

Comment Set A0016

California Department of Transportation, District 11

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 Taylor Street, M.S. 240
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April 3, 2008

11-SD/IMP-VAR
PM VAR
SDG&E Sunrise Powerlink
DEIR SCH 2006091071

Mr. Billie Blanchard, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Mr. Billie Blanchard:

The California Department of Transportation (Caltrans) appreciates the opportunity to have reviewed the SDG&E Sunrise Powerlink Draft Environmental Impact Report (DEIR) (SCH 2006091071). Caltrans has the following comments:

- The proposed transmission line would cross I-8 in Imperial County and I-15, SR-67, SR-78, and SR-79 in San Diego County. Although widening improvements to some or these routes may not be proposed for the short-term, long term widening projects could be considered in the future.
- Any damage to State highways due to construction of the Powerlink must be repaired and paid for by SDG&E.
- Page D.9-4, Table D.9-1, Change "State Route 80" to "Imperial County Route S80"
- Pages D.9-4 to D.9-11. New 2006 Traffic Volumes (ADTs) for State Highways are now available. The 2006 Traffic Volumes can be found at the Caltrans website here:
<http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/>
- Various pages from D.9-25 to D.9.64 Tables D.9-15 to D9.-20. No year listed for ADT. Add a year in the ADT column heading or footnote.
- All Caltrans standards for utility encroachments shall be met.
- Clearances of overhead crossings shall conform to regulations of the California PUC. The number of crossings shall be minimized.
- New installations under an existing roadbed shall be made by boring and jacking method. Trenching under traveled way will not be allowed.
- For freeways and expressways, placement of longitudinal encroachments is prohibited within controlled access rights-of-way.
- Utilities shall not be located in median areas.

A0016-1

A0016-2

A0016-3

A0016-4

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- Transverse crossings should be normal (90 degrees) to the highway alignment where practical. If impractical, skews of up to 30 degrees from normal may be allowed.
- All transverse crossings, single ducts or pipes 6" or greater in diameter, shall be encased. If multiple encasements is requested, the distance between multiple encasements shall be the greater of either 24" or twice that of the diameter of the larger pipe being installed.
- New underground installations within existing or ultimate State highway right-of-way must be not less than 42 inches below existing ground level or finished grade. For further details, refer to Section 600 of the Encroachment Permits Manual.
- Supports for overhead lines crossing freeways shall be located outside the controlled access right of way and not on cut or fill slopes or impair sight distances. All installations shall be placed as close to right-of-way line as possible. Above-ground utilities shall be outside of the clear recovery zone (20 feet from edge-of-travelway for conventional highways and 30 feet for freeways and expressways). Allowance should be made for future widening of the highways.
- New installations shall not impair sight distances.
- A transportation management plan (TMP) is required. The TMP must identify potential traffic delays and keep the delays to a maximum of 30 minutes. Any proposed lane closures or detours during project construction must be approved by the District Traffic Manager. Construction activities affecting the traveling public may be limited to Monday through Friday only during peak seasons. All Bus and Rail Transit providers affected by the project should be notified well in advance of construction of the project in order to minimize any transit service disruptions.
- All traffic control plans (TCP) shall follow the California MUTCD.
- Proposed built form may jeopardize existing and potential scenic highway designation. Evaluation of these impacts can not be conclusively determined without post construction review by the Caltrans Scenic Highway Departmental Technical Advisory Committee (DTAC) and approval by the State Legislature of the DTAC recommendations. Contact the Statewide Scenic Highway Coordinator, Senior Landscape Architect Dennis Cadd (916) 654-5370 for further information regarding certification or decertification of Eligible and Officially Designated Routes.
- The Draft EIR/EIS (D.3-44) states: "California Public Utilities Code Section 320 requires that all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway be undergrounded where feasible. SDG&E will bury all new or relocated utilities where feasible to avoid possible revocation of SR-78 as an Officially Designated Scenic Highway within the ABDS." Prior to PUC approval of this application, the applicant should provide the public a detailed feasibility analysis for undergrounding these facilities. The study should discuss any technical limitations and quantify the economic constraints.

