,2015. Therefore, after implementation of APMs, impacts to thread-leaved brodiaea and San Diego button-celery would be less than significant. However, if NCCP protocols and measures may-do not apply at the time of Proposed Project construction.</u> Therefore then, after implementation of APMs, impacts to thread-leaved Brodiaea and San Diego button-celery would remain significant because the operational protocols and habitat compensation may not be implemented if the NCCP is not applied."
61.	4.1	4.1-54/55	Impact Bio-1	Language in this section reads as if these plant species <i>will</i> be affected. This is not necessarily true, as temporary work areas can be adjusted to avoid sensitive plant species. Additionally, CRPR category 4.2 species are listed and significance of these species should not be addressed under CEQA.	Consider changing all "would" to "could" or "could be potentially impacted". Consider removing CRPR category 3 and 4 species from the determination of significance analysis.
62.	4.1.8	4.1-54/55	Del Mar Mesa sand aster, etc., End of Last paragraph	<b>Del Mar Mesa sand aster, etc.</b> APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM Biology 2, are not necessary.	Recommend that the significance finding for Del Mar Mesa sand aster, long-spined spineflower, Nuttall's scrub oak, decumbent goldenbush and summer holly be revised to less than significant with incorporation of APM-BIO-1 and -2.
63.	4.1.8	4.1-55/56	Spineshrub, etc., End of Last paragraph	<b>Spineshrub, etc.</b> APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM Biology 2, are not necessary.	Recommend that the significance finding for spineshrub, coast barell cactus, San Diego march-elder, and wart stemmed ceanothus be revised to less than significant with incorporation of APM-BIO-1 and -2.
64.	4.1.8	4.1-55/56	Ashy spike moss, etc., End of Last paragraph	<b>Ashy Spike Moss, etc.</b> APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM Biology 2, are not necessary.	Recommend that the significance finding for ashy spike-moss, graceful tarplant, Robinson's pepper grass, spiny rush, San Diego sagewort, San Diego sunflower, and Palmer's grapplinghook be revised to less than significant with incorporation of APM-BIO-1 and -2.
65.	4.1.8	4.1-56	Third paragraph	<b>Direct Impacts to Special-Status Plants Not Observed in the BSA</b> APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM Biology 2, are not necessary	Recommend that the significance finding for direct impacts to special-status plants not observed within the BSA be revised to less than significant with incorporation of APM-BIO-1 and -2.
66.	4.1	4.1-57/64	Mitigation Measures Biology 1a, 1b, 1c, 1d, 1e, 1f and 1g	APMs BIO-1 and BIO-2 mitigate potential impacts on special status species covered by the NCCP to a level that is less than significant and SDG&E has committed to implementing APMs BIO-1 and BIO-2. Therefore, throughout the biological resources analysis, such impacts should be considered less than significant after implementation of APMs BIO-1 and BIO-2. Further mitigation measures, including 1a, 1c, 1d, 1e, 1f and 1g and MM	Recommend removing Mitigation Measures Biology-1a, 1b, 1c, 1d, 1e, 1f, and 1g in their entirety.  If these measures are not removed, they should be revised to reflect the SDG&E NCCP Operational Protocols as originally written:

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				<p>Biology 2, are not necessary. The NCCP is available as a valid take permit for the Proposed Project, so inclusion of these mitigation measures is duplicative, unnecessary, and potentially contradictory.</p> <p>SDG&amp;E recognizes that the environmental training Operational Protocols (7.1.2, protocols 11 and 12) contained within the NCCP specifically apply to SDG&amp;E employees and not to contractors that may be working on the Proposed Project. Therefore SDG&amp;E does not recommend the removal or revision of Mitigation Measure Biology-1b, despite that fact that it differs from the NCCP Operational Protocols. However SDG&amp;E recommends that this measure be made into a stand-alone mitigation measure that is separate from the SDG&amp;E NCCP Operational Protocols.</p>	<p><del><b>Mitigation Measure Biology-1a: 7.1.1 General Field Personnel Behavior Requirements for all Field Personnel:</b></del> <u>All field personnel shall abide by the following general behavior requirements:</u></p> <ol style="list-style-type: none"> <li>1. All vehicles must be kept on <del>approved</del> access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads <u>to allow reptile species to disperse</u>. Vehicles <del>shall</del> <u>must</u> be turned around in established or designated areas only.</li> <li>2. No wildlife, including rattlesnakes, may be harmed, except to protect life and limb.</li> <li>3. Firearms shall be prohibited <u>on the rights-of-way</u> except for those used by security personnel.</li> <li>4. Feeding of wildlife <del>shall</del> <u>is not be</u> allowed.</li> <li>5. SDG&amp;E personnel <del>shall</del> <u>are not allowed to bring pets to work areas on the rights-of-way</u> in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations.</li> <li>6. Parking or driving underneath oak trees <del>shall</del> <u>is not be</u> allowed in order to protect root structures except in established traffic areas.</li> <li>7. Plant or wildlife species <del>shall</del> <u>may not be</u> collected for pets or any other reason.</li> <li>8. Littering <del>shall</del> <u>is not be</u> allowed. SDG&amp;E shall not deposit or leave any food or waste <del>in any work area on the rights-of-way or adjacent property</del>.</li> <li>9. Wild fires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, <u>it may be necessary for trucks shall to carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care should be exhibited when smoking in natural habitats.</u></li> <li>10. Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impacts <del>to the Environmental Surveyor</del> <u>biologists(s) approved by the CPUC and the USFWS and CDFW. Other CPUC and USFWS or CDFW Biologists or experts in wildlife handling may need to be brought in by the Environmental Surveyor for assistance with wildlife relocations.</u></li> </ol> <p><b>Mitigation Measure Biology-1b: Environmental Training Program.</b> An environmental training program shall be developed and presented to all crew members prior to the beginning of all project construction. The training shall describe special-status plant and wildlife species and sensitive habitats that could occur within project work areas,</p>

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					<p>protection afforded to these species and habitats, and avoidance and minimization measures required to avoid and/or minimize impacts from the project. Penalties for violations of environmental laws shall also be incorporated into the training session. Each crewmember shall be provided with an informational training handout and a decal to indicate that he/she has attended the training. The roles and responsibilities of CPUC-, USFWS-, and CDFW-approved biologist(s) and other environmental representatives shall be identified in the Mitigation, Monitoring, Compliance, and Reporting Program and discussed during the training. All new construction personnel shall receive this training before beginning work on this project. A copy of the training and training materials shall be provided to CPUC for review and approval at least 30 days prior to the start of construction. Training logs and sign-in sheets shall be provided to CPUC on a monthly basis. As needed, in-field training shall be provided to new on-site construction personnel by the environmental compliance supervisor or a qualified individual who shall be identified by SDG&amp;E's Project Biologist, or initial training shall be recorded and replayed for new personnel.</p> <p><del>Mitigation Measure Biology 1e: 7.1.3 Pre-Activity Surveys Studies:</del>  <u>13. The CPUC, USFWS, and CDFW approved biologist(s) Environmental Surveyor shall conduct a pre-activity survey studies for all activities occurring off of access roads in sensitive natural habitats areas. The pre-activity survey shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-activity survey shall be documented by the Qualified Biologist in a pre-activity survey report. The pre-activity survey report shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to CDFW and USFWS as required by any regulatory permits or approvals. The pre-activity study shall include the following:</u></p> <ul style="list-style-type: none"> <li>• <del>Type, location, and size of project</del></li> <li>• <del>Date, time weather surrounding land uses</del></li> <li>• <del>Evaluation of type and quality of habitat</del></li> <li>• <del>Work description and methods which will be used to avoid or minimize ground disturbance, including biological monitoring during construction</del></li> <li>• <del>Anticipated impacts and proposed mitigation</del></li> <li>• <del>Map of location of work area</del></li> </ul> <p><u>The scope of these studies is included in Appendix A. The Environmental Surveyor will complete a pre-activity study form contained in Appendix A, including recommendations for review by a biologist and construction monitoring as appropriate. Biologists should be called in when there is the potential for unavoidable impacts to Covered Species. These forms are for information only, and will not require CDFG or USFWS approval.</u></p>

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					<p><u>These forms shall be faxed to CDFG and USFWS, along with phone notification {OR the forms will be submitted via email only}, who will reply within 5 working days, indicating if they would like to review the project and/or suggest recommendations for post project monitoring. If a biologist is required, he/she will be contacted concurrent to notification to CDFG and USFWS. SDG&amp;E's project may proceed during this time if necessary, in compliance with the recommendations of the biologist (For narrow endemic species see mitigation IV following Table 3.1). USFWS survey protocols performed by qualified biologists will be required for new projects which are defined as projects requiring CEQA review.</u></p> <p><u>In those situations where the <del>Qualified</del> Biologist Environmental Surveyor cannot make a definitive species identification, an on-call biologist will be brought in <del>the Qualified Biologist shall make a determination based on the available evidence and professional expertise.</del> When the biologist is called, he or she will be contacted concurrently with CDFG and USFWS. The biologist will make the determination of the species in question and recommend avoidance or mitigation approaches to the Environmental Surveyor and a decision will be made. In those situations where more than one visit may be necessary to identify a given species, such as certain birds, no more than three site visits shall be required. It is expected that the typical USFWS search protocols will not be utilized in most situation due to the Plan's avoidance priority. Background information necessary to complete the annual report shall be collected on the preactivity study form and used by SDG&amp;E to prepare the annual report.</u></p> <p><u>14. In order to ensure that habitats are not inadvertently impacted, the <del>CPUC, USFWS, and CDFW approved biologists</del> Environmental Surveyor shall determine the extent of habitat and flag boundaries of habitats which must be avoided. When necessary, the <del>CPUC, USFWS, and CDFW approved biologist</del> Environmental Surveyor <del>shall</del> should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the <del>CPUC, USFWS, and CDFW approved biologist</del> Environmental Surveyor shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project <del>site</del>-specific basis.</u></p> <p><u>15. SDG&amp;E <del>shall</del> will maintain a library of <del>special status-rare</del> plant species locations known to SDG&amp;E occurring within <del>the project BSA easements and fee owned properties.</del> "Known" means a verified population either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency Habitat Conservation Plans, pre-activity surveys, or biological surveys conducted for environmental compliance <del>of the project on a project site (e.g. initial study), but there is no requirement for development of original biological data.</del> Plant inventories shall be consulted as part of pre-activity survey procedures.</u></p> <p><u><del>Mitigation Measure Biology 1-d: 7.1.4 Maintenance, Repair, and Construction of Facilities. SDG&amp;E shall implement the following measures pertaining to maintenance, repair, and construction of facilities:</del></u></p>

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					<p><del>1-16.</del> Maintenance, repair and construction activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.</p> <p><del>2-17.</del> Routine maintenance of all facilities <del>shall</del> includes visual inspections on a regular basis, conducted from vehicles driven on the <del>project</del> access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot or from the air.</p> <p><del>3-19.</del> Erosion <del>shall</del> will be minimized on access roads and other locations primarily with water bars. The water bars are mounds of soil shaped to direct flow and prevent erosion.</p> <p><del>4-20.</del> Hydrologic impacts <del>shall</del> will be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices.</p> <p><del>5-21.</del> When siting new facilities, every effort shall be made to cross wetland habitat perpendicular to the watercourse, spanning the water course to minimize the amount of disturbance to riparian areas.</p> <p><del>6- 22.</del> Gas and other facilities cross streambeds and require maintenance and repair. During repair or maintenance of facilities in a stream bed, such times water may be temporarily diverted as long as the natural drainage patterns are restored after disturbance to minimize the impact of the disturbances and to help re-establish or enhance the native habitat. Erosion control during construction in a streambed in the form of intermittent check dams and culverts <del>shall</del> should also be considered to prevent alteration to natural drainage patterns and prevent siltation.</p> <p><del>7- 23.</del> Impacts to wetland shall be minimized by avoiding pushing soil or brush into washes or ravines.</p> <p><del>8- 24.</del> During work on facilities, all trucks, tools, and equipment <del>shall</del> should be kept on existing access roads or cleared areas, to the extent feasible.</p> <p><del>9- 25.</del> The CPUC, USFWS, and CDFW approved biologist Environmental Surveyor <del>shall</del> must approve of an activity prior to working in <del>any natural area</del> sensitive areas where disturbance to habitats may be unavoidable.</p> <p><del>10- 26.</del> Insulator washing <del>shall be</del> is allowed from access roads if other applicable protocols in this mitigation measure are followed.</p>

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					<p><del>11. 27. Brush clearing around facilities for fire protection shall not be conducted from January 15 through August 31 (to avoid the general bird nesting season) March through August without prior approval by the CPUC, USFWS, and CDFW approved biologist Environmental Surveyor. The CPUC, USFWS, and CDFW approved biologist Environmental Surveyor shall will make sure that the habitat contains no active nests, burrows, or dens prior to clearing.</del></p> <p><del>12. 28. In the event that a special status plant species is located within the area required to be cleared for fire protection purposes, SDG&amp;E identifies a covered species of plant within a 10' radius around power poles, which is the area required to be cleared for fire protection purposes, SDG&amp;E shall notify USFWS (for ESA-listed plants), and CDFW (for CESA listed plants), in writing, of the plants identity and location and of the proposed activity, which will result in the take of such plant. Notification shall will occur ten working days prior to such activity, during which time USFWS and CDFW may remove such plant(s). If neither USFWS or CDFW have removed such plant(s) within the ten working days following the notice, SDG&amp;E may proceed to complete its fire clearing and cause a take of such plant(s) consistent with SDG&amp;E's take coverage for the ESA- or CESA listed plants.</del></p> <p><del>When fire clearing is necessary in instances other than around power poles, SDG&amp;E shall follow the pre-activity survey and notification procedures in Mitigation Measure Biology 1e, above. and the potential for impacts to Covered Species exists, SDG&amp;E will follow the preactivity and notification procedures in Operational Protocol number 13.</del></p> <p><del>13. 30. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes.</del></p> <p><del>14. 31. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the CPUC, USFWS, and CDFW approved biologist Environmental Surveyor or used immediately to fill eroded areas. Cleared vegetation shall be hauled off the rights-of-way to a permitted disposal location.</del></p> <p><del>15. 32. Within 6 months of Plan approval, environmentally sensitive tree trimming locations will be identified in the tree trim computer data base system utilized by tree trim contractors. (This data base also tracks the date of each tree trim, type of tree, where threatening dogs reside, etc.). The CPUC, USFWS, and CDFW approved biologist Environmental Surveyor shall should be contacted to perform a pre-activity survey when vegetation trimming is planned in environmentally sensitive habitats areas. Whenever possible, trees in environmentally sensitive habitats areas (determined by CDFW and SDG&amp;E) such as native riparian, woodland, or scrub vegetation shall will be scheduled for trimming in non-sensitive times (i.e., outside of breeding or nesting seasons).</del></p> <p><del>16. 33. No new facilities and activities shall be planned that would disturb vernal pools,</del></p>

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					<p>their watersheds, or impact their natural regeneration. Continued historic maintenance of existing infrastructure utilizing existing access roads <del>shall</del> <u>is</u> allowed to continue in areas containing vernal pool habitat <del>provided no such habitat located within these roads would be impacted by project activities.</del> New construction of overhead infrastructure which spans vernal pool habitats <del>shall be</del> <u>is</u> allowed as long as the placement of facilities or the associated construction activities in no way impact the vernal pools.</p> <p><del>17.</del> <u>34.</u> If any previously unidentified dens, burrows, nests or <del>special status</del> plants are located on any project site after the pre-activity survey, the <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> shall be contacted. The <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> <u>shall will</u> determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time-of-day limitations, etc.</p> <p><del>18.</del> <u>35.</u> The <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> shall conduct monitoring as recommended in the pre-activity survey report. At completion of work, the <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> shall check to verify compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> is responsible for removing all habitat flagging from the construction site.</p> <p><del>19.</del> <u>36.</u> The <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> shall conduct checks on mowing procedures to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than 4 inches.</p> <p><del>20.</del> <u>37.</u> Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected or from which animals cannot be removed shall be capped or otherwise covered at the end of each work day, <del>to avoid animal entrapment.</del> Old piping or other supplies that have been left open shall not be capped until inspected and any species found in them allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as authorized by the <del>CPUC, USFWS, and CDFW approved biologist CDFW.</del> Refer to Mitigation Measure 1a, Item 10 for wildlife relocations.</p> <p><del>21.</del> <u>38.</u> All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife are located in the trench or excavation, the <del>CPUC, USFWS, and CDFW approved biologist Environmental Surveyor</del> shall be called immediately to remove them</p>

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					<p>if they cannot escape unimpeded.</p> <p><del>22.</del> <u>39.</u> Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities <del>shall</del> will be controlled by regular watering. At all times, fugitive dust emission will be controlled by limiting on-site vehicle speed to 15 miles per hour.</p> <p><del>23.</del> <u>40.</u> Before using pesticides in areas where burrowing owls may be found, a pre-activity survey <del>shall</del> will be conducted.</p> <p><del>Mitigation Measure Biology 1-e-7.1.5- Maintenance of Access Roads shall consist of:</del>  <del>Maintenance of access roads shall consist of:</del></p> <p><del>1.</del> <u>41.</u> Repairing <del>of</del> erosion by grading, <del>addition</del> <del>ing</del> of fill, and compacting <del>it</del>. In each case of repair, the total area of disturbance shall be minimized by careful access and use of appropriately sized equipment. Repairs shall be conducted after pre-activity surveys conducted by the <del>CPUC, USFWS, and CDFW approved biologist</del> <u>Environmental Surveyor</u> and in accordance with the <u>recommendations regarding construction monitoring and relevant protocols. Consideration should be given to source of erosion problem, when source is within control of SDG&amp;E.</u></p> <p><del>2.</del> <u>42.</u> <del>Controlling vegetation</del> <u>Vegetation control</u> through grading, <del>which shall</del> should be used only where the vegetation obscures the inspection of the facilities, access may be entirely lost, or the threat of facility failure or fire hazard exists. The graded access road width shall not exceed 12 feet on straight portions (radius turns may be slightly wider).</p> <p><del>3.</del> <u>44.</u> Maintenance work on access roads <del>shall</del> <u>should</u> not expand the existing road bed.</p> <p><del>4.</del> <u>45.</u> Material for filling in road ruts should never be obtained from the sides of the road which contain habitat without approval from the <del>CPUC, USFWS, and CDFW approved biologist</del> <u>Environmental Surveyor</u>.</p> <p><del>Mitigation Measure Biology 1-f: 7.1.6 Construction of New Access Roads Shall Comply with the Following Protocols:</del> :</p> <p><del>1.</del> <u>New spur roads shall be designed in coordination with the wildlife agencies and preserve managers and priority shall be given to placement of spur roads in previously disturbed areas and areas which require the least amount of construction grading.</u></p> <p><u>46.</u> <u>SDG&amp;E access roads will be designed and constructed according to the SDG&amp;E Guide for Encroachment on Transmission Rights-of-Way (4/91).</u></p> <p><u>And 48.</u> <u>New access roads shall be designed to be placed within previously disturbed areas and areas which require the least amount of grading in sensitive areas during construction whenever possible. Preference shall be given to the use of stub roads rather than linking facilities tangentially.</u></p>

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					<p><del>2. 50. Construction of New access roads-construction shall be is allowed year round, providing the soil is dry and no natural ponding has occurred. Every effort shall be made to avoid constructing roads during the nesting season. During the nesting season, the presence or absence of nesting species shall be determined by the CPUC, USFWS, and CDFW approved a biologist and. If nesting birds are detected, appropriate avoidance and minimization recommendations, as described in Mitigation Measures Biology 7 and Biology 8, shall be followed.</del></p> <p><del>Mitigation Measure Biology 1g: 7.1.8 Survey Work Protocols. SDG&amp;E shall implement the follow measures during survey work:</del></p> <p><del>1. 54. Brush clearing for foot paths or line-of-sight cutting shall is not be allowed from February through September March through August in sensitive habitats without prior approval from the CPUC, USFWS, and CDFW approved biologist Environmental Surveyor, who will ensure the brush clearing activity does not adversely affect a special-status sensitive species or nesting birds.</del></p> <p><del>2. 55. SDG&amp;E survey personnel shall must keep vehicles on existing access roads. No clearing of brush for panel point placement shall be-is allowed from February through September-March through August without prior approval from the CPUC, USFWS, and CDFW approved biologist Environmental Surveyor, who will ensure the brush clearing activity, does not adversely affect a special status species or nesting birds.</del></p> <p><del>3. 56. Hiking off roads or paths for survey data collection shall be is allowed year round so long as other protocols are met.</del></p>
67.	4.1.8	4.1-64/65	MM Bio-2	<p><b>MM Bio-2:</b> The DEIR states, “Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation per the direction of the USFWS and/or CDFW.”</p> <p>This measure should be amended to include the NCCP as compensatory mitigation for all special-status species that are covered under the NCCP. For all special-status species that are not covered by the NCCP, Mitigation Measure Bio-2 would apply.</p>	<p>Recommend revising to,” Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through the NCCP when that species is covered under the NCCP. If the species is not covered under the NCCP, then unavoidable impacts to special-status plant species shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation per the direction of the USFWS and/or CDFW.”</p>
68.	4.1.8	4.1-67	Impact Bio-2	<p>The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i>. For example, crushing a fairy shrimp cyst is considered a significant impact for Impact Bio-2. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR’s articulated threshold of significance.</p>	<p>Recommend revising the significance findings to match the DEIR’s articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i>. SDG&amp;E anticipates that if the analysis properly considers <i>species</i>, then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.</p>
69.	4.1.8	4.1-67	Impact Bio-2, first paragraph	<p>The DEIR states that there is potential for permanent impacts to vernal pools through road repair and/or grading. SDG&amp;E will not repair or grade any feature determined to be a jurisdictional vernal pool as a part of the Proposed Project. Therefore, permanent impacts to vernal pools from road repair and/or grading will not occur (PEA at pages 3-40, 4.4-50, 4.4-60, and 4.4-64).</p>	<p>Recommend revising analysis of impacts based on this information, “There are no permanent structures that would be built on potentially suitable habitat for San Diego fairy shrimp and vernal pool fairy shrimp. However, there is potential for permanent impacts to pools and fairy shrimp if SDG&amp;E repairs access roads and fills in road rut pools containing suitable habitat in segments C and D. In addition, SDG&amp;E will not repair or refresh access roads in the vicinity of features determined to be jurisdictional</p>

Attachment A - San Diego Gas & Electric Company (SDG&E) Comments  
 Sycamore to Peñasquitos 230kV Transmission Line Project  
 Draft Environmental Impact Report



