



UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION MIRAMAR
P.O. BOX 452001
SAN DIEGO, CA 92145-2001

F0012

509025 AUG 2008
S-7 1866

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

Dear Ms. Blanchard and Ms. Kastoll:

SUBJECT: DRAFT EIR/SUPPLEMENTAL DRAFT EIS, SUNRISE POWERLINK
PROJECT (ATN 06059J)

MCAS Miramar received the subject documents dated January 2008 and July 2008. The comment matrix in Enclosure (1) is provided based on the review of these documents by MCAS Miramar Environmental Impact Review Board (EIRB) and Environmental Management Department (EMD) staff. Please address these comments prior to finalizing the documents and proceeding with the project.

Our POC is Ms. Myrna Alzaga, Director, and Program Support Division, at (858) 577-6115.

Sincerely,

B. M. HALL
Environmental Management Officer
By direction of the Commanding Officer

Enclosure: 1. MCAS Miramar Comment Matrix

Copy to: Lynn Traxel, SDG&E

**MCAS MIRAMAR COMMENT MATRIX FOR
Draft EIR/EIS AND PROPOSED LAND USE AMENDMENT
FOR SUNRISE POWERLINK PROJECT, JANUARY 2008 (ATN 06059I)**

#	Page	Section/ Line	Reviewer	Comment	Response
1.	ES-2		Counsel Mr. Stimson	Erroneously states that "gas-fired generation would be concentrated at already disturbed sites." Potential East Miramar locations for ENPEX are undisturbed sites. Potential areas of West Miramar, other than the landfill, are heavily encumbered by sensitive species, not to mention mission impacts.	
2.	D.10-34		Counsel Mr. Stimson	This section discusses possible munitions response within the easement on Miramar property. Should identify that USMC/DON is/are lead agency for any necessary munitions response.	
3.	D.17-1		Counsel Mr. Stimson	Discussion on Plan Consistency should identify the USMC as one of the jurisdictions through which the project passes, and identify the need to ensure consistency with our Master Plan.	
4.	E.5		Counsel Mr. Stimson	This chapter discusses the Renewable Sources In-Area alternative. One component is the power plant drawing on the bio-solids plant at the landfill. USMC needs to determine whether it will support that project. Airspace issues? Thermal plumes? Steam plumes?	
5.	E.5-19		Counsel Mr. Stimson	Discussion of the biomass fuel plant mentions storage of prepared fuel bio-mass fuel? Is it volatile? Problem in the APZ or vicinity. Also, discussion of the methane gas plant – Note that our contracting directly with Minnesota Methane is not necessarily contrary to the SRPL plan, since our use of that energy takes that much of our load off the rest of the grid.	
6.	E.5-74		Counsel Mr. Stimson	Identifies SIGNIFICANT impacts to sensitive species associated with the methane plant.	

7.		General Comment	CP&L Ms. Thornton	CP&L strongly urges continued coordination with San Diego Gas & Electric (SDG&E) regarding the height of the proposed transmission lines and potential impacts to airfield operations. Federal Aviation Regulations (FAR) Part 77 stipulate that the height of the Outer Horizontal Surface and eastern portion of the Horizontal Approach/Departure Clearance Surface for Runway 24R/6L to be 500 feet above the airport reference point. At MCAS Miramar, this height would be 978 feet Above Mean Sea Level (AMSL). Thirty-four of the proposed forty-five structures would exceed this height, and it is unknown what impacts they would have on airport operations. It is also unknown if they would impact Terminal Instrument Procedures (TERPS) surfaces in the same region.	
8.		General Comment	CP&L Ms. Thornton	The Federal Aviation Administration (FAA) should conduct an airspace analysis (Form 7460-1) as quickly as possible to determine if any of the proposed structures would negatively impact operations at MCAS Miramar. Additionally, CP&L urges that the same analysis include any proposed structures off base that would exceed the height of 978 feet within the Outer Horizontal Surface or TERPS surfaces to determine if any impacts would occur to fixed-wing and/or rotary airspace corridors surrounding MCAS Miramar. Table A-1 indicates that a Part 77 Request needs to be submitted by the project proponent to FAA. CP&L urges that MCAS Miramar be notified as quickly as possible when the results of the airspace analysis are made public.	
9.	D.4-29		CP&L Ms. Thornton	Mitigation measure L-1c in the Land Use section of the EIR/EIS indicates that the project proponent will provide MCAS Miramar with all project engineering details 90 days prior to construction for review and approval. The CP&L Office requests that this also include completed and authorized FAA Part 77 Obstruction Evaluation(s) (Form 7460-1) for all objects exceeding the Outer Horizontal Surface (978 Ft AMSL).	
10.	D.9-44		CP&L Ms. Thornton	Mitigation measure T-9a in the Transportation and Traffic section of the EIR/EIS indicates that the project proponent will have no impacts to air traffic. The project proponent sites that no object will be greater than 200 feet or 100:1 slope extending 20,000 feet from the nearest runway. The project proponent fails to mention that only the FAA has the authority to make this determination after a Part 77 Form 7460-1 has been filed. Request that the project proponent include this language in this section.	