A0016-5

A0016-6

A0016-7

A0016-8

A0016-9

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- A Hazardous waste investigation for work done with Caltrans right-of-way may be required as part of Caltrans Encroachment Permit process. **A0016-10**
- The appropriate Biological and Cultural resource studies will need to be evaluated as part of Caltrans Encroachment Permit process in not properly identified in the Sunrise Powerlink EIR. **A0016-11**
- Caltrans Environmental requests that if any towers are to be constructed within Caltrans' ROW that the locations are to be delineated on a map in the EIR/EIS for evaluation of potential biological impacts within Caltrans' ROW. **A0016-12**
- Should the U.S. Fish and Wildlife Service (USFWS) identify any critical habitat for federally listed species potentially affected by this project, then the critical habitat should be mentioned in the EIR/EIS. **A0016-13**
- For the underground installations, methods of installation and maps of the installation locations should be included in the EIR/EIS. Trenching may result in impacts to jurisdictional waters of the United States, including wetlands, which may occur in the project area. **A0016-14**
- The main biological concerns within Caltrans' ROW include adverse effects on federal and state listed species; riparian, chaparral, coastal sage scrub, desert scrub, and vernal pool habitat; and federally protected wetlands. **A0016-15**
- Any impacts to wetland or riparian habitat from this project within Caltrans' ROW will require a Section 1602 Lake and Streambed Alteration Agreement from the California Department of Fish and Game (CDFG) and a Section 404 Nationwide or Individual Permit from the U.S. Army Corps of Engineers. Any impacts to federally listed species or critical habitat within Caltrans' ROW will require coordination with USFWS. Any impacts to state listed species within Caltrans' ROW will require coordination with CDFG. **A0016-16**

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by the Department. Current policy allows Highway Improvement Projects costing \$1 million or less to follow the Caltrans Encroachment Permit process. Highway Improvement Projects costing greater than \$1 million but less than \$3 million would be allowed to follow a streamlined project development process similar to the Caltrans Encroachment Permit process. In order to determine the appropriate permit processing of projects funded by others, it is recommended the concept and project approval for work to be done on the State Highway System be evaluated through the completion of a Permit Engineering Evaluation Report (PEER). A PEER should always be prepared, regardless of the cost of improvements, when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER and necessary application and supporting documentation an encroachment permit can be issued.

Highway Improvement Projects greater than \$3 million, or considered complex projects, would be required to adhere to the full Project Development Process (e.g. Project Initiation Documents,

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Project Study Reports and Cooperative Agreements). A Caltrans District responsible unit will be notified and a project manager will be assigned to coordinate the project approval.

In order to expedite the process for projects sponsored by a local agency or private developer, it is recommended a PEER be prepared and included in the Lead Agency's CEQA document. This will help expedite the Caltrans Encroachment Permit Review process. The PEER document forms and procedures can be found in the Caltrans Project Development Procedures Manual (PDPM).
<http://www.dot.ca.gov/hq/opd/pdpm/pdpmn.htm>
[http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_\(TR-0112\).pdf](http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_(TR-0112).pdf)

Furthermore, the applicant's environmental documentation must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to State Highway R/W. Environmental documentation should include studies or letters from qualified specialists or personnel which address the potential, or lack of potential, for impacts to the following resources in state right-of-way:

- Biological resources
- Archaeological and historic resources
- Visual quality
- Hazardous waste
- Water quality & stormwater
- Pre-historic resources
- Air quality
- Noise levels

Copies of all project-related environmental documentation and studies which address the above-cited resources should be included with the project proponent's encroachment permit application to Caltrans for work within State R/W. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Encroachment permit submittals that are incomplete can result in significant delays in permit approval. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.

When a property owner proposes to dedicate property to a local agency for Caltrans use in conjunction with a permit project, Caltrans will not issue the encroachment permit until the dedication is made and the property has been conveyed to the Department.

Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. The Department's Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

A0016-16 cont.

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Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

A0016-16 cont.

The California Environmental Quality Act (CEQA) requires, under Public Resources Code (PRC) Section 21081.6, the adoption of reporting or monitoring programs when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after project approval to ensure implementation of the project in accordance with the mitigation adopted during the CEQA review process. According to PRC Section 21081.6, when a project has impacts that are of statewide, regional, or area-wide significance, a reporting or monitoring program shall be submitted to the Department of Transportation (Caltrans). Attached are Caltrans guidelines for the submittal of reporting or monitoring programs. Please submit the attached information to the Caltrans Inter-Governmental Review/Development Review contact following project approval.