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					<i>vernal pools within any portion of the Proposed Project. Therefore, no permanent impacts to vernal pools are anticipated.</i>
70.	4.1.8	4.1-67/68	Impact Bio-2, Quino checkerspot butterfly	<p>The DEIR states that, “<i>The Proposed Project would have a substantial adverse effect on QCB if the Proposed Project caused mortality or injury to QCB or impacted suitable or occupied habitat; this impact would be significant.</i>” However, SDG&amp;E Low-Effect HCP for QCB states, “<i>The impacts to QCB from covered activities under the Plan are expected to be insignificant because the Plan prioritizes the avoidance and minimization of impacts, and unavoidable impacts from covered activities would generally be very small. The Plan further provides offsetting mitigation for any unavoidable impacts, including situations for which mitigation is not required under the Act (e.g., mitigation for suitable but unoccupied habitat.)</i>” Therefore, impacts to QCB from the Proposed Project cannot be considered significant if the SDG&amp;E Low-Effect QCB is utilized for take coverage for QCB.</p> <p>For a more detailed discussion of this issue, please see Section II.B.1.b of the comment letter.</p>	<p>Impacts to QCB from the Proposed Project cannot be considered significant if the SDG&amp;E Low-Effect QCB is utilized for take coverage for QCB. Recommend revising to state that impacts to QCB would be less than significant with APM BIO-3, “<u>With implementation of the SDG&amp;E Low-Effect QCB HCP, the Proposed Project will not have a substantial adverse effect on QCB.</u><del><i>The Proposed Project would have a substantial adverse effect on QCB if the Proposed Project caused mortality or injury to QCB or impacted suitable or occupied habitat; this impact would be significant.</i></del>”</p>
71.	4.1.8	4.1-68	Impact Bio-2, Quino checkerspot butterfly	<p>The DEIR states that impacts to QCB would remain significant even with the inclusion of the SDG&amp;E QCB HCP because there is suitable habitat for QCB outside of SDG&amp;E Mapped Areas for QCB. However the SDG&amp;E Low-Effect QCB HCP determined that, “<i>‘Low-effect’ incidental take permits are those permits that, despite their authorization of some small level of incidental take, individually or cumulatively have a minor or negligible effect on species covered...</i>” The HCP further states, “<i>The impacts to QCB from covered activities under the Plan are expected to be insignificant because the Plan prioritizes the avoidance and minimization of impacts, and unavoidable impacts from covered activities would generally be very small. The Plan further provides offsetting mitigation for any unavoidable impacts, including situations for which mitigation is not required under the Act (e.g., mitigation for suitable but unoccupied habitat.)</i>” Therefore, impacts to QCB from the Proposed Project cannot be considered significant if the SDG&amp;E Low-Effect QCB is utilized for take coverage for QCB.</p>	<p>Impacts to QCB from the Proposed Project cannot be considered significant if the SDG&amp;E Low-Effect QCB is utilized for take coverage for QCB. Recommend revising to state that impacts to QCB would be less than significant with APM BIO-3.</p> <p>Recommend revising language to state, “<i>Under the HCP for QCB, SDG&amp;E is not required to perform pre-activity surveys for the Proposed Project because the Proposed Project is outside of the SDG&amp;E QCB Mapped areas as shown in the HCP (Moser and Skaggs LLP 2007). Impacts to QCB would, therefore, remain be less than significant with the implementation of APM BIO-3 because the Proposed Project would be within the potential range of the QCB, and there is suitable habitat for QCB in the Proposed Project area.</i>utilize the SDG&amp;E QCB HCP, which states that, “<i>The impacts to QCB from covered activities under the Plan are expected to be insignificant because the Plan prioritizes the avoidance and minimization of impacts, and unavoidable impacts from covered activities would generally be very small. The Plan further provides offsetting mitigation for any unavoidable impacts, including situations for which mitigation is not required under the Act (e.g., mitigation for suitable but unoccupied habitat.)</i>”</p>
72.	4.1.8	4.1-68	Impact Bio-2, Quino checkerspot butterfly.	<p>The DEIR states that, “<i>MM Bio-5 requires pre-activity surveys for the QCB within the current USFWS survey area for the species (as defined in USFWS 2014b) and mitigation for suitable and occupied QCB habitat consistent with the HCP.</i>” This is actually inconsistent with the SDG&amp;E Low-Effect QCB HCP as SDG&amp;E is only required to perform pre-activity surveys and to account for impacts and mitigate for those impacts when the proposed impact will occur within a SDG&amp;E Mapped Area for QCB. As discussed in the above comments, the SDG&amp;E Low-Effect HCP for QCB has determined that, “<i>The impacts to QCB from covered activities under the Plan are expected to be insignificant because the Plan prioritizes the avoidance and minimization of impacts, and unavoidable impacts from covered activities would generally be very small. The Plan further provides offsetting mitigation for any unavoidable impacts, including situations for</i></p>	<p>Recommend removing MM Bio-5 as the Proposed Project is located outside of the SDG&amp;E Mapped Areas for QCB, and all potential impacts to QCB have already been mitigated to a level less than significant with compliance with the SDG&amp;E Low-Effect QCB HCP.</p>

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				<i>which mitigation is not required under the Act (e.g., mitigation for suitable but unoccupied habitat.)”.</i>	
73.	4.1.8	4.1-68	Critical Habitat, first paragraph.	The DEIR states, “ <i>However, there is potential for SDG&amp;E to fill in pools or degrade the quality of pools that provide habitat for San Diego fairy shrimp during access road refreshing or use and permanently impact critical habitat.</i> ” As discussed above, SDG&E will not repair or grade any feature determined to be a jurisdictional vernal pool as a part of the Proposed Project (PEA Sections 4.4 and 4.8, as well as SDG&E responses to Energy Division Data Request 2 concerning access road grading). Therefore, permanent impacts to vernal pools from road repair and/or grading will not occur. In addition, SDG&E will limit vehicle access to the Del Mar Mesa portion of the project between Structures E9 and E12 and allow foot access only. All equipment will be carried in by foot or flown in by helicopter. Therefore, there is no potential for permanent impacts to vernal pools or fairy shrimp suitable habitat within Fairy Shrimp Critical Habitat areas.	Recommend revising the referenced sentence to remove references to the potential for SDG&E to permanently impact San Diego fairy shrimp Critical Habitat, as no permanent work activities will occur within this area and no access roads will be repaired in this area, “ <i>SDG&amp;E will not repair or refresh access roads in the vicinity of features determined to be jurisdictional vernal pools within any portion of the Proposed Project. Therefore, no permanent impacts to vernal pools within fairy shrimp critical habitat are anticipated.</i> ” <i>However, there is potential for SDG&amp;E to fill in pools or degrade the quality of pools that provide habitat for San Diego fairy shrimp during access road refreshing or use and permanently impact critical habitat.</i> ”
74.	4.1.8	4.1-68	Critical Habitat, first paragraph.	The DEIR states that, “ <i>...the measures in APM BIO-4 are not considered adequate to reduce potential impacts to critical habitat to less than significant levels because it does not provide measures to compensate for impacts to vernal pools.</i> ” As discussed in previous comments, the Proposed Project will avoid all permanent impacts to vernal pools, including those located within San Diego fairy shrimp critical habitat.  In addition, the SDG&E NCCP provides measures to compensate for impacts to vernal pools.	Recommend that impacts significance for San Diego fairy shrimp critical habitat be revised to show that impacts to San Diego fairy shrimp critical habitat would be less than significant with implementation of APM Bio-1 and -2, “ <i>...while the measures in APM BIO-4 are not considered adequate to reduce potential impacts to critical habitat to less than significant levels because it does not provide measures to compensate for impacts to vernal pools, the SDG&amp;E NCCP does provide measures to compensate for impacts to vernal pools. Therefore, impacts to vernal pools would be less than significant with APMs.</i> ”
75.	4.1.8	4.1-69	Mitigation Measure Biology-4, first paragraph	Mitigation Measure Biology-4 should be re-written to include the potential for the use of the SDG&E NCCP as mitigation for impacts to vernal pools. If the NCCP is not utilized for the Proposed Project, then Mitigation Measure Bio-4 would apply.	Recommend that Mitigation Measure Biology-4 be re-written to include the potential for the use of the SDG&E NCCP as mitigation for impacts to vernal pools. If the NCCP is not utilized for the Proposed Project, then Mitigation Measure Bio-4 would apply, “ <i>SDG&amp;E shall implement either the NCCP, which contains measures to compensate for impacts to vernal pools, or in the event the NCCP is not utilized or available, the following measures shall be implemented to avoid and minimize impacts to San Diego and vernal pool fairy shrimp and their potential vernal pool and road pool habitats.</i> ”
76.	4.1.8	4.1-70	Mitigation Measure Biology-4, second bullet	The DEIR states, “ <i>No construction access shall be allowed at any time on the access road in transmission line Segment C between poles E9 and E12 as shown in figure 4.1-4 due to the substantial number of existing vernal pool and road rut pools present within and immediately adjacent to the access road. Orange construction fencing shall be installed at the end points of the restricted access. Temporary signage shall be posted on the fence stating “No construction access permitted.” The no construction area shall be monitored by a CPUC-, USFWS-, CDFW-approved biologist to ensure no vehicle access or entry occurs throughout the duration of construction.</i> ”  While SDG&E can implement a No Construction Access zone for SDG&E vehicles, SDG&E cannot completely block off the access road between Poles E9 and E12 as there are other entities that utilize these roads.	Recommend revising to read, “ <i>No construction access shall be allowed at any time on the access road in transmission line Segment C between poles E9 and E12 as shown in figure 4.1-4 due to the substantial number of existing vernal pool and road rut pools present within and immediately adjacent to the access road. <del>Orange construction fencing shall be installed at the end points of the restricted access.</del> Temporary signage shall be posted on a stake the fence adjacent to the roads stating “No construction access permitted.” The no construction area shall be monitored by a CPUC-, USFWS-, CDFW-approved biologist to ensure no vehicle access or entry occurs throughout the duration of construction.</i> ”
77.	4.1.8	4.1-72	Mitigation Measure Biology-4, second bullet	The DEIR states, “ <i>Where access roads containing pools are used and the roads are not first repaired under the scenarios listed above, the following measures shall apply during project construction and operation/maintenance.</i> ” SDG&E will utilize its NCCP permit for the O&M of the Proposed Project. The NCCP contains a ‘Vernal Pool Clarification’ document that will guide avoidance, minimization and mitigation for vernal pools.	Recommend this bullet be revised to remove the term ‘operations/maintenance’, “ <i>Where access roads containing pools are used and the roads are not first repaired under the scenarios listed above, the following measures shall apply during project construction and operation/maintenance.</i> ”

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78.	4.1.8	4.1-72	Mitigation Measure Biology-5	SDG&E will be utilizing the SDG&E Low-Effect HCP for QCB in order to avoid, minimize, and mitigate for any potential impacts to QCB as a result of the Proposed Project. The SDG&E QCB HCP requires SDG&E to conduct protocol surveys for QCB, if timing allows, within the SDG&E Mapped Area for QCB only. The HCP also explicitly states that, “ <i>The impacts to QCB from covered activities under the Plan are expected to be insignificant because the Plan prioritizes the avoidance and minimization of impacts, and unavoidable impacts from covered activities would generally be very small. The Plan further provides offsetting mitigation for any unavoidable impacts, including situations for which mitigation is not required under the Act (e.g., mitigation for suitable but unoccupied habitat.)</i> ”. Therefore any impacts to QCB outside of the SDG&E Mapped Area for QCB are already mitigated for to less than significant by the QCB HCP.	Recommend removing this mitigation measure as there are no SDG&E QCB Mapped Areas within the Proposed Project. APM BIO-3 will reduce all impacts to QCB to less than significant.
79.	4.1.8	4.1-73	Impact Bio-3	The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i> . For example, injury to a western spadefoot toad is considered a significant impact for Impact Bio-3. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR’s articulated threshold of significance.	Recommend revising the significance findings to match the DEIR’s articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i> . SDG&E anticipates that if the analysis properly considers <i>species</i> , then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.
80.	4.1.8	4.1-73	Impact Bio-3, second paragraph	The DEIR states that, “ <i>Western spadefoot would be injured or killed, if present, and suitable habitat would be affected during vegetation removal and vehicle and equipment travel on access roads. Construction would result in temporary impacts to 0.01 acre of freshwater marsh. Construction would permanently impact vernal or road rut pool habitat for access road repair and vehicle and equipment travel.</i> ” The above referenced language is written as if it is a given that impacts will occur. In fact, SDG&E has committed to avoiding and minimizing impacts wherever possible, which includes the reshaping of impacts areas to avoid and minimize impacts. While these impacts <i>could</i> occur, it is not appropriate to state that they <i>will</i> occur.  In addition, SDG&E would not permanently impact any vernal pool habitat as a part of the Proposed Project.	Recommend revising to state, “ <i>Western spadefoot <del>would</del> could be injured or killed, if present, and suitable habitat <del>would</del> could be affected during vegetation removal and vehicle and equipment travel on access roads. Construction <del>would</del> could result in temporary impacts to 0.01 acre of freshwater marsh. Construction <del>would</del> could permanently impact <del>vernal or</del> road rut pool habitat for access road repair and vehicle and equipment travel.</i> ”
81.	4.1.8	4.1-74	Impact Bio-3, first paragraph on page	The DEIR states that the implementation of APM BIO-2 and -4 would not reduce impacts to western spadefoot toad to a less than significant level, and recommends the implementation of MM Bio-1a, b, c, and d as well as MM Bio-4 and -6. MM Bio-1a-d are revised NCCP Operational Protocols, and MM Bio-4 and -6 includes compensatory mitigation for impacts to vernal pools and habitat, respectively. All of these measures would be achieved by incorporating APM Bio-2 and -4, or the SDG&E NCCP and Vernal Pool Avoidance and Minimization Measures, as a part of the Proposed Project.	Recommend revising the significance findings based on the utilization of the SDG&E NCCP to less than significant with APMs incorporated. “ <i>Impacts to western spadefoot habitat would <del>remain</del> be less than significant after implementation of APMs. <del>Mitigation Measures Biology 1a, Biology 1b, Biology 1c, and Biology 1d would minimize direct impacts to western spadefoot, including injury and mortality by requiring reduced speeds, worker training, pre-construction surveys, delineation of sensitive habitats, and inspection of trenches. Mitigation Measure Biology 4 requires additional protection of vernal pool and road rut pool habitats and compensatory mitigation for impacts), and Mitigation Measure Biology 6 requires compensation for impacts to freshwater marsh. Impacts to western spadefoot would be less than significant with mitigation.</del></i> ”
82.	4.1.8	4.1-74/75	Mitigation Measures: Biology-6	MM-Bio-6 does not include the SDG&E NCCP as an option for compensatory mitigation for impacts to habitat that are covered by the NCCP. In addition, in lieu of a Habitat Restoration Plan, which is included as a component of MM Bio-6, SDG&E will mitigate for impacts to habitat in accordance with the applicable provisions of the NCCP (i.e. temporary impacts will be mitigated via habitat enhancement measures as described in Section 7.2 of the NCCP and permanent impacts will be mitigated by using existing credits in the NCCP mitigation bank.	Recommend revising this mitigation measure to include the NCCP as an option for compensatory mitigation for impacts to habitat that are covered by the NCCP, “ <i>If the Proposed Project will rely on the SDG&amp;E NCCP for compensatory mitigation for impacts to habitat, then this Mitigation Measure shall not apply to the Proposed Project. However, if SDG&amp;E does not rely on the NCCP for compensatory mitigation for impacts to habitat, then the following Mitigation Measure shall apply.</i> ” <b>In addition, Recommend removing the Habitat Restoration Plan component of this</b>

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					mitigation measure as the SDG&E NCCP provides such a plan.
83.	4.1.8	4.1-79	Impact Bio-4	The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i> . For example, injury to any special-status reptile is considered a significant impact for Impact Bio-4. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR's articulated threshold of significance.	Recommend revising the significance findings to match the DEIR's articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i> . SDG&E anticipates that if the analysis properly considers <i>species</i> , then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.
84.	4.1.8	4.1-79	Impact Bio-4, last paragraph	The DEIR states that the implementation of APM BIO-2 and -4 would not reduce impacts to special-status reptiles to a less than significant level, and recommends the implementation of MM Bio-1a, b, c, and d as well as MM Bio-4 and -6. MM Bio-1a-d are revised NCCP Operational Protocols, and MM Bio-4 and -6 includes compensatory mitigation for impacts to vernal pools and habitat, respectively. All of these measures would be achieved by incorporating APM Bio-2 and -4, or the SDG&E NCCP and Vernal Pool Avoidance and Minimization Measures, as a part of the Proposed Project.	Recommend revising the significance findings based on the utilization of the SDG&E NCCP to less than significant with APMs incorporated, " <i>The NCCP protocols and mitigation measures may not currently apply to the Proposed Project at the time of construction; therefore, impacts to special-status reptiles would still be less than significant after implementation of APM BIO-2's. However, if the NCCP is not utilized for the Proposed Project, impacts to special-status reptiles would still be significant after implementation of APM's. In this case, implementation of the following mitigation measures would be less than significant with mitigation</i> "
85.	4.1.8	4.1-80	Impact Bio-4, California legless lizard, first paragraph	The DEIR does not discuss APM BIO-2 at all, and instead recommends the implementation of MM Bio-1a, b, c, and d as well as MM Bio-4 and -6. MM Bio-1a-d are revised NCCP Operational Protocols, and MM Bio-6, which includes compensatory mitigation for impacts to habitat. All of these measures would be achieved by incorporating APM Bio-2, or the SDG&E NCCP, as a part of the Proposed Project.	Recommend revising the significance findings based on the utilization of the SDG&E NCCP to less than significant with APMs incorporated, " <i>The NCCP protocols and mitigation measures currently apply to the Proposed Project; therefore, impacts to California legless lizard would be less than significant with incorporation of APMs.</i> "
86.	4.1	4.1-81	Last set of bulleted items	The report says there is a moderate or high potential for burrowing owl and least Bell's vireo, and moderate potential for yellow-breasted chat.  Focused surveys for burrowing owl and least Bell's vireo were conducted and were negative, and yellow-breasted chats were not observed during the least Bell's vireo protocol surveys. Based on these survey results, these species should be listed as having an Absent or Low potential for occurrence.	Recommend removing burrowing owl, least Bell's vireo, and yellow-breasted chat from the Impact Bio-5 section: " <i>the following special-status bird species were not observed during biological surveys but have high and moderate potential to occur in the BSA because of suitable habitat.</i> "
87.	4.1.8	4.1-81	Impact Bio-5	The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i> . For example, injury to any special-status bird, any nest abandonment, or nest destruction is considered a significant impact for Impact Bio-5. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR's articulated threshold of significance.	Recommend revising the significance findings to match the DEIR's articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i> . SDG&E anticipates that if the analysis properly considers <i>species</i> , then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.
88.	4.1.8	4.1-82	Impact Bio-5, second paragraph	The DEIR states, " <i>If construction or operation/maintenance noise was to meet or exceed an hourly average threshold of 60 decibels at the edge of the occupied habitat of these species during their breeding seasons, the impact would be significant.</i> "  This analysis does not take into account the existing baseline noise level. The baseline noise level at a particular site has the potential to be greater than 60 dB, especially if the site is adjacent to an existing road or development.  The Proposed Project will utilize the SDG&E NCCP for O&M activities. An incremental increase in operations and maintenance for this line, if any at all, compared to the operation and maintenance over the entire SDG&E service territory, is negligible. Therefore, any impacts from the operations and maintenance of this line would be less than significant.	Recommend revising this sentence to remove the term 'operations/maintenance', and to utilize baseline noise measurements OR 60 dB, whichever is higher, at specific locations, " <i>If construction or operation/maintenance noise was to meet or exceed the existing baseline noise level for the site OR an hourly average threshold of 60 decibels, whichever is higher, at the edge of the occupied habitat of these species during their breeding seasons, the impact would be significant.</i> "
89.	4.1.8	4.1-83	First	The DEIR states that, " <i>SDG&amp;E would implement APM BIO-2 as part of the Proposed</i>	Recommend utilizing a similar measure for the Proposed Project (TL 637 MM BIO-4).

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			paragraph	<i>Project to reduce impacts to NCCP covered species. APM BIO-2 requires the implementation of the SDG&amp;E NCCP protocols, however impacts to NCCP covered bird species would still be significant because the current NCCP may not be available during construction, and the NCCP does not define construction buffers or monitoring requirements for avian species.</i> As stated previously, this DEIR should analyze significance criteria with the NCCP. In addition, the NCCP has been utilized on previous CEQA/CPUC permitted jobs (TL 637 PTC) and impacts to nesting birds were avoided through an adaptive management mitigation measure, which was proven to be effective throughout construction.	In addition, recommend revising the following statement, “SDG&E would implement APM BIO-2 as part of the Proposed Project to reduce impacts to NCCP covered species. APM BIO-2 requires the implementation of the SDG&E NCCP protocols, however <del>impacts to NCCP covered bird species would still be significant because the current NCCP may not be available during construction, and the NCCP does not define construction buffers or monitoring requirements for avian species.</del> ”
90.	4.1.8	4.1-83	Lines 7-9	The DEIR states that the Proposed Project would have impacts to burrowing owl. However, protocol level focused surveys for this species were conducted and were negative.	Recommend revising to, “With implementation of Mitigation Measure Biology-7, the impacts to special-status bird species <del>with the exception of the burrowing owl,</del> would be less than significant.”
91.	4.1.8	4.1-84	Mitigation Measure Biology-7, 1.	MM BIO-7: 1 states that, “Nest surveys shall occur within 48 hours prior to the start of ground-disturbing construction or vegetation trimming or removal activities.” This measure, as written, is not reasonably achievable due to the fluid nature of scheduling construction activities. Requiring that nesting surveys be completed within two days of project-related construction activities would result in an increase in the frequency of surveys and thus an increase in the potential to impact nesting birds because of surveyor intrusions. The increased number of surveys would increase project costs. In addition, it generally takes the majority of avian species up to 5 days to build a nest and to lay eggs. Therefore, a two day survey window is excessive in an effort to meet the goal of reducing impacts to nesting birds to less than significant.	Recommend a 5 day survey window for nesting surveys to be conducted in place of a 48 hour window.
92.	4.1.8	4.1-84	Mitigation Measure Biology-7, 2.	The definition of an “active nest” from Fish and Game Code 3505 and 3503.5 may be changing in 2016 based on a notice of proposed regulations from CDFW.	Recommend that if the draft regulations proposed by CDFW in regards to Fish and Game Code 3503 and 3503.5 are adopted as written, those changes to the Fish and Game Code Sections 3503 and 3503.5 should be incorporated into this document.
93.	4.1.8	4.1-84	Mitigation Measure Biology-7, 2, last sentence.	Nesting bird survey buffers: The DEIR determined that the golden eagle and Swainson’s hawk were absent from the Proposed Project area with no suitable habitat present within the BSA or the vicinity of the Proposed Project (Appendix G, G-54/56), therefore survey buffers for these species are not applicable and should be removed from this mitigation measure.	Recommend removing the survey buffers for golden eagle and Swainson’s hawk from the DEIR as these species were determined to be absent from the Proposed Project BSA or the vicinity of the Proposed Project.  In addition, per the revisions incorporated into to the Salt Creek FEIR, recommend revising the survey buffer for white-tailed kite to 500 feet and all common passerines to 50 feet.
94.	4.1.8	4.1-85	Mitigation Measure Biology-7, Avoid Impacts on Nesting Birds	The DEIR states, “Buffers shall not apply to construction-related traffic using existing roads where the use of such roads is not limited to project-specific use.” This measure, as written, is not reasonably achievable because this portion of the mitigation measure implies that access to large portions of the Proposed Project that are only accessible by SDG&E access roads would be limited if an active nest buffer were to cover SDG&E only access roads proposed to be utilized by the Proposed Project.	Recommend re-stating this portion of the measure to only limit active construction within bird buffers, and not to limit construction-related traffic through a buffer, “Buffers shall not apply to construction-related traffic using existing roads. <del>where the use of such roads is not limited to project specific use (i.e. county roads, highways, farm roads, or other private roads).</del> ”
95.	4.1.8	4.1-85	Mitigation Measure Biology-7, Buffer Reduction	Buffer Reduction: Previous projects that have incorporated a buffer reduction process into the nesting bird measure have created a burdensome and time consuming process that will delay construction and that does not offer additional protection to the resource.	Recommend utilizing an adaptive management approach that has worked well for previous projects (TL 637, ECO Substation). This type of plans allows the biological monitor to create nesting bird buffers that take into account the species, topography, existing level of disturbance, proposed construction activities, and other variables to determine the appropriate buffer size based on all of these variables. Typically