11.	D.16-35 to 16-36:		CP&L Ms. Thornton	This table in the Policy Consistency section regarding the 2005 MCAS Miramar AICUZ is not entirely accurate. The table indicates that the proposed project is consistent with AICUZ Sections Chapter 5, Section 5.3, and Section 6.7 that make references to airspace obstructions. While it is correct that no object exceeds 200 feet or is within the 100:1 slope, this alone does not mean that any proposed object is not an airspace hazard. This initial test is only meant to alert project proponents if an FAA Part 77 Form 7460-1 submittal is mandatory. The consistency section in the table needs to be changed from "YES" to "YES, pending FAA Airspace Analysis."	
12.	D.16-89 to 16-90:		CP&L Ms. Thornton	Table incorrectly identifies the most current Airport Land Use Compatibility Plan for NAS Miramar (prior to the 2004 Amendment) as being 1977. It should read 1992 instead. Same comments as "E" for consistency section.	
13.					
14.	E.6-48	Designated Critical Habitat	EMD Mr. D. Boyer	Review the statement that the SDCPP would cross designated critical habitat for the willow monardella and coastal California gnatcatcher. While "essential habitat" has been identified on MCAS Miramar in the vicinity of the SDCPP sites, none was designated for these species because of the protections afforded by the MCAS Miramar Integrated Natural Resources Management Plan (INRMP) (see http://www.miramar.usmc.mil/WebPages/Environmental/IntegratedNaturalResources.htm). The INRMP identifies the areas identified for the SDCPP sites as warranting special conservation attention, specifically for the conservation of these species. Unless access routes from Santee would pass through designated critical habitat, it would not seem that any critical habitat is involved with the SDCPP.	
15.	Executive Summary		EMD Ms. Jarman	Please include a statement in the executive summary "that a list of comments from Federal, state and local agencies and other sources from which comments have been received and how many comments received is included in the appropriate Appendix	
16.	Cover sheet		EMD Ms. Jarman	Please follow format provided in .MCO P5090.2A	

**MCAS MIRAMAR COMMENT MATRIX FOR
Draft EIR/EIS AND PROPOSED LAND USE AMENDMENT
FOR SUNRISE POWERLINK PROJECT,
JULY 2008 (ATN 06059J)**

#	Page	Section/ Line	Reviewer	Comment	Response
1.		General Comment	CP&L Ms. Thornton	CP&L strongly urges continued coordination with San Diego Gas & Electric (SDG&E) regarding the height of the proposed transmission lines and potential impacts to airfield operations. Federal Aviation Regulations (FAR) Part 77 stipulate that the height of the Outer Horizontal Surface and eastern portion of the Horizontal Approach/Departure Clearance Surface for Runway 24R/6L to be 500 feet above the airport reference point. At MCAS Miramar, this height would be 978 feet Above Mean Sea Level (AMSL). Thirty-four of the proposed forty-five structures would exceed this height, and it is unknown what impacts they would have on airport operations. It is also unknown if they would impact Terminal Instrument Procedures (TERPS) surfaces in the same region.	
2.		General Comment	CP&L Ms. Thornton	The Federal Aviation Administration (FAA) should conduct an airspace analysis (Form 7460-1) as quickly as possible to determine if any of the proposed structures would negatively impact operations at MCAS Miramar. Additionally, CP&L urges that the same analysis include any proposed structures off base that would exceed the height of 978 feet within the Outer Horizontal Surface or TERPS surfaces to determine if any impacts would occur to fixed-wing and/or rotary airspace corridors surrounding MCAS Miramar. CP&L urges that MCAS Miramar be notified as quickly as possible when the results of the airspace analysis are made public.	
3.	2-21	2.2.1 Table Line 7	EMD Ms. Kassebaum	Correct the spelling of Cupressus.	
4.	4-7 to 4-9		Counsel Mr. Stimson	While MCAS Miramar understands SDG&E must make a preliminary assessment of impacts arising from the ENPEX power plant, MCAS Miramar reserves judgment on whether impacts to habitat linkages, wildlife corridors, or visual impacts would be significant. Such impacts would be evaluated as part of NEPA in the event ENPEX ever becomes a proposed action.	