A0016-17

If you have any questions on the comments Caltrans has provided, please contact Trent Clark of the Development Review Branch at (619) 688-3140.

Sincerely,



JACOB M. ARMSTRONG, Chief
Development Review Branch

Comment Set A0016, cont.
California Department of Transportation, District 11

To: CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Date: 4/11/2008

From: Jacob Armstrong
Senior Transportation Planner
California Department of Transportation - District 11
4050 Taylor Street MS-240
San Diego, CA 92110-5406

Subject: Additional Comments on Sunrise Powerlink Draft EIR/S

Caltrans recommends that potential impacts to community character and to local and regional economic activities (including effects to tourism), which could occur as the result of project-related activities within state right of way, be addressed within the Final EIR/S for the Sunrise Powerlink project. If Caltrans determines that there is a potential for such impacts to occur as the result of project-related work, and this potential has not been addressed in the FEIR/S, Caltrans may request additional studies or documentation to be provided at the time of the Sunrise Powerlink proponent's encroachment permit application to work within state right of way.

A0016-18

Responses to Comment Set A0016

California Department of Transportation, District 11

- A0016-1 The commenter notes that crossings over I-8, SR-67, and SR-78 should take into consideration the potential for future widening of these routes.
- Where a transmission line would cross a state highway an encroachment permit is required to do so. During acquisition of this permit, it is assumed that Caltrans would identify its future needs and work with SDG&E to identify suitable tower locations.
- A0016-2 Caltrans notes that damage to state highways due to construction must be repaired and paid for by SDG&E. It is assumed that this would be a condition of any encroachment permit. Additionally, Mitigation Measure T-5a (Repair damaged roads), “If damage to roads occurs as a result of project construction or construction vehicle traffic, SDG&E shall restore damaged roadways at its own expense under the direction of the affected public agencies to ensure that any impacts are adequately repaired.” See Section D.9 regarding additional details of this mitigation measure.
- A0016-3 Caltrans requests updates to tables in Section D.9. Table D.9-1 has been corrected to identify Imperial County Route S80.
- The 2006 ADT data to which the commenter referred the Draft EIR/EIS preparers indicate a slight reduction in traffic volumes on State Highways crossed by the project; therefore, the EIR/EIS will use the more conservative 2005 data. When the Draft EIR/EIS was prepared, ADT data from last available year were used. For state highways, this was 2005. The footnote to the tables has been changed to read:
- a. Average daily traffic – 2005 or latest available.
- A0016-4 In this comment, Caltrans identifies a number of requirements that would apply to the Proposed Project and alternatives, including meeting Caltrans standards for encroachments, clearances, installation under roadbeds, and the use of medians. The comments are noted. No response is required.
- A0016-5 In this comment, Caltrans identifies additional requirements that would apply to the Proposed Project and alternatives, including crossing highways at a 90-degree angle where practical, encasing ducts 6 inches or greater in diameter, and having installations no less than 42 inches below existing ground level or finished grade. The comments are noted. No response is required.
- A0016-6 In this comment, Caltrans states that transmission line supports shall be outside the controlled access ROW, not on cut or fill slopes, and not impair sight distances. Also, allowance should be made for future highway widening. The comments are noted. No response is required.
- A0016-7 Caltrans notes that a transportation management plan is required, and provides criteria and requirements. The comments are noted. Preparation of a traffic management plan is a requirement of the project under Mitigation Measure T-9a. Mitigation Measure T-1a would also reduce traffic impacts associated with lane closures. Additionally, SDG&E has committed to implementing Applicant Proposed Measure T-APM-5a as part of the Proposed Project, which requires SDG&E to consult with the affected school districts and transit systems at least one month prior to construction to coordinate construction

activities adjacent to school bus stops and to reduce potential interruption of transit services.