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					<p>construction is allowed to occur within the buffer as long as the nest is monitored by the biological monitor at all times while construction is ongoing. No monitoring would be required outside of the buffer. The monitor would have the authority to stop construction and to expand and contract the buffer as needed in order to make sure there is no disturbance the nesting bird.</p> <p>This type of adaptive management benefits the resource by adaptively managing the potential impacts to the nest and allows construction to continue when the resource is not being impacted.</p>
96.	4.1.8	4.1-85	Mitigation Measure Biology-7, CAGN/LBVI	<p>Protocol surveys were conducted for California gnatcatcher (CAGN) and least Bell's vireo (LBVI). CAGN was observed and determined to be present, but LBVI were not observed and determined to be absent from the Proposed Project BSA. Therefore LBVI should be removed from the '<i>Specific Requirements for Coastal California Gnatcatcher and Least Bell's Vireo</i>' section.</p>	<p>Recommend removing references for least Bell's vireo from this section as it was not observed during protocol surveys and determined to be absent from the Proposed Project BSA.</p>
97.	4.1.8	4.1-85	Mitigation Measure Biology-7, CAGN/LBVI	<p>The DEIR states, "<i>Where there is potential nesting habitat for the coastal California gnatcatcher or least Bell's vireo within or adjacent to the MHPA, construction or operation/maintenance noise that exceeds the hourly average threshold of 60 decibels shall be avoided during these species' breeding seasons...</i>" The Proposed Project will utilize the SDG&amp;E NCCP for O&amp;M activities. An incremental increase in operations and maintenance for this line, if any at all, compared to the operation and maintenance over the entire SDG&amp;E service territory, is negligible. Therefore, any impacts from the operations and maintenance of this line would be less than significant.</p> <p>In addition, this analysis does not take into account the existing baseline noise level. The baseline noise level at a particular site has the potential to be greater than 60 dB, especially if the site is adjacent to an existing road or development. This measure should include and either/or scenario, in which either the baseline hourly average threshold, the hourly average threshold of 60 decibels, whichever is higher, should apply.</p>	<p>Recommend revising this sentence to remove the term 'operations/maintenance'.</p> <p>In addition, recommend revising to include a consideration for existing baseline noise thresholds. This measure should include and either/or scenario, in which either the baseline hourly average threshold, or the hourly average threshold of 60 decibels, whichever is higher, should apply.</p> <p><i>"Where there is potential nesting habitat for the coastal California gnatcatcher <del>or least Bell's vireo</del> within or adjacent to the MHPA, construction <del>or operation/maintenance</del> noise that exceeds <u>the existing baseline noise level for the site OR an hourly average threshold of 60 decibels, whichever is higher, the hourly average threshold of 60 decibels</u> shall be avoided during these species breeding seasons..."</i></p>
98.	4.1.8	4.1-86	Mitigation Measure Biology-7, Buffer Reduction	<p>The DEIR states, "<i>Non special-status species found building nests within the work areas after specific project activities begin may be tolerant of that specific project activity...</i>" However a buffer reduction request is still required by the measure in the above instance. On pg. 4.1-87 the DEIR then states, "<i>Nests located in areas of existing human disturbance...are likely acclimated to disturbance and do not need to be monitored...</i>"</p>	<p>Recommend not requiring monitoring for non-special status bird species found building nests within active work areas, as it is clear that if the bird is building a nest within an already active work area that that particular bird or pair of birds is not impacted by the existing construction noise and therefore the nest should not need to be monitored.</p>
99.	4.1.8	4.1-87	Mitigation Measure Biology-7, Avian Protection	<p>SDG&amp;E is currently an APLIC member and already voluntarily complies with APLIC guidelines for the construction of new and the rebuilding of existing power lines. SDG&amp;E has an Avian Protection Team that consists of the Environmental Services, Electric Transmission &amp; Distribution Engineering (ETDE) and Electric Regional Operations groups. The SDG&amp;E Avian Protection Team has developed standards that have been included in the ETDE Overhead Construction Standards that were updated in January of 2015. These features all are based upon the APLIC "Suggested Practices for Avian Protection on Power Line: The State of the Art in 2006." Therefore the inclusion of this measure in MM Biology-7 is redundant.</p>	<p>Recommend removing this reference entirely or referencing that SDG&amp;E will <i>continue</i> to construct to APLIC standards, as is our current standard practice.</p>
100.	4.1.8	4.1-87	Mitigation	<p>The DEIR states, "<i>A monthly written report shall be submitted to CPUC, CDFW, and USFWS for construction within a reduced buffer and shall include the following...</i>" This</p>	<p>This measure would be more efficient if the monthly report only required an update on the nest success of nests that had a buffer reduction approved.</p>

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			Measure Biology-7, Monitoring and Reporting	report would only provide redundant information already included in the buffer reduction request, with the exception of information on nest success. This measure would be more efficient if the monthly report only required an update on the nest success of nests that had a buffer reduction approved.	
101.	4.1	4.1-87	Line 27	A burrowing owl mitigation and monitoring plan shouldn't be necessary based on the results of the burrowing owl surveys (although wintering surveys will need to be conducted for areas not previously covered —see previous comments regarding BUOW).  DEIR states: <b>“Mitigation Measure Biology-8: Burrowing Owl Monitoring and Mitigation Plan.</b> SDG&E shall prepare a Burrowing Owl Monitoring and Mitigation Plan (BOMMP) consistent with the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). SDG&E shall submit the Draft BOMMP to CDFW and CPUC. SDG&E shall be required to obtain approval from CDFW on the BOMMP prior to construction. SDG&E shall provide the approved BOMMP to the CPUC 30 days prior to construction.”	Focused surveys for burrowing owl were negative throughout the BSA. Therefore recommend removing this mitigation measure as burrowing owl were not observed during protocol surveys.
102.	4.1.8	4.1-88	Impact Bio-6	The DEIR suggests that an effect on any <i>individual</i> would constitute a significant impact on the <i>species</i> . For example, injury to any special-status mammal is considered a significant impact for Impact Bio-6. These analyses focus on injury to an individual member of the species without considering whether an injury to one individual has a significant impact on the species as is required by CEQA and the DEIR's articulated threshold of significance.	Recommend revising the significance findings to match the DEIR's articulated standard of significance, which rightfully focuses on impacts to <i>species</i> rather than <i>individuals</i> . SDG&E anticipates that if the analysis properly considers <i>species</i> , then the substantial evidence that is already in the record will show that the Proposed Project will not have a significant impact on special status species.
103.	4.1.8	4.1-89	Impact Bio-6, Bats	The DEIR states, “ <i>The disturbance of a bat roost during breeding season would be a significant impact.</i> ” This statement should only be addressed to special-status bat roosts and focus on special-status maternal bat roosts.	Recommend revising to, “ <i>The disturbance of a special-status maternal bat roost during breeding season would be a significant impact.</i> ”
104.	4.1	4.1-90	Mitigation Measure Biology-9, Last paragraph	The mitigation measure for the desert woodrat should be revised to be consistent with the changes made by the CPUC to this mitigation measure on another recent CPUC project (Salt Creek).	Recommend revising to, “ <del>All woodrat houses shall be documented and reported through the MMCRP.</del> Woodrat houses found within the work site or within 5 feet from a work site shall be flagged or fenced for avoidance. If impacts to a woodrat house located within a work site are unavoidable, a CPUC-approved qualified biologist, <del>prior to construction and outside of the breeding season (April through June),</del> shall dismantle the house by hand, removing the materials layer by layer to allow for adult woodrats to escape. <u>All woodrat houses that require dismantling shall be documented and reported through the MMCRP. If young are present and found during the disassembling process, the CPUC-approved qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and moved to another suitable nearby location to allow for nest reconstruction. Piles of cut vegetation/slash shall be retained near the work site prior to nest dismantling to provide refuge for woodrats that may become displaced.</u> ”
105.	4.1.8	4.1-91	Mitigation Measure Biology-10	This mitigation measure should only target special-status bat species, and not all bat species.  This measure, as written, is not reasonably achievable because the term ‘active bat roost’ is not defined. The term ‘active’ should relate to seasonality or breeding state. In addition, limited or no-work exclusion zones for active bat roosts, as currently defined in the	Recommend inserting the phrase ‘special-status’ in front of bat species in the mitigation measure title, and elsewhere as appropriate. In addition recommend adding ‘maternal’ in front of all ‘bat roost’ references, “ <b>Mitigation Measure Biology-10: Mitigation for Special-Status Bat Species.</b> Prior to construction, suitable <u>special-status</u> bat habitat shall be assessed by a CPUC- and CDFW approved, qualified biologist in trees within a 50-foot buffer of active work areas and in any structures with suitable <u>special-status</u> bat

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				measure, may preclude work in a specific area indefinitely, as bats roost all year round.	<i>roosting habitat within a 100-foot buffer of active work areas (e.g., bridges). If an active special-status bat maternity roost is found in a tree or structure, the approved biologist shall define an appropriate limited or no-work exclusion buffer surrounding the special-status bat maternity roost. <del>the roost based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), the type of work to occur, and the duration of the work-related disturbance.</del> The limited work or exclusion areas shall remain in effect until the approved biologist determines that the work would no longer be a disturbance to the roost. A reduction in the buffer may be approved by the qualified biologist if there is a change in the type of work to be conducted.</i>
106.	4.1.8	4.1-91	Mitigation Measure Biology-10, Second paragraph	The DEIR states, “ <i>Buffers shall not apply to construction-related traffic using existing roads where the use of such roads is not limited to project-specific use.</i> ” This measure, as written, is not reasonably achievable because this portion of the mitigation measure implies that access to large portions of the Proposed Project that are only accessible by SDG&E access roads would be limited if an active bat roost were to cover SDG&E only access roads proposed to be utilized by the Proposed Project.	Recommend re-stating this portion of the measure to only limit active construction within active maternal bat roost buffers, and not to limit construction-related traffic through a buffer, “ <i>Buffers shall not apply to construction-related traffic using existing roads. <del>where the use of such roads is not limited to project-specific use</del></i> ”
107.	4.1.8	4.1-92	Impact Bio-7, Operation, first paragraph	<p>The DEIR states, “<i>The Proposed Project could potentially cause an increase in bird mortality from collision, which would be a potential significant impact for special-status species.</i>” The Proposed Project would utilize the SDG&amp;E NCCP for operations and maintenance, and would lead to a negligible increase, if any at all, in operations and maintenance for this line. Therefore, any impacts to special-status avian species from the operations and maintenance of this line would be less than significant.</p> <p>In addition, the DEIR states that, “<i>Mitigation Measure Biology-7 requires collision-reducing techniques for transmission lines based on Reducing Avian Collisions with Power Lines: The State of the Art in 2012 to reduce the potential for bird collisions (APLIC 2012). Impacts would be less than significant with mitigation.</i>” SDG&amp;E is currently an APLIC member and already voluntarily complies with APLIC guidelines for the construction of new and the rebuilding of existing power lines. SDG&amp;E has an Avian Protection Team that consists of the Environmental Services, Electric Transmission &amp; Distribution Engineering (ETDE) and Electric Regional Operations groups. The SDG&amp;E Avian Protection Team has developed standards that have been included in the ETDE Overhead Construction Standards that were updated in January of 2015. These features all are based upon the APLIC “Suggested Practices for Avian Protection on Power Line: The State of the Art in 2006.” Therefore the inclusion of this measure in MM Biology-7 is redundant.</p>	<p>Recommend revising the significance finding for Impact Bio-7, Operation, to less than significant with implementation of APMs.</p> <p>Recommend revising the significance finding for Impact Bio-7, Construction, to less than significant without mitigation.</p>
108.	4.1.8	4.1-92	Impact Bio-7, Permanent Pad and Access Road Maintenance, Second paragraph	The Proposed Project would utilize the SDG&E NCCP for permanent pad and access road maintenance, and would lead to a negligible increase, if any at all, in operations and maintenance for this line. Therefore, any impacts to biological resources from the operations and maintenance of this line would be less than significant.	Recommend revising the significance finding for Impact Bio-7, Permanent Pad and Access Road Maintenance, to less than significant with implementation of APMs.
109.	4.1.8	4.1-	Impact Bio-7,	The Proposed Project would utilize the SDG&E NCCP for inspection and transmission	Recommend revising the significance finding for Impact Bio-7, Transmission Line

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		92/93	Inspection and Transmission Line Maintenance, First paragraph	line maintenance, and would lead to a negligible increase, if any at all, in the inspection and transmission line maintenance for this line. Therefore, any impacts to biological resources from the inspection and transmission line maintenance of this line would be less than significant.	Maintenance, to less than significant with implementation of APMs.
110.	4.1.8	4.1-96	Impact Bio-8, Construction, Direct Impacts, Second paragraph	The DEIR states that 3.34 acres of sensitive vegetation communities would be impacted from access road maintenance during the Proposed Project, and that this would constitute a significant impact. However, per the SDG&E NCCP, any impacts to existing access roads for maintenance cannot be considered significant, because those impacts have already been accounted and mitigated for under the SDG&E NCCP.	Recommend revising the significance finding for Impact Bio-8, Construction, Direct Impacts to sensitive vegetation communities to less than significant without mitigation as these impacts have previously been accounted and mitigated for.
111.	4.1.8	4.1-98	Impact Bio-8, Construction, Direct Impacts, Second paragraph	The DEIR states that APM BIO-4 does not take into account mitigation in the scenario where a vernal pool is impacted by the Proposed Project, and that impacts would therefore remain significant with the incorporation of this measure. However APM BIO-2, or the SDG&E NCCP, does contain mitigation plans for impacts to vernal pools.	Recommend revising the significance finding for Impact Bio-8, Direct Impacts to vernal pools, to less than significant with implementation of APMs.
112.	4.1.8	4.1-100	Impact Bio-9, first paragraph	The DEIR states there are <0.01 acre of permanent impacts to jurisdictional waters from new poles and permanent workpads; 0.06 acre of temporary impacts from temporary work areas and 0.05 acres of access road impacts. SDG&E is not proposing to impact jurisdictional areas.  SDG&E will refine/reconfigure the work spaces to avoid permanent and temporary impacts to aquatic features as the project approaches final design. If an impact to an aquatic resource is not avoidable, SDG&E would obtain the appropriate permits.	
113.	4.1.8	4.1-100	Impact Bio-9, Second paragraph	The DEIR states that there is potential for permanent impacts to vernal pools if SDG&E repairs access roads and fills vernal pools in Segments C and D. SDG&E <i>would not</i> repair any access roads where vernal pools are determined to occur, nor will SDG&E create permanent impacts to vernal pools through construction of the Proposed Project (PEA at pages 3-40, 4.4-50, 4.4-60, and 4.4-64, and PEA Sections 4.8).  In addition, SDG&E has proposed a no drive zone on Del Mar Mesa between structures E9 and E12. No permanent impacts are proposed in this area, only reconductoring on existing structures. Temporary work areas in the vicinity of vernal pools would be adjusted to avoid impacts to vernal pools. In addition, SDG&E would only utilize access roads with disturbed vernal pools and/or road pools when the roads are completely dry in other areas of the Proposed Project outside of the Del Mar Mesa no-drive zone (see SDG&E responses to Energy Division Data Request 2 concerning access road grading).	
114.	4.1.8	4.1-100	Impact Bio 9, Second paragraph	The DEIR does not provide a threshold or definition of an impact to disturbed vernal pools within existing access roads. From SDG&E's perspective we do not consider driving through a DRY disturbed vernal pool within an existing access road as an impact. In	<u>Activities that would be considered an impact and trigger permitting include: 1) driving through disturbed vernal pools within an access road when it is WET; 2) Staging or using the area as a workspace, during wet or dry conditions; 3) placement of a</u>

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				addition, the activity as described would not trigger permitting by the ACOE or RWQCB.	<u>permanent structure within the disturbed vernal pool; 4) grading and/or fill of a vernal pool.</u>
115.	4.1.8	4.1-104	Impact Bio-12	The DEIR states, “ <i>The CPUC has prescribed mitigation measures that parallel the NCCP requirements in the event that the current NCCP cannot be relied on for mitigation. These measures were designed to be consistent with the NCCP, therefore, there would be no conflict.</i> ” SDG&E requests that the CPUC incorporate the NCCP’s exact operating procedures into Measures 1a, 1c, 1d, 1e, 1f, and 1g to ensure that they are consistent with the NCCP. Doing so supports the determination that there would be no significant impact due to a conflict with an adopted NCCP.	“ <i>The CPUC has prescribed mitigation measures that <u>are identical to parallel</u> the NCCP operating procedures. <del>requirements in the event that the current NCCP cannot be relied on for mitigation. These measures were designed to be consistent with the NCCP, t</del> Therefore, there would be no conflict.</i> ”
116.	4.1	4.1-106/143	Tables 4.1-17 through 21	No special-status invertebrate, amphibian, reptile, avian, mammalian species in local or regional plans, policies, or regulations have been identified in the DEIR that are not federally or state-listed threatened or endangered, candidates, or SSC.	Consider removing “or special status species in local or regional plans, policies, or regulations”
117.	4.1	4.1-106/150	Language throughout alternative discussion	List of species that “would” be directly impacted during construction activities. This is not true, as temporary work areas can be adjusted to avoid sensitive plant species.	Consider changing all “would” to “could” or “could be potentially impacted”
<b>4.2 - Aesthetics</b>					
118.			Figure 4.2-6	SDG&E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project: <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• Marker balls do not seem to be of accurate size and color.</li> <li>• Conductor on the west side of the new TSP should be bundled conductor.</li> <li>• New TSP’s are depicting High Voltage bands incorrectly. Per GO 95, Rule 51.6 “A band of bright yellow color not less than 12 inches in width installed no more than 40 inches below the lowest line conductor, energized in excess of 750 volts.”</li> <li>• Yellow bands should be removed from the top of new TSP structures as these bands are not required at this location on the structure.</li> <li>• Simulation does not depict the retaining wall design correctly. The wall is shown is larger than it would be in reality. The retaining wall design is for a maximum height of 12 feet. The wall per design transitions smoothly from 0 to 9 feet tall on the south side of the wall which is not reflected in the simulation. The wall block appears larger than the actual product as well (retaining wall blocks are 18 by 11.5 inches).</li> </ul>	
119.			Figure 4.2-7	The view for this existing condition photograph appears to be looking west and not	

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				southwest as labeled.	
120.			Figure 4.2-8	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• Conductors on the west side of the new TSP should be bundled with a horizontal bundle.</li> <li>• Marker ball colors and sizes are inaccurate.</li> </ul>	
121.			Figure 4.2-10	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• The conductors on the western circuit of the new TSP should be bundled.</li> <li>• The jumper loop on the western circuit of the new TSP should be similar to the TSP on the east’s Jumper loop on the left.</li> <li>• Conductor is not shown on bottom two phases of the 138kV circuit in the south direction.</li> <li>• Marker balls seem to be floating in the air on the northern marker ball span in the simulation- (north or structure P25). Also the sequence of marker ball colors shown is inaccurate.</li> <li>• The yellow bands shown on the new TSP seem to be offset from the pole surface.</li> <li>• Similar to Figure 4.2-6, the retaining wall is shown too tall. The design at this location is for a maximum wall height of 13 feet with smooth transitions to zero feet on both sides. The retaining wall blocks appear to be too large as well.</li> <li>• First marker ball north of structure P25 appears too high (higher than top of structure?).</li> <li>• Underbuild communication wire stops at structure P24 without underground connection shown. The catenary is also incorrect as it transitions past existing tree branch in the foreground.</li> </ul>	
122.			Figure 4.2-12	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo</li> </ul>	

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				<p>simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</p> <ul style="list-style-type: none"> <li>• New TSP's are depicting High Voltage bands incorrectly. Per GO 95, Rule 51.6 "A band of bright yellow color not less than 12 inches in width installed no more than 40 inches below the lowest line conductor, energized in excess of 750 volts."</li> <li>• Yellow bands should be removed from the top of new TSP structures as these bands are not required at this location on the structure.</li> <li>• New TSP color seems to be unrealistic.</li> <li>• Missing new 138kV structures. New 138kV structures (P30 and P31) are not shown. Old 138kV structures still appear in simulation view.</li> <li>• The 138kV circuit on the east side should be dropping into the new 138kV TSPs being installed in the parking lot to tap into the Chicarita Substation (refer to DEIR Appendix A).</li> <li>• The existing TSPs in the Parking lot west of Chicarita Substation are being replaced by two new TSPs.</li> <li>• New conductor wires appear incorrect: wires do not connect to structures correctly, wire spacing is off,</li> <li>• Cross-arms on 230kV DE structure P32 appear to be at an angle, and not parallel to the ground (reference adjacent existing 230kV structure).</li> </ul>	
123.			Figure 4.2-14	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved ("gull") arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• The ground around the base of the pole is shown in silver color, perhaps showing gravel? However, SDG&amp;E would not apply gravel to the work pad.</li> <li>• No foundation of pole is shown in simulation for new TSP: (P33). All new TSPs on the Proposed Project would have foundations.</li> <li>• Conductor wires do not consistently connect to the associated insulators at the appropriate locations.</li> <li>• Relocated 138kV conductor wires (east side of new 230kV Structure P33) are shown behind the insulators and crossarms, when they should be shown in front.</li> </ul>	
124.			Figure 4.2-16	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not</li> </ul>	

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				<p>construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</p> <ul style="list-style-type: none"> <li>• No OPGW is shown on the south side of new TSP. The OGPW should be shown.</li> <li>• It appears that gravel, rock, or perhaps retaining walls are shown at new TSP locations P39 and P40 in the background. This is inaccurate for these locations.</li> <li>• Marker balls as shown appear to be inaccurately placed. Some marker balls appear to be “floating” in the air without connection to the OPGW wire.</li> </ul>	
125.			Figure 4.2-18	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• Marker ball placement shown is unrealistic. The distance between the marker balls is too short, this showing a higher number of marker balls than would be installed. The marker balls are not attached to the shield wire as would be the case (in fact, there does not appear to be a shield wire shown).</li> <li>• The existing steel H-Frame pole with distribution will not be topped as shown in the simulation, but left in place with transmission equipment removed.</li> <li>• Verify that the foundation on Structure P39 would not be visible from the vantage point shown. All new TSPs would have visible concrete foundations.</li> </ul>	
126.			Figure 4.2-20	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• The Cable pole shown in simulation is oriented incorrectly. It should be reversed by 180 degrees, to show the 230kV Cable pole arms on the west and 138kV circuit on the east.</li> <li>• Conductors for the 138kV and 230kV are not shown appropriately. The 230kV should terminate at the cable pole to be routed underground with the 138kV circuit continuing north to the next new H-Frame steel pole.</li> <li>• The conductor shroud is not shown. All 230kV cable poles would have a shroud to house the conductor at the bottom of the structure. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C).</li> <li>• Color of the cable pole looks unrealistic.</li> <li>• Shield wire not visible in simulation.</li> </ul>	

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				<ul style="list-style-type: none"> <li>138kV conductor wires not shown or not visible in simulation.</li> </ul>	
127.			Figure 4.2-22	The bundled 230kV conductors visible within this simulation are shown in a manner that is inconsistent with all other simulations depicting bundled 230kV conductor.	
128.			Figure 4.2-24	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>The new 69kV new TSPs, framing and crossarms/insulators (P45 and P46 within the middle and left portion of the simulation view) appear to be too large in comparison to the 230kV towers.</li> <li>69kV TSP crossarms appear to be at an angle, and should instead be shown as parallel to the ground (reference adjacent lattice towers for comparison).</li> <li>The lattice tower in the simulation should not be showing I-String insulators on the north. The I-Strings will be replaced with V-String insulators.</li> <li>New TSPs are depicting High Voltage bands incorrectly. Per GO 95, Rule 51.6 “A band of bright yellow color not less than 12 inches in width installed no more than 40 inches below the lowest line conductor, energized in excess of 750 volts.”</li> <li>Yellow bands should be removed from the top of new TSP structures as these bands are not required at this location on the structure.</li> </ul>	
129.			Figure 4.2-26	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C).</li> <li>The lattice tower in the simulation should not be showing I-String insulators on the north. The I-Strings will be replaced with V-String insulators.</li> <li>Marker balls coloring sequence is inaccurate.</li> <li>New TSPs are depicting High Voltage bands incorrectly. Per GO 95, Rule 51.6 “A band of bright yellow color not less than 12 inches in width installed no more than 40 inches below the lowest line conductor, energized in excess of 750 volts.”</li> <li>Yellow bands should be removed from the top of new TSP structures as these bands are not required at this location on the structure.</li> <li>New 69kV TSPs, framing and equipment (crossarms and insulators) appear too large in relation to the existing lattice towers.</li> </ul>	