- A0016-8 Impacts associated with scenic highways are addressed in the visual resource sections of the Draft EIR/EIS; Sections D.3, E.1.3, E.2.3, E.3.3, E.4.3, E.5.3, E.6.3, E.7.1.3, E.7.2.3, and E.8.3. It is understood that a post-construction review by Caltrans would be required to determine if the project as built had jeopardized the certification or potential certification of any affected Eligible and/or Officially Designated state scenic highway segments.
- A0016-9 It is understood that Caltrans recommends that prior to PUC approval of the project application, the Applicant should provide the public with a detailed feasibility analysis for undergrounding the proposed facilities, and that the study should discuss any technical limitation and quantify the economic constraints. SDG&E would perform a feasibility analysis on any underground segments of a approved route as a part of final engineering.
- A0016-10 Caltrans notes that a hazardous waste investigation may be required as part of the encroachment permit process as well as biological and cultural resource studies, if not already completed. The comments are noted. No response is required.
- A0016-11 Preliminary engineering has identified towers that are located along the edge, yet within, the Caltrans ROW along the following alternatives: Pomerado Road to Miramar Area North Alternative; Modified Route D Alternative; Interstate 8 Alternative; Overhead 500 kV Existing ROW Alternative; and BCD South Alternative. However, final engineering of whichever route is approved may include the movement of towers off of Caltrans ROW. In addition, final engineering of the approved route would include consultation with Caltrans during the encroachment permitting process. Delineation of towers on Caltrans ROW would occur at this stage and so it is not necessary at this time.
- A0016-12 The commenter states that impacts to critical habitat potentially affected should be mentioned in the Draft EIR/EIS. Critical habitat was discussed in Section D.2.1.1 (pages D.2-20 through D.2-23) of Volume 1 of the Draft EIR/EIS, and impacts to critical habitat are presented in D.2.11 Listed or Sensitive Wildlife Species for the Proposed Project (on a species by species basis) and in subsequent Impact B-7 sections (for the alternatives) of the Draft EIR/EIS where applicable.
- A0016-13 The commenter states that the methods of installation and maps of installation locations for underground transmission lines should be included in the Draft EIR/EIS. The commenter also states that trenching may result in impacts to jurisdictional waters of the U.S. Section B.1.4.2 (pages B-56 through B-63) of Volume 1 of the Draft EIR/EIS describes underground construction methods. The Biological Resources/Impacts graphics in the Draft EIR/EIS show where transmission lines would be overhead and where they would be underground. Impacts to jurisdictional waters of the U.S. would occur in accordance with BIO-APM-5, which limits impacts to jurisdictional areas through project design. Other biological resources APMs (BIO-APM-1, -2, -4, -5, -16, and -18) would also be implemented to avoid or minimize impacts to jurisdictional areas. See General Response GR-3 for a discussion of Jurisdictional Delineations.
- A0016-14 The commenter's primary biological concerns within Caltrans' ROW include adverse effects on federal and state listed species; riparian, chaparral, coastal sage scrub, desert

scrub, and vernal pool habitat; and federally protected wetlands. Each of these resources was addressed for the Proposed Project in Sections D.2.5, D.2.6, D.2.9, and D.2.11 of Volume 1 of the Draft EIR/EIS and in subsequent Draft EIR/EIS sections for the alternatives.

- A0016-15 The commenter states that any impacts to wetland or riparian habitat within Caltrans' ROW will require a Section 1602 Agreement and a Section 404 Permit. Additionally, the commenter states that any impacts to federally listed species or critical habitat within Caltrans' ROW will require coordination with the USFWS, and any impacts to state listed species within Caltrans' ROW will require coordination with the CDFG. Federal and state laws and regulations regarding these permits and the Federal and State Endangered Species Acts are discussed in Sections D.2.3.1 and D.2.3.2 of Volume 1 of the Draft EIR/EIS.
- A0016-16 Table A-1 (Permits or Other Actions Required Prior to Construction of the SRPL) in Section A.6.5 of the Draft EIR/EIS notes that the Caltrans will have permitting authority for streets and highways (Code 660-711.21 Cal. Code of Regs. 1411.1-1411.6), which would require an encroachment/crossing permit. A Permit Engineering Evaluation Report and other necessary plans would be completed as a part of this permitting process.
- A0016-17 The requirement under Pub. Res. Code Section 21081.6 to submit the Mitigation Monitoring Compliance and Reporting Program to Caltrans upon project approval has been noted and is referred to SDG&E for compliance prior to construction.
- A0016-18 The impacts to local and regional economic activities, including tourism, are addressed under the Socioeconomics sections in the Draft EIR/EIS. Specifically Impact S-1 (Project construction and/or transmission line presence would cause a change in revenue for businesses, tribes, or governments) addresses the impact on business revenues during both construction and operation of the project.

Comment Set A0017
U.S. Department of the Navy



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 N. HARBOR DRIVE
SAN DIEGO, CA 92132-0058

IN REPLY REFER TO:
11000
Ser N411/212
9 Apr 08

Ms. Billie Blanchard, CPUC and Ms. Lynda Kastoll, BLM
C/O Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report/Environmental Impact Statement (DEIS/EIR) for San Diego Gas and Electric's application to build and operate the Sunrise Powerlink Transmission Line Project (January 2008).

The DEIS/EIR identifies 27 alternatives and the proposed project that would construct a new 91-mile, 500 kilovolt transmission line from Imperial County to San Diego. The Navy has reviewed all alternatives for compatibility with its operations and training, and has the following comments.

The Navy has concerns with the proposed Environmentally Superior Southern Route Alternative and route options.

1. Interstate 8, Chocolate Canyon Alternative:

This alternative has potential significant impact to Naval aviation. The unique topography of the Chocolate Canyon is used for helicopter low level, terrain following flights. Specifically, Chocolate Canyon is used by the Navy to train helicopters to use terrain to camouflage their transition to/from tactical situations. Installing power lines down this valley will have significant impact on this valuable training. To avoid impacting this training, the Navy recommends installing the power lines to the west, along the Interstate 8 Alternative.

A0017-1

2. Modified Route D Option:

The Modified Route D option will place the power line at or below the west side of the ridge line located northwest of La Posta Mountain Warfare Training Facility (MWTF). This area is commonly used for helicopter low level access flights between Camp Morena and La Posta MWTF in support of unique Naval Special Warfare training, therefore, there will be minor impact to Naval aviation. As long as the power lines are located on the down slope, west of the ridge, the lines would not pose a significant impact.

A0017-2

The Navy has no comments on the following Alternatives and various route options:

**Comment Set A0017, cont.
U.S. Department of the Navy**

11000
Ser N411/212
9 Apr 08

1. New In-Area All-Source Generation Alternative
2. New In-Area Renewable Generation Alternative
3. LEAPS Transmission-Only Alternative
4. Environmentally Superior Northern Route Alternative
5. Proposed Project
6. LEAPS Generation and Transmission Alternative

The Navy appreciates the excellent working relationship established with the CPUC/BLM Sunrise Powerlink project team. We continue to be available to meet with you to provide Navy input.

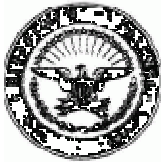
My point of contact for this project is Ms. Sheila Donovan who can be reached at (619) 532-1253.

Sincerely,



L. R. HERING
Rear Admiral, U.S. Navy
Commander, Navy Region Southwest

Comment Set A0017, cont.
U.S. Department of Navy



DEPARTMENT OF THE NAVY
NAVAL BASE CORONADO
BOX 357033
SAN DIEGO, CALIFORNIA 92135-7033

IN REPLY REFER TO:
11017
Ser N00C/1016
14 Jul 08

Ms. Billie Blanchard, CPUC
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Ms. Blanchard:

This letter is in response to your letter of April 21, 2008 requesting additional information on the Sunrise Powerlink Project Alternatives. Specifically, you asked for further clarification on impacts to the Navy as was outlined in our DEIS comment letter of April 8, 2008. Clarification on Chocolate Canyon Alternative and Modified Route D Alternative is provided below:

A0017-3

a. Interstate 8: Chocolate Canyon Alternative:

(1) As previously identified, the unique topography of the Chocolate Canyon is used for helicopter low level, terrain following flights. Specifically, Chocolate Canyon is used by the Navy to train helicopters to use terrain to camouflage their transition to/from tactical situations. While our preference is to locate the transmission lines outside of the canyon to avoid all potential conflicts with Navy helicopter training as stated in our April 8, 2008 comment letter, if the Chocolate Canyon Alternative is selected, the Navy requests the following:

(2) As currently depicted, this option, lies close to our flight route, however, the alignment should be compatible with our operations as long as the wires remain on the western side of the canyon valley low on the valley floor, as depicted.

(3) In addition, the wires must be adequately marked with safety devices for both day and night recognition by our crews, in compliance with 14 CFR part 77.