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
130.			Figure 4.2-28	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• The lattice tower in the simulation should not be showing I-String insulators on the north. The I-Strings will be replaced with V-String insulators.</li> <li>• New 69kV TSPs, framing and equipment (crossarms and insulators) appear too large in relation to the existing lattice towers.</li> </ul>	
131.			Figure 4.2-30	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• The lattice tower in the simulation should not be showing I-String insulators on the north. The I-String insulators will be replaced with V-String insulators.</li> <li>• The location of the pole appears to be inaccurate, almost seems like the pole is in line with the lattice tower.</li> <li>• The retaining wall is shown too tall. The design is for only a 4-foot maximum wall height. In addition, the road increases in elevation towards the structure per the design which is not shown in the simulation. Also the wall does not tie into the ground on right side of the wall, the wall appears to extend into the air on the southern side.</li> <li>• The 230kV conductor should be shown in front of the new 69kV structure and hardware. The 230kV conductor is in the foreground from this view.</li> <li>• The middle phase of the 138kV line (northern portion of lattice tower) does not show the conductor. The conductor needs to be added.</li> </ul>	
132.			Figure 4.2-32	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>• New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>• The lattice tower in the simulation should not be showing I-String insulators on the</li> </ul>	

Attachment A - San Diego Gas & Electric Company (SDG&E) Comments  
 Sycamore to Peñasquitos 230kV Transmission Line Project  
 Draft Environmental Impact Report



Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
				<p>north. The I-Strings will be replaced with V-String insulators.</p> <ul style="list-style-type: none"> <li>The new 69kV TSP is disjointed above the first set of crossarms. The upper portion of the structure appears to be offset from the lower half.</li> <li>The new 69kV TSPs, framing and equipment (crossarms and insulators) appear to be too large in relation to the existing lattice towers.</li> <li>The new TSP foundation is incorrect. The foundation is too large as shown.</li> <li>The marker ball sizes, spacing, and number appear off.</li> </ul>	
133.			Figure 4.2-34	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>The lattice tower in the simulation should not be showing I-String insulators on the North. The I-Strings will be replaced with V-String insulators.</li> <li>69kV structure in the foreground (P56) does not show the foundation. It appears the foundation should be visible from this location.</li> <li>Marker ball numbers, sequencing, and size seem off.</li> <li>2<sup>nd</sup> 69kV structure (P55) in the simulation appears to be showing a 230kV design with extra structure height being shown above the last set of crossarms. 69kV structures should only have a small portion of structure above the last set of crossarms because 69kV structures do not require a shieldwire. Refer to the other 69kV structures shown in this simulation (e.g. P56 and P54) for the correct look for the top of a 69kV TSP.</li> </ul>	
134.			Figure 4.2-40	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>It appears that the 138kV and 12kV lines are shown as underbuilt (horizontal position) on the 230kV cable pole structure. SDG&amp;E would not design the structure in this manner. The 230kV cable, if constructed at this location, would have a design and appearance similar to the Proposed Project cable pole (P41).</li> <li>Actual design for retaining wall is not yet known and the area shown may be insufficient.</li> <li>The cable, if installed at this located, may need to be moved further south to accommodate the fence and have adequate ground clearances to the back span.</li> </ul>	
135.			Figure 4.2-42	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project</li> </ul>	

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
				<p>Description).</p> <ul style="list-style-type: none"> <li>The exiting wood H-Frame with distribution will need to be topped and is not currently displayed in the simulation. The distribution circuit cannot be attached to the cable pole as displayed.</li> <li>There will be no OPGW installed on the north side of the cable pole as currently displayed in the simulation.</li> <li>138kV conductor on the top set of crossarms, south of the cable pole structure is not shown and should be added to the simulation.</li> </ul>	
136.			Figure 4.2-44	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>The cable pole framing is shown incorrectly, the cable pole should be similar to the proposed cable pole originally or match the cable pole shown on figure 4.2.42, without the distribution arm.</li> <li>The crossarm spacing appears to be incorrect. The 138kV spacing should not be greater than the 230kV crossarm spacing as shown on the simulations.</li> <li>The 138kV conductors on the 230kV cable pole do not connect. There are gaps on the conductor that should be corrected.</li> </ul>	
137.			Figure 4.2-46	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>The retaining wall appears to be in an incorrect location. As shown, there does not appear to be adequate access (spur road) to the cable pole location.</li> <li>The 69kV structure shown (P45) should be a deadend structure, not a tangent structure as shown in the simulation.</li> <li>There are conductor wires shown leaving structure E14 that abruptly end in vegetation east of the structure. These conductors should be clipped at the top of the hill that E14 is located upon.</li> <li>There is a segment of wire from the existing condition (bottom right hand corner) that should be removed from the simulation view.</li> </ul>	
138.			Figure 4.2-48	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p>	

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
				<ul style="list-style-type: none"> <li>The cable pole configurations for the 69kV cable poles may differ from the simulations and will be two double circuit standard cable poles capable of split bundling the conductors.</li> <li>The existing H-Frame in the vicinity may also need to be removed, or the conductor should be removed from the eastern side of the structure.</li> <li>The existing I-String conductor on the lattice towers will be replaced with V-String insulators.</li> <li>The fence around the cable poles would not be continuous. Rather, each cable pole would have a dedicated perimeter fence.</li> <li>The type of fence could also be slightly different from what is shown. For example, the fence could be vinyl coated or made of iron.</li> </ul>	
139.			Figure 4.2-50	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>The cable pole shown in simulation is oriented incorrectly. The cable poles should be reversed by 180 degrees to show the 230kV cable pole arms on the west and 138kV circuit on the east.</li> <li>The new steel H-Frame north of the cable pole will be a dead end pole not a suspension pole as shown currently in the simulation.</li> <li>The fence and cable pole structure are not properly (proportionately) sized. It appears the fence is shown as much larger than is realistic.</li> <li>The conductor shroud is not shown on the cable pole structure. The shroud is installed at the base of the structure to provide a barrier around the conductor as they travel down the side of the cable poles structure. Refer to SDG&amp;E-prepared simulation included as PEA Figure 4.1-9 for an example of what the conductor shroud should look like on a 230kV cable pole.</li> <li>The simulation does not depict the retaining wall design correctly. The retaining wall appears too tall. The design is for a maximum wall height of 12 feet. The wall per design transitions smoothly from 0 to 9 feet on the south side of the wall which is not reflected in the simulation. The wall block appears larger than the real product, which is 18 by 11.5 inches.</li> </ul>	
140.			Figure 4.2-52	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>New tubular steel pole arms should be straight, not curved. SDG&amp;E does not construct tubular steel structures with the curved (“gull”) arms. Refer to photo simulations and typical structure diagrams prepared by SDG&amp;E (PEA Chapter 4.1 and Appendix 3-C) as well as those contained within the DEIR Section 2 (Project Description).</li> <li>In reference to the two interest structures, only one set of crossarms would be installed as only one circuit would be installed on the structures.</li> <li>The two interest structures could be deadend structures (not tangent structures) and may utilize strain insulators.</li> </ul>	

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
141.			Figure 4.2-54	<p>SDG&amp;E noticed the following corrections that need to be made to the Visual Simulation in order to make the simulation depict an accurate representation of the Proposed Project:</p> <ul style="list-style-type: none"> <li>The cable pole will be similar to the originally proposed cable pole at P42 in the configuration of arms. This cable pole will have bundled 230kV on both circuits heading north and single 230kV cables on both circuits heading south jumpered together. TL 23013 will be on the west and TL32071 will be on the east (as is currently displayed).</li> <li>Conductor shroud not shown at the bottom of the cable pole.</li> </ul>	
142.	4.2 Aesthetics	4.2-66	1	<p>The DEIR concludes that the impacts for KOPs 6 and 7 are significant and unavoidable even with the implementation of all applicable APMs and Mitigation Measures. This analysis seems to understate the existing baseline condition and overstate the significance of the visual impact associated with replacing existing structures with taller structures in an existing transmission corridor, resulting in an extremely conservative analysis and conclusion. In addition, comments are provided on the simulations (Figures 4.2-16 and 4.2-17) regarding corrections that need to be made to these photo simulations.</p> <p>For a more detailed discussion of aesthetic impacts, please refer to Section II.C.3 of the comment letter.</p>	
143.	4.2 Aesthetics	4.2-70	3	<p>The DEIR concludes that the impacts for KOPs 11, 14 and 15 are significant and unavoidable even with the implementation of all applicable APMs and Mitigation Measures. Again, this analysis seems to understate the existing baseline condition and overstate the significance of the visual impact associated with replacing existing structures with taller structures in an existing transmission corridor, resulting in an extremely conservative analysis and conclusion. For KOP 11 (Figure 4.2-26), the simulation is such a distant view, that the proposed change clearly does not rise to the level of significant and unavoidable. For KOP 14 (Figure 4.2-32), with the existing steel lattice tower in such close proximity to the proposed new tubular steel pole, the proposed change clearly does not rise to the level of significant and unavoidable. Similarly, for KOP 15 (Figure 4.2-34), the existing steel lattice tower is in such close proximity to the proposed new tubular steel pole and the next existing steel lattice tower is also nearby in the background, the proposed change clearly does not rise to the level of significant and unavoidable. In addition, comments are provided on the simulations (Figures 4.2-16 and 4.2-17) regarding corrections that need to be made to these photo simulations. The analysis and conclusions should be revised to reflect these concerns.</p> <p>For a more detailed discussion of aesthetic impacts, please refer to Section II.C.3 of the comment letter.</p>	
<b>4.3 – Cultural Resources</b>					
144.	4.3	4,5	2014 Surveys, last paragraph p. 4, first paragraph p. 5	<p>Testing was conducted by ASM Affiliates on June 20th, 2014 at CA-SDI-11910, SDI-18278, and SDI-18437 and on November 18th, 2014 at CA-SDI-14,131. These sites were tested but not mentioned in the 2014 Survey section. This information needs to be added in the FEIR.</p>	

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
145.	4.3	30	Construction	While impacts to historic structures may also occur, the term does not encompass the variety of properties that may be impacted.	Impacts on cultural resources would result if ground-disturbing activities cause damage, destruction, or alteration of historic <del>structures</del> . resources.
146.	4.3	56	Table 4.3-11	The following statement needs clarification: “This resource was evaluated during cultural resource surveys for the Sunrise Powerlink Project”. The resource was not formally “evaluated” during work for the Sunrise Powerlink.	This resource was <del>evaluated</del> <u>not identified</u> during cultural resource surveys for the Sunrise Powerlink Project. The resource is not eligible due to insufficient data at the site (CPUC and BLM 2008).
<b>4.4 – Paleontological Resources</b>					
147.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.5 – Geology, Soils, &amp; Mineral Resources</b>					
148.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.6 – Hydrology and Water Quality</b>					
149.	4.6.7	4.6-25 to -28	MM-Hydrology-1	Mitigation Measure – Hydrology 1 <u>should be revised to delete</u> the requirement to submit the project’s Storm Water Pollution Prevention Plan (SWPPP) to the CPUC and the City of San Diego for review and approval since these actions are not required to ensure compliance with the Total Maximum Daily Load (TMDL) for sediment in Los Penasquitos lagoon (LPL-TMDL). The local municipality has no authority to enforce the State’s CGP requirements; this is done by the Regional Board inspectors. SDG&E’s APM HYDRO-1 would implement Best Management Practices through its SWPPP to ensure compliance with all relevant SDG&E and government–mandated regulatory water quality standards, which includes TMDLs. Additionally, there are already other regulatory mechanisms in place to ensure compliance with the LPL-TMDL. This project will require coverage under the State Water Resources Control Board’s (SWRCB) Storm Water Construction General Permit (CGP) which requires projects located within a watershed area subject to a TMDL to comply with the requirements of the TMDL. Further, the LPL-TMDL identifies CGP permittees as “Responsible Parties” and requires them to submit their SWPPP to the SDRWQCB for review. These existing requirements eliminate the need for the SWPPP to be reviewed and approved by the CPUC and City of San Diego. The SWPPP will be submitted to the SDRWQCB through the Storm Water Multiple Application & Report Tracking System (SMARTS).	<p>p. 4.6-25 (top of page)                      Los Peñasquitos Lagoon, at the terminus of Los Peñasquitos Creek is listed for sedimentation/siltation and has an adopted TMDL for sediment. <del>Although discharge of</del> sediment from the Proposed Project to downstream waterbodies and the resulting increase in sediment in Los Peñasquitos Lagoon <del>would</del> violate water quality standards including an established TMDL, <del>resulting in a significant impact</del> <u>the CGP requires permittees to comply with approved TMDLs. Further, the Los Penasquitos Lagoon sediment TMDL identifies permittees under the CGP as “Responsible Parties” and requires compliance with the LPL-TMDL. The APM HYDRO-1 requirement to obtain CGP coverage and develop and implement a SWPPP containing Best Management Practices (BMPs) that would comply with the LPL-TMDL would make this impact less than significant.</u></p> <p>p. 4.6-26 (top of page)                      APM HYDRO-2 requires stabilization of temporarily disturbed areas. APM GEO-3 would require minimization of ground and soil disturbance, including management of topsoil loss. Impacts would <u>be less than remain</u> significant after APMs because <del>these APM-HYDRO-1s do not</del> requires compliance with the TMDL for Los Peñasquitos Lagoon. <u>BMPs will be employed pursuant to the SWPPP in locations where temporary habitat impacts are restored following construction through revegetation, to prevent impacts to water quality from erosion and soil loss during</u> <del>could still be significant with implementation of these APMs if the</del> stabilization and revegetation of temporarily disturbed areas <del>is not successful</del>. Mitigation Measure Hydrology-1 requires SDG&amp;E to prepare the SWPPP in compliance with the SWRCB Order 2012-0006 and <u>applicable City of San Diego Stormwater Standards Manual requirements</u> and to provide the SWPPP to the SDRWQCB through the Storm Water Multiple Application &amp; Report Tracking System (SMARTS) <u>and City and CPUC for review prior to construction.</u> Mitigation Measure Biology-6 requires monitoring of revegetated temporary disturbance areas and implementation of corrective actions to assure revegetation success which</p>
	4.6.7	4.6-25	Top par.		

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
	4.6.7	4.6-26	Top of page		<p>would reduce potential discharge of sediment and impacts to downstream waters. These mitigation measures would address the construction sources of sedimentation to avoid violation of water quality standards. Proposed Project construction impacts from grading and earth disturbance would be less than significant with mitigation.”</p> <p><u>p. 4.6-30</u>  <b>Transmission Line Segments A, C, and D</b>  <b>Drainage Alteration.</b> The proposed poles... ..sediment and erosion control. These APMs also do not specify requirements to ensure successful revegetation of disturbed areas. Impacts would remain significant after implementation of APMs. Mitigation Measure Hydrology-1 requires <u>submittal of the SWPPP to the SDRWQCB (via SMARTS) and City of San Diego prior to construction and CPUC review to verify that the SWPPP defines adequate sediment and erosion control practices.</u> Mitigation Measure Biology-6 defines standards for revegetation success. Impacts on erosion from drainage alteration would be less than significant with mitigation.</p>
	4.6.7	4.6-30	Middle of page		<p><u>p. 4.6-31 (3<sup>rd</sup> full par.)</u>  <b>Staging Yards</b>                      Staging yard preparation could involve grading or smoothing at the Camino Del Sur staging yard. The proposed smoothing would not change the drainage patterns of the staging yard site. The staging yard would be stabilized as required by the SWPPP and APM HYDRO-1 as part of the Proposed Project; however, these APMs do not specify specific BMP requirements or review for the SWPPP. Mitigation Measure Hydrology-1 requires <u>submittal of the SWPPP to the SDRWQCB (via SMARTS) and City of San Diego prior to construction and CPUC review of the SWPPP.</u> Site preparation and use of staging yards would not cause significant erosion with Mitigation Measure Hydrology-1. Impacts from staging yard preparation and use would be less than significant with mitigation.</p>

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
	4.6.7	4.6-31	3 <sup>rd</sup> full par.		
150.	4.6.7	4.6-28	MM-Hydrology-1	Mitigation Measure Hydrology-1 (p. 4.6-28) would prohibit discharge of any groundwater extracted during dewatering to surface waters or storm drains and limits the options for managing the disposal/reuse of the water. There may be situations (e.g., an area requires extensive dewatering, sites with a limited area available to manage the water, lack of available viable reuse options, contaminated groundwater) in which it may not be possible to manage (e.g., collect, hold, treat) all of the water so that it can be used for irrigation, dust control and makeup or it does not meet the requirements for disposal. In such situations, it may be necessary to discharge the groundwater to the sewer or to surface water or dispose of it at an appropriately licensed off-site facility. We request that this Measure be revised to allow discharges to sewer and to surface waters and storm drains under such situations contingent upon them being conducted in compliance with the applicable discharge permits from the sewerage agency, the State Water Resources Control Board or the Regional Water Quality Control Board. Further, we request that, if necessary, the water can be disposed of at an appropriately licensed disposal facility.	<p>p. 4.6-26 to 27  <b>“Waste Discharge Requirements</b>                      The Proposed Project may require discharge of shallow groundwater during foundation construction. The Proposed Project would also involve earthwork and access road use near surface waters subject to SDRWQCB jurisdiction. The Proposed Project <del>would</del> violate waste discharge requirements and cause a significant impact if pumped shallow groundwater or fill materials were discharged to waters of the state or U.S. SDG&amp;E would implement APM HYDRO-3 as part of the Proposed Project. APM HYDRO-3 defines the methods for access road refreshing and grading to avoid discharge of fill materials to jurisdictional waters. Impacts <del>would</del> still be significant with APMs if groundwater were discharged to a stream or storm drain. Mitigation Measure Hydrology-1 requires that shallow groundwater <del>be applied in a manner that the water would not be discharged to a stream or storm drain unless it is conducted in compliance with an applicable discharge permit (e.g. NPDES permit) from the SWRCB or the SDRWQCB. Groundwater discharges may be made to the sanitary sewer when conducted in compliance with a discharge permit from the sewerage agency or to land when made in compliance with applicable SDRWQCB requirements. Groundwater may also be disposed of at an appropriately licensed disposal facility. A discharge made using one of the above options would protect water quality.</del> Therefore, Proposed Project construction impacts associated with the discharge of fill materials would be less than significant with APMs and impacts associated with discharge of shallow groundwater would be less than significant with mitigation.</p> <p>p. 4.6-61  <b>Waste Discharge Requirements</b>                      Alternative 5 would violate waste discharge requirements and cause a significant impact if pumped shallow groundwater were discharged to waters of the state or U.S., if reclaimed water applied for dust control (Mitigation Measure Utilities-1) were discharged to waters of the state or U.S., or if fill materials were discharged to waters of the state during underground duct bank construction across Carroll Canyon Creek. Implementation of Mitigation Measures Hydrology-1, Hydrology-2, and Hydrology-4 would reduce impacts through <del>treatment</del> <u>appropriate management</u> of shallow groundwater, application of reclaimed water for dust control in a manner that does not contribute to runoff, avoiding discharge in a flowing creek <u>without applicable permits</u>, and obtaining a waiver of waste discharge requirements <u>or as applicable CWA Section 404 permit/Section 401 certification coverage</u>. Impacts would be less than significant</p>

Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
	4.6.12.2	4.6-61	Top par.		with mitigation.
151.	4.6-4	4.6-10	Table 4.6-4	In Table 4.6-4, “California Conservation Corps” should be changed to “California Coastal Commission” to identify the correct agency.	
152.	4.6-10.2	4.6-51	Top par.	Mitigation Measure Hydrology-4 (pp. 4.6-50 to 51) would restrict construction of underground lines under creeks or natural drainages to only when the watercourse is dry and no less than 72 hours after any rain event. It also prohibits construction within 100 feet of any stream within 48 hours of a rain event with a forecast of 50% or greater chance of precipitation. Lastly it requires any work within a water of the state to obtain a waiver of discharge of WDRs from the RWQCB. Construction of the Proposed Project will be conducted in compliance with the State Water Resources Control Board’s Storm Water Construction General Permit (CGP). Further, activities within creeks and natural drainages will be conducted pursuant to Waste Discharge Requirements (or a waiver of such) when conducted in water features determined to be state-only waters and pursuant to Clean Water Act Section 404 dredge and fill permits and Section 401 water quality certifications when conducted in waters of the US. These permits require measures (e.g., BMPs) be employed to protect water quality. Given that there is already oversight for these activities under these other regulatory permits, in order to prevent conflicting requirements under these programs, we request that this Measure be revised to specify that the Proposed Project comply with the regulatory permits required for the work (e.g., Waste Discharge Requirements, CWA 404 permits, CWA 401 certifications).	<u>p. 4.6-50 (Top par.)</u> Alternative 3 involves a crossing of an unnamed tributary to Los Peñasquitos Canyon within an unpaved access road west of Park Village Road. The underground alignment is also located in roadways that cross several unnamed tributaries via culverts. The crossing of Los Peñasquitos Creek would be overhead via the existing roadway bridge and would not impact water quality or violate waste discharge requirements. Underground duct bank construction within waters of the state or U.S. would violate <u>federal and/or state waste discharge requirements</u> if SDG&E did not obtain <u>Waste Discharge Requirements or a waiver of waste discharge requirements from San Diego Regional Water Quality Control Board, or a CWA Section 404 dredge and fill permit and a CWA Section 401 certification</u> , or if <u>surface</u> construction occurred when the creek contained flowing water. The violation of <u>federal and/or state waste discharge requirements</u> would be a significant impact. Mitigation Measure Hydrology-4 would reduce impacts by restricting <u>surface</u> construction within creeks or natural drainages to periods when the drainage would be dry and requiring SDG&E to obtain <u>Waste Discharge Requirements or a waiver therefrom, or a CWA Section 404 dredge and fill permit and a CWA Section 401 certification</u> <del>a waiver of waste discharge requirements</del> prior to any construction within a natural drainage. SDRWQCB would include measures to protect water quality in the <del>waiver of waste discharge requirements or waiver therefrom or in the CWA Section 401 certification</del> . Implementation of all measures included in the waiver of waste discharge requirements would prevent violation of <del>a federal and/or state waste discharge requirements</del> . Impacts would be less than significant with mitigation.
<b>4.7 – Transportation and Traffic</b>					
153.	4.7.4	16	2	DEIR states that the FAA restricts helicopter operations within 1,500 feet of residential dwellings and that such activities would require a “Helicopter Lift Plan”. However, FAA regulations do not require the creation, submission, or approval of a “Helicopter Lift Plan”. All Proposed Project use of helicopters will be compliant with FAA regulations. The	FAA also has restrictions on helicopter flights <u>carrying external loads in congested areas within 1,500 feet of residential dwellings</u> . Helicopter flights <u>with external loads in congested areas require submittal of a “Congested Area Plan” to the FAA (14 CFR part 133.33)</u> . <del>within this area require a helicopter lift plan.</del>

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				incorrect statements concerning FAA requirements should be deleted from the Final EIR. Refer to suggested revisions herein.	
154.	4.7	39	Paragraph 4	4.7-39 The sentence that reads “The Proposed Project includes lighting and marker balls on all structures that require FAA notification” is incorrect. A correct statement would be “ <i>The Proposed Project will include lights and marker balls on all structures for which the FAA determines they are necessary.</i> ”	The Proposed Project <u>will include lights and marker balls</u> <del>includes lighting and marker balls</del> on all structures <u>for which that require the FAA determines they are necessary.</u> <del>Notification.</del>
155.	4.7			<p>Significant unavoidable impacts are identified for temporary construction traffic along roadways that currently do not meet applicable level-of-service goals. This is extremely conservative and is an overstatement of the Proposed Project’s effect on these roadways. As part of the DEIR’s conclusion of significance for these roadways, the DEIR drastically overstates the potential number of trips that could be added to each roadway on a daily basis, especially in reference to staging yard traffic. Finally, one of the roadways in question (Scripps Poway Parkway between Springbrook Dr. and Spring Canyon Rd.), can actually be avoided by the vast majority (if not all) of construction traffic, thus removing the stated significant impact to Scripps Poway Parkway.</p> <p>For a more detailed discussion of traffic impacts, please refer to Section II.C.1 of the comment letter.</p>	
156.		4.7-28	paragraph 4	<p>The DEIR states that maximum traffic increases were estimated at the maximum possible impact with all maximum trips per day for each project segment directed down the same roadway on the same day. This is not only conservative (which the DEIR acknowledges), it is also unrealistic and is not consistent with the actual construction schedule. The maximum traffic generated during construction on Segment A would not necessarily coincide with the maximum traffic generated on any other project segment. That is to say, the assumption that the maximum traffic day for one segment would coincide with the maximum traffic day for another segment is not realistic (refer to the construction schedule for actual anticipated overlaps during construction activities), and results in an overstatement of the Proposed Project’s potential effect on traffic circulation.</p> <p>For a more detailed discussion of traffic impacts, please refer to Section II.C.1 of the comment letter.</p>	
157.	4.7.7.3	4.7-30	Paragraph 1	<p>Section 4.7.7.3 states that traffic impacts associated with worker and vehicle trips were considered assuming that all project-related traffic could coincide (e.g. all 4 segments) and all construction activities could utilized one staging yard. This assumption is not just conservative, but represents an infeasible construction scenario. SDG&amp;E could not stage enough workers and equipment at one staging yard to support a cumulative traffic count of 524 trips. This methodology therefore results in an unrealistic conservative statement of impacts. CEQA analysis is based upon a description of realistic project construction and operations activities. However, the assumption (and analysis) of all potential project-related construction is based upon multiple layers of unrealistic assumptions and therefore results in exaggerated significant unavoidable impacts.</p>	

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				For a more detailed discussion of traffic impacts, please refer to Section II.C.1 of the comment letter.	
158.		4.7-34		<p>The DEIR describes significant, unavoidable impacts to LOS due to the Proposed Project resulting in up to 524 trips to roadways and freeways that do not currently meet applicable LOS standards. These impacts are predicated on the assumption that Proposed Project would result in a significant number of additional trips during the peak traffic hours. The DEIR defines peak traffic hours as 7am to 9am and 4pm to 6pm (DEIR at 4.7-3). However, as documented on DEIR page 2-57, construction is scheduled to begin at 7am. By the time that peak traffic conditions begin at 7 am, most of SDG&amp;E’s workers will already be at a staging yard or an individual work location.</p> <p>Construction often ends before the start of peak traffic hours in the evening and will therefore not add significantly to the peak traffic counts. Implementation of Mitigation Measure TR-1 would further reduce Proposed Project-related traffic on freeways and roadways that do not currently meet LOS standards.</p> <p>For a more detailed discussion of traffic impacts, please refer to Section II.C.1 of the comment letter.</p>	
159.		4.7-35	Paragraph 3	The DEIR incorrectly describes vault inspection and maintenance activities. Inspections of underground vaults occur once per three years. The FEIR should include this corrected inspection frequency.	
160.		4.7-37		The DEIR states that significant, unavoidable impacts would results from the addition of project-related construction traffic on SR-56, which does not meet LOS standards outlined by Caltrans and the CMP. However, the DEIR incorrectly assumes greater impacts to SR-56 resulting from the Proposed Project than would reasonably occur. As outlined in Comment 158 above, most of the Proposed Project would avoid peak traffic hours, especially during the morning peak hours (7-9 am).	
161.			MM TR-4	Mitigation Measure TR-4 does not add anything that SDG&E would not already be doing under procedures described within Section 2 (project descriptions) or through compliance with traffic control and encroachment permits from local and state agencies (e.g. Caltrans). Mitigation Measure TR-4 is duplicative with the project description and the requirements that will be included within agency approved traffic control plans and agency issued encroachment permits. Mitigation Measure TR-4 is unnecessary as impacts would be less than significant without implementation of TR-4. Therefore, it is recommended the TR-4 be deleted.	<del><b>Mitigation Measure Traffic-4: Temporary Traffic Control Measures.</b> To mitigate the risk of the conductor falling onto traveled roadways during wire stringing operations, SDG&amp;E shall temporarily close roads or incorporate temporary support measures to protect traffic, such as guard structures or netting across roadways that would catch and support the conductor above traffic, in the event that tension control of the conductor is lost during installation. The temporary measures to be incorporated shall be identified on construction plans and installed by SDG&amp;E in advance of construction and shall remain in place until the conductor is clipped into support hardware on the transmission line structures. SDG&amp;E shall implement all traffic control procedures and measures defined in Mitigation Measure Traffic-1 during installation of temporary support measures or temporary road closure.</del>
<b>4.8 – Noise</b>					
162.	4.8	4.8-23	Table 4.8-8	Impact Noise 3 Operations and Maintenance should be “Less than significant.” See comments 167, 168, and 169 for full explanation	

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163.	4.8	4.8-34	MM Noise-1	Revisions to notification requirements in Mitigation Measure Noise-1 are proposed to make them consistent with the CPUC's requirements for other similar transmission projects in residential areas and to clarify the noticing requirements in "public areas". In addition, references to "specifically" and "specific" are requested to be deleted since the timing and location of specific construction activities are subject to change based on a variety of factors.	<b>Mitigation Measure Noise-1: Resident Notification and Complaints.</b> SDG&E shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within <del>500-300</del> feet of construction sites, staging yards, and access roads, <del>and within 1,000 feet of helicopter fly yards and flight paths.</del> SDG&E shall also post notices <u>in SDG&amp;E's right-of-way where the right-of-way is located within 300 feet of designated trails, public parks and roads. in public areas, including recreational use areas, within 300 feet of the project alignment and construction work areas.</u> The announcement shall state <del>specifically</del> where and when construction will occur in the area. For areas that would be exposed to helicopter noise, the announcement shall provide <del>specific</del> details on the schedule of the dates, times, and duration of helicopter activities. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.
164.	4.8	4.8-34	MM Noise-1	APM Noise-5 states that SDG&E would meet and confer with the appropriate city to discuss temporarily deviating from the requirements of the noise standards. A component of Mitigation Measure Noise-2 requires SDG&E to "apply for and obtain variances from the City of San Diego and the City of Poway for construction activities that must occur outside of the daytime hours allowed by local ordinances in each jurisdiction". SDG&E does not obtain noise variances from local agencies as these are discretionary permits that are pre-empted under GO 131-D. Therefore, SDG&E requests that this component of Mitigation Measure Noise-2 be revised to replace "obtain variances" with "meet and confer".	SDG&E shall <del>apply for and obtain variances from</del> <u>meet and confer with</u> the City of San Diego and the City of Poway for construction activities that must occur outside of the daytime hours allowed by local ordinances in each jurisdiction. SDG&E shall submit <del>a copy of approved variance</del> <u>documentation of the meet and confer process</u> to the CPUC at least two weeks prior to construction activities <del>requiring the variance</del> <u>outside of locally permitted construction hours.</u> The CPUC will not authorize any work outside of locally permitted construction hours that would exceed <del>local standards without an approved variance</del> <u>documentation of meeting and conferring with the applicable city.</u>
165.	4.8	4.8-34 & -35	MM Noise-2	MM Noise-2 limits 'night and weekend' construction activities, but the Cities of San Diego and Poway allow construction noise on Saturdays. All limitations to construction should be modified to only limit work on nights and Sundays consistent with local noise regulations.  For a more detailed discussion of noise impacts, please refer to Section II.B.2 of the comment letter.	
166.	4.8	4.8-35	MM Noise-4	The noise analysis shows that there will be no impacts due to corona noise. In addition, the Proposed Project is already designed to reduce corona noise to the maximum extent possible. Therefore, more stringent controls on corona noise are unnecessary and such controls are unavailable for use for the Proposed Project.	
167.	4.8	4.8-32	5	The corona noise produced by operation of the transmission line will vary depending on relative humidity and precipitation. Typical corona noise levels from 230 kV lines are in the range of 15 dBA at 100 feet. Wet conditions may increase the sound levels to 35 dBA; however, ambient conditions during rain events will also increase and generally masks the increase in noise from the transmission lines. Segments A and C, which each will have two 230 kV lines, will experience transmission line sound levels of 18 dBA during dry conditions and 38 dBA during wet conditions. These sound levels do not exceed the City of San Diego or the City of Poway nighttime noise limits of 40 dBA. Therefore, there is no impact.	

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168.	4.8	4.8-33	2	Noise surveys conducted during October 2013 measured nighttime ambient noise levels as high as 42 dBA on Segment D during dry conditions. It is important to note that this sound level reflects the total noise environment, not only corona noise. During impact assessment, Project-generated noise is compared to applicable noise standards, so an existing exceedance of the standards does not imply the Proposed Project cannot meet the standard. The proposed additional transmission line (15 dBA during dry weather) is below the nighttime standard, and will not substantially increase the ambient sound levels. Therefore, the impact from the project is less than significant.	
169.	4.8	4.8-39	2	The ambient noise levels in Segment D ranged from 34.7 dBA to 50.6 dBA during dry conditions. The Proposed Project line would produce corona noise of approximately 15 dBA at 100 feet during dry conditions and approximately 35 dBA during wet conditions. However, the higher sound levels occurring during rain are masked by the sound of falling rain. Increases over ambient will be limited to less than 3 dBA, and increases of less than 3 dBA are considered to be a barely perceptible increase (FHWA, 1995). Therefore impacts due to operation of the Proposed Project will be less than significant.	
170.	4.8	4.8-42 through 4.8-46		Alternatives 1 and 2 – These alternatives consist of very small changes to the Proposed Project, yet have vastly different stated impacts. Although impacts in the immediate area of the change will be reduced, overall impacts to the rest of the line should remain unchanged from the Proposed Project. This is not clearly stated in the DEIR. The Alternative impacts section implies that Alternatives 1 and 2 would have drastically lower impacts than the Proposed Project; when in truth the overall noise impacts from Alternatives 1 and 2 would be substantially similar to the Proposed Project.	The following note should be added to the noise impact discussions for both Alternative 1 and 2: <u>While noise impacts at the alternative cable pole location would be reduced, the majority of noise impacts identified for the Proposed Project would also occur under this alternative.</u>
<b>4.9 – Land Use and Planning</b>					
171.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.10 – Recreation</b>					
172.	4.10.7	4.10-19 4.10-28 4.10-32 4.10-36 4.10-56	Throughout	Within statements about construction impacts being significant and unavoidable, it is recommended that the sentences clarify that the impacts are also temporary. Instead this sentence states that the impacts “would remain”, which is language that implies it is describing a permanent impact. This is a global comment for section 4.10 – Recreation, because there are numerous instances where the language used to describe construction-phase impacts could be improved to make it clear that impacts would be temporary. The impacts as described are therefore misleading and should be changed.	
173.	4.10	4.10-29	1	The DEIR concludes on page 4.10-29 that “The Proposed Project would introduce industrial elements to the open space recreational landscape” and that “While these mitigation measures (Mitigation Measures Aesthetics-2 and (Mitigation Measures Aesthetics-3 – added for clarification) would reduce the visual impact, the Proposed Project would still result in a moderately high impact to visual quality from several trails, which would result in a significant and unavoidable impact”. This conclusion overstates the impact of the Proposed Project on trail users since the Proposed Project is replacing existing transmission structures with new structures (albeit larger structures) which does not support the premise in the DEIR that the project is “introducing” industrial elements into the open space recreational landscape. There are two sets of existing transmission	

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				structures located within the existing transmission corridor including steel lattice towers, tubular steel poles and wooden H-frame pole structures, establishing “industrial elements” throughout the entire transmission corridor. In addition, the visual impact on trail users would be short in duration, further reducing the impact on trail users. The analysis on page 4.10-29 should be revised to accurately reflect the existing baseline conditions described above and to conclude that impacts would be less than significant.  For a more detailed discussion of impacts to recreation, please see Section II.C.4 of the comment letter.	
174.	4.10.7	4.10-27	Last paragraph on page	For the sentence saying that “helicopters would be traveling along the overhead corridor for up to 10 months during construction for the delivery of materials”, the Final EIR should include reference to the conservative nature of the helicopter use. In order to avoid a required modification to the Project Decision during construction, the worst case potential helicopter usage was estimated. Therefore, for the purposes of accurate public disclosure of impacts, the Final EIR should include a note that clearly communicates the conservative nature of the maximum helicopter usage on the Proposed Project. Proposed language is provided.	Helicopters would be traveling along the overhead corridor for up to 10 months during construction for the delivery of materials. <u>However, these volumes of helicopter use assume no road access to construction sites where helicopters would need to deliver all of the required equipment and materials. For work sites that have drivable access, the helicopter will only be used for stringing operations. It should be noted that based upon preliminary engineering and review of access, SDG&amp;E anticipates having direct (drivable) access to the vast majority of the Proposed Project alignment.</u>
175.	4.10.7	4.10-28 Impact REC-4 Construction	1 <sup>st</sup> paragraph on page, middle of paragraph	The DEIR states that “Impacts would remain significant after implementation of these APMs because the restoration of temporarily disturbed areas may not be successful...” This sentence also imply that the APMs may be successful, in which case the impacts would not be significant after implementation after application of the APMs.	Impacts <del>would could</del> remain significant after implementation of these APMs <u>if because</u> the restoration of temporarily disturbed areas <del>may is</del> not be successful...
176.	4.10.8	4.10-32	1 <sup>st</sup> two paragraphs	The conclusion of significance (following implementation of APMs) is not adequately supported by the discussion. The discussion appears to base the conclusion on the assumption that the APMs would not be successful, and therefore applies additional mitigation. However, using this logic, impacts would also remain significant if the mitigation is not successful. The discussion does not provide rationale for why mitigation would be successful and, more importantly, why it is correct to assume the APMs would fail.	
<b>4.11 – Hazards and Hazardous Materials</b>					
177.	4.11.3.2 Existing Hazardous Sites	4.11-5	1	The Ranch Peñasquitos Exxon site is closed as of August 14, 2015, LOC case H21411-01. Source: Geotracker	Nineteen sites were identified within 0.25 mile of Segment A in the 2013 EDR report and 2015 database search, including three open sites involving the release of hazardous materials. The three sites were reviewed further with the California SWRCB GeoTracker database. It was determined that <del>one two sites</del> , the Sycamore Canyon Facility, <del>has in fact been completed and the case has been closed as of August 2013 (SWRCB 2015a) and the Rancho Penasquitos Exxon, have in fact been completed and the cases have been closed as of August 2013 (SWRCB 2015a) and August 2015 (LOC Case H21411-01)-</del> The <del>two one</del> remaining open site locations <del>are is</del> shown in Figure 4.11-1 and details for the <del>two open sites are is</del> summarized in Table 4.11-1.

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178.	4.11.3.2 Existing Hazards	4.11-6	Figure 4.11-1	Remove Rancho Peñasquitos Exxon as this site case was closed August 2015 (LOC Case H21411-01)	
179.	4.11.3.2 Existing Hazards	4.11-7	Table 4.11-1	Remove Rancho Peñasquitos Exxon from the table as this site case was closed August 2015 (LOC Case H21411-01)	
180.	4.11-5	4.11-20		Impact Hazards -4: Rancho Peñasquitos Exxon case was closed August 2015 (LOC Case H21411-01). Soil contamination was limited to the property and ground water flow direction is southwest, away from the Proposed Project area. This information and the closed case and no nearby, documented releases with potential threat warrant a conclusion of “no impact”. No mitigation is required.	Correct Significance from “Significant” to “No Impact”
181.		4.11-23	2	The EIR’s assertion that “spilled or leaking hazardous materials would create a significant hazard... and would be a significant impact” is an overstatement and, therefore, unfounded. Whether or not any given spill or leak constitutes a “significant hazard” and, therefore, a significant impact, would depend on the leaked or spilled material type, quantity, location, response actions, and other factors. The DEIR should be revised to state that spilled or leaking hazardous materials <u>could</u> create a significant hazard to the public or the environment and a significant impact.	A hazardous materials release could also occur during equipment and vehicle servicing and refueling. Although accidental spills would be unlikely, spilled or leaking hazardous materials <del>would</del> <u>could</u> create a significant hazard to the public or the environment and <del>would</del> <u>could result in</u> be a significant impact. <u>It is important to note that most releases of hazardous materials that occur during equipment and vehicle servicing are small, have limited or no potential for exposure to the public or sensitive natural resources, and are cleaned up immediately with not lasting effect on the surroundings. These releases are considered less than significant.</u>
182.	4.11	4.11-24		In order to avoid confusion, SPCC Plans do not reference BMPs for spill prevention. They are referred to as spill or discharge prevention measures, systems or devices and differ greatly from those described as “BMPs” in storm water pollution prevention plans and similar water quality management plans. Any description of water quality or spill prevention “BMPs” should be referenced in the HSCERP or the SWPPP for the Proposed Project alignment.	<u>If required per Federal and State Regulations, an SPCC Plan will be prepared and implemented.</u>
183.		4.11-24	1	Comment 188 demonstrates that Mitigation Measure Hazards-3 is duplicative with existing regulatory requirements that would apply to the Proposed Project. Therefore, this mitigation measure is not needed in order for the impacts to be less than significant. Impacts, if any, would already be less than significant without this measures.	
184.		4.11-24	1	The DEIR states that “Damage to pipelines, if it occurred, would be a significant impact.” This sentence is overstated making it misleading. Damage to a gas pipeline would not necessarily create a significant hazard to the public or the environment. The extent of any hazard from damage to a pipeline would depend on the nature of the damage, location, and other factors.	Damage to pipelines, if it occurred, <del>would</del> <u>could</u> be a significant impact.
185.	MM Hazards-1	4.11-26	1	The mitigation measure states that the construction contractor shall “ensure compliance with all relevant... regulations related to blasting activities through the development and submittal of site-specific blasting plans, notification requirements and monitoring, and monitoring...” This mitigation measure should be clarified since it would not, in and of itself, be effective for “ensuring compliance with all relevant ... regulations” since blasting	

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				regulations are more comprehensive than the topics addressed. The mitigation measure should either be revised to include reference to all relevant regulations, or should be deleted as it would not add ensure compliance with such regulations.	
186.	MM Hazards-1	4.11-26	1	Mitigation Measure Hazards-1 requires review and approval by the CPUC and the City of San Diego of site-specific blasting plans. This should be revised to require approval only by the City of San Diego so as to avoid differing and potentially conflicting requirements.	Blasting plans shall be submitted to <del>the CPUC and</del> the City of San Diego for review and approval before blasting at each site. SDG&E's contractor shall prepare daily blasting-related reports that include: Blast Report, Seismograph Monitoring Report, Inspection Report, Blasting Complaint Report, and Pre-Blast Inspection Report.
187.	MM Hazards-2	4.11.27	1	Mitigation Measure Hazards-2 should be revised to clarify that a SPCC will be prepared only for sites that exceed SPCC requirement thresholds.  Furthermore, Mitigation Measure Hazards-2 includes a requirement to prepare a SPCC Plan. Federal Regulation 40CFR 112 Requires an SPCC Plan, as does the California Health & Safety Code 25270. Both are for storage of petroleum product above ground in aggregate quantities of 1,320 gallons. The requirement for an SPCC Plan should state a condition such as, "should petroleum product be stored at a specific site in aggregate quantities of 1,320 gallons or more, an SPCC Plan is required." Spill prevention measures can be required in the HSCERP or the SWPPP.  SPCC Plans are currently in place for the Sycamore Canyon and Peñasquitos substations.	<b>Mitigation Measure Hazards-2. Spill Prevention, Control, and Countermeasure Plan.</b> As part of the Safety and Environmental Awareness Program (SEAP), SDG&E shall prepare a site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan <u>for sites that are subject to the SPCC program (e.g., sites that contain more than 1,320 gallons of petroleum products stored in an aboveground location)</u> that will identify spill prevention and response measures and Best Management Practices (BMPs). The plan will emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest water bodies).  An SDG&E-designated representative shall be identified to ensure that all hazardous materials <del>and</del> safety plans are followed throughout the construction period. BMPs identified in the project Stormwater Pollution Prevention Plan (SWPPP) and <del>HSCERP</del> <u>SPCC Plan</u> shall be implemented during project construction to minimize the risk of an accidental release and to provide the necessary information for emergency response. A copy of the project SEAP shall be submitted to the CPUC at least 30 days prior to construction. All construction personnel shall be required to attend SEAP training prior to conducting any work on the project site. Training attendance sheet(s) shall be submitted to the CPUC on a monthly basis.
188.	MM Hazards-3	4.11-28 to 4.11-29	all	This mitigation measures should be deleted since regulations and requirements are already in place that would implement equivalent measures and limit the impact to a less than significant level. Requirements that are already in place that minimize potentially harmful exposure to the public include: <ul style="list-style-type: none"> <li>• 8 CCR requirements for hazard awareness for workers;</li> <li>• 40 CFR 112 SPCC requirements for preventing oil releases;</li> <li>• State General Permit requirements for a SWPPP with BMPs to prevent contact of hazardous materials by stormwater;</li> <li>• 19 CCR Division 2, Chapter 4, Article 4 requirements for a hazardous materials business plan;</li> <li>• 22 CCR requirements for hazardous waste management.</li> </ul> Each of these regulations includes requirements for training workers on regulations and safeguards in place for workers and the public. Appropriate containment for hazardous materials and hazardous waste is addressed in 8 CCR, 40 CFR, and 22 CCR, and is a key aspect of BMPs required to be in the SWPPP.	
189.	MM Hazards-	4.11-28	all	If this mitigation measure is not deleted in its entirety, the inclusion of the HSCERP as part of the SWPPP should be removed. A HSCERP is not a document typically included in a	SDG&E shall prepare and incorporate methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction

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	3			SWPPP. The SWPPP already incorporates Best Management Practices and Good Housekeeping procedures for managing hazardous substances. However, a HSCERP can be prepared and maintained as a separate document.	and post-construction operation into a Hazardous Substance Control and Emergency Response Plan (HSCERP). The HSCERP shall be part of the project-specific SWPPP and shall be submitted to CPUC for recordkeeping at least 30 days prior to project construction.
190.	MM Hazards-3	4.11-28	Bullet 1	If this mitigation measure is not deleted in its entirety, “proper disposal of contaminated soils” should be deleted. Characterization and disposal of soils would have to occur in accordance with established waste management regulations including, as applicable, 23 CCR Chapter 15, 27 CCR Division 2 regulations for Solid Waste and 22 CCR Division 4.5 regulations for hazardous waste. Because these are established requirements, the mitigation measure provides no additional benefit.	<del>proper disposal of contaminated soils</del>
191.	MM Hazards-3	4.11-28	Bullet 2	If this mitigation measure is not deleted in its entirety, “daily inspection of vehicles and equipment parking near sensitive resource areas during construction and spill containment procedures” should be deleted. The SWPPP would be required to utilize standard BMPs from the SDG&E BMP Manual or equivalent measures for vehicle and equipment management. Standard BMPs (per the SDG&E BMP Manual) that would apply to the Proposed Project already include spill prevention and preparedness and includes daily equipment inspections. The SWPPP requirements and standard BMPs have been thoroughly vetted and accepted through public, expert and stakeholder participation and accepted as limiting risk of pollution to an acceptable level. Spill containment procedures in a HSCERP would be redundant with requirements already in place.	<del>daily inspection of vehicles and equipment parking near sensitive resource areas during construction and spill containment procedures</del>
192.	4.11	4.11-28	2	If Mitigation Measure Hazards-3 is not deleted in its entirety, detailed description of waste management should be revised as indicated in the Suggested DEIR Text Revisions.	<b>Mitigation Measure Hazards-3. Hazardous Substance Control and Emergency Response Plan.</b> SDG&E shall prepare and incorporate methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction and post-construction operation into a Hazardous Substance Control and Emergency Response Plan (HSCERP). The HSCERP shall be part of the project-specific SWPPP and shall be submitted to CPUC for recordkeeping at least 30 days prior to project construction. The HSCERP measures shall require implementation of appropriate control methods and approved containment (e.g., use of partial or total enclosures, hazardous material handling methods and employee training, ventilation requirements) and spill control practices for construction and on-site hazardous material storage. All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations <u>and</u> by personnel qualified to handle hazardous materials. <del>With the exception of wood poles, the plan shall specify that all hazardous materials shall be collected in project-specific containers and transported to an SDG&amp;E service center designated as a SDG&amp;E consolidation site. Wood poles shall be transported off site once removed from the ground and temporarily stored in project-specific containers at an SDG&amp;E facility. As containers are filled, poles shall be transported to an appropriately licensed Class I landfill or the compost lined portion of a solid waste landfill. Wastes will be transported to appropriately licensed and permitted waste disposal facilities.</del>
193.	4.11 Impact	4.11-32	6	The Rancho Penasquitos Exxon, has in fact been completed and the case has been closed as of August 2015 (LOC Case H21411-01).	The Proposed Project area would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Attachment A - San Diego Gas & Electric Company (SDG&E) Comments  
 Sycamore to Peñasquitos 230kV Transmission Line Project  
 Draft Environmental Impact Report