A0017-4

(a) Day Markings of wires - Balls or other similar high visibility device attached to the top most wire running between towers from CC0 (or its equivalent when wires come above ground) thru CC3.

(b) Night Markings of towers - Night Vision Device compatible lighting or other similar visual system to be placed on each tower from CC0 (or its equivalent when wires come above ground) thru CC3. These devices/markers should not interfere with use of aircrew Night Vision Devices through blooming or other negative visual characteristics (high intensity, disorienting frequency/pulsation).

Comment Set A0017, cont.
U.S. Department of Navy

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14 Jul 08

The devices/markers must be visible in both high light (>.0022 LUX) and low light (<.0022LUX) conditions.

A0017-4 cont.

b. Modified Route D Option/La Posta Mountain Warfare Training Facility (MWTF):

A0017-5

(1) The Modified Route D option will place the power line at or below the west side of the ridge line located northwest of La Posta MWTF. As shown in map 2 of your April 21, 2008 letter, the Modified Route D is compatible with our operations. Any wires approaching within one mile of our route/landing zones (LZ's) at La Posta MWTF must be adequately marked, in compliance with 14 CFR part 77, for both day and night operations as described above for the Chocolate Canyon Alternative.

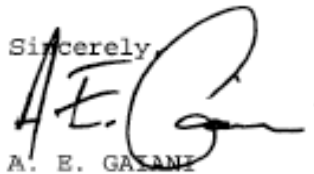
c. Modified Route D Alternative - Lenac Revision:

(1) As shown in map 3 of your letter of April 21, 2008, the Lenac option primarily lies on the east side of the ridge line. As previously indicated in our meetings and letters, location of an alignment on the east side of the ridge is incompatible with La Posta MWTF.

The Navy appreciates the excellent working relationship established with the California Public Utilities Commission/Bureau of Land Management Sunrise Powerlink project team. We continue to be available to meet with you to provide additional Navy input as the alignments are refined and specific tower locations are identified.

My point of contact for this project is Ms. Sheila Donovan who can be reached at (619) 532-1253.

Sincerely,



A. E. GAZANI
Captain, U.S. Navy
Commanding Officer
Naval Base Coronado

Copy to: Naval Facilities Engineering Command, Southwest

Responses to Comment Set A0017

U.S. Department of the Navy

- 0017-1 Note that this comment letter (dated April 9, 2008) has been supplemented by a letter (dated July 14, 2008) from the Department of the Navy in response to a CPUC/BLM Data Response. The July supplemental letter provides additional information on the items addressed in the original April 9, 2008 letter and it is addressed in Responses to Comments A0017-3 to A0017-5. In the July letter, the Navy clarified that the Chocolate Canyon Option (a variation of the Interstate 8 Alternative) would be acceptable as long as the route remains on the west side of the canyon. This is the current location of the Chocolate Canyon Option, and there is no proposal to modify it.
- A0017-2 The Navy comments that the Modified Route D Alternative will be located northwest of the La Posta Mountain Warfare Training Facility (MWTF). In the Navy's July letter, it clarified that the location of the Modified Route D Alternative as defined in the Draft EIR/EIS would not affect operations at La Posta MWTF.
- A0017-3 Please see Response to Comment A0017-1 regarding the Chocolate Canyon Option.
- A0017-4 The commenter states the wires must be adequately marked with safety devices in compliance with 14 CFR Part 77. Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Section § 77.13 states that any person/organization who intends to sponsor construction or alterations must notify the Administrator of the FAA if the construction or alteration would exceed 200 feet above ground level.¹ The towers that would be constructed in along Chocolate Canyon would not exceed 200 feet. No changes to the Draft EIR/EIS have been made based on this comment.
- A0017-5 The Navy indicates a concern for helicopter safety along the Modified Route D Alternative and requests that any wires that would be located within one mile of the La Posta Mountain Warfare Training Facility (MWTF) route/landing zones must be marked. The Modified Route D Alternative would be located over one mile from the La Posta MWTF. No changes have been made to the Draft EIR/EIS based on this comment.

¹ Part 77 Airspace Obstruction Analysis. Accessed at: http://www.faa.gov/airports_airtraffic/airports/regional_guidance/central/construction/part77/#purpose, in September, 2008.