Comment #	DEIR Section #	Page #	Paragraph, Figure, or Table #	Detailed Comments	Suggested DEIR Text Revisions
	Hazards-4				There are two is one listed hazardous material sites with open cases within 0.25 mile of the proposed 230-kV transmission line (SWRCB 2015a; 2015c). <del>These</del> <u>This</u> sites are <del>both is</del> located in Segment A and described in Table 4.11-1.
194.	Impact Hazards-4	4.11-33	2	Encountering contaminated ground water or soil would not meet any of the significance criteria identified on p 4.11-18 of the EIR. Therefore, it would not be a significant impact and this statement should be deleted from the EIR.	Contaminated soil and groundwater could potentially be encountered within a limited area around the point of excavation if the gasoline has spread to the area where excavation would occur. <del>This would be a significant impact.</del>
195.	Impact Hazards-4	4.11-33	3	<p>Rancho Penasquitos Exxon case was closed August 2015 (LOC Case H21411-01). Soil contamination was limited to property, ground water flow direction is southwest, away from the Proposed Project site. (source: Geotracker posted documents). Therefore, Mitigation Measure Hazards-5 to test and manage impacts to soil and groundwater is unnecessary and should be removed.</p> <p>Furthermore, the DEIR provides no evidence that there is any significant impact that would occur and, therefore, no evidence that this mitigation measure would reduce or eliminate any significant impact. Furthermore, existing regulatory requirements are already in place and would apply to the Proposed Project including but not limited to OSHA regulations for worker awareness and exposure, RCRA and 22 CCR regulations for proper characterization, management and disposal of impacted soils, the State General Permit requirements for BMPs, and SDAPCD Rule 51 prohibiting any unhealthful level a hazardous emission. Considering these factors, the mitigation does not reduce or eliminate any significant impact. Therefore, Mitigation Measure Hazards-5 should be deleted.</p> <p>Furthermore, trace levels of contamination could be encountered that would not reach hazardous materials thresholds. Therefore, even if Mitigation Measure Hazards-5 is not deleted in its entirety as recommended above, then the description of the measure should be modified to state that excavated soil and groundwater will be characterized and then disposed of in compliance with established regulations.</p>	<p><del><b>Mitigation Measure Hazards-5. Soil and Groundwater Testing.</b> Soil samples shall be taken from representative foundation depths prior to construction excavation for TSP P26 and shall be tested to determine the presence and extent of gasoline and other hydrocarbons. The sampling and testing plan shall be prepared and conducted by an appropriate California licensed professional and sent to a California Certified laboratory. Soil and groundwater samples shall be tested at a California Certified Laboratory. A report documenting the areas proposed for sampling, and the process to be used for sampling and testing shall be submitted to the CPUC for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for handling of excavation material found to exceed regulatory requirements shall be submitted to the CPUC 30 days prior to construction.</del></p> <p><del>In the event that soils to be excavated are found to be contaminated, the excavated soil shall be treated as hazardous materials and disposed of in compliance with state and federal regulations and SDG&amp;E operational procedures. Effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public. Regulatory agencies for the State of California (DTSC or RWQCB) and San Diego County shall be contacted by SDG&amp;E or its contractor to plan handling, treatment, and/or disposal options.</del></p> <p><del><b>Significance after mitigation: Less than significant.</b></del></p> <p>In the event that soils to be excavated are found to be contaminated, the excavated soil shall be <u>characterized and then disposed of in compliance with established regulations.</u> <del>treated as hazardous materials and disposed of in compliance with state and federal regulations and SDG&amp;E operational procedures.</del> Effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants (<del>if and where present</del>) and reduce the risk of exposure to workers and the public. Regulatory agencies for the State of California (DTSC or RWQCB) and San Diego County shall be contacted by SDG&amp;E or its contractor to plan handling, treatment, and/or disposal options, <u>if required by established regulations based upon the characterization of excavated soil or groundwater.</u></p>
196.	4.11 Impact Hazards-4	4.11-33	2 & 3	Delete paragraphs Two and Three discussing the Rancho Penasquitos Exxon. Rancho Penasquitos Exxon from the table as this site case was closed August 2015 (LOC Case H21411-01).	<del>The closest open case to the Proposed Project area is a leaking underground storage tank at the Rancho Peñasquitos Exxon that is located 142 feet west of the work area for proposed TSP P26 (refer to Appendix A maps for specific pole location). This site involved a release of approximately 150 gallons of gasoline (petroleum hydrocarbon constituents) from an underground storage tank in 1988 into the soil and groundwater;</del>

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					<p>therefore, there is some potential for contaminated soil and groundwater in Proposed Project excavations at TSP P26. Excavations for TSP foundations would range in depth from 20 to 40 feet. Contaminated soil and groundwater could potentially be encountered within a limited area around the point of excavation if the gasoline has spread to the area where excavation would occur. This would be a significant impact.</p> <p>Mitigation Measure Hazards 5 requires testing of excavation soils prior to construction within the work area for TSP P26. If contaminated soil is determined to be present, both the excavated soil and groundwater would be treated as hazardous materials and disposed of in compliance with state and federal regulations and SDG&amp;E operational procedures identified under APM HAZ-2. Impacts would be less than significant with mitigation. Copy paragraphs and then delete</p>
197.	4.11 Impact Hazards	4.11-33	4	There is only one remaining open site.	<p>The second open site is the Elegant II Cleaners &amp; Laundry site, which has affected groundwater with chlorinated hydrocarbons. This site is located 729 feet west of the proposed pole R35 work area and at a lower elevation. Because of the distance and lower topography of the open hazardous site to the pole R35 work area, it is unlikely that groundwater or soil encountered during pole excavation would be contaminated by chlorinated hydrocarbons from the Elegant II Cleaners &amp; Laundry site. Impacts would be less than significant. No mitigation is required.</p>
<b>4.12 – Fire and Fuels Management</b>					
198.	4.12 Fire and Fuels Management	9-35 4.12-20 4.12-29 4.12-30	Table 4.12-3 4 and 5 1 and 2 Table 9.1-1 MM Fire-4	<p>The intent of MM Fire-4 is to reduce the risk of fire risk by clearing/trimming vegetation during construction and prior to energization, not during Operation and Maintenance (“SDG&amp;E shall establish adequate conductor clearances prior to energizing the Project ..... During Project Construction, SDG&amp;E shall maintain adequate conductor clearances by inspecting the growth of vegetation along the entire length of the overhead transmission line” .....). Per Table 4.12-3: Summary of Proposed Project Impacts to Fire and Fuels Management, Operation and Maintenance is classified as Less than Significant and per 4.12, Operations and Maintenance, “Impacts from maintenance would be less than significant. No mitigation is required.”...”Impacts from operation of the transmission lines would be less than significant. No mitigation is required.”...” Operational impacts of new transmission lines would be less than significant. No mitigation is required.” This is because operation and maintenance of the new lines would be consistent with current standard practices, as pointed out on page 4.12-29, in which the DEIR states that “Aerial and ground inspections of the new transmission lines would be performed in conjunction with inspections of existing lines within the transmission corridor and would not increase the potential for wildland fire generation that could expose people or structures to a significant risk of loss, injury, or death. ...Maintenance activities for the transmission lines would be similar in scope to current maintenance activities for the existing power lines in the transmission corridor”. Therefore, for consistency and clarification, it is recommended that the MMRP Timing notes on the intended timing of the measure be revised. It is also recommended that the language in MM Fire-4 on the timing for inspecting the growth of vegetation (stated as “spring”) and subsequent submittal of survey results to the CPUC (stated as “before June 1”)be revised to allow flexibility based on a construction timeline.</p>	<p><b>Mitigation Measure Fire 4: Conductor Clearance.</b> SDG&amp;E shall establish adequate conductor clearances prior to energizing the Project by removing all vegetation from within 15 radial feet of new and relocated overhead conductors under maximum sag and sway. Only trees and vegetation with a mature height of 15 feet or less shall be permitted within the ROW. In addition, tree branches that overhang the ROW within 15 horizontal feet of any conductor shall be trimmed or removed, as appropriate, including those on steep hillsides that may be many vertical feet above the facility. Cleared vegetation shall either be removed or chipped and spread onsite in piles no higher than 6 inches.</p> <p>During Project construction, SDG&amp;E shall maintain adequate conductor clearances by inspecting the growth of vegetation along the entire length of the overhead transmission line <del>at least once each spring</del> and documenting the survey and results in a report submitted to the CPUC <del>before June 1 of each year</del> <u>annually during construction</u>. Conductor clearance of 15 radial feet under maximum sag and sway shall be maintained at all times. Maximum sag and sway shall be computed based on ambient temperatures of no less than 120 degrees Fahrenheit and wind gusts of no less than 100 miles per hour.</p> <p><b>Table 9.1-1, MM Fire-4, Timing</b>                      During construction –                      Vegetation maintenance                      Operation and Maintenance</p>

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					—SDG&E submits yearly reports to CPUC about <del>vegetation growth</del>
<b>4.13 – Air Quality</b>					
199.	4.13	23	2	The only unmitigated pollutant potentially exceeding the emission threshold is PM10. There is no difference between Tier 2 and Tier 3 PM10 emissions in the emissions calculation (in other words, the PM10 emissions factor for Tier 2 is the same as Tier 3), therefore it is not a logical conclusion that impacts would remain significant because APM AIR-4 does not require SDG&E to use a minimum 30 percent Tier 3 engines. Therefore, Mitigation Measure Air-2 would impose an unnecessary recordkeeping burden and is not required based upon the conclusions of the analysis. Mitigation Measure Air-2 should be removed from the Final EIR.	
200.	4.13	44	MM AIR-4	<p>Mitigation Measure AIR-4 should indicate the use of ‘reasonably available’ 2007 and newer diesel-powered equipment that meet Tier 3 standards. Some of the construction equipment used during high voltage electrical power and transmission lines can be limited, and Mitigation Measure AIR-4 needs to include flexibility to cover realistic availability of equipment.</p> <p>Suggested edits/additions to Mitigation Measure AIR-4 are provided to allow for the documentation of the best faith effort to locate and utilize 2007 and newer diesel-powered equipment that meets Tier 3 standards.</p> <p>For additional analysis of this issue please refer to Section II.B.2 of the comment letter.</p>	<p><b>Mitigation Measure Air-4: Exhaust Emissions Control Plan.</b></p> <p>SDG&amp;E shall use 2007 and newer diesel-powered equipment and use available construction equipment that meet a minimum of EPA Tier 3 emission standards.</p> <p><u>Equipment with an engine not compliant with the Tier 3 standard will be allowed only when the applicant (SDGE) has performed (and documented) a good faith effort (due diligence) to locate Tier 3 or newer equipment in the Project vicinity (defined as within 200 miles of the Project site). Use of older equipment would be allowable following due diligence and associated documentation that no Tier 3 or newer equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with written correspondence (or signed statement and electronic mail) by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms providing equipment within the defined project vicinity (200 miles). Documentation of due diligence will be submitted to CPUC staff before the non- Tier 3 compliant equipment is used on the project. The applicant will submit as part of the weekly CPUC compliance report a log of all construction equipment’s engine identification number and certified tier specification.</u></p> <p><del>An Exhaust Emissions Control Plan that identifies each off-road unit’s certified tier specification, Best Available Control Technology, as well as the model year of all diesel-powered equipment used during construction shall be submitted to the CPUC for review and approval at least 30 days prior to construction. Construction may not commence until the Exhaust Emissions Control Plan has been approved.</del></p>
201.	4.13	44	MM AIR-4	Mitigation Measure Air-4 which states, “An Exhaust Emissions Control Plan that identifies each off-road unit’s certified tier specification, Best Available Control Technology, as well as the model year of all diesel-powered equipment used during construction shall be submitted to the CPUC for review and approval at least 30 days prior to construction.	

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				<p><i>Construction may not commence until the Exhaust Emissions Control Plan has been approved</i>” is an infeasible request to fulfill, due to the nature of construction and the ongoing availability and sourcing of construction equipment. Additionally, as currently written, there is no language anticipating the need for revised equipment; equipment replacement; and equipment repair, which is all a dynamic process. The “30-day prior approval” adds overbearing limitations to the Proposed Project. Many of the required construction equipment (such as a helicopter) may only be required for a short duration of the overall construction schedule, and may only be required later within the overall construction schedule. It is therefore infeasible for SDG&amp;E to identify every piece of equipment that might be used (for the duration of construction) 30 days prior to the start of construction. Construction cannot feasibly be completed without the flexibility for construction contractors to bring on and replace construction equipment, as needed, throughout the duration of construction. Therefore the requirement within Mitigation Measure Air-4 for SDG&amp;E to provide the CPUC with the full list of (off road) construction equipment 30 days prior to the start of construction needs to be deleted in order to preserve feasibility of construction.</p> <p>Once the requirement for SDG&amp;E to identify all off road construction equipment prior to the start of construction is removed, there is no longer a functional need for an Exhaust Emissions Control Plan because the remaining components of interest are already addressed through the existing APM measures. Detailed information for utilized equipment and specifications (engine model/year/VIN) will be provided prior to use on the Proposed Project. As equipment is added, addition information will be provided. However, as previously mentioned, a completely static equipment list developed prior to commencement of construction is infeasible.</p> <p>Suggested edits to Mitigation Measures Air-4 are provided within the previous comment.</p> <p>For additional analysis of this issue please refer to Section II.B.2 of the comment letter.</p>	
202.	4.13	4.13-51		<p>Mitigation Measure Air-5 requires that construction of Alternative 4 (partial 69kV underground) shall not occur simultaneously with other 230kV construction (either as part of Segment B of the Proposed Project or the underground portion of Alternative 3). The mitigation should be augmented to allow for the required construction phasing plan to allow for construction sequencing that could achieve reduction in emission while allowing simultaneous underground construction of the Alternative 4 alignment.</p>	<p>Avoid Simultaneous Underground Construction. SDG&amp;E shall phase construction such that 230-kV underground duct bank construction in another underground segment (i.e., Proposed Project Segment B or the Alternative 3 underground alignment) does not occur simultaneously with the 69-kV underground duct bank construction in Carmel Mountain Road and East Ocean Air Drive of Alternative 4 <u>unless construction phasing can be shown that simultaneous underground construction will not result in an exceedance of emissions thresholds</u>. SDG&amp;E shall submit a construction phasing plan to the CPUC for review and approval at least 30 days prior to the start of construction in either alignment. The construction phasing plan shall document when SDG&amp;E intends to construct the Alternative 4 underground alignment.</p>

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<b>4.14 – Greenhouse Gases</b>					
203.	Proposed Project Impacts and Mitigation Measures	11, 21, 24, 28	Tables 7, 12, 14, 16	The calculated emissions in the table are based on combined construction emissions for 2016 and 2017 years. For the sake of accuracy and consistency (with approach used in previous CPUC issued DEIRs), the emissions need to be amortized over the life of the transmission line (e.g. 30-year life) and then compared with the 10,000 metric ton per year threshold. This amortization would render a much lower annual CO2e value than what is reflected in the document.  For example the CO2e from construction emissions (amortized over life of project) for Proposed Project would be 92 metric tons (instead of 2,752 metric tons – which is the unamortized value reported in the document).	
<b>4.15 – Agriculture and Forestry</b>					
204.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.16 – Population &amp; Housing</b>					
205.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>4.17 – Utilities &amp; Public Service Systems</b>					
206.	Utilities	4.17-34	1	SDG&E is requesting a modification to the language APM PS-6 to allow for either contracted or SDG&E patrols. Suggested revised text has been included.	SDG&E will also implement its project-specific fire plan, which will include <del>private</del> fire patrol monitoring as appropriate.
207.	Utilities	4.17-21	Table 4.17-4 APM PS-6	SDG&E is requesting a modification to the language APM PS-6 to allow for either contracted or SDG&E patrols.	SDG&E also would implement APM PS-6 as part of the Proposed Project, which would require <del>private</del> fire patrol monitoring under the project specific Fire Prevention Plan.
<b>5.0 – Cumulative Impacts</b>					
208.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>6.0 – Comparison of Alternatives</b>					
209.	For a detailed discussion of the proposed Alternatives, please see Section I of the comment letter.				
<b>7.0 – Other CEQA Considerations</b>					
210.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>8.0 – Report Preparation</b>					
211.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>9.0 – MMRP (Please see additional comments on Mitigation Measures included in the comments for issues in Section 4)</b>					
212.	Bio Res	9-21	MM BIO-3	Added text to improve effectiveness of measure. Deleted reference to San Diego County Agriculture Commissioner and Cal-IPC because neither organization performs the assigned consultation function in their normal course of business.	<b>Mitigation Measure Biology-3: Weed Control Plan.</b> SDG&E shall prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive, non-native species abatement. Developed land shall be excluded from weed control. Where SDG&E owns the property, the Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed <u>specifically for the project area by persons with at least 5-years of weed control experience in San Diego County. The Weed Control Plan shall address control methods and issues controlling invasive non-native species within all vegetation communities and land cover</u>

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					<p><del>types found along the project alignment, in consultation with the San Diego County Agriculture Commissioner's Office and California Invasive Plant Council (Cal-IPC).</del> On ROW easement on MCAS Miramar, the Weed Control Plan shall incorporate all appropriate and legal U.S. Marine Corps-stipulated regulations. The Weed Control Plan shall be submitted to MCAS Miramar for final authorization of weed control methods, practices, and timing prior to implementation of weed control on MCAS Miramar.</p>
213.	Bio Res	9-21	MM BIO-3	<p>Mitigation Measure Bio-3 regarding the Weed Control Plan should be revised to reflect the following:</p> <ul style="list-style-type: none"> <li>• <del>Access to survey off ROW may require a right of entry agreement with landowner.</del></li> <li>• Language is added in (2) for clarification</li> <li>• Language is added in (3) to improve the effectiveness of measure</li> <li>• The reference to San Diego County Agriculture Commissioner and Cal-IPC should be deleted because neither organization performs the assigned consultation function in their normal course of business.</li> </ul> <p>The requirement for a pre-construction weed inventory should be deleted because this requirement is addressed by added language in paragraph above.</p>	<p>The Weed Control Plan shall include the following:</p> <ul style="list-style-type: none"> <li>□ A pre-construction weed inventory shall be conducted by surveying the entire ROW and areas immediately adjacent to the ROW <del>where access permission can be obtained,</del> as well as at all ancillary facilities associated with the <del>Proposed P</del>project for weed populations that: (1) are considered by the San Diego County Agriculture Commissioner or MCAS Miramar (for ROW on MCAS Miramar) as being a priority for control, (2) <del>weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (Cal-IPC 2006 [and 2007 update];</del> <a href="http://www.calipc.org/ip/inventory/index.php">http://www.calipc.org/ip/inventory/index.php</a> and (23) aid and promote the spread of wildfires <del>in San Diego County; prolific wildfire promoting species such as brome grasses (<i>Bromus</i> sp.) will be mapped but not be targeted for control outside of Proposed P</del>project impact areas. These populations shall be mapped and described according to density <del>and within the area covered surveyed per each species detected.</del> These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology <del>within proposed impact areas</del> according to control methods and practices for invasive weed populations <del>included in the Weed Control Plan designed in consultation with the San Diego County Agriculture Commissioner's Office and Cal-IPC or required by MCAS Miramar, as appropriate.</del></li> <li>□ A pre-construction weed inventory shall also be conducted by surveying areas that will be directly impacted by the project for weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (Cal-IPC 2006 [and 2007 update]; <a href="http://www.calipc.org/ip/inventory/index.php">http://www.calipc.org/ip/inventory/index.php</a>) or are weed species of concern to MCAS Miramar (for ROW on MCAS Miramar). These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations <del>designed in consultation with Cal-IPC and MCAS Miramar (for treatment in ROW on MCAS Miramar)</del></li> </ul> <p>Weed control treatments shall include all legally permitted methods <del>to be used in the following prioritized order</del> including preventative, manual, mechanical, and chemical <del>methods.</del> All treatments shall be applied with the authorization of <del>San Diego County Agriculture Commissioner and</del> MCAS Miramar, as appropriate. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris <del>will</del> shall be within an approved landfill within San Diego County <del>follow</del></p>

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				<p>Deleted because this prioritization hampers the effective control of target exotic species.</p> <p>This long-term measure is unnecessary because the NCCP provides for the elimination of noxious weeds around SDG&amp;E facilities. (Section 2.1.3.9 Vegetation Control, pages 24-25). SDG&amp;E conducts routine vegetation control on access roads and permanent work areas to minimize weed species. Control consists of manual removal or herbicide spraying if not impactive to sensitive species.</p>	<p><del>regulations set by the San Diego County Agriculture Commissioner. The timing of the weed control treatment shall be determined for each plant species in consultation with by the PCA for the Proposed Pproject, San Diego County Agriculture Commissioner, Cal-IPC and with MCAS Miramar, as appropriate, with the goal of controlling populations before they start producing seeds. For the lifespan of the project (i.e. as long as the project is physically present), long term measure to control the introduction and spread of weeds in the project area shall be taken as follows.</del></p> <p><input type="checkbox"/> From the time construction begins until 2 years after construction is complete, annual surveying for new invasive weed populations within and immediately adjacent to the Proposed Pproject impact areas, where permission can be secured by individual landowners, shall be conducted. All invasive, non-native species found these areas shall be treated as described above and the monitoring of identified and treated populations shall be required in the survey areas described above. After this time, surveying for new invasive weed populations and monitoring of identified treated populations shall be required at an interval of every two years. However, the treatment of weeds shall occur on a minimum annual basis, unless otherwise approved by the PCA, San Diego County Agriculture Commissioner, Cal-IPC and MCAS Miramar, as appropriate.</p> <p><input type="checkbox"/> During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall also be certified weed free by the San Diego County Agriculture Commissioner's Office.</p>
214.	Bio Res	9=26	MM BIO=6	Deleted. The approved Habitat Restoration Plan will describe success criteria and adaptive management protocols. Therefore this language is unnecessary	<p>Maintenance and monitoring for restoration shall be <del>for a minimum of 5 years or until performance criteria are met unless otherwise approved by the CPUC, USFWS, CDFW and MCAS Miramar, as applicable even if established success criteria are met before the end of 5 years.</del> Compensation planting areas shall be monitored eight times in Year 1, six times in Years 2 and 3, and 4 times in Years 4 and 5.</p> <p>Compensation planting areas shall be monitored for invasive plants in the first 5 years following replanting. Invasive plant monitoring shall occur eight time in Year 1, six times in Years 2 and 3 and, 4 times in Years 4 and 5. If invasive plants are found during the 5 year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria.</p> <p>If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the 5 year period until criteria or met or as otherwise approved by the CPUC</p> <p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Maintenance and monitoring shall be conducted following a prescribed schedule that shall be included in the restoration plan to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding,</p>

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					<p>erosion control, use of container stock, supplemental watering, etc.) shall be taken by the <u>Habitat Restoration Specialist in conjunction with</u> an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration. Any <u>temporary impacts</u> associated with unauthorized activity (e.g., exceeding approved construction footprints) shall be <u>restored per the approved restoration plans mitigated at a 5:1 ratio.</u>  <del>Restoration of the unauthorized impacts shall be credited at a 1:1 ratio (i.e. mitigated by in-place restoration); the remaining 4:1 shall be acquired and preserved off-site.</del>                      For areas where habitat restoration cannot meet mitigation requirements, as determined by the Habitat Restoration Specialist in coordination with CPUC, USFWS, CDFW, and MCAS Miramar (for restoration on MCAS Miramar), <u>alternative methods for mitigation shall be established. This may be accomplished by off-site purchase and dedication of habitat (or as otherwise prescribed by MCAS Miramar for restoration on MCAS Miramar) or via funding or implementing projects sanctioned by CPUC, USFWS, CDFW and/or MCAS Miramar as appropriate, that meet the same or similar habitat functionality goals as project mitigation requirements shall be provided at the mitigation ratios provided in Table 4.1-10.</u></p>
215.	Bio Res	9-27	MM BIO-6	<p>This proposed timing for approval of the HMP contradicts the “before the line is energized” approval requirement for acquisition of off-site mitigation parcels. It is SDG&amp;E’s experience that the development, review and approval cycle for HMPs is a lengthy iterative process. Therefore the “prior to” approval requirement for the HMP is infeasible and SDG&amp;E believes that 18 months after initiation of ground disturbing activities is a more reasonable timeline.</p>	<p>. The Habitat Management Plan must be approved in writing by these agencies (as applicable) <del>prior to</del> <u>within 18 months after</u> the initiation of any vegetation disturbing activities.</p>
216.	Bio Res	9-24	MM BIO-6	<p>Deleted “preconstruction conditions” since it is poorly defined and moreover successful restoration will be defined by the success criteria in the approved Habitat Restoration Plan.</p> <p>Deleted. Inappropriate mitigation ratio, by definition restoration is 1:1</p>	<p>Compensatory Mitigation for Impacts to Habitat. SDG&amp;E shall restore temporarily impacted areas <del>to pre-construction conditions</del> following construction and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation, for example. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community. Restoration of temporarily impacted areas <u>may</u> involves recontouring <del>the land</del> <u>and if there were grading impacts</u>, replacing the topsoil (if it was collected), planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years <del>and or</del> <u>until the established</u> success criteria are met.</p> <p>SDG&amp;E shall prepare a Habitat Restoration Plan that shall be subject to approval by the CPUC, USFWS, CDFW, and MCAS Miramar (for restoration on MCAS Miramar) <del>prior to habitat impacts. Required mitigation ratios are provided by habitat type in Table 4.1-10.</del> In cases where the impacts to sensitive vegetation communities occur in the City of San Diego MHPA, the mitigation shall also occur in the MHPA. The Habitat Restoration Plan shall also identify, <u>if applicable</u>, the <del>need</del> <u>potential</u> for reintroduction and/or increasing MSCP-covered species populations <u>within habitat restoration areas if those covered species were affected by the Proposed Pproject.</u></p>

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				<p>If a species is affected, then the restoration will cover those species. The language regarding reintroduction or increasing covered species populations should only be considered if it mitigates for permanent impacts to a given species.</p> <p>These performance criteria are recommended in lieu of those deleted below, as they are more consistent with habitat restoration plans currently in use.</p>	<p>The Restoration Plan shall include the following <del>performance criteria</del>:</p> <ul style="list-style-type: none"> <li>• Designation of Habitat Restoration Specialist for the project.</li> <li>• Methods for determining pre-impact site conditions including the vegetation community as well as total percent cover of native and non-native species. The pre-impact site assessments shall also determine dominant native and non-native species at each temporary impact area. Other important information that needs to be addressed during the assessment include, but are not limited to the following,                         <ul style="list-style-type: none"> <li>○ A plant species list (native and non-native plants);</li> <li>○ Distribution and characteristics of vegetation communities;</li> <li>○ Distribution and characteristics of habitat for special status wildlife species;</li> <li>○ Known or assumed occurrence of listed and other special status species;</li> <li>○ Known locations and estimated size of special status plant populations;</li> <li>○ Location of Federal and State waters;</li> <li>○ Weed survey results;</li> <li>○ Soil types, density, and conditions; and</li> <li>○ Site photos</li> </ul> </li> <li>• Specific restoration methods including but not limited to,                         <ul style="list-style-type: none"> <li>○ Topsoil salvage</li> <li>○ Recontouring methods</li> <li>○ Seed collection/procurement</li> <li>○ Plant salvage</li> <li>○ Erosion control</li> </ul> </li> <li>• Define specific remedial measures that may be implemented throughout the restoration program.</li> <li>• Establish site specific success criteria and procedures for final site signoff.</li> </ul> <p><del>Percent cover and composition shall be similar to the conditions of a nearby reference site, defined as variation of no more than ten percent absolute cover from reference site cover and species composition condition</del></p>
217.	Cultural Resources	9-31	APM CUL-1	Effectiveness Criteria states that the archaeologist will be informed by surveying the Proposed Project area. Archaeologists completed surveys of the Proposed Project area, so additional surveys should not be required in the effectiveness criteria. Surveys may be needed for CPUC alternatives that have not been previously surveyed. The Final EIR should be revised to remove additional surveys from the MM CUL-1 effectiveness criteria.	Archaeological monitoring will occur as prescribed within the measure, cultural resource training will be provided to project personnel, and an archaeological monitor will attend project meetings, as needed. <del>be informed by attending meetings and surveying the Proposed Project area to</del> <u>The qualified archaeologist shall provide accurate archaeological monitoring results report.</u>
218.	Cultural Resources	9-32	APM CUL-5	SCIC should be South Coastal Information Center	Any new cultural sites or features encountered would be recorded with the South <del>Central</del> <u>Coastal</u> Information <u>Center</u> (SCIC).
219.	Cultural	9-32	MM CUL-1	On-site monitors may determine that the potential for buried deposits is low after initial	Monitoring teams shall include one qualified archaeological monitor and one Native

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	Resources			ground disturbance occurs.	American monitor. In the event that ground disturbing activities simultaneously occur in multiple locations, a monitoring team <del>shall</del> <u>may</u> be required at each location. <u>If ESA fencing has been established and the possibility of buried cultural deposits is determined to be low after initial ground-disturbance, the on-site professional archaeologist may determine that monitoring is no longer required in that area.</u>
220.	Cultural Resources	9-32	MM CUL-1	Requested edits for clarification	If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 50 feet (15 meters) of the area of the find, and the CPUC-approved cultural resources specialist/archaeologist shall consult with <u>SDG&amp;E's Cultural Resource Specialist and CPUC staff</u> regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b). Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required <u>when feasible</u> to mitigate impacts to previously undiscovered resources. Other methods of mitigation, described below, shall only be used if the CPUC-approved cultural resource specialist/ archaeologist determines the method would provide equivalent or superior mitigation of the impacts to the resource.
221.	Cultural Resources	4.3-36, 9-33	MM CUL-4	The Mitigation Measure should be consistent with regulatory and legal requirements (Public Resources Code 5097.98(e); Assembly Bill 2641).	The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours, the <u>remains should be reinterred in</u> area of the property <del>shall be</del> secured from further <u>subsurface</u> disturbance.
222.	Paleontological Resources	9-46	MM Paleo-1	The paleontological monitor would work under the direction of a qualified paleontologist.	Paleontological monitoring shall be conducted by <u>a qualified paleontological monitor under the direction of a CPUC-approved, qualified paleontologist</u> . The qualified paleontologist shall have a Master's or PhD in paleontology, have knowledge of the local paleontology, and be familiar with paleontological procedures and techniques.
223.	Paleontological Resources	9-46	MM Paleo-2	Clarification requested	All Proposed Project areas that would require paleontological monitoring shall be noted on construction drawings and/or plans.
224.	Paleontological Resources	9-46	MM Paleo-3	If a discovery occurs, the on-site paleontological monitor will make the initial assessment.  A plan for protection will only apply for "unique"/significant resources.	<del>A</del> <u>Under the direction of a CPUC-approved, qualified paleontologist, the paleontological monitor</u> shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, the qualified paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, part V. <u>If the resource is determined to be "unique" under CEQA,</u> <del>t</del> The determination and associated plan for protection of the resource shall be provided to CPUC for review and approval. If the resource is determined not to be unique, work may commence in the area. If the resource is determined to be a unique paleontological resource, work shall remain halted, and the qualified paleontologist shall consult with SDG&E and CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA.

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225.	Fire & Fuels	4.12-30	MMF-1 Bullet 2	Mitigation Measure Fire-1 should be revised as indicated to reflect and permit exceptions which may actually prevent fires and to be line with SDG&E Wildland Fire Prevention & Fire Safety Plan (SDG&E ESP 113.1).	During Red Flag Warning events, as issued daily by the National Weather Service, all construction and maintenance activities shall cease <del>with the exception of transmission line testing</del> , except for; unfinished work, repairs, or other activities which may be allowed if the facility/equipment poses a greater fire risk if left in its current state; and transmission line testing which may be tested if the loss of another transmission facility could lead to system instability or cascading outages.
226.	Fire & Fuels	4.12-31	MMF-1 Bullet 1	Mitigation Measure Fire-1 should be revised as indicated to allow either radio and/or cellular as an efficient method of communicating emergency messaging and information.	All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational in all Proposed Project work areas <del>and access routes to allow</del> for the immediate reporting of fires.
227.	Fire & Fuels	4.12-31	MMF-1 Bullet 2	Recommending changes to Mitigation Measure Fire-1 to provide a better way of communicating emergency information to workers since all worker must have a hard hat at all times on their person.	All construction personnel shall <del>carry at all times a laminated card</del> be provided a hard hat sticker listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on <del>contact cards</del> hard hat sticker shall be updated and redistributed to all construction personnel, and outdated <del>cards</del> hard hat stickers destroyed, prior to the initiation of construction activities on the day the information change goes into effect.
228.	Fire & Fuels	4.12-31	MMF-2 second paragraph	Recommending changes to Mitigation Measure Fire-2 to provide consistency with the CTMP. Current wording is not achievable and not consistent with the CTMP mitigations.	SDG&E shall ensure that construction personnel, construction equipment, and aerial operations do not create obstructions to firefighting equipment or crews. Emergency ingress and egress to access roads shall <del>remain unobstructed at all times</del> ; implement the Construction Transportation Management Plan (CTMP), specifically MMT1, MMT6, & MMT8.
229.	9.5.2	9-6	First bullet	Section 9.5.2 (Construction Personnel) of the MMRP has language that has not appeared in prior DEIRs. <i>“Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel <u>would be asked to sign, denoting consent to the procedures.</u>”</i> (Italics and underlining added)  SDG&E proposes the removal of the language requiring construction personnel to sign a separate agreement denoting their consent to the procedures. As already noted in the MMRP, the contracts between SDG&E and the construction companies will require the construction companies to follow the necessary procedures to implement all mitigation measures. Ultimately, it is the responsibility of the construction companies to ensure their employees meet this obligation. SDG&E is not the employer of these construction workers – construction companies must be able to develop their own methods and processes to ensure their employees follow the necessary procedures to implement mitigation measures. Therefore, this requirement should be removed.	<b>9.5.2 Construction Personnel</b> A key element in the success of mitigation and mitigation monitoring is the full cooperation of construction personnel and supervisors. Successful implementation of many of the mitigation measures requires specific actions and behaviors on the part of the construction supervisors or crews. To ensure success, the following actions, detailed in specific mitigation measures included in the MMCRP, would be taken:  <ul style="list-style-type: none"> <li>Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SDG&amp;E. <del>Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.</del></li> </ul>
230.			MM Bio-7	MM Bio-7 states that nest surveys shall occur within 48 hours prior to activities. Due to delays that sometime occur in construction schedules, recommend changing this nest survey requirement to no more than 5 days prior to activities.	<b>Nesting Bird Survey Requirements.</b> If work is scheduled to occur during the avian nesting season, nesting bird surveys shall be conducted according to the following provisions: 1. Nest surveys shall occur within <del>48 hours</del> <b>5 days</b> prior to the start of ground-disturbing construction or vegetation trimming or removal activities. If there is no work in an area for 7 days, it shall be considered a new work area if construction, vegetation trimming, or vegetation removal begins again.

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231.			MM Bio-2 & Bio-6	MM Bio-2 and MM Bio-6 both call for an annual monitoring for 5 years and until success criteria are met. If success criteria are met, additional monitoring will only serve to create more disturbance and increase likelihood of bringing weedy plant material to the site. The Mitigation should be changed to include monitoring for 5 years <u>or</u> until success criteria are met.	<p><b>Mitigation Measure Biology-2:</b> Compensatory Mitigation for Special-Status Plants. All special-status plant populations shall be staked or flagged by a qualified biologist approved by the CPUC, USFWS, and CDFW if they fall within the limits of work. All stakes, flagging, or fencing shall be removed no later than 30 days after construction is complete. Impacts to special-status plant species shall be avoided to the extent feasible. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation per the direction of the USFWS and/or CDFW. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the CPUC. Off-site mitigation land shall be identified prior to the start of construction. The establishment of long-term land management and legal protection assurances must be completed within 12 months of construction start. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the wildlife agencies, it shall be conducted pursuant to a CPUC-, USFWS-, and CDFW approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. The salvage and relocation plan shall also define the monitoring strategy with a minimum of annual monitoring for 5 years <del>and</del> <u>or</u> until success criteria are met. Success criteria shall include a minimum of:</p> <p><b>Mitigation Measure Biology-6:</b> Compensatory Mitigation for Impacts to Habitat. SDG&amp;E shall restore temporarily impacted areas to pre-construction conditions following construction and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation, for example. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community. Restoration of temporarily impacted areas involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years <del>and</del> <u>or</u> until success criteria are met.</p>
232.			Mitigation Measure Aesthetics-2	<p>SDG&amp;E recommends that Mitigation Measure Aesthetics-2 be revised to eliminate the landscaping requirement. The requirement to landscape the retaining walls should be eliminated based on the remote location of the retaining walls at work pads along the transmission road, the lack of irrigation available at these remote locations, and the drought conditions which do not support the use of irrigation water to ensure the success of the landscaping. The selection of the proper color for the retaining walls to blend with the surrounding environment should be sufficient to reduce visual impacts.</p> <p>If the elimination of the landscaping requirement for retaining walls is not supported, then the mitigation measure should be revised to only require landscaping where it feasible to obtain irrigation water.</p>	<p><b>Recommended revisions if the landscaping requirement is eliminated:</b></p> <p><b>Mitigation Measure Aesthetics-2: Retaining Wall Screening Treatment.</b> Retaining walls shall use <u>Verdura</u> blocks <del>that accommodate plants along the wall face</del>. The block color shall be similar in hue and value to the native soil or up to <u>approximately 2</u> shades darker. <u>SDG&amp;E will submit the proposed block color for CPUC approval per Mitigation Measure Aesthetics-3 utilizing standard commercially available block colors.</u> <del>All retaining walls shall be planted with native vegetation common to the area. SDG&amp;E shall submit a retaining wall design and vegetation plan to the CPUC for review and approval. The retaining wall design shall show the planting pockets in the blocks and the color of the blocks for all project retaining walls. SDG&amp;E shall not order or procure the blocks</del></p>

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				<p>For a more detailed discussion of this issue, please refer to Section II.B.2 of the comment letter.</p>	<p>until CPUC approves the design and color of the blocks. The vegetation plan shall include a list of all species to be planted in the retaining walls and the container size for the plantings. Vegetation planted in the retaining walls shall be maintained and watered as needed until plant material is established. Plants that die shall be replaced with similar specimens. SDG&amp;E shall monitor the vegetation planted in the retaining wall pockets for three years or until plants are fully established.</p> <p><b>If the elimination of the landscaping requirement for retaining walls is not supported, then the following revisions to the landscaping requirement should be incorporated:</b></p> <p><b>Mitigation Measure Aesthetics-2: Retaining Wall Screening.</b> Retaining walls shall use blocks that accommodate plants along the wall face. The block color shall be similar in hue and value to the native soil or up to 2 shades darker. <del>And</del> <u>if retaining walls are located in an areas where water for irrigation is available or can be reasonably extended to the retaining wall location, then it shall be planted with native vegetation common to the area. Factors to be considered in determining the feasibility of the irrigation include the distance to existing water source, if recycled water is available, water pressure and the ability to secure water for irrigation.</u> SDG&amp;E shall submit a retaining wall design and vegetation plan to the CPUC for review and approval. The retaining wall design shall show the planting pockets in the blocks and the color of the blocks for all project retaining walls. SDG&amp;E shall not order or procure the blocks until CPUC approves the design and color of the blocks. The vegetation plan shall include a list of all species to be planted in the retaining walls and the container size for the plantings. Vegetation planted in the retaining walls shall be maintained and watered as needed until plant material is established. Plants that die shall be replaced with similar specimens. SDG&amp;E shall monitor the vegetation planted in the retaining wall pockets for three years or until plants are fully established.</p>
233.	AESTHE TICS 4.2	4.2-72	MM AES-3	<p>The existing transmission corridor includes some transmission structures that are painted. SDG&amp;E’s current design standard is to utilize dull-galvanized steel instead of painted poles. The dull-galvanized poles included as part of APM Aesthetics-5 eliminates glare that can be associated initially with galvanized poles until they “weather”. The dull-galvanized poles are a neutral color that blends with a variety of different backgrounds that exist in the surrounding environment. In addition, they eliminate the on-going need to re-paint poles as part of maintenance activities, thereby eliminating the need for outages during painting, reducing operational costs and reducing potential visual impacts prior to the re-painting of the pole. Also, since the color of painted poles fade over time, it makes it difficult to match the color of existing poles. All of these issues are resolved by utilizing dull galvanized poles.</p> <p>The goal of the Facilities Color Treatment Plan is to minimize the visual appearance of the structure when compared to the surrounding environmental and to the greatest extent feasible. Visual simulations in the Facilities Color Treatment Plan will show the reduction</p>	<p><b>Mitigation Measure Aesthetics-3: Facilities Color Treatment Plan.</b> SDG&amp;E shall prepare a Facilities Color Treatment Plan describing the application of colors to all new structures. The proposed color treatments shall minimize visual intrusion and contrast by <del>matching</del> <u>blending</u> the new structure’s color to the adjacent existing structures and <u>with the surroundings landscape. Dull galvanized poles shall be utilized for all TSPs. Ancillary structures shall use colors that are congruent with the landscape in which they are proposed. Color treatments shall reduce new structure contrast making new structures less noticeable.</u> The Plan shall be submitted to CPUC for review and approval at least 90 days prior to ordering the first structure to be color treated. The Facilities Color Treatment Plan shall include:</p> <ul style="list-style-type: none"> <li>• Specification, and 11 x 17 inch color simulations at real-world scale, of the treatment proposed for use on project structures from identified KOPs. Structures include TSPs, retaining wall faces, and fences for cable poles and staging areas</li> </ul>

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				<p>of visual contrast when compared to galvanized poles. Painting transmission structures will add very little aesthetic reduction and will increase cost and maintenance.</p> <p>For further discussion of this issue please see Section II.B.2 of the comment letter.</p>	<ul style="list-style-type: none"> <li>• List of each major project structure, specifying the color and finish proposed</li> <li>• Two sets of brochures and/or color chips for the proposed color for each project element</li> <li>• A <del>detailed</del> schedule for completion of the treatment</li> <li>• <del>A procedure to ensure proper treatment maintenance for the life of the project</del></li> <li>• SDG&amp;E shall not specify to the vendors the treatment of any structures treated during manufacture or perform the final treatment on any structures treated onsite during construction until SDG&amp;E receives notification of approval of the Color Treatment Plan by the CPUC.</li> </ul>
234.	AESTHETICS 4.2	4.2-73	MM AES-4	<p>Mitigation Measure Aesthetics-4 requires a Landscape Plan to screen cable poles. Depending on what project design or alternative is approved by the CPUC, there is the potential that the required cable poles could be located in remote areas that do not have access to irrigation, making compliance with this requirement infeasible or unpractical, especially given the drought conditions. Revisions to Mitigation Measure Aesthetics-4 are proposed to provide appropriate flexibility to respond to the different environmental conditions for landscaping based on the approved alignment and design for the project.</p>	<p><b>Mitigation Measure Aesthetics-4: Cable Pole Screening.</b> SDG&amp;E shall prepare a <del>Landscape-Cable Pole Screening</del> Plan that details the <del>landscape treatment and fence design around the cable poles.</del> <u>If the Cable Pole is located in area where water for irrigation is available or can be reasonably extended to the cable pole location, then the Cable Pole Screening The Landscape Plan shall include vegetation landscaping to screen the base of the cable pole and fence to the extent feasible. Factors to be considered in determining the feasibility of the irrigation include the distance to existing water source, if recycled water is available, water pressure and the ability to secure water for irrigation.</u> Vegetation around the cable pole shall consist of container plantings due to the need to visually screen the cable pole. The vegetation type selected shall be compatible with the surrounding vegetation communities. Vegetation planted around the cable pole shall be maintained and watered as needed until plant material is established. Plants that die shall be replaced with similar specimens. SDG&amp;E shall monitor the vegetation around the cable pole until all container plants are fully established. SDG&amp;E shall submit the <del>Landscape-Cable Pole Screening</del> Plan to the CPUC for review and approval at least 60 days prior to construction of the cable pole. No work shall be conducted at the cable pole prior to CPUC approval of the <del>Landscape Cable Pole Screening</del> Plan.</p>
235.	MMRP	9-10	MM AES-5	<p>The requirement is not justified because the impact from the aviation hazard lights was determined to be less than significant in the environmental analysis (Page 4.2-75). MM AES-5, as described in the DEIR Section 4.2 does not include any language or requirements relating to FAA hazard lighting. Therefore, the MM AES-5 should be revised within the MMRP to be consistent with the impact analysis and MM AES-5 as described within DEIR Section 4.2.</p>	<p><del>All flashing red strobe lights required on tower structure shall be synchronized to flash at the same time as other strobe lights in the same viewshed</del></p>
236.			Mitigation Measure Geology-1	<p>All applicable rules in General Order 95 and 128 will be met in the design and construction of the Proposed Project. In addition to the minimum loading and safety factors required in Section IV of General Order 95, a more stringent local wind conditions will be used for the design of new structures.</p> <p>Seismic loading for transmission lines will not be considered and is above and</p>	<p><del><b>Mitigation Measure Geology-1: Geotechnical Investigation for Liquefaction.</b> The design level geotechnical investigations to be performed by SDG&amp;E shall include investigations that assess the potential for liquefaction to affect the Project and all associated facilities, specifically at tubular steel pole locations in areas with potential liquefaction-related impacts. Where these hazards are found to occur, appropriate engineering design and construction measures shall be incorporated</del></p>

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				<p>beyond what is required by GO 95, or by the National Electric Safety Code (NESC), or by the American Society of Civil Engineers (ASCE).</p> <p>In addition, a Geotechnical Report has been prepared by Trinity Engineers (San Diego, CA) dated April 15, 2015 and is included for your information within Attachment B (Exhibit 12). The geotechnical study evaluated the subsurface conditions within the Proposed Project site and provides geotechnical recommendations for the design and construction of the proposed steel pole foundations as well as preliminary recommendations for the appurtenant maintenance pads, access roads, and earth retention structures. The Geotechnical Report indicates that liquefaction beneath the structural site areas is considered nil. Therefore, Mitigation Measure Gology-1 is unnecessary and should be deleted.</p>	<p>into the project designs as deemed appropriate by the a California licensed Geotechnical Engineer or Certified Engineering Geologist. Design measures that would mitigate liquefaction-related impacts could include construction of pile foundations, ground improvement of liquefiable zones, and incorporation of slack in cables to allow ground deformations without damage to structures. Study results and proposed solutions to mitigate liquefaction shall be provided to the CPUC for review and approval at least 60 days before final project design.</p>
237.			Mitigation Measure Geology-2	<p>Refer to the comment above regarding Mitigation Measure Geology-1. The Geotechnical Report prepared by Trinity Engineers (San Diego, CA) dated April 15, 2015 analyzing the surface conditions along the proposed transmission line alignment did not reveal the existence of landslide activity. Therefore, Mitigation Measure Gology-2 is unnecessary and should be deleted.</p>	<p><b>Mitigation Measure Geology-2: Geotechnical Investigation for Landslides.</b> The design-level geotechnical surveys conducted by SDG&amp;E shall include slope stability analyses in areas of planned grading and excavation that cross and are immediately adjacent to hills and mountains. These surveys shall acquire data that shall allow identification of specific areas with the potential for unstable slopes, landslides, earth flows, and debris flows along the approved transmission line route and in other areas of ground disturbance, such as grading for access and spur roads. The investigations shall include an evaluation of subsurface conditions, identification of potential landslide hazards, and shall provide information for development of excavation plans and procedures. If the results of the geotechnical survey indicate the presence of unstable slopes at or adjacent to Project structures, appropriate support and protection measures shall be designed and implemented to maintain the stability of slopes adjacent to newly graded or re-graded access roads, work areas, and project structures during and after construction, and to minimize potential for damage to project facilities. These design measures shall include, but are not limited to, retaining walls, visquene, removal of unstable materials, and avoidance of highly unstable areas. SDG&amp;E shall document compliance with this measure prior to the final project design by submitting a report to the CPUC for review and approval at least 60 days before construction. The report shall document the investigations and detail the specific support and protection measures that shall be implemented.</p>
238.			Mitigation Measure Geology-3	<p>Refer to the comment above regarding Mitigation Measure Geology-1. The Geotechnical Report prepared by Trinity Engineers (San Diego, CA) dated April 15, 2015 analyzing the surface conditions along the proposed transmission line alignment concluded that impacts from expansive foundation soils are not anticipated. Backfill for retaining walls shall be non-expansive soil (E.I. of 20 or less). Therefore, Mitigation Measure Gology-3 is unnecessary and should be deleted.</p>	<p><b>Mitigation Measure Geology-3: Assess Potential for Collapsible and Expansive Soils.</b> The design-level geotechnical surveys shall identify areas with potentially expansive or collapsible soils and include appropriate design features, including excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill, ground treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Studies shall conform to industry standards of care and American Society for Testing and Materials standards for field and laboratory testing. Study results and proposed solutions shall be provided to the CPUC for review and approval at least 60 days before construction. The report shall document the investigations and detail the specific support and protection measures that shall be implemented.</p>

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239.	MM Hazards-6	4.11-39	MM Hazards-6	<p>Research of the FUDS data base reveals that SDG&amp;E's proposed route for the 230kv tie line crosses a very small portion of one Formerly Used Defense Site (FUDS). The proposed route is within an existing transmission corridor that has been used for many years. The new poles are being installed near existing poles where ground disturbing activities have been done in the past.</p> <p>SDG&amp;E will be applying to MCAS Miramar for a Tier 1 permit to construct the Proposed Project within MCAS Miramar. As part of the Tier 1 review and approval process, SDG&amp;E will be required to comply with the Federal Governments NAVSEA OP 5 as related to unexploded ordinance. Suggested edits to Mitigation Measures Hazards -6 are proposed to make the mitigation measure more consistent with the required MCAS Miramar Tier 1 permit process. SDG&amp;E will retain a trained contractor to be employed in the case of UXO discoveries that may occur off of MCAS Miramar.</p>	<p><b>Mitigation Measure Hazards-6. Unexploded Ordinance Investigation.</b> SDG&amp;E shall perform a survey of identified Formerly Used Defense Sites (FUDS) database sites prior to the start of construction to identify potential unexploded ordnance locations. <del>An unexploded ordnance investigation of known and potential areas used by the military along the ROW shall be undertaken by a trained contractor. If unexploded ordnance are found, they shall be removed by trained personnel. All personnel involved in excavation, grading, or ROW clearing shall be educated by the trained contractor to recognize unexploded ordnance.</del> <u>SDG&amp;E shall perform a survey of identified Formerly Used Defense Sites (FUDS) database sites prior to the start of construction to identify potential unexploded ordnance locations. SDG&amp;E will comply with NAVSEA OP 5 as required by the MCAS Miramar Tier 1 permit process to insure all project personnel are trained in UXO identification and response. SDG&amp;E will retain a trained contractor for removal of unexploded ordinance that may be found off of MCAS Miramar Base.</u></p>
240.	MMRP		MM HYD 3	<p>The Mitigation Measure as written is inconsistent with Monitoring/Reporting action: "CPUC verifies that SDG&amp;E uses reclaimed or potable water, and not groundwater for operation and maintenance activities".</p>	<p>Water for operation and maintenance activities, including irrigation of restoration areas, shall be obtained <del>solely</del> from <u>potable or</u> reclaimed water sources. Groundwater shall not be used.</p>
241.	MMRP		MM- Utilities 1	<p>Requiring SDG&amp;E to solely use recycled water is infeasible given existing infrastructure constraints (e.g. lack of reclaimed water distribution pipelines, lack of reclaimed water fill stations, reclamation plant maintenance and other capacity constraints, and lack of availability due to over subscription as a result of increasing demand from competing users). Therefore SDG&amp;E will use reclaimed water to the extent feasible given these constraints.</p> <p>Note: The City of San Diego has proposed to construct a reclaimed water fill station in the vicinity of the Proposed Project. If this infrastructure improvement is completed during project construction SDG&amp;E proposes to use it as a source of reclaimed water.</p>	<p><b>Mitigation Measure Utilities-1: Reclaimed-Water Use for Dust Control.</b> The water supply for <u>Proposed P</u>project construction activities (e.g., dust control, soil compaction) shall be obtained from <u>both potable and non-potable</u> sources and ensured in a <u>Will-Serve letter</u><del>water contract</del> through a local water agency or district. SDG&amp;E shall provide verification that water will be obtained from <u>potable or</u> a non-potable source to the CPUC a minimum of 60 days prior to the start of construction.</p>
242.			MM Bio 4	<p>Mitigation ratios for impacts to vernal pools should be determined by the appropriate resource agency.</p>	<p><del>All impacts to v</del>Vernal pool <del>impacts, with or without special status species present,</del> shall be mitigated at a <u>ratio determined by the appropriate permitting agencies</u><del>3:1 ratio.</del></p>
243.	MMRP	9	MM Noise-2	<p>SDG&amp;E is requesting that the Mitigation Measure for sound walls or acoustic blankets be revised to be consistent with the Mitigation Measure required on the Tie Line 637 PTC project. This mitigation measure was successfully implemented on TL 637 and addresses constructability issues associated with the language included as part of MM Noise-2 in the DEIR.</p> <p>In addition, sound walls during certain types of construction may not be feasible. For example, there is not room for the installation or utilization of sounds walls during underground construction within roadways. In addition, roadway oversight agencies (i.e. City of San Diego or Caltrans) would not approve of the installation of sound walls within their encroachment permits and traffic control plans.</p>	<p><del>Sound walls or aeoustic blankets shall be temporarily installed to shield adjacent residences from stationary equipment (e.g., generators) where residences are located within 200 feet of the equipment. The sound walls or aeoustic blankets shall have a height of no less than 3 feet greater than noise-generating piece(s) or parts of equipment, a Sound Transmission Class (STC) of 19 or greater, and a surface with a solid face from top to bottom without any openings or cutouts along the face or at the base of the barrier.</del></p> <p><u>In the event noise levels during construction activities are expected to exceed established noise limits (included within the local jurisdictions noise code) at the nearest property line or within 50 feet of the existing and Pproposed pProject alignment where noise sensitive areas are located. San Diego Gas &amp;Electric (SDG&amp;E) shall implement noise reduction measures to reduce noise levels below the acceptable noise limit. Measures to be implemented could include: (1) portable noise barriers erected</u></p>

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					<u>temporarily to reduce noise impacts at specific locations; or 2) if noise barriers would not reduce levels to below acceptable limits, depending on the location of residences and the level of construction noise, SDG&amp;E shall offer to relocate affected residents.</u>
244.	MMRP	P9-45	MM Noise-3	Per APM Noise-4 San Diego Noise Code allows operations from 7:00 am to 7:00 pm. The Poway Noise Code is 7:00 am to 5:00 pm. MM Noise 3 should be revised to be consistent with APM Noise-4 and allow operations in accordance with local ordinances.	Helicopter takeoff and landing areas shall be located a minimum of 300 feet from the nearest sensitive receptor, -Helicopter takeoff and landing shall only occur within the hours of 7:00 am to 5:00 <u>pm in the City of Poway and 7:00 am to 7:00 pm in the City of San Diego.</u>
245.	MMRP	P9-45	MM Noise-6	There are existing regulations which apply when conducting helicopter operations near schools. When working within 1,000 feet of any public K-12 school, SDG&E is required to coordinate with the school, file a congested area plan with the FAA, and submit the information to the DOT aeronautics division. SDG&E should be allowed to establish acceptable flight times with the local school as part of the coordination process. Schools conduct classes year round. The local schools may be able to allow some operations that would not be disruptive. The restrictions lack clarity on how far away from schools they apply. Trenching activities are not part of helicopter operations and should be deleted from this measure. The 5 dba restriction should be removed as it would be disruptive to classroom activities to conduct the audio tests to determine when it is applicable. This will be covered during coordination activities with the schools.	SDGE and the Helicopter operator shall coordinate with local schools and file all relevant information with the FAA and DOT Aeronautical Division per regulations when conducting transmission line construction activities, including power pole installation within 1000' of a school. <del>and trenching activities. No activities shall be allowed within 300 feet of school properties at times deemed inappropriate by the local school representatives, at times when classes are in active instruction periods (e.g. before school, after school during lunch or classroom breaks). Schools shall be notified of any helicopter activities that would increase the noise level at classrooms by 5 dba or more at least 30 days prior to helicopter use.</del>
246.	MMRP	9-49	MM Traffic-2	There is an FAA Regulation for "Congested Area Plans" when conducting helicopter operations, with external loads, in "congested areas". SDG&E will comply with and file Congested Area Plans in accordance with the FAA regulations. While Helicopter Lift Plans (or similar documents) have been prepared for SDG&E projects in the past, these are not FAA documents and the FAA will not review, comment on, or approve documents that are not under their jurisdiction. SDG&E assumes that the intent of MM Traffic-2 is ensure and document compliance with FAA regulations concerning helicopter use in congested areas. Therefore, SDG&E requests that Mitigation Measure Traffic-2 be revised to accurately reflect FAA regulations.	Prior to construction, helicopter contractors shall coordinate helicopter activities for the project with the regional FAA office and obtain any required approvals to operate helicopters. <del>FAA coordination shall include submittal of a Helicopter Lift Plan prepared by the helicopter operator to obtain approval for the helicopter operations for all routes within 1,500 feet of residences or that would cross over "congested areas" as described in 14 CFR 133.33. FAA coordination shall include submittal of a Congested Area Plan prepared by the helicopter operator to obtain approval for any helicopter lift tasks (external load) within a "congested area" as described in 14 CFR part 133.33. The Helicopter Lift Plan will identify the location of the lift, anticipated work dates, a detailed description of the work to be performed and required notifications of coordination to local agencies or adjacent property owners to restrict work area access, any safety hazard control measure that are required and appropriate emergency procedures.</del> Helicopter contractors shall provide the CPUC with all required approvals, documents and conditions of work prior to conducting helicopter activities for the project.
247.			MM TR-4	Mitigation Measure TR-4 does not add anything that SDG&E would not already be doing under procedures described within Section 2 (Project Description) or through compliance with traffic control and encroachment permits from local and state agencies (e.g. Caltrans). Mitigation Measure TR-4 is duplicative with the Project Description and the requirements that will be included within agency approved traffic control plants and agency issued encroachment permits. Mitigation Measure TR-4 is unnecessary as impacts would be less than significant without implementation of TR-4. Therefore, it is recommended the TR-4 be deleted.	<del><b>Mitigation Measure Traffic-4: Temporary Traffic Control Measures.</b> To mitigate the risk of the conductor falling onto traveled roadways during wire stringing operations, SDG&amp;E shall temporarily close roads or incorporate temporary support measures to protect traffic, such as guard structures or netting across roadways that would catch and support the conductor above traffic, in the event that tension control of the conductor is lost during installation. The temporary measures to be incorporated shall be identified on construction plans and installed by SDG&amp;E in advance of construction and shall remain in place until the conductor is clipped into support hardware on the transmission line structures. SDG&amp;E shall implement all traffic control procedures and measures defined in Mitigation Measure Traffic-1 during</del>

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					installation of temporary support measures or temporary road closure.
248.	4.7.1	4.7-1 4.7-44	MM Traffic-6	<p>The street classifications listed in Section 4.7.1 do not include “Major” roadways. However, Mitigation Measure Traffic-6 (below) refers to “major” roadways. Mitigation Measure Traffic-6 should be revised to clarify which roadways are subject to this Mitigation Measure below.</p> <p><b>Mitigation Measure Traffic-6: Restrict Road Closures and Maintain Access.</b>                      SDG&amp;E shall restrict all necessary lane closures or obstructions on major roadways associated with overhead or underground construction activities to off-peak periods to reduce traffic delays.</p>	
249.	9	9-42	MMRP-MM-Hydrology-1	<p>See comments in Hydrology section (4.6). Proposed text revisions for MM&amp;RP-MM-Hydrology-1 flow from Comments Nos. 149 and 150 above.</p>	<p>Mitigation Measures and Reporting Plan – Mitigation Measure Hydrology-1  <b>“Mitigation Measures Hydrology-1: SWPPP and Treatment Management of Shallow Groundwater Discharge.</b> SDG&amp;E shall prepare a Stormwater Pollution Prevention Plan in compliance with the State Water Resources Control Board Construction General Permit CAS000002 (Order No. 2012-0006-DWQ) (CGP) and applicable City of San Diego Stormwater requirements Standards Manual (2012). The Project construction plans and the SWPPP shall be submitted to the SDRWQCB (via the Storm Water Multiple Application &amp; Report Tracking System or “SMARTS”) CPUC and the City of San Diego for review and approval prior to construction. The SWPPP shall address erosion and sedimentation control, groundwater dewatering procedures, hazardous materials identification, handling, disposal and emergency spill procedures, and any other best management procedures necessary to comply with the Los Peñasquitos Lagoon sediment TMDL (“LPL-TMDL”) prevent sediment or contaminants from entering Los Peñasquitos Creek. A copy of the final SWPPP submitted to the SWRCB via the Storm Water Multiple Application and Reporting Tracking System (SMARTS) as part of the Project’s Notice of Intent under the CGP and the Waste Discharge Identification (WDID) number assigned to the Project shall be provided to the CPUC prior to construction.”</p> <p>Groundwater extracted during construction dewatering shall not be discharged to any surface waters or storm drains unless the discharge is conducted in compliance with an applicable discharge permit (e.g., NPDES permit) from the SWRCB or the SDRWQCB. If dewatering is necessary, the water shall be discharged in accordance with SWRCB or SDRWQCB requirements, discharged to sanitary sewer with an approved permit, or hauled off to disposed of at a licensed disposal n appropriate facility either be used (i) to irrigate upland areas, (ii) for dust control, or (iii) as makeup for a construction process (e.g., concrete production).</p> <p><u>Monitoring/Reporting Action</u>                      SDG&amp;E provides the CPUC a copy of the final SWPPP uploaded to <del>uploaded to</del> SWRCB-SMARTS and the WDID number assigned to the Project SDG&amp;E prepares and submits SWPPP to CPUC and City of San Diego; SDG&amp;E obtains approval of SWPPP from the City of San Diego prior to construction; CPUC verifies that SDG&amp;E</p>

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					<p>implements SWPPP and does not discharge groundwater to surface water or storm drains <u>unless in compliance with the applicable discharge permit (e.g., NPDES permit) from the SWRCB or SDRWQCB; and if dewatering is necessary, it is conducted in compliance with applicable SWRCB or SDRWQCB requirements, discharged to sewer, or hauled to a licensed disposal facility</u>the water is used to irrigate uplands areas, for dust control, or as makeup for a construction process.</p> <p><u>Effectiveness Criteria</u>                      SWPPP is prepared and implemented.                      Groundwater is not discharged to surface water or storm drains, <u>unless it is conducted in compliance with an applicable SWRCB or SDRWQCB discharge permit.</u></p> <p><u>Timing</u>                      During construction</p> <p><u>Location</u>                      All excavated areas</p> <p><u>Responsible Agency</u>                      SDG&amp;E, CPUC, <u>SDRWQCB, City of San Diego</u></p>
250.			MM Hydrology-4	<p>Construction of the Proposed Project will be conducted in compliance with the State Water Resources Control Board’s Storm Water Construction General Permit (CGP). This permit requires BMPs be employed to protect water quality. If construction was required within a Jurisdictional Feature (open-trenching, jack and bore, or horizontal directional drilling) appropriate permitting would be required from CDFW, USACE and RWQCB. In order to prevent conflicting requirements under these programs this Measure should be revised to require the Proposed Project comply with regulatory permits.                      Mitigation Measure Hydrology-4 should be revised to clarify the specific circumstances for which the mitigation measure would apply and to include other permits which would be applicable and provide oversight, as indicated.</p>	<p><del><b>Mitigation Measure Hydrology -4: Underground Construction Only During Dry Conditions.</b> Construction of the underground transmission line across any creeks or natural drainages shall only occur when the watercourse is dry and no less than 72 hours after any rain event. No construction shall occur within 100 feet of any stream within 48 hours of a rain event with a forecast of 50 percent or greater chance of precipitation. No earthwork shall occur within any Water of the State prior to SDG&amp;E obtaining a waiver of Waste Discharge Requirements from San Diego Regional Water Quality Control Board.</del></p> <p><b><u>Mitigation Measure Hydrology -4: Construction within Jurisdictional Features (includes HDD, jack and bore and open-trenching).</u></b> Construction through any creeks or natural drainages would require appropriate permits from CDFW, USACE and RWQCB. In addition the Proposed Project will be conducted in compliance with the State Water Resources Control Board’s Storm Water Construction General Permit (CGP). This measure requires that the Proposed Project comply with regulatory permits required for the work (e.g., Section 1602 Streambed Alteration Agreement, CWA 404 permit, CWA 401 certification, WDR).</p>
251.	MM Air-3	9-12	MMRP	<p>The addition of the adjective “sustained” to the measure clarifies that short-lived wind gusts in excess of 20 mph would not create conditions that exceed this measure’s threshold (Item No. 1) i.e. discharges of “...visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60 minute period; ...”</p>	<p>Ceasing earthmoving activities when <u>sustained</u> wind speed exceeds 20 miles per hour</p>

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252.	MM Utilities-1 & 4.17	9-51 & 4.17-28	MMRP	<p>The letter from Tatyana Fikhman to Todd Voorhees (City of San Diego 2014a) regarding availability of water for SDG&amp;E’s proposed Sycamore to Peñasquitos 230 kilovolt transmission line project, Dated September 30 2014 did not mention any water supply constraints due to drought conditions. The letter states that “25 million gallons of potable and recycled water shall be available for Project use during construction which is currently scheduled to begin in June, 2016.” There is no need for the mitigation measure. Impacts to water supplies are less than significant since SDG&amp;E received confirmation from the City of San Diego Public Utilities Department that 25 million gallons of both potable and recycled water are available for construction of the Proposed Project. Requiring SDG&amp;E to solely use recycled water is infeasible given potential infrastructure constraints (Water Reclamation Plant shutdowns, fill station and distribution main access problems, etc.) or supply limitations due to increasing demand.</p> <p>Please remove sole use of reclaimed water requirement during construction and O&amp;M activities throughout the document. SDG&amp;E will use reclaimed water to the extent feasible.</p>	<p>Water would be the primary means for dust control during construction. The Proposed Project requires 25 million of gallons of water for dust control, soil compaction, and landscaping during the 12-month construction period. As discussed in Impact Utilities-2, the use of 25 million gallons of water could pose a significant impact to water supplies because of current drought conditions. <del>Thus, while the</del> <u>The</u> City of San Diego, Public Utilities Department confirmed the availability of 25 million gallons of potable and recycled water for the construction of the Proposed Project in June 2016., <del>there would still be a potential significant impact to water supplies due to the drought conditions (City of San Diego 2014a). Mitigation Measure Utilities-1 requires SDG&amp;E to only use reclaimed, non-potable water during construction and to confirm the availability of reclaimed, non-potable water for construction.</del> <u>Impacts to water supplies would be therefore be less than significant, after implementation of Mitigation Measure Utilities-1.</u></p>
<b>Appendix A – Proposed Project Detailed Route Maps</b>					
253.	Refer to Attachment B (Minor Design Refinements) for updated civil and work space design for the Proposed Project alignment.				
<b>Appendix C – Magnetic Field Management Plan</b>					
254.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>Appendix E – Alternatives Detailed Route Maps</b>					
255.	Refer to Attachment B (Minor Design Refinements) for SDG&E’s proposed revisions and refinements to the Alternative route designs, cable pole locations, and alignments.				
<b>Appendix I – Draft Fire Plan</b>					
256.	SDG&E does not have any comments on this section of the Draft Environmental Impact Report.				
<b>OTHER COMMENTS ON APPENDICES</b>					
257.	Appendix G	P 183 - 189	Figure G-5 Alternative 5 Vegetation Communities and special-status plants	<p>Numerous inconsistencies were noted within Figure G-5 and Table G-5, including (but not limited to) follows:</p> <ol style="list-style-type: none"> <li>1. P. 2 of 6 – <ol style="list-style-type: none"> <li>a. Existing access roads are not labeled as bare ground or developed and may be part of impact calculations.</li> <li>b. There are areas outside of the developed areas that are likely Diegan Coastal Sage Scrub (DCSS), ornamental communities.</li> <li>c. Southern Riparian Woodland is labeled over what appears to be DCSS – restored or Nonnative grassland (NNG).</li> </ol> </li> <li>2. P. 4 of 6 – <ol style="list-style-type: none"> <li>a. Southern Riparian Forest and Coastal and Valley Freshwater Marsh (CVFM) labeled over Sorrento Valley Blvd</li> </ol> </li> </ol>	

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				<ul style="list-style-type: none"> <li>b. South of Sorrento Blvd, the USFWS NWI layer shows a freshwater emergent wetland that is labeled as NNG in this location (see Figure G-6, Aquatic habitat map p. 194 App G).</li> <li>c. The developed polygon north of Lusk Blvd is not accurate with the land layout in this location.</li> <li>d. Developed areas just north of Lusk road include what appears to be DCSS.</li> <li>e. Access roads are not labeled as bare ground and may be part of their impact calculations.</li> </ul> <p>3. P. 5 of 6 –</p> <ul style="list-style-type: none"> <li>a. CVFM labeled over the entire westbound lane of Sorrento Valley Blvd</li> <li>b. NNG labeled over 8 residential properties and roads</li> <li>c. Based on the inaccuracies identified, we are not confident in the NNG vs. DCSS boundaries identified on this page.</li> </ul>	
258.	Appendix G	N/A	Figures G-3, G-4, and G-5	Vegetation communities for the underground areas of Alternatives 3, 4, and 5 are not shown.	